

Strete Draft Neighbourhood Plan (Regulation 14 version, February 2018)

Regulation 14 consultation response on behalf of South Hams District Council

Introduction

The draft Strete Neighbourhood Plan has been published for a formal 6 week public consultation. This represents the plan reaching Regulation 14 stage of the plan preparation process, and offers the first formal opportunity for all stakeholders to comment on the emerging plan.

As the Local Planning Authority, South Hams District Council has a statutory duty to support the preparation of neighbourhood plans.

As well as its statutory duty, SHDC has an obligation to ensure that any planning document that sits within the suite of Development Plan Documents (DPDs) is consistent with its corporate objectives, and will make a positive contribution to the long term health, wellbeing and resilience of the district's communities. Advice and guidance provided to neighbourhood plan groups will reflect this wider remit, although it is acknowledged that this guidance may go beyond what is strictly required by regulation. Where we do exceed the levels of guidance required by regulation, we will clearly state as much in our comments.

Advice and guidance at Regulation 14 stage is most usefully focused on:

- The draft Neighbourhood Plan Vision, Aims and Objectives
- The draft Neighbourhood Plan Policies
- The draft Neighbourhood Plan Evidence Base

The draft Strete Neighbourhood Plan

The Strete Draft Neighbourhood Plan (the Plan) sets out policies and approaches which will add local detail to policies in the Plymouth and South West Devon Joint Local Plan. The Plan sets out a vision for Strete as follows:

“To grow slowly and sustainably so that its high coastal character, sea views and natural beauty are preserved while meeting local needs and improving local services.”

SHDC comment – The vision effectively gives an impression of what is seeking to be achieved.

Underneath the Vision is a set of stated Objectives. These could be presented in a more prominent way – perhaps in a box and with a specific, bolder heading.

The Objectives appear to form a logical link from the Vision through to the policies and appear to be largely consistent with strategic planning policy.

The Policies

Neighbourhood Plans are advised not to try and repeat local or national planning policy. Some of the policies in the draft Strete Neighbourhood Plan are already the subject of adopted and emerging local planning policy and/or national planning policy or guidance. In such cases consideration needs to be given to what degree the NP policies add relevant and justifiable additional policy guidance for the locality.

SHDC considers that alongside the detailed comments below, the Strete NP group considers whether each policy is necessary for inclusion in future drafts of their plan. If policies remain that are already the subject of local and/or national policies, care needs to be taken to ensure consistency with existing policy to avoid ambiguity over interpretation in the decision-making process.

The Plan contains 15 policies as summarised in the table below. A commentary is provided for each policy that looks at the level of conformity with locally adopted policy and national guidance, as well as considering how each policy will be implemented in order to achieve the aims and objectives of the plan.

Policies and SHDC comments

Policy	SHDC comments
POLICY SNP1 – Protecting the Landscape	Clause 1 only refers to other guidance and policies and should therefore be deleted. A policy cannot require adherence to <u>guidance</u> in other documents which is not adopted policy in its own right.
POLICY SNP2 – Heritage and Conservation	Does this policy add anything to national and local policy?
POLICY SNP3 – Coastal setting and land south of the A379	Some parts of the village within the settlement boundary lie to the south of the A379. For these parts of the village are the requirements of Policies SNP3 and SNP6 consistent? The former's requirement that development 'must enhance that coastal setting' is perhaps too onerous and the latter's requirement that development should 'cause no significant adverse impacts' is more appropriate.
POLICY SNP4 – Low density area	A policy seeking to retain the existing 'townscape' character, including its overall density, of part of a settlement is an acceptable approach in principle. Such an approach needs to be evidenced (e.g. is the density of dwellings per hectare in the proposed area significantly different to that in other parts of the village?) and justified i.e. why is the character within the area important and what is being protected against?

	<p>The lower field of Cox's Farm is an open agricultural field and has no development on it. As such it is not appropriate for inclusion within the low density area.</p> <p>In the policy itself, it is difficult to see how development could 'enhance' the low density character. 'Development which would alter the low density character within the Policy Area will not be permitted' could be a better expression of what is being sought.</p>
POLICY SNP5 – Tranquility and dark skies	<p>It is not clear how '<u>no undue</u> noise or light pollution' will be measured and assessed i.e. what will be acceptable and unacceptable? 'Development shall be designed so that it will minimise noise and light pollution' could be better.</p> <p>It would be better to include this issue in Policy SNP8: Design and Construction clause 5 – currently they duplicate each other.</p>
POLICY SNP6 – Development and the Settlement Boundary	No comments.
POLICY SNP7 – Village Core and A379 corridor	No comments
POLICY SNP8 – Design and Construction	<p>Para. 4.5 second sentence. The current wording could be interpreted to mean that the design of 'private areas' of new development must 'ensure' that they are 'accessible for all'. It is assumed that this isn't what is meant, but what is being sought? Is it that new development should be designed to the latest access standards?</p> <p>Policy clause 2. It is not a function of the planning system to protect views, especially private views. If there are some especially significant views from publicly accessible points, these should be identified in the plan and an appropriate safeguarding policy introduced.</p> <p>Policy clause 3. The requirement that all new development shall be 'attractive' – this is highly subjective, how will it be assessed? Re. car parking requirements – does this mean that a one-bedroom flat would have to provide three car parking spaces?</p>
POLICY SNP9 – Housing development site at Cox's Farm	Para. 4.8. The statement that 'The JLP anticipates that, as a guideline, about 10 new houses are likely

