

Recommendation number	Policy /Page	Submission Version text	Examiners recommendation	Modification proposed	Reasons for decision
1	Policy PE1a Development within a conservation area	<p>POLICY PE1a. Development Within the Conservation Area</p> <p>Within the Conservation Area, new development will only be permitted if it is in harmony with existing buildings and the street scene. Buildings should be of an appropriate scale, in terms of massing and proportions, so as to ensure they are in keeping with the traditional buildings located in the Conservation Area. Whilst the Parish Council supports green energy principles, photovoltaic panels should only be used if they would not detract from the local street scene in the Conservation Area.</p>	<p>Insert 'as shown on the Policies Map (Map 1) after 'Area'</p> <p>Insert 'be supported where it preserves or enhances its character and appearance'</p> <p>after 'will'</p> <p>Delete the remainder of the first paragraph and replace with: 'New development should be in harmony with and respect existing buildings'.</p> <p>In the third paragraph of the policy delete 'Whilst the.... principles'</p> <p>Replace 'should only be used if' with 'will be supported where'</p>	<p>POLICY PE1a. Development Within the Conservation Area</p> <p>Within the Conservation Area <u>as shown on the Policies Map (Map 1)</u>, new development will <u>be supported where it preserves or enhances its character and appearance only be permitted if it is in harmony with existing buildings and the street scene. New development should be in harmony with and respect existing buildings</u>.</p> <p>Buildings should be of an appropriate scale, in terms of massing and proportions, so as to ensure they are in keeping with the traditional buildings located in the Conservation Area.</p> <p>Whilst the Parish Council supports green energy principles, Photovoltaic panels should only be used if <u>will be supported where they would not detract from the local street scene in the Conservation Area.</u></p>	<p>As its title suggests this policy sets out to identify the type of development that will be supported in the conservation area. Its approach generally reflects national guidance on conservation areas and seeks to ensure that its character should be preserved or enhanced.</p> <p>I recommend modifications to the policy so that it has full regard to national policy and has the clarity required by the NPPF. These modifications reflect the national test for conservation areas, the repositioning of supporting text from the policy itself and making a direct relationship between the policy and the Policies Map (Map 1)</p>
	4.1.1		<p>Include the following additional text in the second section of 4.1.1: 'Policy PE1a sets out the Plan's approach to development in the conservation area. The policy also clarifies the Plan's approach to photovoltaic panels.</p>	<p><i>Policy PE1a sets out the Plan's approach to development in the conservation area. The policy also clarifies the Plan's approach to photovoltaic panels.</i></p>	
	Policy PE2 Biodiversity and Landscape	<p>POLICY PE2. Biodiversity and Landscape</p> <p>Any new development proposals, housing or industrial, within the parish would be required to include a detailed impact assessment on the local biodiversity and landscape. In particular, should there be any impact on non-Special Area of Conservation (SAC) bat roosts, then these proposals should include appropriate mitigation measures.</p>	<p>Replace the policy with the following:</p> <p>New development proposals should be designed so that they do not have any unacceptable detrimental effect on biodiversity or wildlife in the Plan area. In particular new development proposals should respect the Wye Valley and the Forest of Dean Bat SAC.</p> <p>Any development that has the potential to impact on bat roosts in non-designated areas should include appropriate mitigation measures.</p>	<p>POLICY PE2. Biodiversity and Landscape</p> <p><u>New development proposals should be designed so that they do not have any unacceptable detrimental effect on biodiversity or wildlife in the Plan area. In particular new development proposals should respect the Wye Valley and the Forest of Dean Bat SAC.</u></p> <p><u>Any development that has the potential to impact on bat roosts in non-designated areas should include appropriate mitigation measures.</u></p>	<p>The policy sets out to preserve and enhance biodiversity in the parish. It adopts a precautionary approach. This policy has the ability to contribute significantly to the delivery of the environmental dimension of sustainable development.</p> <p>Key elements of the policy focus on development management processes (the preparation of an impact assessment) rather than to craft a traditional policy approach. I recommend a modification to address this matter. The recommended modification takes account of the representation made by Natural England on this matter. It also reflects the importance of the Wye Valley and Forest of Dean Bat SAC in the Plan area.</p>

	Policy H1a Meeting Local Needs	<p>POLICY H1a. Meeting Local Needs</p> <p>Where possible, applications must include a mix of housing size and type, reflecting the existing and projected needs of the parish. In particular, two/three-bedroomed properties suitable for younger families and properties suitable for older people (<i>i.e. built to Lifetime Homes standards</i>) should be included.</p>	<p>In the first sentence replace ‘Where possible’ with ‘Where appropriate’ and ‘the existing and projected needs’ with ‘the latest assessment of housing needs’.</p> <p>In the second sentence delete ‘(i.e. built to Lifetime Home standards)’ and replace ‘included’ with ‘incorporated in new residential proposals.’</p>	<p>POLICY H1a. Meeting Local Needs</p> <p>Where possible, <u>appropriate</u>, applications must include a mix of housing size and type, reflecting the existing and projected needs <u>the latest assessment of housing needs</u> of the parish. In particular, two/three-bedroomed properties suitable for younger families and properties suitable for older people (<i>i.e. built to Lifetime Homes standards</i>) should be included <u>incorporated in new residential proposals</u>.</p>	<p>This policy sets out to ensure that proposals for new residential development should include a mix of housing size and types to reflect the projected needs of the Plan area. It has a focus on delivering two and three bedroomed properties (to cater for younger families) and housing suitable for older persons. This policy has the ability to contribute significantly to the delivery of the social dimension of sustainable development.</p> <p>I recommend two modifications to the policy. The first builds in a reference to emerging assessments of housing needs. Plainly this matter has the ability to be dynamic during the Plan period. The second deletes any reference to the Lifetime Homes standards. Whilst I appreciate that these standards have the ability to assist in the delivery of properties suitable for older persons national advice is clear on this matter. In March 2015, a written ministerial statement indicated that local plans and neighbourhood plans should not set any technical standards relating to the construction, internal layout or the performance of new dwellings. Plainly this is a matter that has overtaken the production of the submitted Plan.</p>
	Policy H1b Affordable Housing	<p>POLICY H1b. Affordable Housing</p> <p>Future housing developments within the village and wider parish will be expected to include some affordable housing provision, in line with the FoDDC Core Strategy (CSP.5), which seeks affordable housing as a proportion of all housing on sites of 0.16ha or more or accommodating five or more dwellings.</p>	Delete policy		<p>This policy sets out to ensure that new residential developments should provide affordable housing to Core Strategy standards.</p> <p>I sought clarification on this matter from both the Parish Council and FoDDC. The latter provided a helpful update on its ongoing implementation of Core Strategy Policy CSP5 and its relationship to national policy that has developed since its adoption. It is clear that the District Council has procedures in place to address this important matter. In all the circumstances, the policy in the submitted Plan does not add any local value to the</p>

