

## Mitcheldean NDP draft

FoDDC comments Sept 2018

Thank you for the opportunity to comment on the draft NDP. There is a lot of work involved in preparing a plan and we look forward to being involved as it continues. The comments below are intended to help with the plan and we are happy to discuss as and when you would like to run through them.

- 1) It will be helpful for the NDP to be updated to reflect the fact that the Allocations Plan for the FoDD has now been adopted (summary etc) (eg NDP4.6, 4.7). There may be quite a few updates needed but overall the Allocations Plan is a better and clearer context for the NDP now it is adopted.
- 2) The format of the plan could give greater emphasis to the policies and proposals by placing the summaries of consultation in an appendix or elsewhere. As the plan evolves there will be more consultation exercises to be reported and a separate consultation report will need to be prepared. The plan's explanatory text can explain how the various policies relate to the consultation points made.
- 3) The NDP refers to the NPPF, which has been revised recently and cross references to the new version and to the related planning policy guidance would be beneficial (there are some changes which are relevant to NDP preparation, conformity with other plans, SA etc) <https://www.gov.uk/government/publications/national-planning-policy-framework--2> NPPF and <https://www.gov.uk/guidance/neighbourhood-planning--2> the planning guidance. It may be useful to pick up on the revised NPPF in respect of its support for design etc (NPPF s 12)
- 4) Local strategic planning policies are those in the Core strategy of 2012 but as amended in the Allocations Plan. The latter makes changes to the CS housing provision which is important for the NDP and its conformity. None of the saved policies from the 2005 Local Plan apply (eg NDP4.9).
- 5) Objectives- 8; some types of development are expected away from settlements and this may need to be reflected in the objective. It may be considered that this should be reworded to something like... "protect the countryside from inappropriate development especially (named areas) which are vulnerable because of their sensitive ... landscapes..."
- 6) The NDP (6.1) refers to the CS as well as the draft AP. These references could be updated to the adopted AP. The land adjoining the former bus depot is not now proposed to be allocated (map 3). The CS set out the approximate requirement according to its housing provision. The AP superseded this although the scale of the proposed allocations are still broadly the same for the Mitcheldean (they have changed considerably for some other settlements). The precise numbers are less relevant being the numbers required at the time the CS was written using forecasts that are now out of date (see also NDP 1.8).
- 7) (6.1.7) It is likely that housing will usually require 2 parking spaces per unit plus visitor provision. This may be relaxed in the case of schemes like that at the former George PH, but the requirement is usually applied elsewhere even though there is no set standard.
- 8) 6.1.8 The SHMA provides a guide which is now being replaced by a new housing needs assessment. FoDDC may be able to provide additional evidence on this and an update on

the current need for affordable housing- please let us know if you would like additional information.

- 9) Policy H1- see above re parking minimum. Does the NDP have any evidence that the current “building five” is likely to be available in the plan period (it is allocated in the AP but not expected to deliver over the first five year period). We will review the allocation in the new FoDD Plan. Policy could usefully cross refer to E1.
- 10) H2 will the NDP define the “gateways?” A map of “protection zones” would be useful at this point too or ref to your map 8 (second one there are two numbered 8 in this draft). H2 is not compatible with NPPF policies, though it could be amended to impose strict control, or some form of landscape impact policy.
- 11) 6.25 could sq ft and acres have metric equivalents please?. 6.2.8 needs a policy if NDP wants to retain the retail element- there may be some changes of use that may not need planning permission.
- 12) B1- is it appropriate to separate some of the uses as employment and tourism may have different impacts, and the policy at present supports some employment outside the main settlement.
- 13) The protection zone/ area (?) references need to be supported by additional evidence. Policies could also identify trails on a map? Justification needs to reference NPPF/ NPG. The map (8) seems to cover nearly all of the countryside outside the defined settlement. New development in this area is already subject to strict control so what does the protection zone add and what does the NDP wish to achieve by adding the policy? The actual area defined seems to exclude Plump Hill and Wilderness areas above the A 4136 (your view 2 page 43). Is there a particular justification for this (especially the exclusion of the higher ground and woodland)?
- 14) AC1 seems to be addressing a variety of related issues- support/ retention of community facilities, accessibility of them, and their potential local impact. It also refers to space at the schools (explanatory text or allocation) and adds that additional appropriate facilities will be sought by s106.
- 15) Local Green space, see para 99 etc of new NPPF- the NDP can also refer to the AP important open areas which the FoDDC identify and identify any other green areas that it considers important. The table within the policy could be moved to explanatory text with a list of the areas being retained in the policy itself.
- 16) Policy E1 will need some evidence to justify reference to 2 storey design, could say as an alternative “aspects of the design, including height and massing, materials..etc will need to be justified against how they preserve or enhance the conservation Area” Some additional evidence re materials would be helpful as hinted at in the policy clause 3. Is 4 over prescriptive or is there evidence to suggest the need for tight control on materials. Cross reference to H1.
- 17) E2 as drafted duplicates national guidance, the advantage the NDP has is that it could (does) identify non designated assets. These could be listed in an appendix or elsewhere.
- 18) The character assessment material (6.4.13...) would be best placed in a separate document or appendix to the NDP itself. Policy E3 could simply say new development must protect and enhance... The landscaping of it is a separate matter which may mitigate any impacts arising. Would it be more appropriate to refer to building with nature in the context of development generally not just under “within the village outside the Conservation Area”? E3 does

duplicate some of the policies elsewhere but protection of landscape character is clearly a priority.

- 19) The landscape character material in particular could form the basis for the protection zone policy and help justify the zones themselves.
- 20) Transport, some of the proposals lie outside the planning policy area and may need to be separated from those that are covered. The plan can still comment on the issues such as parking restrictions in the High Street.
- 21) Definition and rationale for protection areas may need to be supplemented