



Bath and North East Somerset Council

Whitchurch Village Neighbourhood Development Plan Regulation 16 Consultation

Dates of the consultation: 19th May 2017- 30th June 2017

Consultation re-run: 7th July 2017 – 18th August 2017

The following page presents a summary, written by Officers at Bath and North East Somerset District Council, of the comments made during the Regulation 16 consultation on the Whitchurch Village Neighbourhood Development Plan, which took place between 19th May 2017- 30th June 2017.

Due to an administrative error the draft Whitchurch Village Neighbourhood Plan (and supporting documents, including the correct version of the consultation statement) was republished for consultation under Regulation 16 for 6 weeks between 7th July - 18th August 2017

The summary is written to provide assistance to the Examiner and to allow anyone who wishes to see some of the issues raised. It does not contain every point a consultee has made. The Examiner will read the comments of each consultee in full.

Reg 16 Consultation Responses: 19th May 2017- 30th June 2017	Date
Respondent 0093 Highways England	22/05/2017
Respondent 0170 Robert Hitchins Ltd	28/06/2017
Respondent 0263 Wessex Water	29/06/2017
Respondent 0281 Natural England	30/06/2017
Respondent 1437 Publow with Pensford Parish Council	26/06/2017
Respondent 3902 Bristol City Council	30/06/2017
Respondent 4701 Gladman Developments	30/06/2017
Respondent 7138 Taylor Wimpey, 0251 Bovis Homes & 4639 Land Improvement	30/06/2017
Respondent 7260 Barwood Development Securities Ltd	30/06/2017
Respondent 7314 Jonathan Medlin	29/06/2017

Reg 16 Reconsultation Responses: 7th July - 18th August 2017	Date	Notes
Respondent 0170 Robert Hitchins Ltd	17/08/2017	Resubmission with additional comments
Respondent 4701 Gladman Developments	07/07/2017	Resubmission
Respondent 7138 Taylor Wimpey, 0251 Bovis Homes & 4639 Land Improvement	07/08/2017	Resubmission
Respondent 7260 Barwood Development Securities Ltd	18/08/2017	Resubmission with additional comments
Respondent 7314 Jonathan Medlin	15/08/2017	Resubmission with additional comments

Name of the Consultee/ Organisation	Date the comment was received	Comment format	Plan Ref	Pg. no.	Comments made
Highways England	22/05/2017	Email	N/A	N/A	We note that the area covered by the plan is located some distance from the strategic road network therefore we have no comments to make on the plan.
Wessex Water	29/06/2017	Email	WV 2.1	37	Policy WV 2.1 should distinguish between new housing development and infrastructure development when establishing locational restrictions. There are often constraints on location associated with siting new sewerage infrastructure due to the need to take account of existing assets (which may be below ground) and topography. The policy should incorporate greater flexibility to permit the delivery of infrastructure development within the gap between Whitchurch Village and Bristol.
Wessex Water	29/06/2017	Email	WV 2.3	38	The design requirements under Policy WV2.3 should recognise that infrastructure development and maintenance by utility companies by its nature needs to be functional and considerations such as security and health and safety must take precedence over appearance. While we seek to ensure design is as sensitive to its location as possible, there are often constraints on location, materials (for example requirements to meet national security standards) and size/form (driven by operational requirements). We are concerned that Policy WV2.3 may be overly restrictive when we are seeking consent to undertake maintenance/improvement works to our existing infrastructure. In response to development requirements, we may also need to construct new above ground infrastructure during the plan period. At present Policy WV2.3 requires all development to provide a visual impact assessment. Many of the planning applications we make are for small-scale proposals. We are concerned that the requirement under Policy WV2.3 will add to the cost and administration involved with seeking planning consent. The requirement should be proportional to the scale and nature of the development proposed.