					current position. In particular the Plan area is identified as a 'rural area' under Section 157 (1) of the Housing Act 1985. On this basis, I recommend that the policy is deleted.
Paragraph 4.2.4	4.2.4 The NPPF defines 'affordable housing' as being for eligible households whose needs are not met by the housing market. Affordable housing can include 'social rented' housing, 'affordable rented' housing and 'intermediate' housing (<i>which includes shared equity schemes and the like</i>). According to the LHNS (March 2015), Longhope Parish currently has 18 affordable dwellings. (<i>During the NDP consultation process, concerns were expressed about the disposal of affordable housing on the open market by a local housing association, so this number might change.</i>) The LHNS (March 2015) identified 20 eligible households with a local connection to the parish who would benefit from affordable housing. However, of these 20 households, only three were looking to move from their current accommodation within the next two years. Eleven households were looking to move within the next two to five years, while five households indicated a potential need to move at some point over five years hence. (<i>The remaining household did not specify a time frame.</i>) Planning permission has already been granted (<i>in June 2015</i>) for a rural exception site comprising 16 affordable homes on land at The Wend in the main settlement area of Longhope. Rural exception site rules stipulate that people with a strong local connection will have priority for this accommodation, so it is likely that The Wend development will satisfy the local need for affordable housing in the immediate future and beyond. Further exception sites are therefore unlikely to be required in the parish over the life of this NDP. The provision of additional 'windfall'	In 4.2.4 delete the sentence referenced above	4.2.4 The NPPF defines 'affordable housing' as being for eligible households whose needs are not met by the housing market. Affordable housing can include 'social rented' housing, 'affordable rented' housing and 'intermediate' housing (<i>which includes shared equity schemes and the like</i>). According to the LHNS (March 2015), Longhope Parish currently has 18 affordable dwellings. (<i>During the NDP consultation process, concerns were expressed about the disposal of affordable housing on the open market by a local housing association, so this number might change.</i>) The LHNS (March 2015) identified 20 eligible households with a local connection to the parish who would benefit from affordable housing. However, of these 20 households, only three were looking to move from their current accommodation within the next two years. Eleven households were looking to move within the next two to five years, while five households indicated a potential need to move at some point over five years hence. (<i>The remaining household did not specify a time frame.</i>) Planning permission has already been granted (<i>in June 2015</i>) for a rural exception site comprising 16 affordable homes on land at The Wend in the main settlement area of Longhope. Rural exception site rules stipulate that people with a strong local connection will have priority for this accommodation, so it is likely that The Wend development will satisfy the local need for affordable housing in the immediate future and beyond. Further exception sites are therefore unlikely to be required in the parish over the life of this NDP. The provision of additional 'windfall' affordable or low-cost housing on small-scale 'brownfield' sites would be supported.	The Plan's supporting text on housing matters (Section B) properly sets the scene for the variety of housing policies H1a to H1g and H2a to H2c. I have recommended a series of modifications to some of these policies in this report. There are however certain elements of the supporting text which make policy type statements and which run the risk of conflicting with the policies that would appear in any 'made' neighbourhood plan. In particular: Paragraph 4.2.4 makes a sweeping statement that 'further exception sites are therefore unlikely to be required in the parish over the life of this NDP'. This may prove to be the case however there is no evidence provided to substantiate the statement in the Plan. I recommend modifications to address these matters. In 4.2.4 I recommend that the full sentence is deleted.	

		affordable or low-cost housing on small-scale 'brownfield' sites would be supported.			
Policy H1c Windfall Sites	POLICY H1c. 'Windfall' Sites Small (i.e. minor development), well-designed, residential sites on 'brownfield' land within the village and wider parish that include low-cost or affordable homes and which do not have a detrimental effect on the surrounding area and neighbouring properties will be supported, provided that they comply fully with the policies and spirit of this NDP.	Delete '(i.e. minor development)' and 'that include low-cost...homes'. Replace 'fully with.... NDP' with 'with other policies in this Plan and with wider development plan policies'	POLICY H1c. 'Windfall' Sites Small (i.e. minor development), well-designed, residential sites on 'brownfield' land within the village and wider parish that include low-cost or affordable homes and which do not have a detrimental effect on the surrounding area and neighbouring properties will be supported, provided that they comply <u>with other policies in this Plan and with wider development plan policies</u> fully with the policies and spirit of this NDP	The policy supports small scale development (as defined as minor development - up to 9 dwellings). Core Strategy policy CSP16 specifies that in Longhope and other 'service' villages small-scale development will be supported. In that Plan, 'small scale' is identified as single plots or pairs of houses. This issue also appears in Policy H1f as addressed later in this report. There is no direct evidence to support the maximum size of a residential development as set out in the policy. The Plan does not set out a substantive case to warrant an approach that departs from the adopted Core Strategy. As such I recommend the deletion of this element of the policy and its associated supporting text. Plainly the FoDDC has the ongoing ability to make day-to-day judgements on planning applications for windfall sites in general terms, and for given sizes in particular. This will inevitably take place on a site-by-site basis.	
Paragraph 4.2.5		Delete the references to minor development in paragraphs 4.2.5.	That any future housing development in the parish should be 'small scale' (i.e. minor development) only..		
Paragraph 4.2.6	4.2.6 This NDP does not seek to identify specific sites for new housing development. However, it is recognised that there are previously developed 'brownfield' sites that might have the future potential to accommodate small numbers of new dwellings as 'windfall' development. This is in line with the FoDDC Core Strategy, which states that <i>'the national aim of using previously developed land should be adhered to where possible' (CSP.5, section 6.28)</i> . Small (<i>i.e. minor development</i>), well-designed, residential developments on brownfield sites that include low-cost or affordable homes, and that do not have a detrimental effect on the surrounding area and neighbouring properties and comply with the policies and spirit of this NDP will be considered.	Delete the references to minor development in paragraphs 4.2.6.	4.2.6 This NDP does not seek to identify specific sites for new housing development. However, it is recognised that there are previously developed 'brownfield' sites that might have the future potential to accommodate small numbers of new dwellings as 'windfall' development. This is in line with the FoDDC Core Strategy, which states that <i>'the national aim of using previously developed land should be adhered to where possible' (CSP.5, section 6.28)</i> . Small (<i>i.e. minor development</i>), well-designed, residential developments on brownfield sites that include low-cost or affordable homes, and that do not have a detrimental effect on the surrounding area and neighbouring properties and comply with the policies and spirit of this NDP will be considered.	The policy also requires windfall sites to provide for low-cost or affordable homes. I have already addressed this matter in relation to Policy H1b. Given the recommended modification that I have proposed to the size element of the policy I also recommend that this element of the policy is deleted. This second modification will not in itself prevent affordable housing schemes coming forward in their own rights on brownfield sites or as a required component of an open market development The policy also refers to the need for windfall developments to 'comply fully with the policies and spirit of this NDP'. I recommend that this aspect of the policy is modified so that it refers more widely to development plan policies. This will then require that such proposals comply with current and future FoDDC planning	

