

Clutton Regulation 16 Neighbourhood Planning Consultation Responses

Date	Consultee	Comment format	Comment
11 th March 2015	Highways Agency	Email	<p>Dear Julie</p> <p>Thank you for consulting the Highways Agency on this stage of the Clutton Neighbourhood Plan.</p> <p>As Clutton is located at some distance from the strategic road network the proposals in the plan will not have an adverse impact on it, we therefore have no comments to make on them.</p> <p>Regards</p> <p>Jacqui</p> <p>Jacqui Ashman, Asset Manager</p>
30 th March 2015	Rosemary Naish (Chair of the Clutton Parish Council and NDP Coordinator)	Email	<p>As one of the steering group who worked on the pavements, street lights and parking policies I would like to submit the following comment on CNP20.</p> <p>The prime objective of this policy is to address the issue of pavement parking, but we also hope that there might be a knock-on effect on the price of smaller starter homes. Making maximum use of space is always an issue on new developments, and having a garage, even if it is too small to park a car in, adds a premium to the price of the house. We hope that if a developer has to provide off road parking space regardless of whether there is a garage or not, then on smaller/starter homes the garages might be omitted, thus lowering the price for those trying to get on the housing ladder.</p> <p>Rosemary Naish</p>

14 th April 2015	Natural England	Email	<p>Planning consultation: The Draft Clutton Neighbourhood Plan Location: Clutton</p> <p>Thank you for your consultation on the above dated 6 March 2015 which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Draft Clutton Neighbourhood Plan</p> <p>Landscape & Ecology, Policy CNP15 In line with our previous comments in our letter dated 26 January 2015, we recommend that this policy is strengthened so that its wording reflects the requirement of the NPPF for the planning system to <u>achieve net gains</u> in biodiversity where possible.</p> <p>We welcome the requirement in this policy that hedges planted on new developments should be native British species of trees and shrubs</p> <p>Policy CNP21 Street Lighting. We welcome the requirement for new development to install LED street lighting in order to reduce light pollution and minimise energy use. We note that part of the rationale for this policy is to protect bats and other nocturnal wildlife. In line with this aspiration, we recommend that the policy should include a requirement that where new lighting is installed, hedgerows and other boundary features should remain unlit.</p> <p>The comments we have made in this response are based on the information provided by you, and for the avoidance of doubt does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan or program which is the subject of this consultation, and which may have adverse effects on the environment.</p>
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14 th April 2015	County Estates	Email/Hard Copy	<p>Dear Sirs,</p> <p>On behalf of our client, Country Estates, please find attached a representation in respect of the Clutton Neighbourhood Plan.</p> <p>We look forward to receiving acknowledgement of this representation in due course.</p> <p>Kind regards</p> <p>Jeff</p> <p>.</p> <p>Jeff Richards Director</p>

	Edward Ware		<p>Our Ref: PR.115 Date: 17th April 2015 Planning Policy Planning Services Bath & North East Somerset Council Lewis House Manvers Street Bath BA1 1JG Dear Sir / Madam</p> <p>CLUTTON NEIGHBOURHOOD PLAN</p> <p>I write in response to the public consultation on the draft Clutton Neighbourhood Plan (“the draft plan”) that was recently submitted to Bath and North East Somerset Council (“the LPA”) and which will shortly be submitted for independent examination. As you will be aware the Examiner is unable to recommend that a draft plan be adopted unless it satisfies the basic conditions set out within paragraph 8(2) to Schedule 4B of the 1990 Act. Of particular relevance is basic condition (e) which provides that the draft plan must be in general conformity with the policies of the development plan. In Bath and North East Somerset, the key document in the development plan comprises the Core Strategy. Accordingly, the draft Clutton Neighbourhood Plan cannot be adopted unless it is in general conformity with the policies contained within this Core Strategy. Furthermore we note that a sustainability appraisal has been undertaken and we suggest that as it is accepted that such an assessment is appropriate it must be compliant with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>The draft plan cannot be considered to be in general conformity with the Core Strategy and therefore cannot properly be adopted in its current form. In addition the process to date is not compliant with the 2004 regulations.</p>

