

Swinford Parish Council

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Mr Geoff Armstrong
Armstrong Rigg Planning
The Exchange
Colworth Science Park
Sharnbrook
Bedford
MK44 1LQ

Sent by email to: Geoff.armstrong@arplanning.co.uk

30th September 2017

Dear Mr Armstrong,

I am writing to you on behalf of the Parish Council and the NPAC to let you know about the work that the NPAC Housing Group have carried out in respect of the letters you sent to the Parish Council dated 04.07.17 and 21.08.17 on behalf of your clients Mr and Mrs Morris.

The process that the Parish Council has adopted with all landowners is to commission the independent assessments, seek comments from landowners and then make any amendments to the assessments that are agreed appropriate by the Housing Group. The final version of the assessment is then published on the PC website.

Independent site assessments are not required by the National Planning Framework, which is the framework for neighbourhood planning. However, the Parish Council and the NPAC felt that because of their independent nature the assessments would help to support the decision-making process when it came to identifying sites for development.

The Parish Council would like to emphasise to you that the scores on the land assessments do not by themselves determine which sites are identified in the Plan as most suitable for development. For example, had the 'Glebe' land in the centre of the village scored the highest mark it is unlikely that it would have been identified as a preferred location because it was made very clear by parishioners that they do not wish to see development on the land.

All the work done by the NPAC group, all the comments from consultations, all the fieldwork and research carried out, all the statistical and background information accumulated, have helped to formulate and shape the policies that are in the submission version of the Plan. This includes the identification of proposed sites for housing development.

The table below details the NPAC response to the various points you raised in the appendix to your letter dated 04.07.17:

Site capacity	We disagree with all the proposed changes – sites are assessed on the size of the site presented, not what it could be if reduced. We note in this regard that some landowners have not engaged with NPAC at all despite invitations to do so, with the result that it is unlikely that such reductions could be achieved.
Adjoining uses	We agree that site 2 should be reassessed as amber as it is inside the LTD boundary, but disagree with proposed changes on sites 5a, 6, 7 and 8 which are all outside the village boundary (and their size is not considered relevant).
Landscape quality	We agree with the change to red on site 2. We disagree with the proposed changes on sites 4, 7 and 8 (subjectivity inevitable in this category, and do not consider that small scale of development of site 7 is relevant).
Trees	We disagree with the proposed change to site 5b. Impact can be mitigated.
Relationship with existing pattern of built development, traffic impact, noise, drainage	We disagree that these categories should be disregarded. Consistency for all sites with standard criteria set.
Wildlife	We agree that there should be consistency between wildlife that is statutorily protected and those that are not. Accordingly we agree with the change to amber for sites 7 and 8, but we also believe that this should apply to site 6 – any impact of great crested newts up to 500m away can be mitigated.
Listed buildings	We disagree with the changes proposed on sites 4 and 8. Site 8 has the grounds of a Grade 1 listed building in clear view and mitigation will be required so amber is appropriate. Whilst sites 4 and 7 are in view of Grade 2 listed Swinford Lodge, we consider that the views from the Lodge are not significantly affected as they already overlook the houses in the village of Swinford. We appreciate this is a subjective matter.
Conservation area	Whilst we do not agree with the proposed change to site 4 as it is outside the conservation area, for consistency we suggest that sites 6, 7 and 8 are treated in the same way as they are outside the conservation area, scores changed to green for each site.
Pedestrian access	We do not agree with the proposed changes to sites 2 and 7. Access to site 2 will be far from straightforward, and site 7 would involve building a path on a verge next to other landowners land and is therefore more constrained. We do however agree that sites 5b and 6 must be consistent, and therefore site 6 is changed to amber.
Vehicular access	We agree with the proposed change on site 3. We do not however agree with the proposed changes on sites 5b, 6, 7 and 8 – 5b and 6 depend very much on where access is planned, and 7 and 8 is highly subjective with the possibility that the HA could reject.
Distance to community facilities	The proposed change on site 3 is agreed (along with a number of other changes as a result of checking all distances).
Current recreational opportunities	The proposed changes to sites 2 and 6 are agreed.
Archaeology	We do not agree with the changes proposed to sites 3, 4, 5b and 6. The revised NP does not identify any of these sites as best examples of ridge & furrow, and we consider this to be immaterial.