					policies as part of the development management process. This recommended modification also removes any reference to the 'spirit' of neighbourhood plan and development plan policies. Plainly this has the ability to be interpreted in many different ways and as such would not have the clarity required by the NPPF.
		4.2.7 The impact of brownfield windfall development will be incorporated into the ongoing monitoring and review process. Excluding schemes that have already been granted planning permission, no further development outside the existing settlement boundary is envisaged or supported (FoDDC CCSP.16 states that, in the case of villages, 'the defined settlement boundary will be a key determinant in judging the acceptability of proposals').	In 4.2.7 replace 'envisaged or supported' in the sentenced referenced above with 'anticipated'.	4.2.7 The impact of brownfield windfall development will be incorporated into the ongoing monitoring and review process. Excluding schemes that have already been granted planning permission, no further development outside the existing settlement boundary is envisaged or supported <u>anticipated</u> . (FoDDC CCSP.16 states that, in the case of villages, 'the defined settlement boundary will be a key determinant in judging the acceptability of proposals').	The Plan's supporting text on housing matters (Section B) properly sets the scene for the variety of housing policies H1a to H1g and H2a to H2c. I have recommended a series of modifications to some of these policies in this report. There are however certain elements of the supporting text which make policy type statements and which run the risk of conflicting with the policies that would appear in any 'made' neighbourhood plan. In particular: Paragraph 4.2.7 comments that 'excluding schemes that have already been granted planning permission no further development outside the existing settlement boundary is envisaged or supported'. This is a sweeping statement that is without detailed evidence and does not have regard to national policy. I recommend modifications to address these matters. In 4.2.7 I recommend that the tone of the sentence is modified so that further development outside the settlement boundary is not 'anticipated'. This would be in general conformity with the development plan. In addition it would not prevent potentially-acceptable development coming forward that otherwise had regard to national policy and addressed a particular set of local circumstances at some point within the Plan period.
	Policy H1d Infill development	POLICY H1d. Infill Development 'Back land' (<i>development behind existing frontage</i>) and 'tandem' development (<i>one development behind another in a single plot</i>) in gardens of existing properties will not be supported where they have the potential for loss of amenity of neighbouring properties either through	Replace 'will not be supported.... neighbouring properties either through' with 'will be supported where they safeguard the amenities of neighbouring properties by ensuring that there is not either an unacceptable'	POLICY H1d. Infill Development 'Back land' (<i>development behind existing frontage</i>) and 'tandem' development (<i>one development behind another in a single plot</i>) in gardens of existing properties will not be supported where they have the potential for loss of amenity of neighbouring properties either through <u>will be supported where they</u>	This policy sets out the Plan's approach to backland development. It reflects the potential for such development to come forward in the main village itself given its linear nature. The policy correctly identifies an appropriate range of criteria against which any such proposals will be assessed.

		loss of privacy, loss of daylight, visual intrusion by a building or structure, loss of mature vegetation or landscape screening and additional traffic resulting from the development.		<u>safeguard the amenities of neighbouring properties by ensuring that there is not either an unacceptable loss of privacy, loss of daylight, visual intrusion by a building or structure, loss of mature vegetation or landscape screening and additional traffic resulting from the development.</u>	I recommend a modification to the policy so that it adopts a positive rather than a negative tone. In doing so the environmental safeguards that I have described above would remain.
	Policy H1e Developer Contributions	<p>POLICY H1e. Developer Contributions</p> <p>Any planning applications for new development must demonstrate how they can contribute towards the delivery of community development. These might (<i>where appropriate</i>) include contributions via a Section 106 agreement or through payment of any future Community Infrastructure Levy. Provision towards community development, either through direct provision of new facilities or through financial contributions, will be expected from all development subject to guidance set out in paragraph 175 of the National Planning Policy Framework. The Parish Council will prioritise any general financial contribution towards the projects considered appropriate at the time.</p>	<p>Replace the policy with:</p> <p>Where appropriate and in accordance with paragraph 204 of the NPPF, development proposals should make proportionate contributions towards the delivery of strategic infrastructure as set out in the Forest of Dean Infrastructure Delivery Plan (2015) or any equivalent replacement document’.</p>	<p>POLICY H1e. Developer Contributions</p> <p><u>Where appropriate and in accordance with paragraph 204 of the NPPF, development proposals should make proportionate contributions towards the delivery of strategic infrastructure as set out in the Forest of Dean Infrastructure Delivery Plan (2015) or any equivalent replacement document’</u></p>	<p>This policy sets out the Plan’s approach towards developer contributions. It requires that any planning application for new development contributes towards the delivery of community development.</p> <p>The aspiration of the policy may naturally be met by a wide range of planning applications and by the implementation of other policies in the wider development plan. Nevertheless, there is a requirement for neighbourhood plan policies to meet the basic conditions. In this respect paragraph 204 of the NPPF is clear that planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, where they are directly-related to the development and where they are fairly and reasonably related in scale and kind to the proposed development.</p> <p>FoDDC has not yet adopted a Community Infrastructure Levy. It has however adopted a detailed Infrastructure Delivery Plan in 2015. This sets out the scale and nature of the infrastructure that will be needed to implement the policies and proposals of the adopted Core Strategy. It provides a clear context within which FoDDC can reasonably request developer contributions and how the monies concerned can be applied. I recommend that the policy is modified so that it has regard to national policy and is in general conformity with the strategic policies in the development plan (and in this case how they are applied through the Infrastructure Delivery Plan). FoDDC has advised that the Infrastructure Delivery Plan is being refreshed. I reflect this in the recommended modification.</p>