Pegasus Group – On behalf of: Robert Hitchins	28/06/2017	Email	Consultation Report	N/A	Pegasus wish to make clear that the ‘Consultation Report’ accompanying the Regulation 16 consultation fails to describe and review the comments that were made by those responding to the Regulation 14 Whitchurch Neighbourhood Plan Consultation that ran between 24th January and 7th March 2017.
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017	Email	N/A	N/A	Pegasus previously submitted representations at the Regulation 14 stage to those preparing the WNP, no reference to these representations is made in the WNP or any of its accompanying Appendices or supporting evidence, nor is there any description of how these representations were taken into consideration in preparing the Submission version of the WNP. Therefore, for the benefit of the local authority and the Examiner the Pegasus Regulation 14 representations are attached at Appendix 2.
Pegasus Group – On behalf of: Robert Hitchins	17/08/2017	Email	N/A	N/A	Pegasus previously submitted representations at the Regulation 14 stage to those preparing the WNP in March 2017. The Consultation Report accompanying the Revised Regulation 16 WNP provides Pegasus with the consultee reference number of ‘178’. The revised Consultation Report lists and describes the response of the WNP to the representations Pegasus made to the Regulation 14 Consultation. It is submitted however that the Regulation 16 WNP still fails to pick up on all the actions listed as responses in the Consultation Report, these matters are discussed further below

Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	N/A	N/A	<p>Regulation 14 representations submitted by Pegasus drew attention at Section 2 to the need for the Neighbourhood Plan to amend its plan period to be in 'general conformity' with the adopted local plan, the BANES CS 2014-2029.</p> <p>The Regulation 16 version of the WNP has failed to amend its plan period and is internally inconsistent as a document. Paragraph 3.6 states that the WNP is a plan for the village for the next 27 years (which would be up to 2044); paragraph 7.3 states that it has a lifespan until 2040 and the front cover states that the plan covers the period 2015-2042.</p> <p>In suggesting a plan period longer than that of the adopted local plan the WNP does not meet the basic conditions test as it is not in general conformity with the adopted local plan.</p>
Pegasus Group – On behalf of: Robert Hitchins	17/08/2017	Email	N/A	N/A	Despite noting this point as 'Error noted and amended' in the Consultation Statement (July 2017) the published Regulation 16 version of the WNP (July 2017) still fails to amend its plan period and is internally inconsistent as a document. Paragraph 3.6 states that the WNP is a plan for the village for the next 27 years (which would be up to 2044); paragraph 7.3 states that it has a lifespan until 2040 and the front cover states that the plan covers the period 2015-2042.
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	N/A	N/A	Acknowledgement of the JSP process by the WNP is welcomed as this was missing from the Regulation 14 version of the document. The JSP will certainly require the WNP to be reviewed once it is adopted as Whitchurch has been identified as a location for strategic growth

Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	N/A	N/A	It is therefore not correct for the WNP to state at paragraph 1.3 that it has been produced ‘in accordance’ with the JSP as the WNP seeks to protect all current Green Belt surrounding the village and only allocates site for development in accordance with adopted BANES CS single site allocation for the village (policy RA5) plus one further site that is committed for housing development having been allowed on appeal in 2012.
Pegasus Group – On behalf of: Robert Hitchins	17/08/2017	Email	N/A	N/A	The reference in the Consultation Statement to the quantum of development in the WNP reflecting Policy RA5 and Policy RA1 of the BANES Core Strategy is noted, however objection is maintained to the WNP suggesting it has been produced ‘in accordance’ with the JSP.
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	Quantum of Development	N/A	<p>The Regulation 16 WNP continues to propose the same quantum of residential development as the Regulation 14 consultation document, namely the development of two sites, one at ‘Sleep Lane’ and one at ‘Horseworld’, as illustrated in Figure 12 on page 22 of the WNP.</p> <p>It is submitted that the planning practice guidance states that when a neighbourhood plan is prepared that there should be sufficient flexibility to be able to take account of the requirements of emerging higher tier development plans and the implications they may have on land use within the neighbourhood plan area.</p> <p>In this instance the most up to date evidence on housing need will be that emerging through the JSP evidence base including the JSP Strategy which identifies Whitchurch as a potential location for up to 3,500 dwellings as it performs well against sustainability criteria owing to its proximity to Bristol. The ‘Towards the Emerging Spatial Strategy’ consultation strategy states that ‘exceptional circumstances’ exist for the release of land at Whitchurch from the Green Belt.</p>

