

From: [Rachael Riach](#)
To: [andrew ashcroft](#)
Subject: FW: [EXTERNAL] Winslow NDP Review - Clarification Note
Date: 07 October 2022 12:54:00
Attachments: [WTC Response to Examiner.pdf](#)

Dear Andrew,

Please find attached the comments from Winslow Town Council to the clarification note.

Furthermore, in answer to the question for Buckinghamshire on 5YHLS: It is still the April 2022 position statement.

Best wishes,

Rachael Riach
Neighbourhood Planning Coordinator
Planning Growth and Sustainability
Buckinghamshire Council

Winslow Neighbourhood Development Plan Review

Response by Winslow Town Council to Examiner's Clarification Note

Winslow Town Council (WTC) is grateful for the opportunity to respond to the Clarification Note, and for the Initial Comments made by the Examiner. Its responses to the individual points raised are as follows.

Policy 1

In drafting this Policy WTC took it as read that the modified NP would support the developments for which allocations are made by VALP or itself. Apart from a new medical centre (Policy 7) at some indeterminate future time WTC has no other potential developments in contemplation, but Part A(b) does promote infill and Part A(d) the re-use of brownfield sites.

The aim of Part B is to ensure that the settlement boundary serves its intended purpose of preventing sprawl (see further observations below) and is intended to go as far as the presumption in favour of sustainable development allows. Might Part B be improved, and a positive tone be injected, by adding at the beginning 'In order to promote the objectives of Policy 1A(b) and (d), and'?

The comment relating to Part C is not understood. Part C represents positive support, notwithstanding the site's location outside the WSB, for what WTC considers to be a desirable redevelopment of an existing site, for which a pre-application enquiry has been made and which WTC expects to be the subject of a planning application very soon. See further comments below.

Policy 2

WTC would have no objection to the move of Part B to the supporting text.

Policy 3

WTC does not have the resources to carry out a detailed housing needs assessment, and it considers that such an assessment could not offer any precision in such a contested market context with Buckingham, Aylesbury and Milton Keynes in particular having significant overlapping influences in the area. VALP Policy H1 states that 'Residential developments of 11 or more dwellings gross or sites of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site.' The rationale for the retention of the requirement of 35% affordable housing for sites in Winslow is essentially as stated at paragraph 4.29: it was the target approved in the 2014 referendum which preceded the making of the existing Neighbourhood Plan; there is unmet demand for affordable housing accommodation; it has proved effective in practice in that developers of relevant sites within the town have been willing to comply with it (presumably in the knowledge that such a proportion is commercially viable—the would-be developers of the land adjacent to the railway station are even proposing 50% affordable housing); and no respondent to the various consultations already undertaken, save for Buckinghamshire Council (BC), has suggested a variation of it.

Section 106 agreements which include 35% affordable housing are already in place for the WIN001 site, and are close to completion for Station Road, whilst BC as promoter of the development of the Winslow Centre and Rugby Field housing sites has confirmed it is planning to achieve 35% affordable housing in those areas. These agreements and assurances already cover all relevant development sites identified in the modified WNP.

A few days ago BC published its consultation draft SPD for affordable housing in the Aylesbury Vale area. This reinforces WTC's view that 25% is the minimum required:

12. *The council will require a minimum of 25% of the total number of units on the site to be provided as affordable housing. There may also be circumstances, such as in Neighbourhood*

Plans, where a different affordable housing requirement applies. The VALP Inspector's Report (August 2021) noted at para 271: 'As noted elsewhere in this report, VALP does not explicitly say that it supersedes any Neighbourhood Plan policy and so they exist side by side. VALP policy H1 requires a minimum of 25% affordable homes on site and so Neighbourhood plan policies which require more than that minimum are not inconsistent with it.'