	Policy H1f Size of Housing Developments	<p>POLICY H1f. Size of Housing Developments Future housing development in Longhope village and Parish will be supported only if it is small scale (<i>i.e. minor development as defined by the DCLG – see Glossary</i>). This is in line with the FoDDC Core Strategy (CSP.16). The Core Strategy gives examples of small-scale development as including ‘single plots, or pairs, small workshops or changes of use of existing buildings plus reuse of agricultural buildings’.</p>	Delete policy		<p>This policy seeks to establish guidance on the size of future housing developments. The policy sets its own limit to that defined as minor development (up to 9 dwellings). The policy draws its own comparison with Core Strategy policy CSP16 which specifies that in Longhope and other ‘service’ villages small-scale development will be supported. In that Plan, small scale is identified as single plots or pairs of houses. The approach adopted mirrors that set out in Policy H1c Windfall Sites.</p> <p>The approach has attracted a representation from a developer which comments that the identification of ‘minor’ development is arbitrary and unevidenced. It also refers to the inherent contradiction of the emerging Allocations Plan (and the associated main modification MM069) identifying land for housing development off Church Road for 28 dwellings.</p> <p>Taking all the information into account I am not satisfied that the policy has the clarity required by the NPPF. Its two principal components are contradictory and will not assist in the effective delivery of the development management process. In addition, there is no direct evidence to support the maximum size of a residential development as set out in the policy. The Plan does not set out a substantive case to warrant an approach that departs from the adopted Core Strategy. As such I recommend the deletion of the policy and its associated supporting text.</p>
	Paragraph 4.2.8.	<p>The FoDDC Core Strategy designates Longhope as a ‘service village’ (CSP.16). The Core Strategy states that new housing and employment development opportunities in service villages will tend to be ‘small in scale’ (CSP.16). Parish residents have also made it clear (<i>via NDP community consultation</i>) that future development in the parish must therefore be ‘minor’ i.e. the number of dwellings constructed is between 1 and 9 inclusive, or a site area of less than 0.5 hectares (<i>DCLG definition</i>).</p>	Delete paragraph 4.2.8.		
	Policy H1g Density of Housing	<p>POLICY H1g. Density of Housing Any development within the parish must not have an unacceptable impact on the local landscape character. The maintenance of local character will have a higher significance than achieving any set maximum housing density figure as per CSP.16.</p>	<p>Replace the policy with the following: ‘New development within the Plan area should respect the landscape character of the locality in which it is located. The density, layout and scale of housing developments should be designed in a way that does not have an unacceptable impact on local landscape character’.</p>	<p>Policy H1g Density of Housing <u>New development within the Plan area should respect the landscape character of the locality in which it is located. The density, layout and scale of housing developments should be designed in a way that does not have an unacceptable impact on local landscape character’</u></p>	<p>This policy seeks to address the density of housing developments. Its first part seeks to ensure that new housing proposals do not have an unacceptable impact on local landscape character. Its second part comments that the maintenance of local character will have a higher significance than that of achieving the density figures identified in the Core Strategy.</p> <p>I sought clarification from the Parish Council on the second part of the policy. In its response, the Parish Council acknowledges that FoDDC does not apply density policies in the Core Strategy as is implied by the language in the policy. It</p>

					<p>advises that community would prefer to see small low-density new developments.</p> <p>I recommend that the policy is modified so that it has the clarity required by the NPPF and appropriately adds value to adopted Core Strategy policies. In particular the recommended modifications relate density considerations to local landscape character.</p>
	Policy H2a Design Standards	<p>POLICY H2a. Design Standards Any new housing development should be of high-quality design and built to a high sustainability standard e.g. Lifetime Homes or Building for Life criteria. In addition, the design and location of new development should be resilient to the effects of climate change and flooding.</p>	<p>Delete ‘and built to a...criteria’</p> <p>In the first sentence of the policy replace ‘Any’ with ‘All’</p> <p>In the second sentence of the policy delete ‘In addition’</p>	<p>Policy H2a Design Standards</p> <p>Any All new housing development should be of high-quality design and built to a high sustainability standard e.g. Lifetime Homes or Building for Life criteria. In addition, the design and location of new development should be resilient to the effects of climate change and flooding.</p>	<p>This policy requires high design standards for new housing development. It also outlines the need for high sustainability standards by reference to two specific design checklists. The final section of the policy sets out the need for new development to be resilient to the effects of climate change and flooding.</p> <p>Good design is an integral part of national and local policy. Nevertheless, a direct reference to two specific design standards (Lifetime Homes and Building for Life) in relation to sustainability standards is onerous. In any event the March 2015 written ministerial statement indicates that local plans and neighbourhood plans should not set any technical standards relating to the construction, internal layout or the performance of new dwellings. Plainly this is a matter that has overtaken the production of the submitted Plan.</p> <p>Taking all these matters into account I recommend that this component of the policy is deleted. I also recommend that the structure of the remaining parts of the policy is modified to take account of the deleted element and to have the clarity required by the NPPF.</p>
	Policy Secured by Design H2b	<p>POLICY H2b. Secured by Design All types of new development will incorporate the principles of ‘Secured by Design’ (SBD) and, wherever possible, achieve SBD accreditation to ensure that a safe and sustainable community is maintained, e.g. Lifetime Homes or Building for Life criteria.</p>	<p>Replace the policy with the following:</p> <p>‘All new development should be designed in a fashion that would provide appropriate security for occupants and visitors alike’.</p>	<p>Policy H2b Secured by Design</p> <p><u>All new development should be designed in a fashion that would provide appropriate security for occupants and visitors alike.</u></p>	<p>The policy sets out the Plan’s ambitions for the security of new developments. It does so by reference to a series of national non-statutory guidance notes.</p> <p>Plainly there is an overlap here with my comments on the previous policy. However, in this case the policy refers to the spatial layout of new developments rather than the internal layout or performance standards of new dwellings.</p> <p>I am satisfied that it would be appropriate</p>

					to include a policy of this type in the Plan and that (as modified) it would meet the basic conditions. I recommend that the policy is modified so that it adopts a general format rather than one that refers to specific guidance. Plainly a developer would be able to adopt the more specific design codes that are widely promoted, including those mentioned in the submitted policy.
	Policy H2c Residential Car Parking Spaces	<p>POLICY H2c. Residential Car Parking Spaces Sufficient parking should be available within a development to ensure that environmental and safety problems do not occur in the surrounding area as a result of overflow parking generated from the development. The parking facilities should be integrated within the overall design of the development so that they are easy, safe and attractive to use, and so that parking in inappropriate areas is deterred.</p> <p>Developers are encouraged to calculate the parking demand that would be generated by the proposed development using the methodology set out in the NPPF and submit this evidence with the planning application. Parking requirements should also conform to the guidance set out in the Manual for Gloucestershire Streets (4th Edition 2016).</p>	Replace the policy with the following: 'Proposals for new residential development should provide sufficient off-street car parking spaces for their own needs and to prevent environmental and safety problems arising elsewhere. The car parking needs for individual developments should be calculated in accordance with the principles in paragraphs 35 and 39 of the NPPF. The required parking provision should be sensitively integrated into the overall design of the development concerned'.	<p>Policy H2c Residential Car Parking Spaces</p> <p><u>'Proposals for new residential development should provide sufficient off-street car parking spaces for their own needs and to prevent environmental and safety problems arising elsewhere. The car parking needs for individual developments should be calculated in accordance with the principles in paragraphs 35 and 39 of the NPPF. The required parking provision should be sensitively integrated into the overall design of the development concerned'.</u></p>	<p>The policy sets out to ensure that new residential developments are self-sufficient in providing for their car parking needs. The second part of the policy refers to both NPPF and County Council guidance.</p> <p>I recommend modifications to the policy so that it has the clarity required by the NPPF. Whilst as drafted it refers both to the NPPF and to County Council guidance in neither case are detailed standards identified. The recommended modified policy incorporates the approach adopted by paragraphs 35 and 39 of the NPPF into the initial part of the policy. In addition, the second part of the policy simply 'encourages' developers to use the methodology in the NPPF. I also recommend modifications to the structure of the policy so that it clarifies the types of proposals that will be supported.</p>
	Policy E1a Small Scale Business	<p>Policy E1a Small Scale Business Applications to expand businesses in categories A1 (<i>shops</i>), A3 (<i>restaurants and cafes</i>), A4 (<i>drinking establishments</i>), B1 (<i>light industry appropriate in a residential area</i>), B2 (<i>general industrial</i>) and B8 (<i>storage or distribution</i>) categories within the parish will be encouraged, provided they do not adversely affect the natural or residential environment and where proposals include appropriate mitigation. Applications will be particularly encouraged if they offer new local employment opportunities.</p>	In both sentences of the policy replace 'encouraged' with 'supported.'	<p>Policy E1a Small Scale Business Applications to expand businesses in categories A1 (<i>shops</i>), A3 (<i>restaurants and cafes</i>), A4 (<i>drinking establishments</i>), B1 (<i>light industry appropriate in a residential area</i>), B2 (<i>general industrial</i>) and B8 (<i>storage or distribution</i>) categories within the parish will be encouraged <u>supported</u> provided they do not adversely affect the natural or residential environment and where proposals include appropriate mitigation. Applications will be particularly encouraged <u>supported</u> if they offer new local employment opportunities</p>	<p>The policy provides a positive context within which commercial development can take place within the Plan area. It has regard to national policy as expressed in paragraph 28 of the NPPF. The policy offers particular support for A1/A4/B1/B2/B8 uses. It includes appropriate environmental controls and safeguards.</p> <p>The policy offers 'encouragement' to these uses. The policy would however provide the clarity required by the NPPF if it 'supported' the development of such uses. I recommend accordingly</p>

