

<Name and address removed>

10th February 2018

Steering Group
Allensmore Neighbourhood Development Plan

Dear all,

Allensmore NDP – Issues & Options Consultation

I write to supplement the points I have made on the consultation questionnaire.

Firstly I would like to thank the steering group for an excellent job so far. I am sure that all of the community are really grateful for the voluntary time you have put into this and the professional approach you have adopted. The draft proposals you have circulated and the community interest that the consultation process has generated are excellent beginnings - and I hope that the opinions I express below are viewed as an attempt to build constructively on your great start.

My key point is that, as I understand it, the National Planning Policy Framework (NPPF) must be taken into account in the preparation of local and neighbourhood plans (NPPF paragraph 2 Page 1).

The NPPF specifically states (para 6 page 2) that:

The purpose of the planning system is to contribute to the achievement of sustainable development.

And At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking (para 14, page 4).

And There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles (para7, page2):

- ● **an economic role** – contributing to building a strong, responsive and competitive economy.....
- ● **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- ● **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Given this, my sense is that the current draft of the Allensmore NDP has insufficient emphasis on:

- the community's health, social and cultural wellbeing
- the enhancement of biodiversity
- the use of natural resources (within natural limits)
- the minimisation of waste and pollution, and
- mitigation and adaptation to climate change

I do acknowledge that the full 48 page document does have reference to some of these issues but my request is for them to be given higher priority and focus.

With this in mind, these are my specific comments/ opinions regarding the Draft vision, objectives and policy options in the Allensmore NDP:

1. Vision

- a. The use of the word “more” in front of sustainable should be removed. The aim is for sustainability – not reduced unsustainability. To emphasise the point, a 1 degree pa rise in mean temperatures is more sustainable than a 2 degree pa rise – but is still completely unsustainable.
- b. There is no reference in the vision to community cohesion or wellbeing. I believe that there is strong evidence that individual wellbeing; community cohesion (neighbourliness, interaction, mutual support, compassion and co-operation); and ecological wellbeing are all interrelated so ideally they should all be referenced in the vision.
- c. I think that the reference to “all of” the community is a hostage to fortune. Any resident who wishes to object to a planning application (for NIMBY reasons or otherwise) could argue that by affecting the quality of his/her life the application is contrary to this vision. That could put the Parish Council in a difficult position! Can I suggest the use of the wording “for current and future generations”
So an alternative vision could be something like:
“To protect and enhance the parish’s rural character through gradual evolution and appropriate development, which improves the quality of life for current and future generations of residents by creating a sustainable environment, enhancing wellbeing and promoting community cohesion”

2. Objectives:

Housing

One of the 12 core principles set out in the NPPF (para 17, page 5) is that planning should:

“support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy)”

In the light of this, surely it should be our objective that housing developments should contribute to climate change mitigation and/ or adaptation, by applying insulation standards at or above national regulations; adopting orientations in favour of solar gain etc; generating renewable energy; contributing to water and sewage waste minimisation/ flood avoidance; using existing buildings and natural materials etc .

Also, given that Allensmore is off the gas grid should the NDP reference (and subsequently explore) creating a connection to the gas grid and/ or creating one or more renewable energy generation and/or district heat schemes (eg biomass).

Environment

In line with my earlier comments, my view is that the current objective under this heading should be phrased more positively; minimising impact is insufficient. In line with the NPPF, our aim should be to protect **and enrich** our natural environment; to enhance biodiversity; to use natural resources within environmental limits, to eliminate waste and pollution, and to mitigate and adapt to climate change; to promote active travel; in short to pursue sustainable development.

Farming & other business

Another of the 12 core principles set out in the NPPF (para 17, page 6) is that planning should:

“contribute to conserving and enhancing the natural environment and reducing pollution.”

It stands to reason, therefore, that farming and other business developments should meet these aims – and that these should be specified as objectives in our NDP. Business planning applications should always be reviewed against the overall sustainable development objectives for the parish. This would ensure that plans for intensive, polluting agriculture, including (for example) chicken sheds etc would be clearly refused because they are not in pursuance of sustainable development (ie they do not enrich the environment and reduce pollution).

Community Facilities and Infrastructure

The existing objective emphasises enhancing existing facilities but doesn't specify the aim to create new ones. I would like to see a shop/ café/ post office /central hub (like the Dorstone front room) and some local “common” green spaces & other green infrastructure (cf my wife's response to the NDP). Whilst it may not be appropriate to be specific, it feels important to include in the objectives a clear reference to the desirability of new local facilities.

3. Policy Options

I have responded to the policy options set out in the questionnaire and do not feel it appropriate to comment in more detail here. If the general points of principle elucidated above are accepted, and applied to the policy options, then the detailed changes will flow logically.

However, if the steering group has any questions about my comments or would welcome any further input, I would be happy to co-operate.

Thank you again for initiating and facilitating this initiative.

Yours faithfully,

<name removed>