Field	<p>to be built in the parish over the plan period 2014-34' is a misinterpretation and is incorrect. The indicative 10 dwellings should be regarded as a minimum and relates to a site or sites to be identified and proposed in the NP. Other dwellings constructed during the plan period by means of 'windfalls' (i.e. on sites not identified in a plan), be they in the main village or elsewhere in the parish, do not count towards this indicative number of 10.</p> <p>Para. 4.9 refers to a Housing Needs Survey that 'identified a definite need for four homes to meet local needs for housing – the true figure is probably a little higher.' The Council agrees with this last point, as a HNS has a timescale of about 3-5 years and the plan covers a 20 year period. It would therefore be reasonable to plan for the provision of at least 5 affordable houses. Based on the JLP requirement for on-site affordable housing provision at a level of 30% (on sites of 11 dwellings or more), the NP should be seeking to deliver at least 15 dwellings on the proposed site.</p> <p>The two fields at Cox's Farm in the centre of the village potentially provide adequate scope to accommodate this scale of housing development in a way that would be in keeping with adjoining areas of the village and be sympathetic to the Conservation Area and wider AONB landscape. The NP itself acknowledges that this is 'the most suitable and best located site for housing development.</p> <p>The NP also expresses community wishes to see provision of a public car park (a long-held aspiration), a footpath connection between The Plat and A379 and for some POS/recreational use. The Council considers that all of these elements could be delivered by a comprehensive proposal covering both parcels of land. Such a comprehensive approach could result in the residential element being accommodated in a more acceptable way across both parcels of land rather than being concentrated just in the southern parcel. Such an approach may also enable greater 'set-back' from the Conservation Area and a form of development that would be more easily assimilated into the</p>
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	<p>sensitive landscape. By taking such a comprehensive approach there is greater scope to secure the delivery of the 'community gain' elements (the NP at para. 4.11 states that 'Although not conditional for the development, there is space within the site to meet the aspirations of the community for a village car park and footpath link...'). Why not take a long-term, comprehensive view, planning for the whole of this central area and seeking to make the development of the housing conditional on the provision of the other elements that would benefit the local community? A phased approach to the delivery of the housing could potentially be included.</p>
<p>POLICY SNP10 – Principal Residence requirement</p>	<p>The NP states that the level of second home ownership in the parish has risen recently to about 20%. Is this sufficiently high enough to warrant a principal residence requirement? Such an approach will need to be well evidenced to stand chance of becoming adopted policy.</p>
<p>POLICY SNP11 – Community facilities and infrastructure</p>	<p>Clause 2. It is not necessary to include 'provided it complies with national and local strategic policies and the other policies of this plan'. This is a well-established principle that doesn't need to be stated in policy and it also applies equally to the other policy proposals in the NP.</p>
<p>POLICY SNP12 – Local Green Space</p>	<p>This appears to be a measured and justifiable approach to LGS designation. It would be logical to flip the order of clauses 1 and 2 in the policy.</p>
<p>POLICY SNP13 – Open Space at Cox's Farm Fields</p>	<p>This site is within the proposed settlement boundary, where development is acceptable in principle. Given the housing needs of the parish and that the NP itself acknowledges that 'It is clear that the most suitable and best located site is at Cox's Farm Field near the centre of the village' (para.4.10), the Council considers that there is little justification or evidence to support the retention of agricultural use of this parcel of land. The alternative use proposed in the NP is recreational, but given that the field is in private ownership what evidence is there that the whole field might come forward for such use, and how would this be financed and managed? The Council considers that this parcel of land should be included in a comprehensive proposal along with the adjoining</p>

	field to the south (see response to Policy SNP9, above). Such an approach could potentially secure an appropriate element of POS/recreational use and provide a pedestrian link to Blackbird Wood.
POLICY SNP14 – Local footpaths	It is unlikely that many forms of development will ‘involve the improvement of existing footpaths or the provision of new ones’. It might be more fruitful to re-phrase the policy along these lines – ‘Where the opportunity exists, development will be required to provide for new footpaths where there is a lack of provision or improve existing footpaths, in order to enhance pedestrian connectivity.’ Again, there is no need for the policy to refer to compliance with other policies.
POLICY SNP15 – Sustainable tourism	The NP’s positive approach to sustainable tourism is supported in principle. However, the policy’s approach to tourism development outside the settlement boundary appears to be in conflict with JLP Policy DEV15 Supporting the Rural Economy which does not permit camping, caravan, chalet or similar facilities within the Undeveloped Coast. The JLP provides strategic policy guidance on the Countryside, Nationally Protected Landscapes (incl. the South Devon AONB), the Undeveloped Coast and Heritage Coast and on Supporting the Rural Economy (clause 7 of which deals with tourism development). It is not clear what additional local policy guidance the NP is seeking to provide.

The Strete Neighbourhood Plan seeks to manage development within a sensitive landscape, whilst enabling small-scale organic development that meets the priorities and needs of the local community first. The broad aspirations of the plan are consistent with adopted and emerging local policy.

For the most part, this consultation response poses questions or proposes amendments that are designed to make a positive contribution to the next iteration of the neighbourhood plan.

The Housing Needs Survey provides a limited snapshot of need, and has a limited relevance in terms of timescale of 3-5 years. Like all statutory DPDs, review and monitoring of the effectiveness of the plan will be required. Under-delivery of affordable housing to meet an identified housing need could result in proposals on unallocated sites being approved. SHDC encourages neighbourhood plans to identify and allocate sites for specific uses to provide certainty of delivery, providing that the requisite allocations processes are followed.

It should also be noted that newly arising need is required to be factored into a review cycle of this neighbourhood plan.

The draft plan is well presented with good illustrations and clear plans and graphics.

SHDC considers that the draft Strete neighbourhood plan can be brought into compliance with local policy and national guidance subject to the advice and guidance provided being followed and would welcome dialogue with the NP group to help achieve this.

April 2018