

Policy H2 – additional feedback

In addition to the matters raised in my previous letter, I wanted to raise the following points in relation to the Site Allocation process in the NP.

- The village has not had the opportunity to look at the TSA and associated third party Reports in detail, have the alternatives impartially described and then vote on the specific development option it wants to follow (including the “infill only” strategy that is in keeping with the emerging Local Plan). The amount of infill opportunity / momentum has increased considerably during this process. For the avoidance of doubt, 10 dwellings are in build or approved, with another 12 required to meet the 5% target, which represents circa one dwelling per year. This data is different to that contained in the NP Consultation statement, but is available at SODC.
- The Six Acre site described in Policy H2 has been subject to a separate and premature planning application, despite its inclusion in the Neighbourhood Plan. Members of the NPSG actively supported this application. Whilst this is permissible legally, it feels disingenuous and not in keeping with the community involvement (and referendum) which should underpin the purpose of a Neighbourhood Plan. The Planning Application was approved by SODC in March, following presentations from the Vice Chair of the NPSG, the Parish Council and the District Councillor for this Ward (also a member of the NPSG). This breached no rules, but does mean that the inclusion of Policy H2 is now irrelevant and the village has no opportunity to comment on it in the referendum. For the avoidance of doubt, SODC recorded there were 111 objectors to the Planning Application and 113 were supporters. Following a review of the data, removing a note of support from a deceased villager and removing duplicate entries (Ann Smith, Mrs A Smith, etc., on both “sides”) we recorded 111 objectors to the Application and 99 Supporters. SODC did not pass this revised information onto planning councillors, although received and acknowledged by SODC. However, this data suggests that the NP referendum could have gone either way with Policy H2 included. All in all, this didn’t seem a democratic and inclusive move by the NPSG.
- The Basic Conditions Statement seems to make light of the Planning guidelines in the NPPF, Emerging Local Plan and Core Strategy. We’ve raised this point before, but can only find the following comment in the Consultation Statement on P114 which seems to address the issue: *“having taken advice from CFO and independent Planning Consultants there are no policies in the Neighbourhood Plan which are not consistent with SODC Emerging Local plan. This is consistent with the feedback from SODC.”* I can’t find any source detail to support this comment and it’s not clear how the earlier issues and policies identified as at conflict with, particularly, Policy H2 have been addressed. There are clear points of differentiation with regard to the NPPF and heritage assets.
- Policy H2 claims to have taken account of the impact on Heritage Assets, but the evidence that demonstrates how the benefit is measured against the harm caused is unclear. There is no process then to assess whether other alternative Sites would deliver more sustainable benefit, following the feedback from Historic England. Historic England stated in the Planning Application feedback that it was disappointing that no winter wireframes were provided to demonstrate the impact to landscape setting, heritage assets and the conservation area in the six/seven months of the year the foliage is less around Six Acres. Please find photographs enclosed taken by Heritage Consultant David Hickie of Heritage Matters, which clearly demonstrates the impact.
- The Neighbourhood Plan in part relies on a sustainability advantage associated with provision of car parking for the School. The data to support this conclusion has been challenged in material you will have seen. However, the following statement from the School Governors, submitted in reference to the premature Planning Application, may be of value:

The governing body of St Laurence Primary School is objecting to these plans (Ref. P17/S0241/FUL). Whilst we have no opinion whatsoever on the matter of developing the Six Acres site, the plans include a car park and changes to the traffic arrangements as an inducement to secure local support. We have examined this in detail at every stage of planning and have raised a number of objections on the grounds of safety. In our opinion, the car park and its associated traffic restrictions do not improve safety and are not fit for purpose. The developer has failed to take into account our previous feedback as to how to improve the car park, and we have no option left but to formally object.

If the planning office believe that these plans should go ahead, then we strongly insist that the car park and traffic restrictions are removed from the development as it will increase the risk to children and staff rather than safeguard them.

*Marc Carlucci
for & on behalf of St Laurence School Governing Body*

- The matter raised on Page 99, item 11, of the Consultation Statement relating to the validity of the SAR is not dealt with, despite a reference to it being resolved in the Basic Conditions statement. I cannot find a reference to it there. I am not sure how important this is, but thought it worth raising in order to clarify.
- There are many contradictions between the Policies proposed and the recommendation in Policy H2. This has not been adequately explained.