<p>Policy E1b Relocation of Businesses</p>	<p>POLICY E1b. Relocation of Businesses Proposals to redevelop a site, where existing employment uses are inappropriately located in the village and causing traffic congestion, noise and visual intrusion, will be supported provided there is no net loss of local employment and proposals include any appropriate nature conservation measures.</p>	<p>Replace 'there is.....nature conservation measures' with 'the following criteria are met:</p> <ul style="list-style-type: none"> ▪ the development package includes proposals for the relocation of the existing employment use; ▪ the proposals for the redevelopment of the site are in accordance with development plan policies including other policies in this Plan; and ▪ the proposed redevelopment of the site can be satisfactorily accommodated without creating unacceptable impacts on the amenities of surrounding land uses and the capacity of the local highway network 	<p>POLICY E1b. Relocation of Businesses Proposals to redevelop a site, where existing employment uses are inappropriately located in the village and causing traffic congestion, noise and visual intrusion, will be supported provided there is no net loss of local employment and proposals include any appropriate nature conservation measures. <u>'the following criteria are met:</u></p> <ul style="list-style-type: none"> ▪ <u>the development package includes proposals for the relocation of the existing employment use;</u> ▪ <u>the proposals for the redevelopment of the site are in accordance with development plan policies including other policies in this Plan; and</u> ▪ <u>the proposed redevelopment of the site can be satisfactorily accommodated without creating unacceptable impacts on the amenities of surrounding land uses and the capacity of the local highway network</u> 	<p>As its title suggests this policy provides a supportive context for the redevelopment of existing employment sites which may present a series of environmental issues. It requires that there is no net loss of local employment.</p> <p>I sought clarification from the Parish Council on this matter in general, and the types of uses that it had in mind. It advised on potentially emerging proposals on one site in particular. It was flexible on the type of uses that would arise on the original site following its redevelopment.</p> <p>Plainly there is a degree of balance to be struck on this policy. It needs to have sufficient flexibility to achieve its ultimate ambition of enhancing the prospects for the local economy on the one hand and ensuring that the end uses are appropriate to the location of the site and development plan policies on the other hand. There is also a need to ensure that appropriate levels of local employment are safeguarded as part of the different developments.</p> <p>I recommend modifications to the policy to reflect these differing requirements. They also bring the degree of clarity required both by the decision-maker and the developer.</p>
<p>Policy E1c Working from home</p>	<p>POLICY E1c. Working from Home Planning permission will be supported for the use of part of a dwelling for office and/or light industrial use, and for small-scale freestanding buildings within its curtilage, extensions to the dwelling or conversion of outbuildings for those uses provided that:</p> <ul style="list-style-type: none"> • other than minor ancillary support, servicing and maintenance, all work activities are carried out only by the occupants of the dwelling; • no adverse impact arises to nearby residents or other sensitive land uses from noise, fumes, odour or other nuisance associated with work activity; • any extension or freestanding building shall be designed having regard to policies in this NDP and 	<p>Replace 'Planning permission light industrial use and' with 'Insofar as planning permission is required proposals for the use of part of a dwelling for office, light industrial or tourism uses will be supported together with proposals'</p>	<p>POLICY E1c. Working from Home Planning permission will be supported for the use of part of a dwelling for office and/or light industrial use, and <u>Insofar as planning permission is required proposals for the use of part of a dwelling for office, light industrial or tourism uses will be supported together with proposals</u> for small-scale freestanding buildings within its curtilage, extensions to the dwelling or conversion of outbuildings for those uses provided that:</p> <ul style="list-style-type: none"> • other than minor ancillary support, servicing and maintenance, all work activities are carried out only by the occupants of the dwelling; • no adverse impact arises to nearby residents or other sensitive land uses from noise, fumes, odour or other nuisance associated with work activity; 	<p>This policy actively supports the concept of working from home. The Plan recognises that this will assist in contributing towards the diversification of the local economy. The policy usefully identifies a series of criteria against which proposals can be assessed.</p> <p>I recommend two modifications to the policy. The first clarifies that planning permission will not necessarily be required for all such proposals. The second inserts a degree of support for the tourism sector in the policy. This approach has been suggested by the FoDDC Regeneration Manager. Such an approach also has regard to national policy.</p>