The arithmetic in paragraph 4.29 is designed to show that if the First Homes included in the modified NP Policy are excluded (so that the definition matches that in VALP, which reflects an earlier NPPF definition and makes no provision for First Homes) to allow for a like-for-like comparison, the requirement of the modified NP only marginally exceeds the VALP expectations for rental and other affordable categories whilst additionally providing for First Homes.

Of VALP's minimum of 25% affordable, BC is seeking 80% to be rental and 20% to be shared ownership or other affordable housing. So 20% of new housing would be rental and 5% would be shared ownership or other.

Of WNP's proposal for a minimum of 35% affordable, WTC is seeking 25% to be First Homes, 60% to be rental and 15% to be other. So 8.75% of new housing would be First Homes, 21% would be rental and 5.25% would be shared ownership or other.

WTC's proposals therefore very slightly increase the percentages of rental/shared ownerships compared with the VALP expectation, but then additionally secures 8.75% as First Homes.

Part C was included within the Policy at the suggestion of BC's housing officer with a view to ensuring that it was taken into account in the drafting of conditions to relevant planning permissions, which it is thought would be less likely to occur if it were relegated to the supporting text. However, if it is not considered an appropriate topic for a Policy WTC will not object to its being moved to the supporting text.

Policy 4

Winslow's conservation area (see Plan K on page 41 of the submitted State of the Town Report) is extensive—exceptionally so for a town of its size—with the consequence that the number of properties and potential properties close to it is substantial. The Policy's aim is to ensure that development outside, but within sight of, the conservation area is sympathetic in design and does not undermine the visual value of the conservation area (see also proposed Policy 13.B). All of the sites identified at Policy 2 are in close proximity to the conservation area, in some cases adjoining it, and Part B is intended to supplement what is said in that Policy, while not confining the requirement to those sites alone.

Policy 5

The site identified at Part A(a) was designated for uses in what were then Use Classes B1, B2 and B8 in WNP2014 (see Policy 8.I). The site has been marketed for such uses but, the owner's representatives have stated, without success, although it is notable that rural workshops and other employment opportunities suitable for the site have been established in neighbouring parishes. An application for permission to develop the site for housing has recently been refused and that refusal is now the subject of an appeal. No responses to the consultations, save those from organisations (Crevichon et al) interested in developing the site for residential purposes as noted below, were received which suggested that the WNP2014 allocation should be reconsidered. WTC remains of the view that development of the site for uses in what are now Use Classes B2, B8 or E is appropriate whereas residential development is not. If the owners of the site were to accept that allocation and adjust their marketing strategy accordingly WTC considers that a developer could be found, and the site could be developed, well within the Plan period; the forthcoming opening of the railway can be expected to make a site adjacent to the new station, already fully serviced, an attractive location for employment. Although Winslow has a variety of employment opportunities (see paragraph 4.38 of the modified NP)

they are limited in number and the town is very far from providing local employment for the majority of its inhabitants of working age (see also paragraph 4.35).

The site identified at Part A(b) is owned by Buckinghamshire Council, and it is their proposal to develop the land for employment purposes. The timing of any such development is within that Council's control. WTC knows of no reason why the site could not be developed within the Plan period, although probably in the later part of that period when it, too, will benefit from the proximity of the new railway station.

Policy 6

This site is also owned by Buckinghamshire Council. The primary purpose of the proposed development of this site is to re-provide the sports facilities, identified at (a) to (d) that will be displaced from the Winslow Centre and the rugby field in order that those sites can be redeveloped, but BC has indicated that it aims to provide more extensive facilities, and has recently conducted a public consultation on its proposals. WTC is in active discussions with BC, whose intention is that an application for the necessary planning permission will be made in the first half of 2023. WTC has agreed to fund, or contribute the greater part of the funding for, the skate park referred to at (f) from section 106 moneys and will, if possible, also fund the playground referred to at (g) from the same source.

