

COLWALL NEIGHBOURHOOD DEVELOPMENT PLAN Submission Draft Version

**Neighbourhood Plan Examiner's Questions
by Independent Examiner, Rosemary Kidd**

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Colwall Neighbourhood Development Plan Examiner's Questions

Following my initial assessment of the Neighbourhood Plan and representations, I would appreciate clarification and comment on the following matters from the Qualifying Body and/or the Local Planning Authority. In order to ensure openness and transparency of the examination process, these questions and the responses should be published on the Council's website.

In addition to matters on which I would welcome clarification or further information, I am highlighting my concerns about the plan and proposing suggestions for addressing them so that the QB and/ or LPA has the opportunity to respond to them, if they wish, in advance of receiving my examination report.

I set out below my concerns on the policy wording and revisions that I am proposing. I would welcome comments from the QB and/or LPA as appropriate.

1. Would you provide me with an update of Table 2 on completed developments and commitments. Is the assumption that 24 dwellings will be deliverable through windfall plots in the remaining plan period reasonable?
2. Would the QB and HC advise me on the delivery of housing in the parish over the last 3 years in view of the comment in the representation by Collins that is promoting a buffer of 20%. NPPF para 73 calls for a buffer of 20% where there has been significant under delivery of housing over the previous 3 years.
3. Would you provide me with the report of the full site assessment forms covering factors other than those addressed in the LCSA.
4. **Policy CSB1 and Policy CD2:** - The third part of Policy CSB1 includes a design principle. It is not clear how this principle is to be applied. I am proposing to delete it and to revise Policy CD2 point 3 to read: **".....Schemes should aim to be integrated into the existing streetscape.....will not be supported. Where possible, built form should respect and continue the existing building line."** Would the QB confirm that this is acceptable.
5. **Policy CD2** point 12 refers to Exceptional Key Views; other policies refer to important views. Map 7 shows the classification of 2 locations from the Malvern Hills AONB viewpoints as Exceptional or Special. The Visual Study did not attempt to grade the quality of the viewpoints and referred to them all as important views. Would the QB explain the change to the term "exceptional" in the description of viewpoints and consider whether this seeks to give greater status to the viewpoints than was intended by the assessment in the Visual Report and whether this greater status can be justified.
6. **Policy CD3 – Former Primary School** – Point 1 says agreement will be required from the Malvern Hills Conservators for access across the common land. Have discussions been held with the Conservators to ascertain whether they are likely to agree to this?
7. **Policy CD4 Grovesend Road** – Point 2 seeks provision of a safe pedestrian and cycle route, however, HC Transportation have questioned whether this is achievable.

The PC state in their response that this is a Highways requirement. Would HC comment on whether this highways requirement is deliverable?

8. **Policy CD4 Grovesend Road** The landowner's agent is seeking a cross reference to the Malvern Hills AONB Guidance on Highway Design to give a degree of flexibility to enable various options to be explored. Would HC confirm the appropriate highways design guidance that should be referred to in the Plan.
9. What is the status of the Malvern Hills AONB Highways Design Guide? Should it be cross referenced from the justification in the policies in the plan itself rather than in Appendix I?
10. **Policy CD4 Grovesend Road** - Would the QB explain why the land to the west and south of the housing allocation has been included in the Plan as public open space. It is noted that part of it is shown on the indicative layout plan as subject to landowner agreement. Also it is shown incorrectly on the Policies Map as a Local Green Space instead of a proposed green space. Would the QB comment on the suggestion by the landowner that these areas of open space should be omitted and open space should be included in the site allocation itself.
11. What is the status of the AONB Guidance on Building Design and the associated colour palette? Has it been adopted as SPD by HC or is it informal guidance only?
12. **Policy CD6:** Would the QB comment on the proposed text to be added to the beginning of the policy to help make the purpose of the policy explicit: "***The conversion of farm buildings for residential use or the extension of existing farm dwellings should take account of the following design principles:***" It is also proposed to retitle the policy "***The Conversion of Farmsteads to Residential Use and the Extension of Existing Dwellings on a Farmstead***".
13. **Policy CD6:** I am proposing to recommend that point 7 is deleted as it is no longer relevant with the change in focus of the policy. The final clause of point 8 and the final sentence of point 11 are explanations and not policy so I am proposing that they should be moved to the justification and point 12 is revised to read: "***Where there is no hard boundary definition between farm buildings and the landscape, new buildings and extensions should follow this characteristic.***" Would the QB confirm their acceptance.
14. **Policy CD8** – point 14. Malvern Hills AONB has suggested revisions to the text which the QB has proposed should be accepted. The text on page 20 of their response to the representations is unclear as to what the revised text should be. Would they clarify this please.
15. **Policy CD8** – Would the QB and HC review whether points 4, 5, 6 and 7 are necessary if point 26 of Policy CD2 is set out as a separate policy applying to the whole of the plan area. Would you consider whether there should be a cross reference to the new policy (point 26) included in the justification to Policy CD8 and whether it would be more appropriate to include points 4 – 7 in the justification as examples of how to achieve the integration of large buildings into the landscape.
16. **Policy CF1** – I am proposing to include the revision to the policy proposed by the QB. To help to make the policy directly relevant to the parish, it is suggested that a list of the names of local community and social facilities that are to be safeguarded under this policy should be included rather than relying on generic examples (such as

the public houses and village shop). Would the QB provide me with a list of the community facilities they propose to include for safeguarding under this policy.

17. **Policy CF3** – The policy does not include a policy statement towards managing any future development in the LGS. Would the QB confirm the following is acceptable in accordance with NPPF paragraph 101 “***Development on this area will not be supported except in very special circumstances.***”
18. **Policy CRE1** – What evidence is there to justify the statement that wind turbines are not considered appropriate in the plan area? Was any consideration given in background evidence to whether small wind turbines could be located in the area and if so, which locations might be suitable?

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