

## Comments

### Main Modifications to the Local Plan (18/02/19 to 01/04/19)

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|---------------------------|--|
| <b>Comment by</b>         | Cllr Sam Chapman-Allen (1205227)   |
| <b>Comment ID</b>         | 85   |
| <b>Response Date</b>      | 28/03/19 10:36   |
| <b>Consultation Point</b> | Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries ( <a href="#">View</a> ) |
| <b>Status</b>             | Processed  |
| <b>Submission Type</b>    | Web  |
| <b>Version</b>            | 0.1  |

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM17 removes the dwelling threshold of 5 dwellings from Policy HOU4 along with the words 'minor development' from criterion 1. The effect of this modification is that it would potentially allow larger scale developments (10 or more) on the edges of villages with boundaries. The provision of larger scale development could result in disproportionate additions to the character and appearance of some rural settlements, and the wording could lead to inconsistent implementation by relying only on the use of overly ambiguous terminology such as 'an appropriate scale and design' without further quantification. If it was known in advance that major developments would potentially have been allowed as single sites you may have seen heightened concern from rural parishes at the previous publication stage.

The above point applies equally in relation to the Main Modifications proposed to Policy HOU5 (Small villages and hamlets outside of settlement boundaries) where the words 'minor development' have been removed, as has the dwelling threshold of 3 dwellings. The removal of this wording renders the policy ineffective as again, this could result in disproportionate additions to the character and appearance of some of our smallest rural settlements. The removal of the point 3 of HOU 05 also removes the need for local consensus which the Members believe is important for developments in very rural areas.

The removal of the wording 'in exceptional circumstances' from the first paragraph of HOU5 and the absence of any percentage 'cap' on the quantum of dwellings that could come forward under this policy may mean that either individually or more likely, cumulatively, a disproportionate scale of development could come forward in these very small settlements, possibly in excess of the quantum that could come forward under HOU4.

In my Ward, Policy HOU5 as modified could result in small estate scale development in Croxton village as the term 'appropriate scale' does not give sufficient guidance as to how the policy can be applied and is open to significant debate. The text in the reasoned justification at paragraph 3.27 of the plan provides little comfort as to when the cumulative scale of development in such places might or might not be reached.

**Do you consider the proposed modification is:** . Sound?  
(please mark the appropriate box)

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?** . Is it positively prepared?  
. Is it justified?  
. Is it effective?

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?**

It is important that I highlight to you that the rural housing policies presented in the Local Plan were the subject of significant local engagement and debate by the Council over a number of years. These policies sought to provide for a more organic approach to development in our smaller villages, and in other small rural settlements and hamlets, that have, in the past suffered from developments that have resulted in harm to local character. The intention of Policies HOU4 and HOU5 was therefore to provide locally distinctive policies that give a clear and consistent approach to guiding development in our smaller villages that have retained their settlement boundaries, but also allowing modest growth in our smaller hamlets to support their viability.

With the above context in mind, it is considered that that the Main Modifications proposed to Policies HOU4 (Villages with Settlement Boundaries) (MM17), and HOU5 (Small villages and hamlets outside of settlement boundaries) (MM18) as currently drafted are unsound. The amendments made by the Inspector fundamentally changed the meaning and outcomes of these two policies. Given this change the Members and I believe the modifications fail the test of soundness which seeks to establish whether the Local Plan is effective.

**Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.**

Revert back to original recommendations on the policy which the Council presented.

**Would you like to be notified of future stages of the Local Plan?** Yes

**How would you like to be notified?** . By email to my email address

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| <b>Comment by</b>         | Cllr Sam Chapman-Allen (1205227)                           |
| <b>Comment ID</b>         | 84   |
| <b>Response Date</b>      | 28/03/19 10:33   |
| <b>Consultation Point</b> | HOU 04 - Villages with Boundaries ( <a href="#">View</a> ) |
| <b>Status</b>             | Processed  |
| <b>Submission Type</b>    | Web  |
| <b>Version</b>            | 0.1  |

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**Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.**

Revert back to the previous wording as presented by Members of this Council and which we engaged and consulted our communities on.

**Would you like to be notified of future stages of the Local Plan?** Yes

**How would you like to be notified?** . By email to my email address