

Coleford Neighbourhood Development Plan

Independent Examiner's Clarification Note

Context

This note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan is very well-presented. Its design continues the excellent approach adopted by earlier neighbourhood plans in the District. The Plan provides a clear and distinctive vision for the neighbourhood plan area. Its focus on housing delivery, landscape character and local green spaces sits comfortably within the strategic context provided for the neighbourhood area by the existing and emerging development plan. The Plan has clearly been designed to add value to the Forest of Dean Allocations Plan.

Points for Clarification

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now in a position to raise some initial issues for clarification. They are designed for the Town Council. The comments that are made on these points will be used to assist in the preparation of my report. They will also inform any modifications that may be necessary to the Plan to ensure that it meets the basic conditions.

Policy CTC1

I can see that the policy refers to map 5 and appendix D.

Should the numbers that precede the sites have a closer relationship to this earlier work? Otherwise the policy reads either as though the sites appear in the wrong order or that others have been omitted by mistake.

Policy CTC 3

I can see the footnote (18) to the Heritage Lottery Fund. Should I conclude that it would only be such projects that would be supported by the policy?

In this context are the examples just that or do they represent a definitive list of projects?

Policy CE3

As I read the policy it is more a statement of fact rather than a policy. Is it intending to say that new residential, employment and commercial development will be supported where it incorporates or improves connectivity?

Policy CE4

This reads more as a schedule of other sites rather than as a policy. Is it necessary as Tufthorn Avenue is allocated for employment use in the emerging Allocations Plan and as the health facilities issue is already addressed in policy CTIPA 3 of the submitted Plan?

Policy CH2

This policy reads well in general terms. However, is there any significance in 'when it meets Coleford's needs'? Are these the needs identified in Section 5.3 of the Plan?

Policy CH3

In the opening part of the policy there is reference to double allocations (the FoDDC Allocations Plan and the neighbourhood plan). Is this necessary?

As I read the policy details it sets out the additional/local requirements for the development of sites already allocated in local policy. Is this interpretation correct?

Policy CC1

The format and the structure are very robust. However, its clarity and applicability are less than clear. In particular:

- does Appendix F effectively list all the facilities affected by this policy?
- Is Table 10 a sub-set of Appendix F?
- What is the significance of the two examples listed in the body of the policy?

Policy CC3

The level of detail in the policy is good. Subject to any comments which you may have I am proposing to recommend modifications so that it has the desired effect as set out paragraphs 76 to 78 of the NPPF.

I can see that proposed Local Green Space (LGS) 36 is outside the neighbourhood area. Given the nature of the legislation I have no option other than to recommend its deletion from the schedule. A neighbourhood plan cannot make any comments about land outside its boundaries.

Lawnstone (LGS5) overlaps with Lawnstone in Policy CTC1. I can see the approach proposed in CTC1. However, I have to assess LGSs against current conditions rather than future expectations. On this basis I am proposing to recommend the deletion of the LGS designation on the site. Do you have any observations?

Policy CC4

By 'surrounding settlements' does the policy refer to settlements other than Coleford itself which are located within the neighbourhood area?

Policy CHE2

Does the policy relate only to non-designated heritage assets? If so, is the schedule in the policy a full schedule of those non-designated assets?

Policy CNE1

As CC4

Policy CNE2

I can see the relationship with the Locally Valued Landscape in the Allocations Plan (for Zones 1 and 2). What evidence supports the same treatment for Zone 3?

What are your thoughts about the implications the recent decision on the Lower Lane, Berry Hill site on Map 10?

Policy CNE3

As I read the structure of the policy its opening section is supporting text rather than policy. The policy begins in the lower section. Was this your intention?

Developer Contribution Lost for Infrastructure (page 60)

What is the purpose of this section of the Plan? Is it intended to inform the details of other policies?

Policy CITPA1

As I read the policy it is about the details required to support planning applications rather than a policy.

Do you have any comments on this observation? Could it be deleted as a policy and addressed as supporting text?

Policy CITPA3

Am I correct in understanding this policy to offer general support both for a primary health care centre and a Forest of Dean hospital in the neighbourhood area?

Have any sites been identified for either or both of the schemes?

Policy CITPA4

I can understand the issues raised in the supporting text and the importance of this matter to the local community. Nevertheless:

- What is meant by ‘where appropriate opportunities will be used from new development to reduce the flood risk in Coleford’?
- How extensive would be definition of ‘new development’? Can it be defined?
- In any event is it the role of new development to solve pre-existing problems?
- Is the ultimate purpose of the policy to ensure that new development in general, and the allocated sites in particular, address the drainage matters in the neighbourhood area in a satisfactory fashion with appropriate mitigation where necessary?

Representations made to the Plan

Does the Town Council wish to make observations on any of the representations made to the Plan?

Protocol for responses

I would be grateful for comments by Friday 25 May 2018. Please let me know if this timetable may be challenging to achieve. It reflects the factual basis of the questions raised.

In the event that certain responses are available before others I am happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled please can all responses be sent to me by the District Council and make direct reference to the policy/issue concerned.

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