The intention, as BC has indicated to WTC, is to replace the displaced facilities in tandem with the redevelopment of the Winslow Centre site, the latter (in broad terms) providing the finance for the former. No sequencing has yet been determined and WTC recognises that at this stage a precise timetable cannot be set out. For that reason Policy 9 Part B goes no further than to require the agreement, to which Sport England is to be a party, of a development programme which will ensure that the replacement facilities are provided within a reasonable timescale.

Policy 7

Until very shortly before the modified Plan was submitted the proposal, apparently agreed by all concerned, was that the town's existing medical facilities, within a Grade II listed building and adjacent health centre, would be re-housed in the proposed Winslow Centre redevelopment. The CCG and the medical practice then announced that, instead, the health centre would be refurbished—as paragraph 4.45 states—and the space in the Winslow Centre redevelopment would not be taken. However, the expected useful life of the refurbished health centre is no more than about 10 years, and a site for a larger medical practice will accordingly need to be found within the Plan period. At present no site has been identified, though a location on a plot within the site identified at Policy 5A(a) (whose current and proposed allocation would allow for a medical centre to be constructed on it) would be supported by WTC.

Such is the importance of the medical facility to the town and the surrounding villages (currently about 50% of the practice's patients live in the surrounding villages, which are also expanding) that WTC would strongly prefer to retain this as a Policy, aspirational though it may be, in order that it informs planning decisions particularly if an exception to Policy 1B or any other WNP policy might be necessary to accommodate a new Health Centre in the town.

Policy 9

Although the Winslow Centre site (in part brownfield and in part an infill site) is ripe for redevelopment it has limited vehicular access. It is served by a single residential street, Avenue Road, which is narrow, and the houses on both sides of the affected part have no off-street parking or the space to create it. In addition Avenue Road joins the A413, the main road between Aylesbury and Buckingham, at a junction with significantly impaired visibility because of an adjacent High Street property. WTC has considerable concerns about the impact of additional traffic on Avenue Road and its residents

(paragraph 4.51 indicates that there should be no vehicular access to the redeveloped site from Park Road, which has similar parking problems and itself depends on access from Avenue Road) and on the junction with the busy A413. Thus although it supports and welcomes the redevelopment in principle, it considers the traffic implications are of such importance that the measures specified should form part of the Policy and not merely appear in the supporting text.

Policy 10

There is concern not only within WTC but among traders and residents, as shown by the responses to the consultations, that the incremental conversion of shop and office premises to residential will erode the commercial viability of the town centre, already a small shopping area, forcing residents to travel elsewhere, in the main by car, to obtain food and other household goods.

WTC is supporting a request submitted by Town Centre traders to Buckinghamshire Council for BC to make an Article 4 Direction covering the town's Shopping Area which would have the effect of removing permitted development rights under class MA which otherwise allow (with limited exceptions) the conversion of commercial to residential uses. This Direction would at least require careful consideration to be given to any such proposals through the need to secure planning consent for each such proposal in the defined Shopping Area of the town.

Until such a Direction is made the Policy as worded should make the effect on the shopping area of proposed conversions a material planning consideration. WTC will resist such conversions, where possible and reasonable, by objecting in particular on the ground that the additional burden of overnight on-street and off-street parking is unmanageable and therefore unacceptable (and on such other grounds, if any, as may be relevant in a particular case). WTC would aim to do so on a consistent and rational basis, no matter whether such applications are sought for permitted development under class MA or for full planning permission.

Policy 11

Section 7 of VALP itself contains a number of proposals, not all of which involve land allocation. The only proposal within that Section of specific application to Winslow appears at Table 17, requiring the creation of the infrastructure for an increased frequency of bus services at the forthcoming Winslow station—the necessary facilities for bus services are already included in the approved plans for the station and its forecourt, and are considered adequate for foreseeable future.

For other developments in Winslow the relevant VALP Policy is T5, and WNP Policy 11 is designed to provide local context for the mitigations suggested in VALP T5. The delivery of the provisions of Policy 11 will often be achieved through financial aspects of planning agreements (such as section 106) with developers.