		should not detract from the quality and character of the building to which they are subservient by reason of height, scale, massing, location or the facing materials used in their construction.		<ul style="list-style-type: none"> any extension or freestanding building shall be designed having regard to policies in this NDP and should not detract from the quality and character of the building to which they are subservient by reason of height, scale, massing, location or the facing materials used in their construction. 	
Policy E1d Reuse of Farm Buildings	<p>Policy E1d Reuse of Farm Buildings</p> <p>Applications for new uses of redundant traditional farm buildings will be supported if they comply with the other policies of this NDP. Applications for additional farm buildings adjacent to existing ones will be supported, subject to normal planning consent and conformity to the other policies of this NDP, particularly Policy PE2.</p>	<p>Replace 'Applications for new uses of...farm buildings' with 'Proposals for the use of traditional farm buildings for tourist accommodation, tourism-related activities and art and craft-related activities'</p> <p>In the second sentence of the policy insert 'for agricultural use' between 'buildings' and 'adjacent'.</p> <p>In the second sentence of the policy delete 'normal planning consent and' and replace 'conformity to' with 'conformity with'.</p>	<p>Policy E1d Reuse of Farm Buildings</p> <p>Applications for new uses of redundant traditional farm buildings <u>Proposals for the use of traditional farm buildings for tourist accommodation, tourism-related activities and art and craft-related activities</u> will be supported if they comply with the other policies of this NDP. Applications for additional farm buildings <u>for agricultural use</u> adjacent to existing ones will be supported, subject to normal planning consent and <u>with</u> the other policies of this NDP, particularly Policy PE2.</p>	<p>This policy has two separate parts. The first sets out a policy approach towards new uses within redundant farm buildings. The second sets out a policy approach towards further farm buildings adjacent to existing agricultural buildings.</p> <p>I sought clarification from the Parish Council on the first component of the policy. As submitted it does not specify the types of new uses that would be supported (other than that they comply with other policies in the Plan). This does not have the clarity required by the NPPF. The Parish Council commented that the type of uses it had in mind were tourist accommodation, tourism activities and art/gallery uses. I reflect these uses within a recommended modification to the policy. The Parish Council has also helpfully responded to an additional matter of clarification on this policy. It has confirmed that the second part of the policy applies specifically to the proposed development of additional farm building for agricultural use. I recommend that the policy is modified to reflect this point. I also recommend a modification to the second part of the policy by way of deleting unnecessary text.</p>	
Policy AM1a Traffic Congestion	<p>POLICY AM1a. Traffic Congestion</p> <p>Proposals that accord with para. 35 of the NPPF and other policies in this NDP will be supported. Proposals requiring planning permission which seek to increase the number of access points, or, which would involve an increase in traffic generation, will need to demonstrate that they do not inhibit the free flow of traffic or exacerbate conditions of parking stress, including conflict with larger vehicles or pedestrians especially in the narrow sections of Church Road</p>	<p>Replace the first sentence of the policy with the following:</p> <p>'Proposals that promote the use of sustainable transport modes for the movement of goods or people will be supported'.</p> <p>In the second sentence of the policy replace: 'Proposals.... seek to' with 'Insofar as planning permission is required proposals that would'; 'will need to demonstrate that' with</p>	<p>POLICY AM1a. Traffic Congestion</p> <p>Proposals that accord with para. 35 of the NPPF and other policies in this NDP will be supported. <u>Proposals that promote the use of sustainable transport modes for the movement of goods or people will be supported.</u> Proposals requiring planning permission which seek to <u>Insofar as planning permission is required proposals that would</u> increase the number of access points, or, which would involve an increase in traffic generation, will need to demonstrate that <u>will be supported where they do not</u></p>	<p>This policy is an important mechanism to ensure that new development does not add to existing issues in relation to congestion and car parking. It effectively requires that new developments provide an appropriate degree of car parking to meet their own needs. It also provides policy advice on proposals which may increase the number of access points onto the highway or which would in more general terms involve an increase in traffic generation.</p> <p>I sought clarification from the Parish</p>	

		and the cul-de-sac roads leading off.	'will be supported where'; and 'conditions of parking stress' with existing parking issues' Delete 'especially.... leading off'	inhibit the free flow of traffic or exacerbate conditions of parking stress, existing parking issues including conflict with larger vehicles or pedestrians. especially in the narrow sections of Church Road and the cul-de-sac roads leading off.	Council on the policy's reliance on other policies in the submitted Plan and paragraph 35 of the NPPF. I was advised about the specific policies in the Plan and the importance of the NPPF to the circumstances in the Plan area. I am satisfied that there is a need for the policy, and that it has the ability to add local distinctiveness to national policy. However, I recommend modifications to the policy so that it has the clarity required by the NPPF. In particular I recommend that the policy adopts a positive approach towards identifying the basis on which local proposals will be supported rather than making a very general comment that they need to comply with the NPPF and other policies in the Plan.
	paragraph 4.4.2	4.4.2 On-site car parking should be provided in new developments to avoid cars being parked on the road, on pavements and on grass verges, which detracts from the environment and creates a danger for pedestrians.	At the end of paragraph 4.4.2 add: Policy AM1a sets out the Plan's approach both to the promotion of sustainable means of transport and the need for new developments to meet their own car parking requirements. This is particularly important in and around particular sections of Church Road where its inherent narrowness can generate pedestrian and vehicle conflicts.	4.4.2 On-site car parking should be provided in new developments to avoid cars being parked on the road, on pavements and on grass verges, which detracts from the environment and creates a danger for pedestrians. <u>Policy AM1a sets out the Plan's approach both to the promotion of sustainable means of transport and the need for new developments to meet their own car parking requirements. This is particularly important in and around particular sections of Church Road where its inherent narrowness can generate pedestrian and vehicle conflicts.</u>	
	Policy AM1b Public Car Parking Places	POLICY AM1b. Public Car Parking Spaces Proposals for new public car parking facilities within the parish will be supported in their entirety or as part of new developments on suitable sites where: <ul style="list-style-type: none">• access is safe and suitable;• there is appropriate vehicle and pedestrian accessibility;• appropriate hard and soft landscaping is provided to ensure the designs are sensitive to the setting, particularly in the Conservation Area. Where new developments are located near the centre of the main settlement area, schemes should include public car parking provision that is available to non-residents during working hours, as well as parking for residents and visitors.	Delete 'in the parish' Replace 'in their entirety' with 'in their own right' Insert 'and' after the second criterion Delete the second part of the policy.	POLICY AM1b. Public Car Parking Spaces Proposals for new public car parking facilities within the parish will be supported in their entirety in their own right or as part of new developments on suitable sites where: <ul style="list-style-type: none">• access is safe and suitable;• there is appropriate vehicle and pedestrian accessibility; <u>and</u>• appropriate hard and soft landscaping is provided to ensure the designs are sensitive to the setting, particularly in the Conservation Area. Where new developments are located near the centre of the main settlement area, schemes should include public car parking provision that is available to non-residents during working hours, as well as parking for residents and visitors.	The policy sets out to support proposals for public car parking facilities either in their own right or as part of wider new development proposals. It helpfully identifies criteria against which such proposals can be assessed. The second part of the policy identifies that where new development proposals are located near the centre of Longhope they should provide public car parking provision. I am satisfied in principle that the first part of the policy meets the basic conditions. It reflects the restricted nature of Church Road and the limited availability of public car parking to access the various retail, commercial and other services it has to offer. The second part of the policy is however unreasonably onerous on private developers. It takes no account of viability or security/site management issues. In any event it fails to clarify the types of schemes to which it would apply and the extent of public car parking required. I recommend that it is deleted from the policy. Plainly there would be no reason why a developer could not provide public car parking as part of a wider package if it was viable and otherwise appropriate.

