

# **BRIDSTOW NEIGHBOURHOOD DEVELOPMENT PLAN Submission Draft Version**

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

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## Bridstow 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.

Where I am proposing to recommend modifications to the wording of policies, I have set out my suggested wording to ensure that the QB and/ or LPA have the opportunity to consider them and confirm that they are acceptable or to comment on them, if they wish, in advance of receiving my examination report.

1. **Issues and Objectives** - In response to the HC Environmental Health representation on noise, I am proposing to recommend adding the following to objective 4c):  
***“Avoiding noise sensitive development on sites with unacceptable levels of traffic noise close to the trunk roads.”*** Would the HC and QB comment on whether an additional paragraph in the Issues section would be helpful to set out the context for the consideration of the impact of road noise on housing development? If so, would they provide me with suitable text.
2. **Objective 2b)** “significant danger resulting from contact with vehicles” is an unusual form of wording. Can the LPA / QB suggest a suitable alternative that can be more easily measured.
3. **Objectives 3b) and 3c)** - there do not appear to be policies in the plan that relate to these objectives.
4. **Policy BR1** – There is a degree of overlap between this and subsequent policies. To avoid various forms of wording on the definition of major development in the AONB, I am proposing to delete the second sentence of point a) “Major development ...satisfactory degree.” Would the QB confirm that this is satisfactory.
5. **Policy BR2** – Why are different terms used in different villages for settlement boundary and development boundary?
6. **Policy BR4** – Would the PC provide me with the evidence to support the definition of the Strategic Green Gap between Bridstow and Wilton. Unless the evidence to justify this designation is convincing, I am proposing to recommend that point d) is deleted. In any case I am not convinced that it is strategic in nature.
7. **Policy BR5** – Are Moraston House and Ashe Ingen Court the only unregistered parks and gardens in the parish? If so, they should be named in the policy and shown on the Policies Map. Is it intended that they should be considered as local heritage assets? Have the owners been consulted on the policy and designation?
8. **Policy BR5** - I am proposing the following modifications to the wording of this policy. Would QB and LPA comment on them.
  - a. Revise the first paragraph to read: “***....should protect, conserve and where possible enhance:***”
  - b. Revise point a) to read: “***Developments that may result in substantial harm or loss of the Scheduled Ancient Monuments and Grade I and II\* Listed Buildings at Wilton Castle and house attached, Wilton Bridge and Sundial,***

**Churchyard Cross at St Bridget's Church, St Bridget's Church and their settings should be wholly exceptional and will require clear and convincing justification."**

- c. Delete points b), c) and g) to avoid unnecessary repetition of national and strategic policies.
  - d. Revise point d) to read “ **conserves or enhances....**”
  - e. Revise point f) to read: “**....within the unregistered parks and gardens at Moraston House and Ashe Ingen Court to proceed .....**”
  - f. To avoid the use of “may be permitted”, revise the second sentence of point h) to read: “**.....New development associated with historic farmsteads should respect the historic form of the farmstead as demonstrated through thorough research of historic documents to secure a design of exceptional quality.**”
9. **Policy BR6** - will the QB supply a map of the ecological corridors referred to under Policy BR6.
10. **Policy BR7** – this policy adds nothing to national and strategic policies. I am proposing to recommend that the policy is deleted and paragraph 6.8 is retained to describe local conditions.
11. **Policy BR8** – Is this policy necessary given the comments by Welsh Water that the reinforcement scheme at Lower Cleave WwTW has been completed? I am proposing to retain paragraph 6.9 to be amended as proposed by the QB.
12. **Policy BR9** – would the QB and LPA comment on the following:
- a. **Point c)** is this deliverable given the location of housing allocations at some distance from community facilities?
  - b. **Point d)** second part – enabling a sustainable drainage system - what does this relate to?
  - c. **Point g)** does “reducing waste” refer to construction waste? Would HC confirm whether or not this is deliverable - can minimising construction traffic and waste be addressed through planning conditions?
  - d. **Point h)** To reduce repetition. I am proposing to amalgamate this with **point b) of Policy BR10** to read: “ **they should be of a high quality and fit sensitively within the street scene and landscape and reflect locally distinctive features to maintain the area's cohesive character.**”
  - e. HC Environmental Health made a representation on noise to Policy BR13 and the inclusion of 2 sites in the settlement boundaries which have been considered unsuitable as housing allocations. In view of my proposed recommendation to amalgamate Policies BR13 and 14, I am proposing to recommend adding a new criterion to Policy BR9 to apply to all housing development as follows: “**Locating noise sensitive development, including housing, in locations that are not subject to unacceptable levels of noise from highways and ensuring effective measures are taken to ensure that ambient noise levels both indoors and outdoors are acceptable.**”
13. **Policy BR10** - delete point b) as this is proposed to be incorporated in Policy BR9h).
14. **Policy BR11** – this is a Community Action and not a planning policy. I am proposing to recommend that it be placed in a separate section of the Plan titled Community Actions.

