

Compton Neighbourhood Plan Regulation 14 Consultation
Monday 9th November – Monday 21st December 2020



Pre-submission Consultation Comments Form

The Regulation 14 consultation provides an opportunity for the NDP, and supporting documentation to be presented as a whole to the community, statutory consultees and other stakeholders for comment. All responses received will be reviewed by the NDP Steering Group and revisions may be made to the Draft Plan. A Consultation Statement which will include a summary of all comments received and how these were considered will be made available with the final ‘Submission Plan’, that will be submitted to West Berkshire Council for further consultation and independent examination.

Thank you for your help and support in preparing the Compton Neighbourhood Development Plan.

Name/ organisation and postcode (for purposes of clarification and feedback only)	
Name/organisation: Laila Bassett, Senior Planning Officer, Planning Policy Team, Development and Planning, West Berkshire District Council	
Post Code: RG14 5LD	Date: 17 December 2020
<i>If you have comments please record them below:</i>	

Plan page number	Paragraph or Policy Number	Comment
n/a	n/a	<p>Thank you for consulting West Berkshire District Council (WBDC) on the pre-submission version of the Compton Neighbourhood Development Plan (NDP).</p> <p>It is clear that a considerable amount of work has gone into producing the draft of the NDP. The NDP sets out good aims and objectives for managing development within Compton Parish.</p> <p>We have reviewed the NDP in relation to the legal requirements and basic conditions required for the council to accept the plan.</p> <p>We would be more than happy to arrange a meeting to discuss any of the comments included in our response to the NDP consultation.</p> <p>To inform this response, Planning Policy have consulted with the following Council teams/ departments on the NDP:</p> <ul style="list-style-type: none"> • Countryside • Development Control • Drainage • Ecology • Economic Development • Environment • Housing • Community Infrastructure Levy • Highways • Transport Policy <p>Responses were received only from Housing, Highways, and the Community Infrastructure Levy Team.</p>

Plan page number	Paragraph or Policy Number	Comment
		<p>The Council needs to ensure that the NDP meets the following basic conditions (para 8 (1) (a) (2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p> <ul style="list-style-type: none"> • Complies with national policy and guidance from the Secretary of State; • Contributes to sustainable development; • General conformity with the strategic policy of the development plan for the area; and • Doesn't breach/is otherwise compatible with EU obligations (including SEA Directive 2001/42/EC). <p>WBDC concludes that the pre-submission version of the plan is in accordance with the basic conditions.</p>
19	C1	<p>The emerging draft of the West Berkshire Local Plan Review 2037 (LPR) has been published for consultation. Consideration should be given to including a reference to the emerging draft LPR or identifying where an update might be needed should the NDP be adopted in advance of the adoption of the LPR.</p> <p>Policy SP1 (Spatial Strategy) of the draft emerging LPR identifies that there will be a presumption in favour of sustainable development and redevelopment within settlement boundaries. Outside of settlement boundaries land will be treated as open countryside where development will be more restricted, as set out in policy DC1 of the emerging draft LPR.</p> <p>Policy SP7 (Design Principles) of the emerging draft LPR sets parameters that have regard to amenity.</p>
21	C2	<p>It is proposed to roll-forward the Pirbright allocation into the LPR. Within the draft emerging LPR, policy RSA27 has regard to the site.</p>
25	C3	<p>The emerging draft LPR includes a policy on climate change (policy SP5). The existing Local Plan does not include a specific policy on climate change. Consideration should be given to including a reference to the emerging draft LPR or identifying where an update might be needed should the NDP be adopted in advance of the adoption of the LPR.</p>
26	C4	<p>No comments</p>
27	C5	<p>The Council's Housing Team have commented that whilst they agree that no priority can be given on Homes England funded schemes, other than those serving in the MOD, the same follows in that if any Registered Provider utilises grant funding from Homes England alongside the developer's obligation then the same rules apply. Allocations would be in accordance with the current Housing Allocation Policy. The Housing Team would like to know more of what the purpose would be for a Local Lettings Plan (LLP), which would be managed alongside the Registered Provider. Any local connection cascade criteria would be documented in the Section 106 Agreement, which is legally binding rather than a LLP.</p> <p>The Report from CCB is now four years old, and since then there has been an update on the Council's own Housing Strategy (https://info.westberks.gov.uk/article/28839/Housing-Strategy) and Housing Allocation Policy (https://info.westberks.gov.uk/article/28813/Housing-Allocations-Policy). Following the Council's own recent housing needs assessment it is clear that there is still a high demand for social rented homes, and as a starting point the Council will be seeking a tenure split of affordable housing on all new development sites of 70% social rent and 30% affordable home ownership, to ensure sufficient and relevant provision of affordable homes to meet the needs of the district.</p>

