

Preston Parish Neighbourhood Development Plan
Parish Council Response to Examiner's Clarification Note

Questions for the Parish Council

Policy HD1

Is this policy necessary?

To what extent does it add any value to the relevant policy in the emerging Local Plan?

The Parish Council are of the view that this policy is necessary because it provides the opportunity for phased development, while at the same time reinforcing the need and requirement for affordable housing which is included in the emerging Local Plan policy.

Policy HD2/3/4/6/7

Are these policies intended to apply simply to the allocated site (HD1)?

Or is it intended that they would apply both to the allocated site and to any proposal which may come forwards as a result of Policy HD10?

It is the intention that these policies apply equally to the allocated site and to any other development proposals which may come forward.

Policy HD7

As submitted, it is not written as a policy. Is the intention that the first sentence should read along the lines of 'All new homes should be developed to include a garden of a scale appropriate to the size of the dwelling'?

The Parish Council accept this suggested amendment to the first sentence of the policy.

Policy HD8

The initial sentence does not have the clarity required by the NPPF.

Does 'should avoid' mean that such developments 'will not be supported'?

In what circumstances would proposals be supported 'where development is necessary'? How would the District Council be able to apply this element of the policy clearly and consistently?

We agree with these comments. Do you suggest that the first sentence is changed to read: "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk, whether existing or future?"

Policy HD11

Is this a policy or supporting text to Policy HD10?

The intention is for this to be a policy covering a different aspect from HD10, to include all new homes and other new developments.

Policy EH1

For clarity should the village boundary be included within the Neighbourhood Plan itself?

Yes. We think the village boundary should be included within the Neighbourhood Plan. Map attached.

Does the Parish Council support the definition of the village boundary and the relevant local plan policy?

The Parish Council supports the definition of the village boundary and the relevant Local Plan policy. When responding to the Local Plan 2011 – 2031 Submission Version in October 2016 the Parish Council examined the tests of soundness questions and decided that they had no justification in objecting to the proposed village boundary.

When looking at the policies of the Local Plan, particularly SP2, the Parish Council decided that it had no grounds for saying that site PR1 was unsound and it had no alternative location to put forward. It was agreed that the Parish Council would support this site, bearing in mind that there is a need for suitable housing particularly for younger people in the Parish. It also seemed fair that Preston should have some allocation towards the national housing need.

The Parish Council has maintained this view during the production of the Neighbourhood Plan and supports its policies.

Policy EH4

The assessments in Appendix C have been well-developed. However please can I have a version of the map on page 76 which highlights the seven proposed LGSs.

Map attached as requested.

I can see that the policy identifies exceptions to the otherwise restrictive policy. On what basis has the Parish Council sought to identify the ‘very special circumstances’ as mentioned in the NPPF?

Should they be supporting text rather than policy?

The Parish Council commissioned a survey of green and blue spaces and accepts the assessment made.

The Parish Council note that policies for managing development within a Local Green Space should be consistent with those for Green Belts and that an exception which would be relevant to a local green space might be paragraph 146(e) of the NPPF - ‘material changes in

the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds)'.

The Parish Council would not accept building in any of these open spaces unless the loss resulting from the proposed development would be replaced by better or equivalent provision in terms of quality and quantity in a suitable location.

The Parish Council are willing to add the exceptions to the supporting text. However, they note that the NPPF encourages Neighbourhood Plans to include Local Green Spaces and the Parish Council are of the view that these have greater protection by being in a policy rather than in supporting text.

Policies EH5/EH6/EH7

The various policies eventually become policies. However, in each case the policy is prefaced by supporting text.

I am minded to recommend that the initial parts of each of these policies are repositioned into the supporting text. Does the Parish Council have any comments on this proposition?

The intention with the introduction was to add clarification to the policies. The Parish Council are of the view that the policies may be weakened by the removal of this text.

Basic Conditions Statement

I can understand the approach taken in Paragraph 5.2.

However, it acknowledges that the submitted Plan is not in general conformity with the existing (albeit dated) adopted development plan?

Has the Parish Council directly considered this matter and the ability or otherwise of the Plan to meet the basic conditions?

When the second submission version of the Preston Parish Neighbourhood Plan and the Basic Conditions Statement were finalised in February 2019, it was anticipated that the Inspector's report for the NHDC emerging Local Plan 2011- 2031 would have been published when the Neighbourhood Plan went to examination and that it would then meet the basic conditions.

The Parish Council now realise that with the recent letters from the Local Plan Inspector to NHDC that circumstances have changed and that as it stands at the present time the Neighbourhood Plan does not meet the basic conditions.

The Parish Council would, therefore, accept appropriate modifications to the Neighbourhood Plan which would enable it to meet the basic conditions so that the Plan can move on to the next stage.

Representations

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

The Parish Council have comments on the following representations made to the Plan:

Objective T4: CPRE: The Parish Council has discussed these suggestions for traffic calming measures and is of the view that none of them are viable options for Preston at the present time.

Policy QL2: HCC: The Parish Council agrees that the suggested additional wording should be included in the policy.

Policy AF1: NHDC: The Parish Council agrees to the proposed changes to this policy.

Policy HD3: NHDC: The Parish Council agrees that the wording is unclear and suggest the title becomes: Housing Types and Styles.

Policy HD10: NHDC: The Parish Council agrees with the amended wording.

Policy EH2: NHDC: The Parish Council agrees that this should become two separate policies and suggest they are called Conservation Areas Development and Conservation Areas and Heritage Assets. The policies will encompass both Conservation Areas in the Parish.

Policy EH3: NHDC: The Parish Council agrees with the suggested amended wording.

Policy HERC 2: HCC: The Parish Council agrees to the addition of “or the prevailing metric” to this policy.

Appendix C: HCC: The Parish Council agrees to these suggestions.

Appendix D: HCC: The Parish Council agrees to these suggestions

Chapter 10: HCC: The Parish Council notes that reference is made to GLVIA3 Policy EH6. The Parish Council acknowledge HCC’s concern that it should be clearer that the definition of GI includes both green and blue assets and would agree that the word ‘blue’ should be included in paragraphs 10.18, 10.23 and 10.24 so that in each case it reads green and blue spaces.

Appendix C: HMWT: The Parish Council notes the developments to the DEFRA biodiversity and the NPPF and is happy for the policies and texts to be amended as required.

Appendix D: HMWT: The Parish Council notes the recent developments mentioned and are happy for sections of this chapter to be amended as required.

Project List: NHDC: The Parish Council has decided on two possible projects: a section of astro turf to be provided on the Recreation Ground, probably behind the cricket nets, so that there is the opportunity for football and other ball games by village youngsters. An updated modern kitchen in the village hall is the second suggestion.

Organisations:

CPRE: Campaign to Protect Rural England
HCC: Hertfordshire County Council

NHDC: North Hertfordshire District Council
HMWT: Hertfordshire and Middlesex Wildlife Trust