East Coker Neighbourhood Plan Regulation 16 Consultation Summary of main comments received

*Plus initial Responses of East Coker NP Group/Parish Council – June 2018*

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| **Part of Neighbourhood Plan** | **Comment** | **Initial Responses of East Coker NP Group/Parish Council** |
| General comment about schools | Up to date admission figures, County policy on building of schools etc and school transport costs should be made available. | ***Noted: Somerset CC an provide*** |
| The Plan as a whole | A large proportion of Parish respondents express general support for the Neighbourhood Plan.  There are a number of typographical and numerical errors; and of fact. | ***Noted*** |
| Section 2 -National and Local Planning Context | It would be prudent to await the outcome of the recent Local Plan Review Issues and Options Consultation and to the consultation on proposed changes to the NPPF before assessing the implications on the Neighbourhood Plan, to avoid the need for its early review.  Once adopted, which is programmed to be in 2020, the Reviewed Local Plan will replace the current Local plan and extend local planning policy to 2034. The Issues and Options Consultation Document suggests that the new Local Plan will be quite a lot different to the current Plan. It would be a better approach for the Neighbourhood Plan to align with the new Local Plan or it will quickly expire.  The recent PPG update makes clear that neighbourhood plans should conform to national policy requirements and the need to include a presumption in favour of sustainable development; take account of the latest evidence of housing need; and support strategic development needs set out in local plans. They should set out a clear and positive vision for the future of the area and include policies which provide a framework within which decisions on planning applications can be made. The revised PPG refers to a number of component parts of the evidence base that are required to support neighbourhood plans, to undertake a review where the evidence is less robust; and to include a policy relating to this intention.  Neighbourhood plans should not seek to restrict housing development in settlements or prevent others from being expanded and it is in these regards that there are reservations that the East Coker Plan does not meet the required Basic Conditions (a) and (d). | ***This matter has been considered as part of comments on the Regulation 14 consultation. The NP has taken many years to get to the current stage and there is a strong impetus to compete the plan as soon as possible. This a community based initiative that needs to be completed. It is recognised that there will always be some changes taking place in planning but the Local Plan Review is only at initial Issues and Options stage and it will be many years before it is adopted. In particular, adoption by November 2020 after an estimated Inquiry in June is considered to be an extremely optimistic timetable. The NP does not allocate specific sites for development and so the likelihood of it being significantly out of date quickly is considered limited. Sites allocated in the current Local Plan on the edge of Yeovil with EC parish do not yet even have planning consent and are phased to 2030.***  ***There is no restriction of house building planned for East Coker as there is a site for 800 houses referenced in the NP, as well as other development.***  ***See Documents CS 24& 25 on the Neighbourhood Plan website for further information.***  [***http://www.eastcokerparish.com/consultation-statement/***](http://www.eastcokerparish.com/consultation-statement/)  ***There is therefore no basis or sound reasons to hold up the plan for many years*** |

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| Objectives | Housing – Affordable housing for people who work in the village should be provided. Employment – support improvement and expansion; and a range of further business, including home working. No further agricultural land should be lost to support farming. Transport – a pedestrian priority should be provided along the lanes  Recreation – the use of footpaths and walking should be encouraged.  Conservation, Design and Landscape – urgent action is necessary to prevent further loss of flora and fauna | ***Noted. These matters are left to be considered by the appointed Examiner*** |
| Policy EC1 | The NP should set out how the Parish will respond to engagement by a developer with the local community. The arrangement needs to be reciprocal.  Whilst the new housing requirement is expressed as a minimum, it is believed that the Policy still unnecessarily restricts the scale of development proposals coming forward to meet identified housing needs. There is no evidence to suggest why it is appropriate to limit development to around 54 dwellings. The Parish extends to the urban edge of Yeovil and as such it is not appropriate for all development to be measured against Policy SS2 of the Local Plan. | ***This is explained further in the plan itself. East Coker is a ‘Rural Settlement’ without a development boundary; a change made by the Planning Authority. It is not a larger settlement where significant growth is planned but more akin to ‘open countryside’. The plan strikes the right balance between accommodation both major, strategic growth plus some other more local growth.*** |
| Para 5.4 | There should be an assessment of flood risk in the area; mitigation schemes developed accordingly; with improved road drainage; and better landscape and water management. | ***This is complex area of work which is best considered by the Environment Agency and Local Authorities.*** |
| Policies EC2, ECCF1 and ECCN6 | The Tellis Cross play area is privately owned and leased to the District Council; and consultation with the freehold landowners about its future should be referred to as a project action. It should be omitted until its long term provision can be secured.  Paragraph 77 of the NPPF states the criteria for designation of Local Green Space – it also states that designation cannot be used to provide additional public rights of access. | ***Noted. These matters are left to be considered by the appointed Examiner*** |
| Policy ECH2 | Good quality design need not necessarily mean repeating the past – innovation and distinctiveness should not be prevented and the Policy should be amended accordingly. | ***Noted. These matters are left to be considered by the appointed Examiner*** |
| Policy ECH3 | Para 3 – the Policy is too onerous; it does not reflect National or Local Plan policy and it may not be viable. It should be rewritten to enable requirements to be clearly calculated. | ***Noted. These matters are left to be considered by the appointed Examiner*** |