Plan page number	Paragraph or Policy Number	Comment															
		<p>To ensure mixed and balanced communities a mix of dwelling sizes in line with the table below will be sought from developments delivering new homes.</p> <table border="1"> <thead> <tr> <th></th> <th>1-bed</th> <th>2-bed</th> <th>3-bed</th> <th>4+bed</th> </tr> </thead> <tbody> <tr> <td>Market</td> <td>5 -10%</td> <td>25 – 30%</td> <td>40 – 45%</td> <td>20 – 25%</td> </tr> <tr> <td>Affordable</td> <td>20 – 25%</td> <td>35 - 40%</td> <td>30 - 35%</td> <td>5 -10%</td> </tr> </tbody> </table> <p>To accord with our aims to meet the needs of the whole community, including those with specialist requirements, we will be seeking smaller units and bungalows alongside larger units to be delivered as part of the affordable housing provision of the scheme. This would also assist in the delivery of a diverse street scene that captures our aims around pepper-potting and also to provide mixed communities eg. older people, younger families, single people, etc.</p>		1-bed	2-bed	3-bed	4+bed	Market	5 -10%	25 – 30%	40 – 45%	20 – 25%	Affordable	20 – 25%	35 - 40%	30 - 35%	5 -10%
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28	C6	It is unclear what the aspirations are of the landowner of the hostel. The National Planning Policy Framework (NPPF) states at paragraph 67 that planning policies should take into account, amongst others, availability. This policy may need to be revised if the landowner submits representations on the pre-submission version of the NDP.															
29	C7	No comments															
31	C8	No comments															
33	C9	No comments															
35	C10	Emerging draft LPR policy DC32 (Supporting the Rural Economy) has regard to proposals for the diversification of existing agricultural and other land based rural businesses, including through re-use or adaptation. The existing Local Plan does cover the rural economy (in Core Strategy policy CS10), but not in as much detail as policy DC32. The NDP group may want to review whether policy C10 is required when the LPR is adopted.															
36	C11	<p>HSA DPD policy HSA23 identifies that the site will be comprehensively redeveloped delivering a residential led mixed-use scheme with a mix of, amongst others, employment floorspace.</p> <p>There does not appear to have been any discussions with the landowner about the provision of a business hub. This policy may need to be revised if the landowner submits representations on the pre-submission version of the NDP.</p>															
39	C12	No comments															
40	C13	<p>This is more of an aspiration than a policy.</p> <p>The cricket ground is covered off by proposal to make it a Local Green Space designation so has other protection in theory and probably does not need to be included in here.</p> <p>Does the Parish Council have any involvement in the running of the nursery or the pub? Assuming they are in private ownership and the landowner is willing to transfer as part of a S106 then this makes sense to do if the requirement to do so is deemed compliant with the CIL Reg 122 / NPPF tests, ie. necessary to make the development acceptable etc. If not, then policy will not be enforceable in which case the policy should be removed.</p>															
42	C14	This policy largely repeats paragraph 97 of the NPPF as well as parts of Core Strategy policy CS18 (Green Infrastructure). It also repeats emerging draft LPR policy SP10 (Green Infrastructure).															
43	C15	The designation of Public Rights of Way are not made through the development plan process. The policy should be re-worded to refer to footpaths.															

