

**Longhope Parish Council
&
Longhope Neighbourhood Plan Steering Committee**

Response to Examiner's Clarification Note

We have considered the Clarification Note as a committee and provide, to the best of our ability, answers to the questions asked. It may be that further clarification is necessary. We have no objection to this document being posted on the District Council's website.

Policy-based clarification

Policy H1b – I can see the link to CSP5. Does the threshold reflect the parish's designation as a designated rural area in the Housing Act 1985? Has that policy been affected by the Written Ministerial Statement of 2014?

We, too, feel that this question is best answered by FoDDC.

Policy H1e – What is the justification for the policy to apply to all development?

Perhaps it would have been better if we had changed the wording of the first sentence to say "...how they can contribute towards **sustainable** community development." as per paragraphs 6 and 7 of the NPPF i.e. applicants would have to specifically show how their development contributes to the economic, social and environmental criteria of sustainable development. We were under the impression that it was the FoDDC who determined whether Section 106/CIL contributions were payable hence our wording "*where appropriate*".

Policy H1f – Why is development restricted only to minor development? Does this policy apply generally and not specifically to sites that will come forward in the FODDC Allocations Plan?

Yes, we would expect this policy to apply to all future developments which have not yet got planning permission. Our reasons are:

- FoDDC Core Strategy Policy 16 which designates Longhope as a 'service village whereby: "*Except for possible affordable housing as an exception, and existing commitments, new housing and employment opportunities are likely to be small ...*".
- There was overwhelming support for small scale developments in the responses to the questionnaire circulated at the June 2015 'Drop In' event - see page 7 of the Consultation Statement under the Housing policy H1g. (N.B. Policy H1g is now H1f in the current Plan). There was no community support for large developments which could jeopardise our outstanding natural setting.
- More opportunity for small local builders who may not need to make affordable housing and tariff style contributions on sites of 10-units or less and, perhaps, better quality, design and relevance to parish housing needs.

Policy H1g – Is the final sentence a matter of judgement for FoDDC rather than a policy?

Whilst there are no national maximum/minimum figures for housing density, a figure of about 30 dwellings per hectare seems to be commonly used by the FoDDC e.g. the AP79 development. Again, this policy received overwhelming support at the 2015 'Drop In' event

(vide supra). In essence, the community would rather see more minor, low density developments than fewer high density developments. So, yes, we see it as a policy.

Policies H2a and H2b – what are the significance of Lifetime Homes, Building for Life criteria and Secured by Design? Are the first two factors affected by the Written Ministerial Statement of March 2015 (Plan making section)?

Yes. We agree with the sentiments expressed in the ‘Zero carbon Homes: Supporting small builders’ section of the ministerial statement. Also, in view of the increasing numbers of elderly people in Longhope, many of whom would like to downsize, we felt that designating Building for Life and Lifetime Homes criteria would cater for these people. Ideally, we would like all new homes to be built to these standards. Realistically though, maybe only a proportion should be built to those standards.

We realise Building for Life and Lifetime Homes criteria are voluntary standards.

We would wish that all appropriate new developments obtain a Secured by Design Developers Award certificate.

There is a typographical error in Policy H2b. The words “*e.g. Lifetime Homes or Building for Life criteria.*” should be deleted.

Policy E1b – The policy does not specify the use of the redeveloped site. What does the Parish Council have in mind? Is any redevelopment expected to be linked to business relocation? The title suggests this is the case but the policy does not say so directly.

It was suggested during the June 2015 consultation, that the businesses currently on the Longhope Industrial Site in the centre of the main village move across the A4136 to the Transport Depot site (FoDDC AP80). Some of the resulting brownfield site could then be used for a minor housing development as per FoDDC AP81. This would probably happen piecemeal as businesses close due to retirement etc. Such a move would reduce traffic congestion, noise and visual intrusion in the centre of the village. However, these businesses are a source of employment for Longhope residents (see Appendix 5 – Employment Survey and Business Questionnaire) and we would not wish to see a reduction in business opportunities.

Policy E1d – The policy does not identify the new uses to be supported. What does the Parish Council have in mind? In addition, the policy simply refers the reader to other policies. Was this intentional?

No. The lack of explicit mention of Tourism in the Plan is an omission which we acknowledge. The types of usage we would like to see are: visitor accommodation, art/craft studio space, gallery i.e. in support of the visitor economy.

Policy AM1a – The policy appears to rely too much on a paragraph in the NPPF and ‘other’ (unspecified) policies in the Plan. Was this intentional?

No. We want developers show in their Design and Access Statement how they hope to fulfil all the relevant bullet points in paragraph 35 of the NPPF. We should have said that the ‘other’ policies were AM1b, AM1c, AM1d and AM2.

Policy AM1c – How is a ‘significant’ increase in pupil numbers defined? What status does the Sustrans document have in the planning system? Who will be expected to provide ‘convenient off-street parking’ in the final section?

As with many other schools, there is considerable congestion during school ‘drop-off’ and ‘pick-up’ times particularly as the school entrance is near a narrow part of Church Road. Our original policy stated that any enlargement of the school to accommodate extra pupils had to include parking/traffic flow arrangements within the school grounds to alleviate the ‘drop-off’/‘pick-up’ congestion on Church Road as there is no convenient public off-street parking near the school. The FoDDC Planning Dept. suggested we amend the policy – see page 10 of the Consultation Document.

Essentially, we would expect traffic management measures outside the school to reflect any increase in pupil numbers.

The principle of School Travel Plans is exemplified on page 49 of the Communities and Local Government booklet ‘Good Practice Guidelines: Delivering Travel Plans through the Planning Process’. April 2009. The Sustrans document provides a widely used School Travel Plan.

Policy C1 – The schedule in the policy does not relate precisely to paragraph 4.5. Are the community facilities in 4.5 the facilities that the policy wishes to safeguard?

No. Developments will not be permitted on the following community sites: recreation field, tennis courts, children’s play area and the allotments. Whilst we would like to see the other facilities retained, it may be that their use changes over the life of this Plan e.g. a pub becoming a dwelling house.

Policy If1 – The policy relies heavily on paragraph 100 of the NPPF but fails to describe its remit. Is this deliberate?

No. As stated in paragraph 4.6 of the Plan, Longhope village proper has been subject to flooding in the past. Hence the large number of responders agreeing with this policy at the June 2015 ‘Drop In’ (If1a, as it then was, on page 7 of the Consultation Document). Therefore, we felt we had to include such a policy as this, even though the Lead Local Flood Authority (LLFA) would assess each development application. It is possible that the LLFA is not aware of the Longhope Hydrographic Survey (Annex 7 to the Plan).

Policy If2 – The policy is in effect an expression of process rather than policy. Is the purpose of the policy only to support proposals that are appropriately supplied with water and are appropriately drained?

Yes. Again, this policy was inserted due to concerns by parishioners over the ability of the current sewage system to cope with new developments. We are aware that sewerage connections have delayed the development of the recent exception site. In addition, a recent major housing development on the Longhope side of Mitcheldean has caused sewers to run full pipe under the pressure of heavy rain. Some residents have had to fit non-return valves to prevent backflow.

Addendum

We are aware that our Map 1, Map 3 and the extract map on Page 6 of the Plan show the wrong settlement boundary for the School Lane development. A correction is needed.

Mike Phelps
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Chairman Longhope NDP Steering Committee