

Ickleford Parish Council Response to Examiner's Points of Clarification

Policy E1

The purpose of this policy is self-evident. In addition, I note the commentary in paragraphs 7.5 to 7.7 of the Plan. Nevertheless, to what extent would the policy bring any added or local value to the application of national Green Belt policy (as set out in Section 13 of the NPPF 2023)?

Whilst it is acknowledged that Paragraph 16 f) of the National Planning Policy Framework (NPPF) states that Plans should '*serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)*', this policy does not actually duplicate policies that are elsewhere. The Neighbourhood Plan (NP) will be used by the Parish Council to comment on planning applications and will show residents how planning applications are likely to be received. Few of these people are likely to be familiar with Local Plan or NPPF policy and will not necessarily have the knowledge to interpret the relevant parts of those policies and assess planning applications against them to enable them to make informed comments on planning applications. As set out in the preceding paragraphs to Policy E1, this matter is a very important issue for residents of Ickleford who have witnessed the incremental changes in the gap between the settlements. Ickleford is very much a rural settlement and the gap between the two must be maintained to retain its separate identity. Green Belt designation through the previous Local Plan has not achieved the protection of this gap. The policy clearly specifies the location and the policy requirements, it does not duplicate policies elsewhere and the Parish Council request that it is retained in the NP.

Policies E3 and E4

The policies have been well-developed and take account of local circumstances. Are they intended to be applied on a proportionate basis to the scale and nature of the proposed development?

These policies have been carefully worded so as to apply to the majority of planning applications including small scale householder applications such as new buildings, extensions, new walls/fences (where permission is required). Many of these minor applications can change the character and appearance to the detriment of the Parish e.g a tall wall which is urban in appearance and constructed from unsympathetic materials in a location where it would restrict the space between buildings. Some of the policy requirements will simply not be relevant to some planning applications.

Policy HE1

The second part of the policy does not have regard to paragraph 203 of the NPPF. As such I am minded to recommend modifications to remedy this issue. Does the Parish Council have any comments on the way in which it prepared the policy and/or this proposition?

Noted, modifications would be welcome to remedy the issue.

Policy SD2

As submitted the policy has a confusing format.

Does it apply only to:

- sites which would yield between 3 and 10 homes; and
- sites which are not required to deliver affordable housing?

If it includes the latter group, how would the casual reader understand which sites are and are not required to deliver affordable housing?

Would the mathematical approach in the policy realistically work for smaller development (five homes or less)?

In a wider context does the policy not apply to the housing allocations in the Local Plan?

This policy is primarily intended to ensure that new housing sites deliver smaller units on the open market. Sites which are not required to provide affordable housing, either those below 10 units or on larger sites which for some reason are not required to provide affordable units (e.g. because of a viability justification) should still be providing a mix of dwellings with a bias towards smaller units (which is not the requirement in the Local Plan policy).

The mathematical approach is tricky for smaller sites, which is why the wording includes 'at least', so for a site of 5 houses, it would be expected that 2 units would be 1-2 bedroomed and 2 would be 3 bedroomed with the remaining unit to be larger. For a site of 4 houses, 2 units would need to be 1-2 bedroomed with the remaining 2 units to be 3 bedroomed.

Allocations in the Local Plan are usually larger than 10 units and inevitably will provide affordable housing and a mix of sizes. Housing Allocation IC1 is unusually only 9 units which is the reason that it is mentioned in the Policy. So, in this allocation, 3 units should be 1-2 bedroomed, 3 units, 3 bedroomed and 3 units to be larger. NP Policy could also be applied to the other allocations, but it was assumed that there would be a mix in any case.

Policy C1

This policy addresses an important matter to the local community in a positive fashion.

There is a degree of tension between the second and third parts of the policy. As such I am minded to recommend to recommend modifications to remedy this issue. Does the Parish Council have any comments on the way in which it prepared the policy and/or this proposition?

Noted, modifications would be welcome to remedy the issue.

Policy C3

I understand the way in which the policy has been developed.

Nevertheless, is the policy necessary given the contents of Policy IC3 of the adopted Local Plan? In addition, is it reasonable for the submitted Plan to require justification for the delivery of a new school (criterion a) or the detailed assessments (in criteria b and C) given that the principle of a new school has already been established?

This issue is very contentious with local residents who would generally prefer the existing primary school to remain. Replacing the school with a new school on IC3 would make it more difficult for many residents to easily reach the new school, plus there is concern about what would happen to the existing school premises. There is also concern that the existing school could be closed before the new school is opened or even that no primary school would be located in Ickleford. It is therefore very important that these issues are addressed in the NP as opposed to the NP simply referencing the Local Plan.

No real justification has yet been given to relocating the school by the Education Authority other than simply requiring a site to be safeguarded on IC3 nor have there been any traffic/transport assessments as to the impact on existing and/or future residents. The impacts must take into account that parents will travel into and/or through Ickleford from neighbouring parishes to drop their children off at school, it should not be assumed that pupils will only be accepted from Hertfordshire given the geographical location close to Central Bedfordshire.

Policy MTT1

The policy has been well-developed and take account of local circumstances. Is it intended to be applied on a proportionate basis to the scale and nature of the proposed development?

Yes, this is the intention for this policy.