Pegasus Group – On behalf of: Robert Hitchins	17/08/2017	Email	Consultation Report	N/A	While the Consultation Report (July 2016) states in response to Pegasus Regulation 14 representations that ‘it is not the role of a Neighbourhood Plan to test alternatives to a strategic policy’ Pegasus maintain that it would still have been opportune for the WNP to have undertaken an analysis of potential development sites, in conjunction with the local community, to help inform the JSP, as part of the Neighbourhood Plan process. This would have required an analysis of my client’s site of 13ha at Stockwood Lane, attached at Appendix 1, and consideration of its development potential to meet emerging housing needs for the period up to 2036.
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	WV1.1	30	Policy should not go beyond Building Reg requirements in terms of its ask of new development
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	WV1.2	30	Does not meet the Basic Conditions test as it add nothing additional to Policies CP9 and CP10 of the Core Strategy
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	WV1.3	30	Evidence is not provided to support the approach and therefore the Policy remains unsubstantiated
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	WV1.4	31	Policy WV1.4 does not provide an additional level of detail or a distinct local approach to that set out in the strategic policy of the Council.
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	WV 2.1	37	My clients 13ha site should be removed from the Green Belt in the forthcoming review of the Green Belt through the BANES Core Strategy Review to allow for development in accordance with NPPF paragraph 85

Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	WV 2.1	37	<p>Objection is raised to Policy WV2.1 of the WNP as it is considered that development could be adequately accommodated on my clients site without either demonstrably increasing the coalescence between Whitchurch Village and Bristol or reducing the gap between Whitchurch Village and Bristol</p> <p>Development at the site can be master planned to ensure that visual connections with the countryside are maintained and that a green buffer is retained between the village and the edge of the urban area of Bristol in accordance with Policy WV 2.2 of the WNP</p> <p>The visual impact of development at the site can also be minimised in accordance with Policy WV2.3.</p>
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	WV 2.1 / WV 2.2	37	<p>WNP Policies WV 2.1 and WV.2.2 are locally distinctive and provide local policy which adds to the adopted Core Strategy Green Belt Policy - CP8, however as stated above both these policies will need to be reviewed in the light of the outcomes of the JSP and BANES CS Review.</p>
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	WV 4.1	42	<p>Pegasus previously submitted comments on the Air Quality Policy during the Regulation 14 consultation of the WNP. The policy has been amended since the Regulation 14 consultation therefore the comments made then by Pegasus, and attached at Appendix 2 still stand</p> <p>The second paragraph of the policy is not written positively as it seeks to resist development that will result in the ‘detrition’ of Whitchurch Village’s nitrogen oxide pollution levels. This statement should be deleted as it is written negatively. A more positive approach would be to review the matter, and any associated policy through a WNP review.</p>

Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	WV4.2 / WV4.3	43	<p>It is submitted that while these matters are of concern to local residents and to the community of Whitchurch they are not required as planning policies in the WNP. These policies repeat national planning policy guidance contained in the NPPF at paragraphs 32-33 which require the submission of a Transport Statement or Transport Assessment according to the impact a scheme may have on the local highway network</p> <p>It is submitted that these policies do not add local distinctiveness to existing national planning policy guidance or to Policy RA5 of the adopted BANES CS and therefore do not meet the Basic Conditions test.</p>
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017	Email	Consultation Statement	N/A	<p>As stated at the outset of these representations it is submitted that the Consultation Statement that accompanies the Regulation 16 Consultation is inadequate as it fails to state how the comments of the local community and other stakeholders who have engaged with the process of preparing the WNP have been taken into consideration.</p> <p>This matter should be addressed and the Consultation Statement updated and reviewed in the light of the comments provided above in order that the WNP can proceed to examination and referendum.</p>

Pegasus Group – On behalf of: Robert Hitchins	17/08/2017	Email	Consultation Statement	N/A	<p>As stated at the outset of these representations it is submitted that while the revised Consultation Statement (July 2017) responds to the matters raised by Pegasus in the Regulation 14 WNP consultation, and suggests in some instances proposed changes, not all these changes have been implemented in the Regulation 16 version of the WNP.</p> <p>Moreover, the Consultation Statement would still seem to require updating, as there are no entries for engagement with the Parish Council, with BANES, with neighbouring parishes or with developers since May 2016.</p> <p>This matter should be addressed and the Consultation Statement updated and reviewed in the light of the comments provided above in order that the WNP can proceed to examination and referendum.</p>
Pegasus Group – On behalf of: Robert Hitchins	28/06/2017 Resubmitted 17/08/2017	Email	Basic Conditions Statement	N/A	<p>The Basic Conditions Statement accompanying the Regulation 16 Consultation states that the WNP has met the test of general conformity, however, as submitted above there are several policies in the plan that add nothing locally distinctive to existing adopted national or local planning policy.</p> <p>In terms of ‘planning positively’ to meet housing need the WNP merely reflects the position of the adopted BANES Core Strategy through policies RA1 and RA5.</p> <p>It is suggested that this matter should be addressed and the Basic Conditions Statement reviewed in the light of the comments provided above in order that the WNP can proceed to examination and referendum.</p>
Natural England	30/06/2017	Email	General / WV2.4	N/A	<p>The draft Plan appears to be based on a good understanding of the plan area and to be in general conformity with existing and emerging higher tier plans.</p> <p>We welcome the consideration given to landscape character and</p>

