

Planning services

**HEAD OF SERVICE: ADRIAN
DUFFIELD**



Listening Learning Leading

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Dear Ms Gill

Watlington Neighbourhood Development Plan - Pre-Submission Consultation

Thank you for consulting the council on your draft Neighbourhood Development Plan (NDP). It is very pleasing to see the significant progress the community of Watlington has made, and the NDP steering group, particularly, should feel very proud of your efforts.

Having now seen a complete draft, along the evidence, we are able to offer formal advice compiled from across the Council, under our duty to support neighbourhood plans. Our response focusses on helping the plan meet the basic conditions as specified by the regulations.

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view about whether the draft plan meets the basic conditions.

Yours sincerely,

Peter Canavan
Senior Planning Policy Officer

Ref.	Section/Policy	Comment	Recommendation
1	Basic Conditions Statement	The council confirms that the basic conditions statements is acceptable and have no additional comments to make at this stage.	N/A
2	Sustainability Appraisal	The council is pleased to see a comprehensive sustainability appraisal. At this stage, we have no specific comments to make. When comments are received from the statutory consultees officers will be available to assist in any further amendments or evidence sharing that might be required.	N/A
3	Exec. summary	Final key objective bullet point that references reducing traffic flow is not clear.	Clarify what is meant by “reduce the flow of traffic.” This could be misunderstood as aiming to create additional traffic jams and therefore add to air pollution issues.
4	Policy 1	The direction of this policy is commended. It should be clarified with the following additions:	1a. Reference should be made to the character assessment to support the requirement. 1b. important views into and out of Watlington should be shown on a map to support this policy.
5	Policy 2	Transport issues are tricky to manage through NDP policies as by their nature they tend to be a strategic issue. However, there are localised issues for Watlington that are reasonable to include in the NDP, and specifically the alternative route does mirror that of the emerging local plan.	Section 2c of the policy would benefit from some amendments: For the traffic management strategies insert “...that will be detailed through a supplementary planning document.” <i>The content</i>

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		<p>The council would like to understand more clearly how the traffic strategies will be implemented and suggest that obligation strategies are not necessarily policy.</p>	<p><i>of the SPD will need to be agreed with the District and County Council before its adoption.</i></p> <p>The second sentence of 2c – funding for the traffic strategy – is not necessarily a policy. This text should be moved to the supporting text and reference your CIL spending strategy.</p>
6	Policy 3	<p>The essence of this policy is very strong. The council suggest, however, that some additional clarity is bought to it to ensure compliance through applications.</p>	<p>The opening statement: “Development” should be qualified, is this policy directed at <i>all</i> development (including extensions etc.) or is it intended to be directed primarily at larger scale development?</p> <p>3a. The most important views should be shown on a map in your maps supplement as per the chalk streams of element 3b.</p> <p>3a and 3b the term, “<i>protected and enhanced</i>” is found in the NPPF and supported by the council, but the supporting text would benefit from some more detail about the expectations from this policy.</p>

Ref.	Section/Policy	Comment	Recommendation
			<p>3c. Suggested amendment: “Flood risk is <i>managed appropriately and reduced where necessary</i> and the...”</p> <p>3e. Should be a separate policy as it deals with a new designation.</p>
7	Policy 4	<p>This policy is clear in its expectations however; the council would like to understand where these are inclusive or exclusive criteria (i.e. are the criteria all one “and” the next, or is it one “or” the next).</p>	<p>Consider whether “and” or “or” should be inserted between criteria.</p> <p>4e appears to be repeated in Policy 6 (e/f) – consider where the best place for this criterion is.</p>
8	Policy 5	<p>On reflection, this policy would benefit from being split to maintain focus on specific elements of it. Much of the policy is aspiration – rather than something that is required by planning law or national policy – so this will need to be made clear in the supporting text. The supporting text should also explain how the ‘demonstration’ of compliance with the policy. And the first sentence requires review.</p>	<p>The opening sentence should be amended: “In addition to the other policies of the WNDP Proposals for development <i>in Watlington</i> will be expected to demonstrate how they contribute to:”</p> <p>5b and 5c should be a separate policy and the primary frontages should be mapped.</p> <p>5d is a design policy and might be better suited to Policy 1.</p> <p>Supporting text:</p>

