

Alvington 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. The Plan provides a clear and distinctive vision for the neighbourhood plan area. It is very well-presented and it makes good use of carefully-selected photographs. The distinction between the policies, the supporting text and the Projects is very clear

Its focus on community facilities, design and open spaces is both appropriate and distinctive to the neighbourhood area.

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 Parish 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.

General

The Plan uses a variety of words in a policy context. Where it takes a positive approach, it uses either 'supported' or 'encouraged'. Where it takes a negative approach, it uses 'not supported', 'opposed' or 'resisted'. I am minded to recommend a modification which simply uses 'supported' and 'not supported'

Does the Parish Council have any observations on this proposition?

Valid comment all noted. Any instances throughout document of "opposed" or "resisted" replaced by "supported" or not "supported"

Policy F1

Is the first paragraph of the policy intended to have a bearing on proposals for residential development through the development management process?

YES. Councils make most decisions about planning proposals to build on land or change the use of buildings or land. When deciding an application for planning permission, the council refers to planning policy documents and planning guidance

The final paragraph of the policy reads as a Project rather than as a policy.

Agreed. Final paragraph moved to the projects section see page 44 5d. Also referred to in the supporting text of F1 paragraphs 5 and 6

Please can the Parish Council advise on how it developed this policy.

It was developed out of a major concern for flooding especially on the main road – A48 -in and out of Alvington which is also a main route to Chepstow/Bristol & Gloucester. Planning applications along Clanna Lane did not appear to include appropriate mitigation until the commencement of the NDP. Any new development in Clanna Lane/Road to include ‘flood mitigation and drainage management appropriate to the site, See Supporting text of F1 paragraph 1.

Could it be incorporated as a Project in the Plan rather than as a policy without losing the intended purpose?

YES. See 13.0 Projects page 44 5d

Policy NE1

Is there any reason why the Policy Aim and the Rationale are included in the policy rather than within the supporting text?

All noted. Moved Policy aim and Rationale outside policy into adjoining text 6.1 refers.

Policy NE2

In the third paragraph should Map 6 and page 22 read Map 8 and page 25?

YES. ~~Changed to Map 8 page 25~~ Changed to Map 9 page 26

Is the final paragraph of the policy intended to have a bearing on proposals for development through the development management process?

YES

Policy BE1

This is a very good policy.

I make specific comments about section 6 later in this Note

Paragraphs 7.13 to 7.18

Now included in **New Policy NE 3** see paragraphs ~~6.17 to 6.24~~ 6.19 to 6.24

This part of the Plan comments about open spaces/local green spaces. Table 4 provides an assessment of various parcels of land against the local green space criteria in the NPPF. Map 11 adds to this assessment.

~~Page 27 Map 11 now Map 9, Page 28 Map 10 table 4 revised, also both heading and content revised~~

However, as I read the Plan it does not have a direct policy approach to the designation of local green spaces.

See **New Policy NE 3 Important Open Areas (IOA) and Local Green Spaces LGS)**

Please can the Parish Council advise on its intentions on this matter?

The following areas as identified on ~~Map 9~~, Map 10, table 5 are designated as Local Green Spaces:

There is also a consequential impact on the wider contents of Policy BE1

Agreed. BE 1 updated. Paragraph 6 moved to NE 3 Policy paragraph 2 and revised wording.

Policy HM1

Is there any reason why a threshold of three dwellings is identified?

This was parishioners' feedback from Parish NDP Open days

Should the yield on any site be related to its size and location within the village?

Yes

Could information on the actual yield be incorporated into the supporting text?

Yes HM1 paragraph 1 Revised text below.

HM1 Small-scale housing development within Alvington settlement boundary will be supported where:

Policy E2

Could the second paragraph of the policy effectively be redesigned so that it had a positive approach rather than the submitted largely double-negative approach?

Second paragraph revised text below

The NDP supports new holiday lodges/cabins/campsites/caravan sites or tourist service developments which:

1. Are proportionate to their surroundings;
2. Protects the current visitor segment's enjoyment or meet the Destinations Management Plan;
3. Preserves the unique, distinctive landscape setting and unspoilt views;
4. Protects the SAC and associated protection of agricultural/livestock farmland and historic hedgerows;
5. Does not increase or add to flooding;
6. Does not increase the volume of traffic on the lanes and add to parking in the village.

Projects

The schedule of five projects is correctly included in a separate part of the Plan.

It is also clear that they are distinctive and appropriate to the neighbourhood area.

Representations made to the Plan

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

The parish council appreciates the valued observations and comments made to the plan. We have incorporated them into the NDP Submission document.

Protocol for responses

I would be grateful for comments by 13 January 2019. Please let me know if this timetable may be challenging to achieve. It reflects the factual basis of the questions raised.

Apologies for not meeting the 13th January date. This being due to steering group members availability to meet up to review observations and address appropriate responses/clarifications over the Christmas and New Year festive season

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 concerned.

Andrew Ashcroft

Independent Examiner

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19 December 2019