

Examination Additional submission - Policy H2

Notwithstanding the TSAs, inconsistencies/flaws within which have been amply described elsewhere, one of the main justifications for Policy H2 is that the site sits well within a “spatial strategy” (SS) (TSAs p78).

In comparison, none of the other sites sit well within a SS (TSA pp81-83). In SAR the term “spatial strategy” appears to have evolved to ‘a high level spatial strategy preference’ (HLSSP - p46) or ‘a spatial strategy preference’ (SSP - p6). I don’t understand whose “preference” this actually is, the evidence base for it, or how/when this SSP was communicated to the village for feedback/consultation purposes.

Is it the QB preference? If so where is the evidence?

The Community Questionnaire certainly did not address this matter. The main components of this ‘SSP’ are, for 6A (SAR pp6):

1. It sits close to village amenities
2. helped by the flanking buildings and strong perimeter landscaping it is modestly visible and does not impact open vistas
3. it is not in the flood plain, there are no flooding concerns
4. it is not in the Green Belt
5. Existing pedestrian links will allow residents to easily access community facilities on foot
6. there is willingness to mitigate traffic concerns.

Given that other sites meet criteria 2 to 6, the SSP for H2 seems to be predicated entirely on “close to village amenities”.

Re 3 above, “no flooding concerns”: contradicts pp49 of the SAR where flooding concerns in relation to H2 are discussed.

Interestingly none of the terms “SS”, “SSP” or “HLSSP” appear in the NP itself. The mix of terminology used is confusing as is the qualifier ‘high level’. To me it seems these are just words used to describe a very nebulous and imprecise concept that is not adequately developed or explained in the NP. Usually “high level” means an overview lacking in detail. Surely H2 and the NP deserve a more robust evidence base than “high level”?

Despite these ambiguities it is clear that CPP meets these criteria.

1. 10min walk to the centre of the village
2. Has strong perimeter landscaping, modestly visible and does not impact open vistas (pre-app advice)
3. Not flood plain, no evidence of flooding
4. Not Green Belt
5. There are existing pedestrian links which have been adequate for the 30+ years I have lived here. No evidence that this has changed
6. I offered traffic mitigation

Also, CPP has other benefits not afforded to 6A:

1. Less valuable agricultural land - Grade 3

2. No impact on the concentration of heritage assets in centre of village
3. Meets SODC strategic policy through a willingness to restrict housing numbers to those appropriate for sites in small villages
4. Less environmental impact because fewer dwelling (3above) inevitably reduces the number of vehicles and journeys by car.

TSA pp80 and NP pp23, in respect of traffic and parking state:

'The most important criteria to the village regarding the selection of a housing development site, as shown by the WSNP Consultation survey [q10] and several subsequent feedback forms, is the consideration of traffic and parking in the village.'

Q10 CQ is about parking and traffic not site selection. Important criteria in selection of housing development were Q31&Q32, the responses to which suggest traffic features quite low in importance down the list of criteria, and sufficient parking is important for the design and layout of any development, (no reference to the rest of the village), so it is unclear to me how this statement can be made.

In Q31 the three most important factors for site selection are inside village envelope, number of dwellings and not in Green Belt. Good pedestrian access and proximity to bus routes, and proximity to facilities came well down the list of importance. CPP is the only site which meets all three because it is the only one that will offer numbers of dwellings not in conflict with SODC policies for smaller villages.

Q32 refers to design and layout criteria and favours sufficient parking, quality of design and minimise impact on open views. Previous applications on 6A were refused for impact on views (see earlier submissions). Pre-app advice suggests this is not an issue for CPP. Good quality design can be delivered just as easily on CPP as 6A, and the intent for this was evident in my landowner's presentation. Minimising traffic impact was fifth in the order of criteria but is something I am committed to for any development on CPP.

SAR pp47 states:

'All sites apart from Six Acres perform poorly in terms of their location and impact on the Plan's key objectives (particularly setting and place) to the extent that these should be excluded as potential sites.'

I can't see where objectives for "setting and place are listed in NP pp10. ("Sense of Place" is not same thing as "place" in respect of the setting of housing).

SAR Table6.1 pp38-44 against which NP objectives (pp12) are tested is incomplete and contains statements for which there is no evidence. 6A has only 6 objectives listed. The other sites have 8 to 11. Statements on flooding and travel choice for example for sites in the north of the village are not evidenced and from experience, not true.

Finally, community benefits of H2 are frequently referred to but the "benefit" claim is very unclear. The words "community benefit", "local benefit" "public benefit" etc, are used randomly throughout the NP and the SAR, but the concept is vague, and the benefits claimed are not

described. Only one “benefit” is clearly listed. SAR pp51 (off road parking for school). However, school governors opposed 6A planning application because not enough parking spaces are being provided, and for safety reasons.

Why other sites cannot deliver benefits is unclear. I have repeatedly pointed out CPP can deliver drainage and traffic benefits.

In contrast, comments in the TSA are quick to cast doubt on the validity of benefits put forward in support of other sites by landowners.

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