

Blyth Neighbourhood Development Plan
Examiner's Clarification Note – dated 22 October 2019

Further to our initial response to you dated 30 October 2019, please find below our further considerations on the final item on your Clarification Note regarding 'Representations'.

If you wish to seek additional clarification, we will only be too happy to engage with you again.

Representations

Does the Parish Council wish to comment on any of the representations made to the Plan? In particular does it wish to comment on the representation from Heyford Developments in general terms, and the Sustainability Appraisal and Policy 8 in particular?

Key Issues

The Parish Council disagree that this amendment proposed by Heyford Developments. This section of the Plan summarises the main issues that were identified from the research undertaken to produce the evidence base document the Sustainability Appraisal Scoping Report. This is not the appropriate section of the Plan to outline or indeed confirm the 'role' of the Plan.

Community Objectives

The Parish Council also disagree with this proposed amendment. The requirements of the current and future population of Blyth are intrinsically linked to the growth requirements of the village set out within Strategic Policy, which this Plan complies with. Therefore, the proposed amendment is not needed as it is merely repetition.

Section 6: Neighbourhood Development Plan Policies

The current paragraph is deemed to appropriately reflect the NPPF with its current content. All the proposed housing allocations included in the Plan are deliverable and sustainable, as a result of the comprehensive 'Site Allocation Assessment' undertaken in partnership with BDC, utilising their approved methodology.

The 'Reviewing the Neighbourhood Plan' section adequately covers the review process and will allow for future modifications to reflect any change in circumstances at a District level. This review mechanism has been included because it replicates best practice currently utilised for Neighbourhood Plans across the country.

Policy 2: Housing Design and Layout

Whilst the NPPF requirement for making efficient use of land is accepted. Paragraph 122 also indicates; "the desirability of maintaining an area's prevailing character and setting; the importance of securing well-designed...places".

The dwelling per hectare figure utilised in the Site Allocation Assessment Report gave heed to this principle, by applying the average development density for the area of the village that Site BDC03 was located within. This figure was provided by BDC and the approach was in-line with their approved site assessment methodology that was utilised for the preparation of the report and consequentially the Neighbourhood Plan as well.

Section 6.7: Allocation of Sites

As has been indicated above, the Site Assessment methodology utilised in the production of the Plan was produced by BDC and it has been used effectively for the production of a number of 'made' Plan's that allocate sites for residential development.

It is accepted that the approach should mirror and ensure compliance with the District wide approach, which is why the methodology used was indeed prepared and approved by BDC directly.

The concern and objection raised to the 'weight' given to local support in this methodology is however strongly opposed by the Steering Group and Parish Council. This document is a 'Neighbourhood Plan', not a Local Plan, the involvement and views of the local population are deemed equally as important as more technical constraints and deliverability concerns. The methodology for assessing sites prepared by BDC and utilised by the local community in selecting development sites is deemed to strike an excellent balance amongst these often-competing areas and has been equally well received and reviewed through examination on a number of occasions for various 'made' Plan's across Bassetlaw.

The utilised methodology ensures that only sustainable and deliverable sites that are supported by the local community will be included as allocations in the Neighbourhood Plan, ensuring that all Basic Conditions are met by the Plan and its supporting documents.

Policy 8 – Spital Road (BDC03)

As has indicated, the methodology utilised for assessing and including sites for development in the Plan was produced and approved by BDC. The deliverability of the site is taken into consideration as part of this methodology, notably whether the current landowner has indicated the site is available for development as well as whether there are any 'significant' constraints that would impact the deliverability of the site for development.

The Neighbourhood Plan is rightly limited in its power and consequentially as with all Planning Policy documents, is a policy-based document, providing the right Policies to ensure sustainable development and growth can be delivered across the Plan area for the identified timeframe. The deliverability elements of development sites that can be tested and analysed at the Policy stage have indeed been considered and tested appropriately. Further deliverability work relating to the viability of a specific scheme for the site is not within the remit of this Neighbourhood Plan, equally it is not within the direct remit of any Planning Policy document.

Ultimately, the review mechanisation built into the Plan will allow for future review and modification as and when required. This approach is in line with all guidance and regulations and replicated in all 'made' Plan's across the Country. If the site in question is not 'delivered' due to currently unforeseen or unknown issues then it will be reconsidered during the review stage and any modifications to the Plan will be implemented as required.

Aside from the Policy requirements specifically provided in Policy 8, reflecting statutory comments made, the Parish Council and Steering Group have no comments to make on the detailed design and layout of the site.

With regards to access, the relevant authority has already provided comment during the Site Assessment process and indicated "No objection in principle subject to satisfactory details of access and Transport Assessment should the development exceed 80 dwellings." It is therefore felt that no further comment on this matter is required.

Potential impacts on heritage of the site was considered in detail by the appropriate authority through the Site Assessment process. They concluded "With the above in mind, Conservation has no concerns to the principle of development, subject to consideration of the views of the church, together with suitable design, layout, scale, materials and boundary treatments." The adjoining site (NP09) is a single dwelling back garden site to the rear of a non-designated heritage asset therefore comments regarding the impact of these sites rightly reflected this.

A masterplan for the site is not required for its allocation as a development site in the Neighbourhood Plan. As has been indicated, the Plan provides the Policy context identifying what an acceptable and sustainable proposal for the site should consider and address. The comment that the draft allocation will not lead to sustainable development is strongly refuted. A comprehensive approach was taken to identifying suitable sites for development, prepared and approved by the planning authority for the area, ensuring that all matters that may impact deliverability and sustainability were considered and discussed. This process confirmed that subject to a number of necessary mitigation requirements, the identified site was suitable and capable of delivering sustainable development.

Land at Park Farm (NP08)

BDC Planning Policy

It is acknowledged this is an error in referencing and should read 'Blyth Hall unregistered park and garden' which is directly to the west of site NP08. The comment provided does not indicate that development 'would' have an adverse impact, rather that it is deemed 'likely' to do so.

Conservation

These comments were provided by the relevant authority as part of the site assessment process and the Parish Council and Steering Group have no further comments to add. As indicated in the Site Assessment methodology, all sites were considered in the framework of

their 'suitability' for allocation for development in the Neighbourhood Plan, not in the context of specific development schemes for the site, as this would not ensure a fair and transparent process for all sites involved. The Parish Council are not aware if any specific scheme was submitted to BDC that was also considered with regards to the comments provided and therefore cannot comment further on this matter.

It is acknowledged that an 'acceptable' scheme for the site may be possible. However, it is not the Parish Council's position or responsibility to make these decisions as this rests with the relevant statutory authority.

As alternative sustainable sites were identified through the Site Assessment process that then received support from the local community, these more 'deliverable' sites were taken forward and included in the Plan.

The Neighbourhood Planning process is also not an endless one. Where delay has to be applied to allow for the addressing of all statutory consultee comments and objections, it has. Ultimately, sites with less obvious constraints were identified that allowed the Blyth Plan to meet its identified growth requirements, if this was not achieved, then alternative sites may have been looked at in more detail, this however was not required.

Highways

This is a misunderstanding of the text provided in the Site Assessment Report, the conclusion is simply describing which authorities the comments considered were received from. It is accepted this is not clear however. For clarity, Highways did not indicate any issues with the site.

Summary

Information on all consultation events is provided in the 'Consultation Summary' document and further evidence can be provided as required. All sites were presented on an equal footing to ensure transparency and fairness in the process. The site proposed by Heyford Developments was not supported by the local community as the Site Assessment Report highlights.

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