PROW/bridle paths	We disagree with the proposed change on site 3 – the path is adjacent to the site and potentially detrimental to PROW
Contamination	We disagree with the proposed changes to sites 7 and 8 – a planning authority would require investigation of these muck heaps, which is beyond the remit of these assessments. We note that this is entirely consistent with site 4, where a reported old tip has led to an amber score also
Flooding	We disagree with the proposed changes to sites 2, 5a, 5b and 6. A review of the EA flood map does not identify these areas as significant risks

The table below details the NPAC response to the various points you raised in your letter dated 21.08.17:

Site 2 - Adjoining uses	We have reassessed this as amber (not green given location).
Site 2 - Pedestrian access	We disagree – the access too constrained and a design solution will probably be required.
Site 2 - Recreational opportunities	Agreed and altered to amber.
Site 3 - PROW	We disagree with the change – whilst the PROW is only adjacent to the site development could be detrimental.
Site 3 - Recreational opportunities	Despite no theoretical public access the gate is always open and is often used by dog walkers. No change.
Site 4 - Listed buildings	Whilst sites 4 is in view of Grade 2 listed Swinford Lodge, we consider that the views from the Lodge are not significantly affected as they already overlook the houses in the village of Swinford. We appreciate this is a subjective matter. The comment will be updated.
Site 4 - Conservation area	Whilst we do not agree with the proposed change to site 4 as it is outside the conservation area, for consistency we suggest that sites 6, 7 and 8 are treated in the same way as they are outside the conservation area, scores changed to green for each site.
Site 4 - Gas, oil	Sewerage and water is not part of the assessment definition, and has not been taken into account on any site, so this is left as amber for consistency.
Site 6 - Recreational activities	Agreed and altered to amber.
Site 6 - Gas, oil	The electricity pole is sited on the edge of the site next to the existing PROW – this is not part of the planned site. A pathway to the new site could be sited without any impact on the pole, and therefore we do not consider this an issue. Sewerage and water is not part of the assessment definition, and has not been taken into account on any site, so this is left as amber for consistency
Site 7 - Pedestrian access	Existing pathways stop well before getting to this site. The verges are wide in places, but access would involve building a path on a verge next to other landowners land and is therefore constrained. No change.
Site 7 - Contamination	The planning authority would require investigation of these muck heaps, which is beyond the remit of these assessments. We note that this is entirely consistent with site 4, where a reported old tip has led to an amber score also.
Site 8 - Capacity	The number of houses is a subjective opinion by our consultant based on a number of factors, and without a detailed planning application

	which supports your number (which is well beyond the remit of the NP) we see no reason to change this.
Site 8 - Traffic	We note that in your previous letter dated 4 July 2017 you proposed this category was deleted in entirety. As we disagree with your proposed reduction to capacity (see above), we disagree that the score for this category should be improved due to a reduction in capacity.
Site 8 - Contamination	The planning authority would require investigation of these muck heaps, which is beyond the remit of these assessments. We note that this is entirely consistent with site 4, where a reported old tip has led to an amber score also.
Site 8 - Trees	We note that in your previous letter dated 4 July 2017 you agreed with our amber score! The score remains appropriate in our opinion as access to the site may impact on the trees and hedgerows.

The revised site assessments are now available on the Parish Council website along with the submission version of the Plan and the other supporting documents. The submission version of the Plan was approved for submission to the Local Planning Authority at the Parish Council meeting on 12.09.17.

Thank you for the time that you have taken to comment on the work that has been done, please be assured that all points raised have been thoroughly reviewed.

Yours sincerely,

K Clarke

Katherine Clarke
Parish Clerk
Swinford Parish Council