					<p>the important environmental and historic features within Whitchurch Parish in the preparation of the Plan. Although the Plan area does not contain nationally designated sites or landscapes, it does include important habitats and landscape features, which also provide foraging and commuting opportunities for greater and lesser horseshoe bats, both of which have been recorded in the parish. These species are associated with North Somerset & Mendip Bat Special Area of Conservation (SAC) and Bath & Bradford on Avon Bat SAC.</p> <p>With the above in mind, we are pleased to note Policy WV 2.4- Wildlife Corridors and Ecological Network, which should help to protect existing ecological assets, including any features of Importance for foraging and for maintaining habitat connectivity. We would also expect new development to provide ecological enhancements wherever possible, the details of which might be agreed and delivered through the Landscape and Ecological Mitigation and Management Plan referred to in the supporting text of the policy. This would accord with NPPF Para 9. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to): ...moving from a net loss of bio-diversity to achieving net gains for nature.</p> <p>We have considered the HRA and SEA screening assessments. Based on the information provided we concur with the Council's conclusion that the Plan is unlikely to have significant environmental effects, including with respect to national and European designated sites, and that further assessment in relation to these is not necessary.</p>
Publow with Pensford Parish Council	26/06/2017	Email	General	N/A	Publow with Pensford Parish Council support the above plan and do not have comments to submit in respect of the plan however as a neighbouring Parish we would like to be kept informed of the adoption of the plan and any changes made to it.

Bristol City Council	30/06/2017	Email	General	N/A	<p>Thank you for providing Bristol City Council with the opportunity to comment on the Draft Whitchurch Village Neighbourhood Plan.</p> <p>I understand that the plan is generally consistent with the Bath and North East Somerset Adopted Core Strategy. I note that the plan makes reference to the emerging West of England Joint Spatial Plan and that that it anticipates that:</p> <p>“The Whitchurch Village Neighbourhood Plan may need to be reviewed to ensure that the Plan can reflect the policies within the approved JSP whilst retaining its separate identity within the Green Belt requiring major investment to resolve traffic congestion, resulting in further air pollution and significant commitment to employment”.</p> <p>The acknowledgement of the significance of the Joint Spatial Plan in enabling the delivery of development to meet the needs of the West of England is welcomed and supported as is the reference to the need for the Neighbourhood Plan to be reviewed in the light of the JSP.</p>
Gladman Developments Ltd	30/06/2017 Resubmitted 07/07/2017	Email	General	N/A	<p>It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.</p>
Gladman Developments Ltd	30/06/2017 Resubmitted 07/07/2017	Email	The Vision	26	<p>Gladman are concerned that the aims of the plan do not set out a positive vision. Seeking for Whitchurch to remain as ‘stable’ does not indicate the plan will take a positive approach towards growth. This conflicts with the objectives of the Framework, which seeks to plan for growth and as such Gladman recommends deletion of the word ‘stable’ form the plans vision.</p>

Gladman Developments Ltd	30/06/2017 Resubmitted 07/07/2017	Email	WV 1.4	31	This policy is seeking for heritage assets to be conserved and enhanced, whilst maintaining settlement separation. It is unclear why settlement separation would become an issue in the conservation and enhancement of heritage assets. Further, as Whitchurch is surrounded by Green Belt any development would have to conform to national policy towards development within the Green Belt and as such the issue of settlement separation would be dealt with using the higher level national policy designation. Gladman therefore recommend reference to settlement separation is deleted from this policy.
Gladman Developments Ltd	30/06/2017 Resubmitted 07/07/2017	Email	WV 1.6	35	It is considered that this policy is overly prescriptive in setting out the requirements for internet provision. It is not considered appropriate for the plan to set requirements for minimum internet speeds. This policy is not a land use policy and does not need to be included in the main WNP document. It is a statement of intent which would be better suited to an appendix to the document which contains other such non-land use policies. Gladman recommend this policy is reworded and have suggested possible wording below: 'Development proposals must show through a Connectivity Statement how they will connect to the internet with the best available speed.'