					I recommend modifications to the retained part of the policy to bring the clarity required by the NPPF and to delete unnecessary text. In particular the recommended modifications will ensure that proposals need to meet all of the three identified criteria.
	Policy AM1c Access and Parking for the school	POLICY AM1c. Access and Parking for School Proposals that might lead to a significant increase in pupil numbers at Hopebrook School will only be supported when accompanied by proposals to implement any, or all, of the suggestions outlined in the Sustrans document 'Increasing Active Travel to School 2016', e.g. traffic calming measures, cycle paths, pedestrian and cycle training and a School Travel Plan. Consideration should also be given to the provision of convenient off-street parking for parents when delivering and collecting their children.	Delete policy		<p>This policy reflects parking issues associated with the Hopebrook School. It seeks to ensure that proposals that might lead to a significant increase in pupil numbers at the school will only be supported where they include sustainable transport measures. The policy also requires that those proposals should give consideration to the provision of convenient off-street parking for those delivering and collecting children from the school.</p> <p>I have sympathy with the approach proposed by this policy. Nevertheless, it will be impractical to implement through the development management process. There is no direct connection established between the development concerned and the need for the provision of sustainable transport measures at the school. Equally the policy does not identify the land that would otherwise be needed for such facilities. In any event national policy (in the NPPF paragraph 204) is clear that developer contributions for works of this nature should only be sought where they are necessary to make the development acceptable in planning terms, where they are directly related to the development and where they are fairly and reasonably related in scale and kind to the development itself. It may well be that the ambitions of this policy could be delivered indirectly through the implementation of Policy H1e of this Plan (as recommended to be modified).</p>
	Policy AM1d Business Traffic	POLICY AM1d. Business Traffic Businesses and other organisations should make car-parking provision for staff and visitors in consultation with the FoDDC and Parish Council. For a new employment site within the main settlement area (<i>see document 5 – Map 1</i>), appropriate provision should be made for the unloading and turning of delivery vehicles within the site.	<p>Replace the first sentence of the policy with the following:</p> <p>'Proposals to establish or to expand car parking provision for staff and/or visitors at business or other commercial enterprises will be supported'.</p> <p>In the second sentence of the policy</p>	POLICY AM1d. Business Traffic Businesses and other organisations should make car-parking provision for staff and visitors in consultation with the FoDDC and Parish Council. Proposals to establish or to expand car parking provision for staff and/or visitors at business or other commercial enterprises will be supported'	This policy has two separate parts. The first indicates that business and other organisations should make provision for staff and visitors (in consultation with FoDDC and the Parish Council). The second requires that new employment development should make provision for the unloading and turning of delivery vehicles within the site concerned.

			replace 'For a new... Map 1)' with 'Proposals for new employment development within the main settlement area as shown on the Policies Map should make' and delete 'should be made.'	For a new employment site within the main settlement area (see document 5-Map 1), <u>Proposals for new employment development within the main settlement area as shown on the Policies Map should make</u> appropriate provision should be made for the unloading and turning of delivery vehicles within the site.	As submitted the first part of the policy is aspirational. There is no direct mechanism in the planning process to make this aspiration happen in a practical sense. It is likely that many of the businesses in the area will have been in operation for many years and as such whatever parking issues they may experience will be beyond planning control. I recommend a modification to this part of the policy so that it adopts a more permissive format. This will provide a supporting context for developments of this nature as they may arise during the Plan period. The second part of the policy is entirely appropriate to the Plan area. Nevertheless, I recommend modifications so that it has the clarity required by the NPPF.
	Policy AM2 Pedestrian Access	POLICY AM2. Pedestrian Access All new developments must, when appropriate and practicable and in accordance with para. 35 of the NPPF, provide safe access for all parishioners to local facilities and public transport links. In particular, safe and convenient paths should be provided for those pushing a pushchair, in a wheelchair, walking with a stick or walking frame or using a mobility scooter.	Replace 'must' with 'should.'	POLICY AM2. Pedestrian Access All new developments must <u>should</u> , when appropriate and practicable and in accordance with para. 35 of the NPPF, provide safe access for all parishioners to local facilities and public transport links. In particular, safe and convenient paths should be provided for those pushing a pushchair, in a wheelchair, walking with a stick or walking frame or using a mobility scooter.	This policy sets out key principles guiding public accessibility to all new developments. It has regard to national policy by providing a direct linkage to paragraph 35 of the NPPF. The policy provides very specific detail for the levels of accessibility required. However, on balance I am satisfied that it will provide the level of clarity required by the NPPF to all concerned in the development management process. In any event the safe access to be provided will collectively satisfy the needs of the various groups identified in the policy. I recommend a modification to the policy so that it provides a degree of flexibility to FoDDC in the exercise of its development management responsibilities. As submitted the policy is very absolute.
	Policy C1 Protection of Community Facilities	POLICY C1. Protection of Community Facilities Applications for new development should not prejudice the retention of the existing parish facilities. Developments will not be permitted on the following community sites: recreation field, tennis courts, children's play area and the allotments. If the present shop should close, the Parish Council would wish to see the	Replace the first part of the policy with the following: The following facilities are identified as important community facilities: The recreation field; The tennis courts; The children's play area; and The allotments Proposals that would result in either the loss of, or significant harm to an important community facility will not be supported unless it can be clearly	POLICY C1. Protection of Community Facilities Applications for new development should not prejudice the retention of the existing parish facilities. Developments will not be permitted on the following community sites: recreation field, tennis courts, children's play area and the allotments. <u>The following facilities are identified as important community facilities:</u> <u>The recreation field;</u> <u>The tennis courts;</u>	The policy celebrates the range of community facilities in the Plan area. These facilities are also more generally described in paragraph 4.5 of the Plan. The policy has two parts. The first sets out to safeguard four identified facilities. The second sets out a series of alternatives in the event that the existing village shop should close. The first part of the policy in general terms has regard to national policy and is in general conformity with the strategic