		<p>Specifically, the draft plan policy CNP3 (Housing Development Boundary and Types of New Dwellings) is not in general conformity with policy RA1 of the Core Strategy. In addition reasonable alternatives to that policy have not been considered contrary to the 2004 regulations.</p> <p>Policy DW1 of the Core Strategy provides that between 2011 and 2029 “around 13000” homes should be built. This is not a cap and it is anticipated that of that figure “around 1,120” homes (also not a cap) will be built in the Rural Areas.</p> <p>Policy RA1 of the Core Strategy states: <i>“... At the villages outside the Green Belt which meet these criteria, development sites will also be identified in the Placemaking Plan and the housing development boundary will be reviewed accordingly to enable delivery during the Plan period of the 1,120 dwellings identified on the Key Diagram. Residential development on sites outside the Green Belt adjoining the housing development boundary at these villages will be acceptable if identified in an adopted Neighbourhood Plan.”</i></p> <p>This part of policy RA1 is providing strategic guidance on two matters, namely that:</p> <ol style="list-style-type: none"> 1. The housing development boundary should be reviewed through the Placemaking Plan which is a process to be (and in fact being) undertaken by the Local Planning Authority; and 2. Residential development on sites outside the housing development boundary will be acceptable if identified in a Neighbourhood Plan. <p>Therefore policy RA1 leaves the issue of identifying development sites to meet the 1,120 units and the implications of that for the existing housing development boundary to the Placemaking Plan. Policy RA1 leaves the issue of whether any sites should be identified outside the housing development boundary to the Neighbourhood Plan.</p> <p>The draft plan’s proposed policy CNP3 provides: <i>“Policy CNP3 HOUSING DEVELOPMENT BOUNDARY AND TYPES OF NEW DWELLINGS The Housing Development Boundary will be limited to within the area shown in map 3 unless the development are rural exception sites. Should a review of B&NES’s 2014 Adopted Core Strategy, or it’s successor,</i></p>
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			<p>has been a failure to have regard to or assess reasonable alternatives to the policies contained within the draft plan which should have considered the Maynards Terrace sites and no doubt other sites.</p> <p>It is not possible to remedy these fundamental failings with the draft plan at this late stage. The independent examiner must therefore conclude that the draft Neighbourhood Plan does not meet the basic conditions set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and cannot proceed to the referendum stage.</p> <p>Yours sincerely</p> <p>Daniel Sharp MA (Hons) MA MRTPI Principal Planner</p>
20 th April 2015	Alan Boyle (Clutton resident)	Email	<p>Hi</p> <p>I would like to take the opportunity to comment on the draft Neighbourhood Plan Proposals for Clutton that is out for consultation.</p> <p>I have read the draft and would say it is very detailed, well thought through and appears to accurately reflect the wishes of the village. Using the plan as a framework will allow the village to develop in a sensible way over the next 20 years. Therefore, as a village resident I would ask that you pass this plan</p> <p>On the latter point, it is worth noting that as a resident of Clutton I feel that the Parish Council has really involved the village in preparing the plan through questionnaires, surveys and meetings and should be commended for their hard work and diligence.</p> <p>Regards</p> <p>Alan Boyle</p>
20 th April 2015	David Morrison	Email	<p>David Morrison's response to the Clutton Parish Plan</p> <p>1.2 Overview of the Plan Area</p> <p>I would take a different view of the suggested overview for village growth, in that expansion west of the busy</p>

			<p>A37 would seem to create a divided village in the style of ribbon development. I would argue that the village needs to retain the integrity of its rural boundaries by encouraging more compact development south of Station Road (Cook’s Hill/Lane/Road) and west of Church Lane, if anything other than pepper potted development actually needs to go ahead. The plan implies that such development could compromise the separateness and distinctiveness between Clutton and Temple Cloud, but provides no evidence that new development in this area would spread that far. What seems to be the plan’s core proposal – i.e. that growth should occur to the west of the A37 – would seem to undermine village distinctiveness to a much greater degree by splitting the village, unless the plan to move the A37 were to become a reality. Whilst there may have been some historical conurbation south and west of the A37 and Cook’s Lane junction, this was at a time before the widening and straightening of the main road when the road carried less heavy traffic. Now that the A37 is such a major route, it would seem illogical to seek village expansion on the further side of what has become a “natural” village boundary. Even traffic-calming measures will not stem the increase of heavy traffic volumes and may increase local pollution.</p> <p>3.2 Policy Objectives</p> <p><i>“3.2.3 The Housing policy will protect the pattern of development of the village to maintain its connection with the open countryside which reaches into the heart of the settlement.</i></p> <p><i>3.2.4 To make sustainability a high priority in future developments.</i></p> <p><i>3.2.5 To ensure safer roads in future developments.”</i></p> <p>My view is that the plan itself undermines these objectives. By pushing expansion to the west of the A37 the village will become further divided, not only by the Greensbrook Valley which has historically parted the older village of Clutton, but by an additional section of the village that will become a kind of satellite estate separated from the heart of Clutton. This new development area will not be linked into <i>“the open countryside which reaches into the heart of the settlement”</i> but will be separated by the major arterial road of the A37. This neither makes for ‘sustainability’ in terms of sustainable community and neither does it promote road safety.</p> <p>Furthermore the recent illegal landfill to the west of the A37 may undermine the potential for housing development because planning permission is unlikely to be granted for a site where unregistered and unlicensed tipping has taken place, especially as this low grade heavy metal waste was removed from another development site where it was deemed unsuitable.</p>
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