

## Summary of Responses to reg. 16 consultation on Rode Neighbourhood Plan

Respondent	Summary of representations
English Nature	Plan is very unlikely to impact on any significant environmental assets, so no comment to make.
English Heritage	<p>Pleased to note how the community values its historic environment and has used an understanding of this to inform and underpin its policies and proposals.</p> <p>The character assessment is welcomed and offers a succinct distillation of the village's special character and helpfully sets out criteria to ensure that further change protects and enhances its defining qualities.</p> <p>No objection to the conclusion that no SEA is required. Support policy 6 on the protection of local heritage and policy 11 on local green spaces.</p>
SCC Ecologist	The HRA assessment that there are no SAC foraging areas in the vicinity of Rode is incorrect. The River Frome to the south west and west of Rode village is a strategic flyway for Greater Horseshoe Bats from the Mells Valley SAC and probably provides a route for individuals dispersing between this SAC and the Bradford Avon SAC roosts. Having reviewed the policies in the plan, would concur with the conclusions of the HRA except that further explanation is required of the importance of the river corridor. The plan provides protection to the river on its eastern bank. Further information could be included concerning its importance to the SACs.
SCC Acoustics Officer	<p>Suggest that there is need for consideration of the adverse impacts that may result if new development introduces sensitivity to noise that may then conflict with the reasonable expectations from existing development. This might apply particularly to residential development near an existing pub or other commercial development.</p> <p>Suggests an additional sub-section to policy 4 as follows;</p> <p>Policy 4 - New development that complies with other policies in this Plan will be permitted where it:</p> <p>..</p> <p>k. Does not introduce a sensitivity (to light, noise, air / water pollution or amenity) consistent with its use that would be in conflict with any reasonable expectation of impacts arising from existing permitted development.</p>

<p>Gladman Developments Ltd</p>	<p>Neighbourhood plans must meet the basic conditions. NPPF sets out government policy and the requirement for NPs to be in conformity with strategic priorities. At the heart of the NPPF is the presumption in favour of sustainable development. Plans should meet the development needs of their area and Local Plans should meet OAN. NPs should support strategic development needs set out in Local Plans.</p> <p>Policies for the supply of housing should not be considered up to date if the LPA cannot demonstrate a 5 year land supply. This applies to both Local Plans and NPs. NPs should not contain policies restricting housing development. Gladman has reservation regarding Rode NPs ability to meet basic conditions a) d) and e).</p> <p>Housing targets for the NP area should be seen as a minimum. Rode is defined in the Local Plan Part 1 as a primary village. The NP should not seek to preclude delivery of sustainable development opportunities given that the strategic requirements for the wider area are a minimum.</p> <p>Policy 3, housing for the elderly should not be at the expense of ensuring a range of housing options which cater for all age groups.</p> <p>Policy 5, the wording “not normally be permitted” does not allow the policy to be easily and consistently applied and is therefore contrary to the requirements of NPPF. Policy would preclude delivery of sustainable development opportunities and prevent additional housing growth on the edge of the settlement. Limited infilling would not generate financial contributions. Recommend a more flexible approach allowing proposals to be determined site by site. Where they adjoin the development limit proposals should be permitted where the adverse impacts of the development do not significantly outweigh the benefits of the development.</p> <p>Policy 12, LGS 3 and 6 are unrelated to the existing settlement. LGS 2 is an extensive tract of land. These LGS designations do not meet the criteria set out in the NPPF. Examples of areas of land considered to be extensive tracts of land, with their hectarge are quoted. Recommend that LGSs 3, 6 and 2 are deleted.</p> <p>The specific policies listed are not consistent with basic conditions a), d) and e) as they may preclude the delivery of sustainable development or lack the evidence necessary to support designations.</p>
<p>Tetlow King</p>	<p>Do not consider that the NP meets the basic conditions. It fails to have sufficient regard to national policies and the NPPF and fails to contribute to the achievement of sustainable development.</p>

Policy 1; concerned about the conformity of policy 1 with the adopted local plan. Core Policy 2 of the Local Plan requires an additional 505 dwellings to be delivered in the north east of the District. The location of these houses is to be decided in the Local Plan Part 2 which is currently underway. Until the locations are known, it is not clear that the restriction on any further housing sites is in conformity with the development plan. Rode is a primary village which are defined as the best placed to accommodate most new rural development.

Policy 2; objects to the allocation at Merfield House. This was not part of the initial assessments and was included later. Disagree with the assessed impact on the listed building, the village streetscape and landscape quality. Footway access is poor and suitability for housing the elderly is questioned. Alternative sites such as Rode 002 and Rode 003 have not been properly assessed. Housing needs survey indicated 39 people were interested in housing for the elderly in the next 10 years. This only covers half the plan period. Unclear how the creation of 39 units can be achieved without affecting the grade 2 \* listed building or its setting. NP indicates that the majority of people want bungalows. It is unclear how the conversion can achieve this, or a level of development sufficient to meet identified need without causing harm to the setting of the listed building. Do not consider that the policy is sufficiently precise or supported by appropriate evidence. Merfield House is considerably outside the proposed settlement boundary, has no footpath links and is not on a bus route. Too much weight has been given to the results of consultation to the detriment of wider objectives of sustainable development. To meet the basic conditions the NP must comply with the NPPF as a whole.

Policy 3; policy seeks to encourage the principles of more choice and independence for older people but it is not clear how this will be achieved. What is an appropriate scale to the needs of Rode? Does not comply with para 41 of the PPG.

Policy 12; Policy on local green space does not have regard to national policies and guidance. Principle concern is LGS002, Browns Ground. Site assessment has been informed by inaccurate statement that Browns Ground is predominantly used by residents for leisure and recreational purposes and that there is little evidence of agricultural use. It is in agricultural use.

Issues and Options consultation for Local Plan Part 2 shows only 1 green area at Langham House and does not include Browns Ground.

	<p>There is not sufficient evidence to allocate Browns Ground as a local green space. Allocation is not consistent with national policy and does not meet the basic conditions.</p> <p>Development at Browns Ground would benefit the village by providing enhanced open space, housing for the elderly, potential community use and funding could be considered for a community bus and drainage works, preventing water pooling in Church Lane and providing upstream attenuation for the village.</p> <p>The plan is not seeking sustainable development but rather seeks to retain the village as it is. Accommodation for the elderly is not on the most suitable site and not of a scale to meet needs. Serious concerns are expressed about the evidence base and the proposed policies. The evidence base for the local green space allocation is inaccurate. The plan does not contribute to the achievement of sustainable development. The plan does not meet the basic conditions.</p>
MDC	<p>MDC considers that the Neighbourhood Plan is in conformity with the adopted Local Plan Part 1.</p> <p>Part 2 of the Local Plan is in preparation.</p> <p>There are some minor differences between the Neighbourhood Plan and the detail of the policies in Part 1 in respect of the development boundary and the open areas of local significance. In both these cases the local plan policies are being re-assessed as part of the preparation of Part 2 and there is no conflict with the strategic level of policy making set out in Part 1.</p> <p>It is considered that the Neighbourhood Plan meets the basic conditions.</p> <p>There is a tension between provision of housing for the elderly and the heritage value of Merfield House. Although the policy acknowledges the needs to respect the heritage value of the listed building, it remains to be proved that a development for this use can be designed which is acceptable in heritage terms. Some wording emphasising the need for early discussion of this issue should be added.</p>