		use retained, either in the existing building, on another site central to the village, or as part of a new, small-scale development similarly located.	demonstrated that the operation of the facility, or of another community use of the facility, is no longer economically viable, or that there is an alternative facility available to meet the identified community needs in the Plan area Delete the second part of the policy	<u>The children's play area; and</u> <u>The allotments</u> <u>Proposals that would result in either the loss of, or significant harm to an important community facility will not be supported unless it can be clearly demonstrated that the operation of the facility, or of another community use of the facility, is no longer economically viable, or that there is an alternative facility available to meet the identified community needs in the Plan area</u> If the present shop should close, the Parish Council would wish to see the use retained, either in the existing building, on another site central to the village, or as part of a new, small-scale development similarly located	policies of the development plan. I recommend a modification to this part of the policy so that it has the clarity required by the NPPF and delivers the objectives identified in the supporting text. In particular I recommend that the policy has sufficient flexibility to reflect changing circumstances or the establishment of new facilities which may meet the identified community needs in a different way. The second part of the policy does not have the required format to operate as a policy. It is more aspirational in tone. In the event that the existing shop should close it 'would wish to see' another shop unit take its place (this would not need planning permission), another shop to open in other premises central to the village (no premises are identified) or the use relocated into a new small-scale development (no premises are identified). For these reasons, I recommend that this part of the policy is deleted. In practical terms, any proposal for a new or replacement retail unit in the central part of the village would be likely to be supported without the need for a specific policy in the neighbourhood plan.
	Paragraph 4.5	4.5 The parish has the good fortune to possess a primary school, a shop/Post Office, three public houses, a village hall, a recreation ground pavilion, a church and a chapel. These facilities are central to parish life and local people wish to see them retained and prosper. In addition, there is a children's playground, a football field, tennis courts and an allotment site. The Parish Council wishes to see them well used and protected from development unassociated with their current uses.	At the end of paragraph 4.5 add: Policy C1 identifies four important community facilities and safeguards them for this purpose.	4.5 The parish has the good fortune to possess a primary school, a shop/Post Office, three public houses, a village hall, a recreation ground pavilion, a church and a chapel. These facilities are central to parish life and local people wish to see them retained and prosper. In addition, there is a children's playground, a football field, tennis courts and an allotment site. The Parish Council wishes to see them well used and protected from development unassociated with their current uses. <u>Policy C1 identifies four important community facilities and safeguards them for this purpose.</u>	
	Policy IF1 Flood Risk Management	POLICY If1. Flood Risk Management All proposals for new development within the parish must conform to the requirements set out in paragraph 100 of the NPPF and take into account the previous Longhope hydrographic surveys commissioned by the FoDDC.	Replace the policy with the following: 'Inappropriate development in areas at risk of flooding will not be supported unless: <ul style="list-style-type: none"> it can be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk as informed by a Strategic Flood Risk Assessment where one has been prepared; and a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk 	All proposals for new development within the parish must conform to the requirements set out in paragraph 100 of the NPPF and take into account the previous Longhope hydrographic surveys commissioned by the FoDDC. <u>Inappropriate development in areas at risk of flooding will not be supported unless:</u> <ul style="list-style-type: none"> <u>it can be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk as informed by a Strategic Flood Risk Assessment where one has been prepared; and</u> <u>a site-specific flood risk assessment</u> 	This policy sets out the Plan's approach on flood risk management. It requires that any new proposals should conform to the NPPF and to the Longhope hydrological studies. This approach reflects a strong community support to address the important local issue associated with the flooding of Hope Brook. This is confirmed in the response from the Parish Council to my clarification questions. Plainly it is important that these issues should be articulated within the Plan. However, the policy as submitted does not specify to a developer what will and will not be supported. Its focus is on requiring conformity with national policy and with FoDDC-commissioned work. I recommend

			elsewhere, and, where possible, will reduce flood risk overall'.	<u>must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall'.</u>	a modification to the policy so that it has the clarification required by the NPPF. This will be particularly valuable both to the decision-maker and to the developer.
	Paragraph 4.6:	4.6 There have been instances of flooding within Longhope associated with the Hope Brook in the recent past (<i>for example, in 2007</i>). The area to the south of the A4136 is indicated as an area with a high risk of flooding on the Environment Agency Flood Risk map. Concerns have also been raised about the ability of the current sewage system to cope with extra capacity caused by new developments.	Insert the following text at the end of paragraph 4.6: Policy IF1 sets out the Plan's policy towards developments in areas at risk of flooding. All new developments in the Plan area should have regard to paragraphs 100-103 of the NPPF and should take account of the Longhope hydrological surveys commissioned by the District Council.	4.6 There have been instances of flooding within Longhope associated with the Hope Brook in the recent past (<i>for example, in 2007</i>). The area to the south of the A4136 is indicated as an area with a high risk of flooding on the Environment Agency Flood Risk map. Concerns have also been raised about the ability of the current sewage system to cope with extra capacity caused by new developments. <u>Policy IF1 sets out the Plan's policy towards developments in areas at risk of flooding. All new developments in the Plan area should have regard to paragraphs 100-103 of the NPPF and should take account of the Longhope hydrological surveys commissioned by the District Council.</u>	
	Policy Waste Water	IF2 and POLICY If2. Water and Waste Developers will be required to demonstrate that there is adequate waste water and water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. Developers will, where appropriate, fund studies to ascertain whether the proposed development will lead to overloading of existing waste water and water infrastructure.	Replace 'will be required' with 'should'.	POLICY If2. Water and Waste Developers will be required to should demonstrate that there is adequate waste water and water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. Developers will, where appropriate, fund studies to ascertain whether the proposed development will lead to overloading of existing waste water and water infrastructure.	This policy sets out the Plan's approach to waste water and water supply capacity. This is particularly important given that the majority of the built development in the Plan area is concentrated in Longhope village and which is itself restricted within the confines of the Longhope Brook valley. The approach adopted is appropriate in general terms. I recommend a modification so that it is clear how a developer needs to comply with its requirements.
	General text		Modification of general text (where necessary) to achieve consistency with the modified policies		This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. It will be appropriate for FoDDC and the Parish Council to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

	Policies Map		<p>Replace Maps 1 and 3 with one Policies Map to the specification set out below.</p> <p>For the purposes of the 'Policies Map' I recommend the following changes to Map 1:</p> <ul style="list-style-type: none"> • the inclusion of the relevant policy number in brackets after each relevant part of the key • the removal of the Housing Allocations from the Map and the key – they are proposals in the emerging Allocations Plan and not in the Neighbourhood Plan • the inclusion of a title as follows: Longhope Neighbourhood Development Plan 2016-2026 Policies Map 		<p>In the event that the Plan is 'made' it will become part of the development plan and will need a degree of clarity as a Policies Map. On this basis, I recommend that two maps are retained. The first would be what is currently Map 2 (the neighbourhood area). The second would be the 'Policies Map' based on what is currently Map 1.</p> <p>For the purposes of the 'Policies Map' I recommend the following changes to Map 1:</p> <ul style="list-style-type: none"> • the inclusion of the relevant policy number in brackets after each relevant part of the key • the removal of the Housing Allocations from the Map and the key – they are proposals in the emerging Allocations Plan and not in the Neighbourhood Plan • the inclusion of a title as follows: Longhope Neighbourhood Development Plan 2016-2026 Policies Map
	Policies map		<p>Correct the boundaries to the site in the FoDDC Allocations Plan AP79 as shown on page 6 to reflect Main Modification MM069 of the Allocations Plan.</p>		<p>Comments from the Parish Council and the developer concerned have identified that the precise boundaries of site AP79 Church Road need to be amended to reflect the current Allocations Plan position. I recommend accordingly.</p>
	Referendum area		<p>Recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 19 September 2013.</p>		<p>I am required to consider whether the referendum area should be extended beyond the Plan area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 19 September 2013.</p>