Uffington and Baulking Neighbourhood Plan

CONSULTATION STATEMENT: APPENDIX 6

Vale of White Horse District Council: Comments on 6-week Pre-Submission Plan

26June2018

Section/Policy	Comment	Vale Recommendation	SG response (NFA means no further action)
General requirements for neighbourhood plans: Basic Conditions	Neighbourhood plans must meet the Basic Conditions. All of these can be found in paragraph 65 of the national guidance https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum . One of these states that the "neighbourhood plan must be in general conformity with the strategic policies contained in the development plan". Up to date strategic policies are set out in the local plan, which consists of the recently adopted Local Plan 2031: Part 1 (Part 1 plan) and will be followed by the emerging Local Plan 2031: Part 2 (Part 2 plan). All of the Part 1 plan is considered to be strategic, which will be supplemented by strategic policies in the Part 2 plan. Development management policies will also be set out in the Part 2 plan. More information on the progress and expected timetable of the Part 2 plan	It is recommended the Group carefully consider how the Plan meets the Basic Conditions and why.	To be covered by Health Check (see below) A statement will be added in the NP and Basic Condition Statement to advise that the SG have been monitoring development of the LPP2 and that the NP is coherent with it – but noting that LPP2 is not yet extant.

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	is set out on our website. No sites are allocated in the Part 1 or Part 2 plan in Uffington or Baulking Parishes. Officers are aware that a Basic Conditions Statement is being prepared.		Already reflected in NP
General comments about getting a health check from an independent examiner/NPIERS as previously recommended	Neighbourhood planning is a positive tool for communities to help shape development in their area. Seeking independent advice from a suitably qualified professional on whether the neighbourhood plan will meet the Basic Conditions is strongly recommended. Two options that could be considered are to seek the views of an examiner or consultant or to carry out a health check on your plan. Officers are aware that the Group has employed consultants to assist in preparing the plan who may be able to assist in undertaking this exercise. A health check gives valuable independent insight into whether a neighbourhood plan is expected to meet the Basic Conditions and helps to inform the final submission plan. Neighbourhood plan health checks are often available from consultants and separately an independent service that was set up by various professional bodies.	A health check is advised to assist the preparation of the final submission plan.	SG have agreed to the need for an independent 'health check' to be carried out on the plan prior to submission to the VWHDC. Consultant to be asked to conduct this work and to produce a formal statement advising: • How the check had been conducted. • Identifying points for amendment in the draft NP • Stating that, subject to any amendments, he is content with it going forward for submission.
General requirements for neighbourhood plans: evidence	A neighbourhood plan should be supported by a proportionate (in the work required) and robust (to withstand scrutiny) planning evidence base. The three core evidence base documents are the	Prepare the three-core evidence base studies and consider whether amendments are required to the evidence base	To be completed in the process of compiling the Basic Conditions Statement. To be checked as part of

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base	Basic Conditions Statement, Consultation Statement and Environmental Report (SEA or SA report). These should be the primary method of demonstrating how the Plan meets requirements, to help pass the examination and ensure it can be made part of the development plan. Other evidence base documents may be submitted for examination where they have been prepared and lend support to the Plan. The volume of these extra documents should be within reason, so as not to unnecessarily delay examination. It is also worth considering how these evidence base documents are referenced for clarity in the document and to support clarity in decision making. For example, in section 4.6.2 regarding Local Green Spaces, there is no reference to the evidence. In section 4.4, there is reference to the Landscape Capacity Study, but no mention of the author. Also, if the study has been undertaken in accordance with national guidance, the Group may consider it helpful to refer to this in the plan. Officers acknowledge there are many evidence base documents available to view and comment upon alongside the draft Plan, which is helpful. Officers would advise the Group to consider the comments received through the consultation and consider whether amendments are required to these documents prior to Submission.	studies before submission following comments from stakeholders and any health check. Review whether the Plan appropriately references and refers to relevant evidence base documents.	overall Health Check (see above) NP already has several other documents (HNA, LCS etc) included as Reference Documents. Reference Document H provides the evidence supporting the proposed Green Spaces All comments received throughout the work, and including the statutory 6-week consultation, have been reviewed and action taken where considered necessary – see Consultation Report at Reference Document F