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| Policy ECH4 | The specific tenure requirement is inflexible and does not comply with the emerging NPPF or Local Plan Policy. | ***Noted. These matters are left to be considered by the appointed Examiner*** |
| Policy ECEM3 | The requirement that businesses and social enterprises should only meet the needs of the community is overly prescriptive and might restrict diverse economic activity. | ***The policy does not preclude others.*** |
| Para 8.12 | The provision of another car park on the boundary of the Conservation area does not seem appropriate given that the Village Hall car park is not fully utilised. | ***The reasons are explained in the plan*** |
| Para 8.19 | Due to its historical significance, the Monarchs Way footpath should be mentioned in the text. | ***Noted. These matters are left to be considered by the appointed Examiner*** |
| Policy ECCN1 | The setting of heritage assets is important - the two ancient monuments of Roman Villas in Dunnock’s Lane and the Chissels are not shown on the Plan. The settings of the Conservation areas should also be shown – the Yeovil Historic Environment Assessment could be used for this.  It is not clear whether the term “the Council” refers to the Parish or District Council. The Policy does not reflect Local Plan Policies or the emerging NPPF. | ***Noted. These matters are left to be considered by the appointed Examiner***  ***The NP will be used by EC Parish ‘Council’ to advise on applications and also SSD Council as Planning Authority once it is made.*** |
| Policy ECCN2 | The Policy is unclear and there is no justification for the stated heritage assets to be elevated in status to ‘Non Designated Assets’. As presently drafted, the Policy offers no specific guidance to users of the Plan. | ***Noted. These matters are left to be considered by the appointed Examiner***  ***This was added in response to comments made on the Reg. 14 version of the Plan.*** |
| Para 10.12 | Would like to see an extension of the Conservation Areas – there should be an appraisal and review.  The Parish Council should be fully involved and take proactive role in any changes to the Conservation Area; these should not be left to the District Council alone. | ***Noted. These matters are left to be considered by the appointed Examiner*** |
| Policy ECCN4 | Neighbourhood Plans should not be used to create additional policy burdens which have not been fully justified. Such burdens may make development unviable and are not compliant with the NPPF or the adopted Local Plan.  The Policy should be more flexible in order for schemes to respond to specific sites and the character of the local area. | ***Noted. These matters are left to be considered by the appointed Examiner*** |

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| Policy ECCN7 | New development can often be located in areas without eroding views considered to be important and can be designed to take account of the wider landscape features. To be valued, a view would need to have some form of physical attribute – the Policy must allow a decision maker to come to a view as to whether a location has such features of landscape significance that would “take it out of the ordinary”. | ***This is matter that would be considered in any planning application. But it has to be remembered that East Coker is defined as a ‘Rural Settlement’ without a development boundary in the local plan with all the implications of restraint that this implies.*** |
| Policy ECCN8 | High quality agricultural land should always be protected as a resource for future generations so the clause “unless there is no practical alternative” should be removed. | ***This is considered to be a realistic proviso , but the matter is left to be considered by the appointed Examiner*** |
| Policy ECCN9 | The Policy should make a distinction between national and local designated sites – Para 113 of the NPPF refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites and landscape areas and the Policy should be amended to be consistent with this approach. | ***Noted. These matters are left to be considered by the appointed Examiner*** |
| Light Pollution | There is no reference to the importance of retaining dark skies. | ***The NP does not necessarily address All issues and the matter is left to be considered by the appointed Examiner*** |
| Replies of No Comment | Clinical Commissioning Group,  Historic England  Highways England  National Grid – no record of apparatus within the area. | ***Noted*** |

**East Coker Neighbourhood Plan Group & Parish Council**

**June 2018**