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44	C16	<p>The policy proposes to designate seven areas as Local Green Space. The NPPF states at paragraph 100 that such designations should only be used where the green space is:</p> <ul style="list-style-type: none"> (i) Reasonably close proximity to the community it serves; (ii) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and (iii) Local in character and is not an extensive tract of land. <p>To support the NDP, a topic paper has been produced which explains how the Local Green Spaces have been identified.</p> <p>All seven spaces are within the village of Compton which is the main populated area of the Parish and can therefore be seen to serve the local community. They are also all within walking distance to those who live in the village.</p> <p>There is no definition of extensive tract of land in national planning policy and guidance. All of the seven areas proposed for designation are of a modest size.</p> <p>The topic paper sets out that the spaces are demonstrably special to the local community because two are recreation grounds and a further two are allotments. The remaining three spaces are identified as being special because they are used informally for recreation, support wildlife, and help to preserve the rural and open character of the areas they lie within. WBDC concurs with the assessment in the topic paper. It would however be useful for the topic paper to be updated following the consultation to include the communities' views of these spaces.</p>
48	C17	<p>Policy SP11 of the draft emerging LPR requires that development proposals include a minimum 10% net gain for biodiversity. The NDP group might want to review policy C17 when the LPR is adopted.</p>
49	C18	<p>It is not necessary to repeat existing Local Plan policy as the NDP will form part of the development plan which is read as a whole. Duplication is therefore unnecessary, and potentially confusing for applicants and members of the public. All development would be required to meet the adopted Core Strategy policy in any case (and policy SP6 following the adoption of the LPR). The Council has an adopted Sustainable Drainage Systems (SuDS) Supplementary Planning Document (SPD) which supports Core Strategy CS16 by providing guidance on the approach that should be taken to SuDS in new developments in West Berkshire.</p> <p>Such a policy only needs to be included as a policy if additional information is required (eg. SuDS/maintenance of Greenfield run-off rates, etc).</p>
50	C19	<p>The Council's Highways Team have raised any objection to the policy.</p>
50	C20	<p>No comments</p>
51	C21	<p>No comments</p>
52	C22	<p>There is no need to repeat existing Local Plan policy as the NDP will form part of the development plan which is read as a whole. Duplication is therefore unnecessary, and potentially confusing for applicants and members of the public. All development would be required to meet the adopted HSA DPD policy in any case. The emerging draft LPR includes a parking standards policy</p>
53	C23	<p>There is not just CIL – there are planning obligations and other mechanisms too.</p>

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		It appears that what the Parish Council wanted to do in this policy is set out priorities for spend. Could the policy be renamed 'Infrastructure Priorities'? The first line of the policy reads more as context and could be moved to the 'Justification of C23'. The start of the policy could therefore read: 'The following are Parish priority projects'
2	Para 1.2	The LPR will now cover the period through to 2037.
4-7	Section 3	The draft emerging LPR was published for consultation on 11 December 2020. The draft emerging plan should be reflected in this chapter. The allocation for the Pirbright site in the HSA DPD is being rolled forward into the LPR.
16	Para 6.1	The LPR will now cover the period through to 2037.
54-55	Section 20	Whilst this section mentions delivery and monitoring, throughout the document you need to make it clear how each policy will be monitored to see how it is working. It should set out how the parish council will monitor the delivery and implementation of each policy.
n/a	Compton NDP Evidence Document	This will need to be updated to reflect the emerging draft West Berkshire Local Plan Review to 2037, which was published for consultation on 11 December 2020. The document mentions the CCB Report, however this report should be published in full.
n/a	n/a	When the NDP is submitted to the Council the following documents need to be submitted: <ul style="list-style-type: none"> • A map identifying the area covered by the NDP (this should be included within the NDP in any case). • Consultation statement – stating how consultation comments have been taken on board • A copy of the NDP • Statement on how the NDP meets the legal requirements set out in the regulations <p>Further information about the submission stage can be found on the WBDC's neighbourhood planning resources webpage: https://info.westberks.gov.uk/npresources.</p>

Comments can be submitted by returning the Comments Form by:

- **Email to :** comptonndpsec2@gmail.com
- **Placing in** the Collection box in the Compton Village Shop

Or by completing the form online at <http://www.comptonndp.org.uk/community/compton-neighbourhood-development-plan-13450/regulation14-consultation/>