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Whole Plan	For clarity, officers advise the Plan is clear when the policies and supporting text refer to Uffington or Baulking or both. For example, Policy H2 Criteria A does not refer to either location however officers assume this only applies to Uffington.	Review the Plan to ensure policies and supporting text are clear on whether they relate to Uffington or Baulking or both locations	Actioned
Summary of Policies **Pages 7 to 9**	The plan includes a table summarising which policies meet which plan objective. Please note, the council have provided comments on relevant policies below which will also apply to this table.	N/A	NFA unless policy wording changed
Section 4.5 **Public Views** **Last sentence**	There is a sentence included that states the VOWHDC have introduced consideration of the impact upon established public views in making judgements on planning applications. Officers advise this sentence is quantified either through reference to the specific national or local policy or case law.	Revise this sentence as per comments.	References now provided
Landscape Capacity Study	The Landscape Capacity Study could reference the Vale Landscape Character Assessment which was produced as part of the Local Plan Part 2 evidence if it has been considered. Although the Neighbourhood Document does reference this. http://www.whitehorsedc.gov.uk/java/support/Main.jsp?MODULE=FolderView&ID=789122104&CODE=498F5A0A897C751630F233DEB1E72432&NAME=19.+Landscape+Character+Assessment&REF=Local%20Plan%202031%20Part%202:%20Publication%20Version%20Publicity%20Period	As per comments.	Reference to the Landscape Capacity Study (LCS) that refers to 'NP SG opinion' should instead cite specific cases such as the Gladman appeal and include formal reference to the relevant documentation. Done and reference included (part of footnote 19)
Chapter 5	The Group need to consider whether this Section	Review the content and wording	

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Housing Baulking Policies and Text	will meet the basic conditions including whether the plan and policies are in general conformity with the strategic policies contained in the Development Plan (of particular importance are Core Policies 3 and 4 of Local Plan 2031 Part 1) and conformity with national guidance and policy. Officers have the following comment to make in this regard: Baulking is referred to as a settlement within supporting text and Housing Policies H2 and H3 and there is reference to sites being considered in the setting of the settlement. The NDP Group need to consider whether these policies and supporting text, as currently worded, will meet the basic conditions. As currently worded Officers have concerns the policies are not in general conformity with the Development Plan, as previously discussed with the Group, and national policy. Officers recognise the work the Group has undertaken to draft this policy. There is a sentence under 5.8.3 regarding built up area and Baulking which is confusing. Officers note the Group have produced a 'Baulking Housing Policy Evidence' to support the policies.	relating to policies and supporting text in relation to Baulking to ensure the Group consider they meet the basic conditions.	Vale officer concerns about 'general conformity' of Housing Policy H3 are noted The substantive evidence document supplied to justify the Policy fulfils the guidance as indicated at Paragraph: 074 Reference ID: 41-074-20140306 of the NPPG. NFA, unless VWHDC clarify further what is required Now 4.8.2 – have added clarifying words as Baulking did not have a 1970s Village Plan showing a village envelope
Chapter 5 Housing 5.7.2 call for sites and 5.8.4 Infill	Officers would like to highlight some inconsistencies in this section for the Group to consider. The plan is supported by a Housing Needs Assessment concluding that 19 net homes are needed in the plan area to meet the need. The	Review the Housing Section to ensure a consistent position is presented supported by evidence	SG decided that there is potential capacity in the built area and farmyards/agricultural buildings, as well as at the Baulking settlement, to build 19 homes and that H1 would not be amended to refer to 'land adjacent to'.

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	Plan then states the area can accommodate this amount through infill and will not need to allocate any sites. However, the Plan then states that 19 dwellings are unlikely to be built within the built-up area and thus sites adjacent to the built-up area will be needed. Officers would advise the Group to consider the evidence they have to support these positions which are contrary to one another. If the evidence demonstrates the latter is correct, the Group will need to consider how the Plan enables sufficient supply to come forward to meet the need.		All supporting text has been made consistent and unambiguous as identified. See revised text
Section 5.8.5 Brownfield Sites	Officers would advise the Group to consider the evidence they have to support the Plan's content on this matter.	Review the Plan's evidence on this matter. If there is evidence, refer to this in the Plan.	Text in 4.8.4 reviews the factual position
6.3 New Building outside, or on the edge of settlements	Reflecting officer comments above regarding inconsistencies of supporting development adjacent to the built-up area, this section implies the Group support development adjacent to the built-up area.	Review the Plan's policies	Supporting text has been made consistent (see above)
Policy D2	Officers advise the Group to consider this policy alongside its Housing Policies as there is a potential contradiction. Policies H1/2 support smaller dwellings however Policy D2 states low density of large dominant	Review the Plan's policies.	Policy D2 adjusted to clarify meaning with regard to proposals for large houses

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	house will be maintained.		
Equality	Great to see that the parish has completed an Equality Impact check on the Plan and that all development proposals shall accord with the principles in the Vale design guide. Based on policy H1, it does not sound like there is likely to be a lot of new housing, however, it is good to see the housing mix being proposed. There is no reference to M4 (2) category 2: Accessible and adaptable dwellings and M4 (3) category 3: Wheelchair user dwellings, but this could be because the developments would not be large enough to justify these design standards. Consider whether reference to this matter is relevant to the NDP.	As per comments.	SG to review and reword as necessary