15. **Policy BR12** - I have concerns about the deliverability of criterion b) as a development proposal cannot be required to avoid on street parking or address existing on street parking problems. I am proposing to recommend that it be revised to **“Adequate provision of off-street parking for residents and visitors.”**
16. **Policy BR12** - The implementation of criteria c) and d) will involve matters of judgment and they should be worded as “should”.
17. **Policies BR13 and 14** – the criteria in these policies largely repeat those in other policies in the NDP. I am proposing to recommend that the policies should be amalgamated and that the decisions on development proposals should be made in accordance with other policies to avoid repetition. Unless there is clear justification, the terminology to describe the boundaries should be the same for all settlements. Would the QB and LPA comment on the following proposed wording to combine them: **“Development boundaries have been defined for Bannutree, Buckcastle Hill, Claytons and Wilton on the Policies Maps. Housing development on sites allocated under Policy BR15 and sensitive infilling will be supported within the development boundaries that satisfy other policies in the development plan.”**
18. **Policy BR15** – would the QB and / LPA comment on the following
- Has an assessment of the cumulative impact of the committed and proposed allocations in Buckcastle Hill been undertaken on highway safety?
  - Have assessments been undertaken that demonstrate that access to each site is feasible? Are the LPA and QB satisfied that all the sites are deliverable?
  - Paragraph 8.19** – the site is outside the area of special character. Is the fifth bullet point appropriate? The 2<sup>nd</sup> bullet refers to TPOs being used. Planning conditions are usually applied to new development to protect trees.
  - Paragraph 8.20**, sixth bullet point (“Measures may be required...”) What is this referring to and what is envisaged?
  - Paragraph 8.21** – 4<sup>th</sup> bullet - what is the justification for a signature building reflecting a gatehouse for this development?
  - Paragraph 8.21** – 9<sup>th</sup> bullet – there is no dwelling to the west of the site. What is this referring to?
  - What is the reason that site W2 at Wilton has not been allocated when it ranked no 6 in Table 1 of the Housing sites assessment report? Was it following objections on the grounds of noise from Environmental Health? If so, the Sites Assessment Report should be updated to reflect the objections to and rejection of sites on noise grounds.
19. **Policy BR16** –
- The road network serving this area is extremely poor. How will development proposals be assessed against criterion f)?
  - What is the anticipated windfall allowance for this area?
  - To avoid the use of the term ‘will be permitted’ I am proposing to recommend that the second sentence of the first paragraph of the policy should be revised to: **“Within this area, very low density housing development will be supported where it retains or enhances the character of the area and where it meets the following requirements:”** A definition of “very low density” may be included in the Glossary to increase the clarity of the policy requirement.

- d. A planning policy cannot stipulate that TPOs should be made. I am proposing to recommend that “**including through the use of Tree Preservation Orders in relation to trees**” from criterion e) should be deleted.

3. **Policy BR17 –**

- a. I am proposing to revise **criterion d)** to read “.....**and should avoid the loss of best and most versatile agricultural land, where possible.**” to better reflect the wording of the NPPF.
- b. I am proposing to revise **criterion h)** to read “.....**enterprise can be fully mitigated.**” The final part is unnecessary and should be deleted (**and where they cannot, permission will be refused.**)

20. **Policy BR18 –**

- a. Would the QB provide me with the definition of large and medium scale renewable or low carbon energy developments to be used in the interpretation of this policy.
- b. To avoid repeating the definition of major development in the AONB, I am proposing to revise the last paragraph of the policy to read: “.....**will not be supported except in exceptional circumstances as set out in the NPPF and Policy BR3.**”

21. **Policy BR19 –** Is polytunnel development in the AONB considered to be acceptable under the provisions of the Council’s planning guide on polytunnels? Does criterion a) accord with the Council’s policies?

22. **Policy BR20 –** I am going to recommend that the community facilities and their curtilages should be shown on the Policies Map.

23. **Policy BR21 –** does the registration of the area of village green give it effective protection? What additional benefit will be gained by designating it as a Local Green Space?

24. **Policy BR22 –** it is considered that this does not add any locally specific policy requirements to CS Policy ID1 and I am proposing to recommend that it should be deleted; the justification may be retained.

25. **Paragraphs 11.2 and 11.4** include actions by the Parish Council. I am proposing to recommend that those in para 11.2 are deleted and those in para 11.4 are placed in the section on Community Actions.