

[REDACTED]

From: [REDACTED]
Sent: 20 October 2020 09:42
To: [REDACTED]
Subject: Fwd: Southwick Neighbourhood Plan Regulation 14 Consultation - Southwick Neighbourhood Development Plan Comments Form
Attachments: NDP_R14_Comment_Form Fillable_191020(2).pdf

FYI

Kind regards

[REDACTED]
Sent from my iPhone

Begin forwarded message:

From: Nicola Duke <southwickclerk@gmail.com>
Date: 20 October 2020 at 09:25:12 BST
To: [REDACTED]
Subject: FW: Southwick Neighbourhood Plan Regulation 14 Consultation - Southwick Neighbourhood Development Plan Comments Form

Nicola Duke B.A (Hons), FSLCC
Parish Clerk
For and on behalf of
Southwick Parish Council

From: [REDACTED]
Sent: 19 October 2020 21:37
To: Nicola Duke <southwickclerk@gmail.com>; Southwick Clerk <Southwickclerk@outlook.com>
Subject: Southwick Neighbourhood Plan Regulation 14 Consultation - Southwick Neighbourhood Development Plan Comments Form

Dear Southwick Parish Clerk,

Please find the attached comment form which is apparently required to be returned by the deadline, although I was not aware that there is any prescribed form for the purposes of a Regulation 14 consultation.

Unfortunately, I do not know how to fill it in on-line, so please accept this e-mail in lieu as my duly-made comments/ objections.

In respect of Sections 1 and 3 of the Draft Plan, it seems to me that these are being overtaken, or have already been overtaken, by the changes to national planning policy in course of implementation by the current Government, particularly its "Changes to the current planning system" consultation document, which in combination severely limit both the effective scope and duration of neighbourhood plans, and render this Draft Plan in particular hardly worth pursuing (apart from the financial benefit to Southwick Parish

Council of the 10% increase in its share of the Community Infrastructure Levy until it is abolished).

The ten policies summarised in Section 8 of the Draft Plan all need to be re-evaluated in the light of these changed circumstances, because even if technically they can still remain in the Draft Plan, they will largely, if not entirely, be overridden/circumvented by the changes to national planning policy already implemented or likely to be implemented very shortly.

Draft policy 1 in Section 9 of the Draft Plan seeks to create a Landscape Setting Gap by a non-statutory countryside designation of the areas of land shown on Map 1. This is at odds with the NPPF, which indicates that only statutory countryside designations should be recognised for the purposes of planning policy.

In any event, I consider that, east of the A361, the north-western boundary of the Landscape Setting Gap policy area shown well inside the current parish boundary with Trowbridge will lead to a greater and more rapid encroachment of the urban extension of Trowbridge into the parish than is currently proposed/likely without it. So if this policy is to be retained, it should in my opinion only exclude the actual plots of the 180 dwellings shortly to be permitted in the vicinity of Southwick Court (in accordance with Policy H2.6 of the Wiltshire Housing Site Allocations Plan, adopted in February 2020), but include everything else in this absurdly excessive allocation site covering the entire length of the parish east of the A361.

In Section 10 of the Draft Plan, there does not seem to me to be any point in Draft policy 5a allocating the site shown on Map 7 for 8 dwellings (flats). The entire site is already within the Settlement Limits for Southwick in the adopted Wiltshire Core Strategy and is too small to require any affordable housing; so Draft policy 5a duplicates and adds nothing of value to the existing position, and its stated requirements are in any event likely to be overridden/circumvented by the existing provisions for residential development within Settlement Limits in the adopted Wiltshire Core Strategy. I fear that readers of the Neighbourhood Plan will assume that it somehow outranks the Wiltshire Core Strategy, so will be misled into placing special and unmerited reliance on it.

Also in Section 10 of the Draft Plan, the methodology by which Draft policy 5b and the site shown on Map 8 (Land off Wesley Lane Site Allocation) were preferred and selected is hopelessly confused, obscure and fatally flawed.

The opening text of Section 10 of the Draft Plan indicates that the quantum of 27 dwellings was specifically selected to deliver the 8 affordable homes sought by Wiltshire Council in its Housing Needs Survey of 2018. However, it is now clear from the "Changes to the current planning system" consultation document that the threshold for affordable housing is to be raised to 40-50 dwellings, so an allocation site of only 27 dwellings will not be required to make any provision at all for affordable housing, and thus will not deliver any of the 8 affordable homes noted above. Because of the 180 dwellings already proposed for the Southwick Court site under Policy H2.6 of the adopted Wiltshire Housing Site Allocations Plan. I do not think there is likely to be any significant shortage of market new dwellings in the parish in the foreseeable future, so the rationale for any further housing allocation in the parish no longer exists

In any event, the site at Wesley Lane proposed in Draft policy 5b has numerous shortcomings and is not fit for purpose.

Indeed, my understanding is that the owner has not even put it forward for residential development, so the chances of it being built out quickly, or even within the Plan period, are slight, and it cannot therefore realistically deliver on the stated objectives of the Draft Plan.

The field in question is far too large (at least 4 hectares) for an allocation of only 27 dwellings, and even if only 1.6 hectares of it is in fact proposed to be allocated, that is still at the absurdly and unrealistically low density of under 17 dwellings per hectare. Any experienced developer would seek planning permission for at least 50 dwellings on a greenfield site of 1.6 hectares such as this, and would get it on appeal, whatever the objections of the Local Planning Authority and the Parish Council. There is no support amongst electors for further residential development on this scale in the parish.

There is also no adequate explanation in the Draft Plan of the need for such a large (or indeed any) "Area of search for on-site mitigation in line with TBMS" as shown cross-hatched on Map 8. This seems to me simply a device to prefer this site over others.

At a cost, the site at Wesley Lane can certainly be drained adequately for residential development, but that is equally the case for all the other potential sites referred to in [10.4] of the Draft Plan but not selected for unspecified reasons. The references to surface water flooding and to drainage in the text of Draft policy 5b seem to me simply to insinuate incorrectly that other potential sites are incapable of residential development for these reasons.

In respect of Draft policy 6, also in Section 10 of the Draft Plan, clearly it duplicates similar provisions in the Wiltshire Core Strategy and adds little, if anything, to the Development Plan for Southwick. Like Draft policy 5a above, I fear that readers of the Neighbourhood Plan will assume that it somehow outranks the Wiltshire Core Strategy, so will be misled into placing special and unmerited reliance on it.

In respect of Section 11 of the Draft Plan, the issue again is whether Draft policy 9 adds anything to the existing provisions of the Wiltshire Core Strategy or merely duplicates them. The references to a post office in Draft policy 7 and to the Frome Road allotment sites in Draft policy 8 give them at least some non-generic content specific to Southwick, but overall, I am still doubtful that they add much to the existing provisions of the Wiltshire Core Strategy either.

In respect of Draft policy 10, I question whether the Draft Plan should seek to pre-empt how either Wiltshire Council or Southwick Parish Council spend either Section 106 funds or its share of CIL monies. I regard that issue as well outside/beyond the remit of the Southwick Neighbourhood Plan, In any event, it appears that both are to be abolished in the near future.

In respect of Section 12 of the Draft Plan, I do not support the use of Neighbourhood Plans to promote Non-Planning Actions, and I am doubtful that the evidence base for the Draft Plan is anywhere near sufficient to demonstrate that the three issues stated correspond with those chosen by the majority of electors in the parish.

Yours sincerely,

|

|

,