Gladman Developments Ltd	30/06/2017 Resubmitted 07/07/2017	Email	WV 2.1	37	Positive green buffer management between Whitchurch Village and Bristol As Whitchurch is currently surrounded by Green Belt, the very purpose of which is to prevent urban sprawl/coalescence of settlements it is not clear why this policy is deemed necessary or what further detail this policy provides than which the higher-level national Green Belt designation already does. As Green Belt protection has been recently reaffirmed in the published Housing White Paper it is considered this policy is unnecessary and should be deleted. The policy does not reflect the criteria set out for development in the Green Belt from the Framework, in very special circumstances and as such may undermine this national policy designation.
Gladman Developments Ltd	30/06/2017 Resubmitted 07/07/2017	Email	WV 4.1	42	As worded this policy does not make sense and could not be applied by a decision maker. Gladman kindly point out that the Parish may have meant to use the term 'deterioration' rather than 'detrition', a word with little to no relation to air quality or planning. As PPG states that policies should be clear and unambiguous, drafted with sufficient clarity that a decision maker can apply them consistently with confidence Gladman recommend the wording of this policy is changed so that it could be applied effectively by a decision maker.

Gladman Developments Ltd	30/06/2017 Resubmitted 07/07/2017	Email	N/A	N/A	<p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the WCHNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with basic condition (a). The plan does not conform with national policy and could be seen to undermine a national policy designation. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>
Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	N/A	N/A	<p>The proposed plan period to 2042 does not meet the basic conditions 2e as it is not in general conformity with the emerging Joint Spatial Plan that covers the time period to 2036, which proposes a large urban extension at Whitchurch, which is not recognised in the Neighbourhood Plan.</p>

Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	N/A	24	In order to meet the basic conditions 2e, and ensure that the plan is in general conformity with the strategic policies in the emerging JSP, we suggest substituting the final sentence in para 7.11 as follows: <u>The JSP Emerging Spatial Strategy (November 2016) has identified a proposed strategic allocation to the south of Whitchurch for up to 3,500 dwellings. If this development location goes on to form part of the adopted JSP (due for adoption at the end of 2018), then the Neighbourhood Plan will need to be subject to an early review. This is because the Neighbourhood Plan needs to be in general conformity with the strategic policies in the JSP.</u>
Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	N/A	9	Separation around Whitchurch Village - Attempting to create a buffer to prevent any further expansion of Bristol would not be in general conformity with the emerging JSP (contrary to basic condition 2e) and would prevent the sustainable growth of Bristol (contrary to basic condition 2d).
Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	N/A	25	Managing Transport Links - Given how the planning system works, we object to the current wording in para 7.14 which is contrary to the achievement of sustainable development (basic condition 2d) and inconsistent with national policy (basic condition 2a) and suggest it is altered as follows: <u>To be considered acceptable, proposals for major development will need to include appropriate mitigation to limit the significant impacts of the development. Development will be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.</u>

Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	WV 1.4	31	Heritage Assets - Figure 14, is taken from and Evidence base document and is not needed to support the implementation of policy WV1.4 (heritage), it should be removed from the Neighbourhood Plan - Suggested amendment to WV1.4: 'Any development must not cause <u>substantial</u> harm to the setting of important heritage sites in the Parish. <u>Development proposals that lead to less than substantial harm on heritage assets should be weighed against the public benefits of the proposal.</u> '
Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	WV 1.6	35	Policy WV.1.6 which seek improvements beyond the control of developers are not deliverable and would not meet basic condition 2a as they have not had regard to the NPPF's policy on deliverability.
Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	WV 2.1	37	object to policy WV2.1 as it is repeating NPPF and B&NES policy and is not necessary as coalescence is already a consideration the Council will need to take into account in making any decisions about revising the Green Belt boundary

Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	Objective 3	39 - 40	Objective 3 - We support the laudable objective 3 which aims to ensure that new developments are integrated within the village, as well as policy WV3.1
Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	N/A	40	- Object to para 13.6 - does not meet the emerging strategic policy in the JSP (contrary to basic condition 2e) and we suggest that this is replaced with the following: The community do have concerns about the impacts of additional strategic development at Whitchurch which will need to be assessed as part of the JSP process. Applications for development will be expected to demonstrate that the impacts of the development do not exceed air pollution limits, that impacts on the traffic network are not severe and that the benefits of the proposals (e.g. job creation) are assessed.
Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	WV 4.1	42	Air Quality - Object to the wording of policy WV4.1 and suggest that the second paragraph of policy WV4.1 is taken out.

Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	N/A	44	Community Benefit - Para 15.2 does recognise that village facilities can benefit from development
Barton Willmore- On behalf of Taylor Wimpey, Bovis Homes, Land Improvement	30/06/2017 Resubmitted 07/08/2017	Email	N/A	N/A	Appendices The Neighbourhood Plan contains 13 appendices which serve as evidence base documents rather than policy documents - question their inclusion within a DPD
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017	Email	Reg 14 Consultation	N/A	- It is noted that contrary to the National Planning Practice Guidance (PPG), we have not been able to find published minutes of NDP group meetings to review the process through which the group considered the comments raised - we would note with concern that there has been no detailed response to the issues in our earlier representation, and that the Consultation Statement associated with the Submission Version does not reflect the requirement set out in the Regulations. - This greatly undermines the robustness of the consultation process, and raises a concern that the short time frame between close of publication on the Pre-Submission Version (7th March 2017) and publication of the Submission Version (19th May 2017) did not allow sufficient time for a detailed and robust assessment of the draft NDP and the representations made.

Savills – On behalf of Barwood Development Securities Ltd	18/08/2017	Email	Updated Consultation Statement	N/A	It is also noted with concern that according to the Consultation Statement, the NDP group have not met with Bathnes since May 2016 (p4). This is significant given that this indicates there have been no discussions since the publication of the JSP November 2016 which identified Whitchurch as a 'Strategic Development Location' for circa 3,500 dwellings.
Savills – On behalf of Barwood Development Securities Ltd	18/08/2017	Email	Updated Consultation Statement	N/A	It is recognised that the recent publication of an updated Consultation Statement now includes a table at Appendix 8 which summaries points raised, contains a brief response and any changes proposed. We make further comment on this table where relevant below. The table is not particularly detailed, and the outcome of the March 2017 consultation is not clear. There are a significant number of rows where the summary of comments states 'no added comments' but the WVNDP response says 'thank you for your response' or 'thank you for your concurring response'. Does this mean that in any row where the first response is given, that the comment was disagreeing with the draft NDP?
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	Basic Conditions	N/A	-Our previous comments were intended to be constructive and to aid the Parish Council in bringing forward a robust NDP. Given the stage that the NDP is now at, our comments now focus on how the NDP fails to accord with the basic conditions, and as such, where amendment is required.

<p>Savills –</p> <p>On behalf of</p> <p>Barwood Development Securities Ltd</p>	<p>30/06/2017</p> <p>Resubmitted 18/08/2017</p>	<p>Email</p>	<p>N/A</p>	<p>N/A</p>	<p>reference to the Core Strategy Review should also be included at paragraph 1.3 of the NDP</p> <p>- under paragraph 38(5), to the extent where there is any conflict with the NDP, the JSP and Core Strategy Review will take precedence. Reference to this emerging plan should therefore also be included to ensure that the reader is informed of the decision making context within the parish.</p>
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<p>Savills –</p> <p>On behalf of</p> <p>Barwood Development Securities Ltd</p>	<p>30/06/2017</p> <p>Resubmitted</p> <p>18/08/2017</p>	<p>Email</p>	<p>N/A</p>	<p>N/A</p>	<p>- It would be inappropriate for the NDP to seek to influence the emerging strategic policies of the JSP and Core Strategy Review by predetermining the role that Whitchurch may play in these strategic plans. This is contrary to the NPPF, which requires NDP to either support emerging strategic development needs, or to focus only on local development (with any disagreements in relation to strategic development to play out through the Local Plan process). As such, the following modifications to the NDP are required:</p> <p>paragraph 2.6: delete second part of paragraph: but is yet to acknowledge how further growth into 2040 can be facilitated while retaining its historical village characteristics;</p> <p>paragraph 3.2: delete final part of paragraph: to ensure separation between the village and Bristol;</p> <p>paragraph 4.6: delete entire paragraph;</p> <p>paragraph 7.11: delete last part of paragraph: whilst retaining its separate identity within the Green Belt requiring major investment and significant commitment to employment;</p> <p>paragraph 7.12: delete entire paragraph;</p> <p>paragraph 7.13: amend first sentence as the NDP does not respond to the JSP and JTS but rather is based upon the adopted Core Strategy. Delete entire second part of the paragraph: it seeks to establish and address key issues to retain the village as a village and maintain separateness.....;</p> <p>paragraph 7.14: delete second sentence;</p> <p>paragraph 8.1: delete second sentence;</p> <p>paragraph 12.3: delete paragraph and accompanying Figure 13;</p> <p>paragraph 13.6: delete paragraph.</p>
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Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	Village		The NDP's concept of 'village' is unclear and ambiguous given the lack of supporting information provided to clarify the intent of the policy and NDP references
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	Section 6: Landscape Setting and Character	20 - 21	We would query the purpose of this section of the NDP.
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	Vision and Objectives	26	We note the Whitchurch Village Vision; but raise a concern that would immediately be out of date in autumn 2017 as the detailed proposals in the JSP and Core Strategy Review are published
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	WV1.1	30	We request confirmation as to whether requirements c) and d) differ from Building Regulations, and the policies in the emerging Placemaking Plan which will shortly be adopted. If they do not seek anything additional, then these elements of the policy should be deleted

Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	WV1.2	30	It is not clear how the second element of the policy would be implemented, as there is no supporting text which sets out what the NDP means by large scale uniform type and size.
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	WV1.3	30	We have no objection to this draft policy; recognising that the percentage of affordable housing provision is a strategic policy which may be updated in the JSP and/or Core Strategy Review
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	WV1.4	31	It is recognised that this policy has been amended, however, it still does not accord with the NPPF. The reference to maintaining settlement separation should be removed from the draft policy. The final element of the policy does not accord with national policy, and as such would fail to meet the basic conditions. We refer to the NPPF which at Section 12 sets out the approach to heritage assets. The draft policy currently sets the bar at no harm; the NPPF utilising a two track approach: at less than substantial (requiring the harm weighed against the public benefits of the proposal) see paragraph 134, or substantial harm which should be considered in light of paragraphs 132 and 133.

Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	WV1.6	35	This policy is supported, but must be caveated with ‘where feasible’ to reflect where connection may not be possible. However, a Connectivity Statement should not be required as, if it is feasible, a planning condition can be included to ensure connections are provided.
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	Community Facilities	35	The ‘equine centre and Horse World’ are incorrectly identified as community facilities in the NDP; this should be removed. No evidence provided to support their classification as community facilities.
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	WV2.1	37	‘Green buffer’ is not clearly defined - text references Figure 13 which shows the green belt boundaries. It unnecessary for a NDP policy to replicate the protection afforded by the Green Belt. It is also not clear where the evidence base is to justify a Green Buffer, and we would request that this is published. Any changes to the Green Belt will be considered through the strategic planning context, and a NDP can not create local policies to effectively undermine this process. This policy as drafted is contrary to national policy, and requires deletion to ensure the draft plan meets the basic conditions.
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	WV2.2	37	We did suggest that the NDP identifies the ‘key existing routes’ which it references in the policy, and are concerned that this has not be undertaken

Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	WV2.4	38	Draft policy is contrary to the NPPF. It is also noted that the policy appears to require a LEMP for any development proposal; which is clearly not an appropriate response.
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017	Email	Objective 4	41	This section of the NDP appears to be based upon a report which is not published as part of the evidence base. the NDP does not distinguish between 'strategic' and 'local' in accordance with the NPPF. Should the Parish Council wish to retain elements of 'strategic' transport, the NDP should only set out the concerns raised by the local community; without reference to unevidenced requirements placed on future development
Savills – On behalf of Barwood Development Securities Ltd	18/08/2017	Email	Objective 4	41	The evidence base has now been published; however, as opposed to being a report, it is a letter providing a summary of a meeting which took place between the NDP group and Mr David Worskett. the NDP does not distinguish between 'strategic' and 'local' in accordance with the NPPF. Should the Parish Council wish to retain elements of 'strategic' transport, the NDP should only set out the concerns raised by the local community; without reference to unevidenced requirements placed on future development. This concern has been amplified by the publication of the NDP's transport policy evidence, which is clearly in response to the emerging strategic policies within the JSP.

Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	WV4.1	42	There is a detailed Air Quality policy (PCS3) in the emerging Placemaking Plan; and as such it is not clear why the NDP needs to address this further. The NDP policy is also contrary to national policy by setting the test as any detrimental impact.
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017	Email	WV4.3	43	This is the incorrect test, and the policy should be amended to reflect national guidance.
Savills – On behalf of Barwood Development Securities Ltd	30/06/2017 Resubmitted 18/08/2017	Email	N/A	N/A	Conclusion: Concerned that previous comments have not been considered/ Consultation statement does not explain the NDPs response to these comments NPD as currently drafted is seeking to influence the emerging strategic development context contrary to the NPPF and PPG Draft NDP did not accord with the basic conditions
Jonathan Medlin	29/06/2017 Resubmitted 15/08/2017	Email	N/A	N/A	I am supportive of the WVNP in general. It covers a diverse, important area which will see much change in coming years. I am of the opinion that it could do more to assist the non-village parts of the parish. For example, it supports the role of and provision of affordable housing. This will not be delivered in the more rural settings, covered by the Green Belt.

<p>Jonathan Medlin</p> <p>Notes – Appeal Refused 03.08.2017. Application resubmitted 17/03310/FUL</p>	<p>29/06/2017</p> <p>Resubmitted 15/08/2017</p>	<p>Email</p>	<p>WV1.3</p>	<p>30</p>	<p>Policy WV 1.3 relates to affordable housing in Whitchurch Village, and it requires that at least 30% of the affordable housing shall be allocated based on a local connection. Again, this is supported, but the WVNP should go further to promote affordable homes for local people on brownfield sites elsewhere. Where these sites may be in the Green Belt, it could be seen as an exception to Green Belt policy, in accordance with the NPPF. The WVNP could usefully address this issue. Similar restrictions and criteria would apply, but it would allow locally connected people the opportunity to self-build housing, on brownfield sites, and to remain within the parish. An example site is the brownfield site adjacent to ‘Moret’, on Hursley Hill (16/02474/FUL), which has been refused planning permission and subject to an appeal (APP/F0114/W/17/3166414). If the WVNP promoted this, it would assist delivery of housing which has been refused on Green Belt grounds. Such instances would remain exceptional – as advised in the NPPF – but could also contribute towards local needs housing.</p>
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Jonathan Medlin	29/06/2017 Resubmitted 15/08/2017	Email	WV2.1	37	<p>Attached is the rationale and further information, from the appeal on that case. The WVNP should be amended slightly to support such developments. I suggest the following insertion to WV2.1, as shown with underlining:</p> <p>Policy WV 2.1- Positive green buffer management between Whitchurch Village and Bristol</p> <p>Development will not be permitted outside the housing development boundary, as defined on Fig.13 if individually or cumulatively it would result in increasing the coalescence between Whitchurch Village and Bristol or reducing their separate identity by:</p> <p>a) Reducing the gap between Whitchurch Village and Bristol or,</p> <p>b) Increasing the density of development within existing curtilages</p> <p><u>Substantial weight should be given to any harm to the Green Belt. Very special circumstances will need to clearly outweigh potential harm to the Green Belt and the construction of new buildings is considered inappropriate. The exceptions to this are set out in the NPPF (Para 89), which except limited infilling in villages, and limited affordable housing for local community needs, and partial or complete redevelopment of previously developed sites (brownfield land) which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Where such an exception exists, the development of housing for people with a local connection (see Policy WV1.3 for criteria) will be supported.</u></p>
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Jonathan Medlin	29/06/2017 Resubmitted 15/08/2017	Email	N/A	N/A	I trust that the above fits with the WVNP vision – it should. It would mean that where a development proposal within the Green belt for housing meets the NPPF exception test, and is therefore acceptable despite Green Belt policy, that the WVNP would favour this as being for people with local connections. I am happy to discuss further.
Jonathan Medlin	15/08/2017	Email	N/A	N/A	2, Allocation of the site (site plan attached) for the self-build dwelling, for people with a local connection: Site Allocation: The brownfield site known as Land adjacent to ‘Moret’, Hursley Hill, to be in-filled for one self-build dwelling. Rationale: The Placemaking Plan defines ‘infilling’ as: “The filling of small gaps within existing development e.g. the building of one or two houses on a small vacant plot in an otherwise extensively built up frontage. The plot will generally be surrounded on at least three sides by developed sites or roads”. The Placemaking Plan also acknowledges, at para 299a, that development on ‘previously developed sites’ within the Green Belt should provide an exception to Green Belt Policy. Policy H4 of the Placemaking Plan supports self build housing where the proposals are of sufficient design and sustainability merit. Provision of a single dwelling for people with a local connection will assist the aims of WV1.3.