

NORTH HERTFORDSHIRE DISTRICT COUNCIL

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13 February 2018

Mr Wally Steele
Preston Neighbourhood Plan Steering Group

Our Ref: LDF18/cs
Your Ref:

Cc : Mrs Margaret Trinder, PC Liaison
Mrs Lisa Lathane, Parish Clerk

Contact Officer: Clare Skeels
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By email

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Dear Mr Steele,

Preston Parish Neighbourhood Plan – Consultation Draft

Thank you for the opportunity to comment on the Preston Parish Neighbourhood Plan. We recognise the significant amount of work that has been undertaken by the Steering Group in preparation of this pre-submission consultation draft of the neighbourhood plan.

As you are aware, the Strategic Planning Team are fully engaged with the Local Plan Examination but to meet your consultation deadline I have outlined some brief, overarching comments on the Neighbourhood Plan. The following comments have been made in the context of the Proposed Submission Version of the Local Plan. However, it is inevitable that some of the policies in the Proposed Submission Local Plan will change as the local plan examination progresses and the Parish Council should take this into account as it develops the Neighbourhood Plan further.

Policies CR1, CR2 and CR3

These policies do not need to be included in the neighbourhood plan. The Community Rights to Bid, Build and Right to Reclaim Land are all subject to processes outside the planning system and as such these policies cannot be used in the determination of planning applications.

Policies QL1, QL2 and QL3

These policies, as written, are more aspirational and it is suggested that the detailed wording of these policies should be re-considered to enable them to be used effectively when determining planning applications.

Policy HD1

This policy appears to be contrary to the proposals in the emerging Local Plan, where a site has been allocated for 21 dwellings. Or is it the intention of the policy to restrict all additional future development to small scale proposals of five or fewer dwellings, unless demonstrated as an exception site?

Policy HD4

The emerging Local Plan includes an affordable housing policy which includes thresholds for the provision of affordable housing. There is no provision for development sites of below 11 dwellings to make provision for any affordable housing. If the neighbourhood plan includes a policy to restrict development to small sites (Policy HD1), below the affordable housing threshold it is difficult to see how affordable housing can be provided in the village (such as for first time buyers, Policy HD3), except through the development of an exception site.

Policy HD7

Whilst we understand the aims of this policy, should it be clarified to set out whether a shared garden would be appropriate in some circumstances, for example in a development scheme for elderly people?

Policy HD9

Currently, planning applications for extensions which are within a metre of a property boundary can be approved but it is unclear from the policy as it is currently worded whether it is intended that residential extensions at ground floor level should be at least 1m away from the boundary of the property. In the emerging Local Plan, Policy D2: House extensions, replacement dwellings and outbuildings, does give a distance for side extensions at first floor level adjoining a residential plot should be at of 1m from the boundary. In preparing the next version of the neighbourhood plan, it might be beneficial for the Steering Group to discuss this further with the District Council.

Policy HD11

The District Council does try and manage construction traffic and activity through development management decisions, by way of condition, but normally only for developments in excess of 10 dwellings. Is it intended that the policy applies to all development? In preparing the next version of the neighbourhood plan, it might be beneficial for the Steering Group to discuss this further with the District Council.

Policy EH3

Would it be appropriate to include a map of the green infrastructure to which this policy applies? As it stands, the policy is not clear and would be difficult to use in determining planning applications. It would be possible for the neighbourhood plan to designate local green spaces which would help to demonstrate which areas of open space are particularly important to the community. Local green spaces could also include the significant ponds mentioned in Policy EH10. If the Steering Group needs any assistance with preparing a map, we would be pleased to discuss this.

Policy EH4

Could the policy be clarified to establish what is meant by a "clear visual break"? Given that there is some distance between Preston and the settlements listed in the policy it would be difficult to assess whether a development would encroach on a "clear visual break".

Policy EH7

The last sentence of the policy should be deleted from the policy and included in the supporting text.

Policy EH9

Could policies HD8 and EH9 be combined into a single policy which encompasses flood risk and drainage provisions?

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Policy TC1

Following the examination hearing sessions on the Local Plan, consideration is being given to a proposed modification to the residential parking standards, which includes the provision of a minimum of 3 parking spaces for 4+ bedrooms. The Steering Group may wish to review criteria 'c)' accordingly.

Implementation Plan

It is important to note that whilst the District Council does monitor all planning applications this is undertaken with a view to collecting data about the type and locations of development that is taking place across the District. The Council welcomes the acknowledgment that the Parish Council will be monitoring the effectiveness of the neighbourhood plan.

General comments

There are a number of policies which would benefit from being clearer as they will need to be used in determining planning applications. There is guidance available from Locality and Planning Aid England which should be helpful to the Steering Group when reviewing the policies and making them as effective as possible.

I hope that these comments will be helpful to you in taking the neighbourhood plan forward to the next stage. The Council would welcome the opportunity to discuss the policies in further detail once the Steering Group has analysed the consultation responses and before the neighbourhood plan is submitted. If you would like to discuss the comments further, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clare Skeels'.

Clare Skeels
Senior Planning Officer