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			<p>(a) It should be described that the “expectation” of this policy (these policies) is not necessarily a requirement.</p> <p>(b) The way that a proposal should demonstrate compliance should be explained e.g. a supporting statement, and how this will be turned into delivery – the parish council might need to support some of this with their CIL spending.</p>
9	Policy 6	The council supports the aspiration of this policy but we require additional specificity.	<p>The opening statement: “Development” should be qualified, is this policy directed at <i>all</i> development (including extensions etc.) or is it intended to be directed primarily at larger scale development? Also, the words “are encouraged to” should be considered rather than “expected to demonstrate...”</p> <p>If the latter is retained, then the same supporting text considerations should be made as suggested for Policy 5.</p>

Ref.	Section/Policy	Comment	Recommendation
			As noted against Policy 4 above – 6 e/f appear to be a repetition of 4e.
10	Section 7	<p>The spending strategy is pleasing to see. It would benefit from a little more detail and a policy.</p> <p>The council's Community Infrastructure Officer Would like to make the Parish Council aware that rural exception sites, sheltered housing and self-build developments are normally exempt from CIL contributions.</p>	<p>Information that you have about indicative costs should be included. If you do not have this data, then the signposting of when / where it might be available should be included.</p> <p>A policy should be included that states the Parish Council will spend their 'meaningful contribution' on the list included in section 7.</p>
11	Site policies	<p>The council supports the site policies and are pleased to see well detailed examples. There are, however, two generic improvements that we suggest:</p>	<p>First bullet: "complies with the objectives..." this is a policy repetition that is unnecessary and should be removed.</p> <p>"Local Green Spaces" – these should be removed from the site policies. Local Green Spaces are allocated through plans and their review, they cannot be allocated in advance. The inclusion of recreational and biodiverse green spaces is supported.</p>

Ref.	Section/Policy	Comment	Recommendation
12	Monitoring	The commitment to monitoring and review is very welcome. However, the use of specific wording should be considered.	In plan making the term review suggests making changes. Committing to a review, after twelve months is not necessary. We suggest that you consider monitoring and reporting on this on an annual basis but review as appropriate and as material considerations dictate.
13	General Comment on housing issues	<p>Response: Watlington draft Neighbourhood Plan From: Housing Development Date: 05 June 2017</p> <p>----- -----</p> <p>Our comments on the draft neighbourhood Development Plan are:</p> <p>The objectives in 5.4 Housing stock set out the need for a balanced supply of housing and recognises and includes the SODC requirement for affordable housing. Policy 4c New Housing Development Confirms the inclusion of the SODC policy of 40% for over 11 units (except in the ANOB). Policy 4f mentions a small site or site for park homes or other low cost homes in line with the finding of the Housing Survey 2016.housing needs</p>	N/A

Ref.	Section/Policy	Comment	Recommendation
		<p>survey the main thrust of the responses do not seem to mention park homes, low cost affordable homes seems to be the target of those surveyed, with a suggestion of how these could be achieved..</p> <p>To achieve Affordable Housing that is allocated with a priority for local people in perpetuity the Neighbourhood Plan might wish to consider a Rural Exception Scheme or Schemes. As a housing development team we work pro-actively with small parishes to explore this option further.</p> <p>We would recommend that a further clause could be added to those that are recognised as needing affordable homes – Those that work in the within the village full-time and have been permanently employed for a minimum of 5 years.</p> <p>It is also worth the Neighbourhood Plan team looking through the housing white paper.</p> <p>Jan Phillips Housing Development Officer 05 June 2017</p>	