In answer to the specific points:

- Policy 11A : The only development expected to occur within the Plan period to which this requirement would apply is that on the east side of Great Horwood Road (designated in VALP as WIN001). Funding to support initial bus service provision is already included in the signed section 106 agreement following paragraph h of VALP Policy D-WIN001.
- Policy 11B : The Policy as drafted is prescriptive about the principle but leaves the manner of implementation open to discussion and flexible application as the circumstances require. An example is WIN001 whose developers have already agreed to comply with this requirement.
- Policy 11C : WTC has been in discussion for some time with Great Horwood Parish Council about the extension of an existing path leading from Great Horwood towards, but not reaching, Winslow and BC has undertaken a feasibility study which concluded positively. WTC has persuaded the developers of WIN001 to create a combined cycle track and

footpath through the development from Great Horwood Road close to its junction with Buckingham Road, running approximately northwards and terminating at the northern boundary of the site in a position which will allow for later extension to meet the existing path. The agreed termination point coincides with the Winslow parish boundary with Great Horwood (a natural watercourse). The proposed further extension of the path northwards lies wholly within Great Horwood parish and it is not considered appropriate for Winslow's Neighbourhood Plan to say more (but for your information a significant part of the route could follow tracks which already exist as a legacy from a former airfield). WTC observes that the reference in Part C to Policy 2(d) is an error and it should be replaced with a reference to WNP's para 4.20.

- Policy 11D : Network Rail (NR) has agreed in principle to allow the creation of a footpath and cycle track passing beneath the bridge, and the developers of WIN001 have agreed to create a combined foot and cycle path through their development (and linking with the combined path referred to in the previous bullet point) to connect with it. At present no agreement has been reached on the funding of the combined route across NR land to which the Policy refers, but if no other source is available WTC will consider financing the design and construction using section 106 moneys as the pathway is considered to be an important addition to the leisure facilities and connectivity of the town.

Policy 13

While Policies NE8 and I1 of VALP prevent or limit the loss of vegetation, WTC believes that Part A of this proposed Policy goes further in encouraging greater provision of new trees and hedges, with particular emphasis on tree canopy cover (which receives only one passing reference in VALP, at paragraph 9.52). Part A reflects the substantial number of consultation responses in which the need for enhanced environmental measures was emphasised, and WTC was encouraged to strengthen it by BC itself. WTC would be reluctant to see it omitted or moved to the supporting text. It is accepted that, notwithstanding the second sentence of paragraph 4.73, the reference to 'All new development' should be modified so as to exclude minor developments such as domestic extensions, infill with a single dwelling and the like, but WTC would be reluctant to see it further watered down. We suggest that the wording of part A should begin 'All new developments requiring planning consent, save for those related to a single residential unit, should include landscaping ...'.

WTC accepts that the first clause of Part B does not add to VALP's Policies, and will agree to its removal to the supporting text (WTC does not wish to lose it altogether despite the overlap with VALP). The second clause is intended to reinforce Policy BE2 paragraph d, and to highlight the need to protect public views of Winslow's 81 listed buildings. WTC wishes to retain it as a Policy and not merely in the supporting text.

Representations

All of the representations to the most recent consultation cover ground made in responses to previous consultations, and were addressed at that stage. It follows that WTC was not willing to make significant changes because of them, for the reasons explained below. In addition, as this is a modified, and not a revised, NP, and the proposals in it meet VALP targets, it was unnecessary to consider additional sites, and it would be wrong now to add any without considering all options and having strong supporting evidence. That exercise will be undertaken in the preparation of the next (revised) WNP, to be produced alongside the new Buckinghamshire LP.

Winslow Developments

WTC would have no objection to the redrawing of the settlement boundary to include the site if that were thought appropriate. The rationale for not taking forward the earlier proposal to extend the

settlement boundary to incorporate the site at Tinkers End was to reduce the potential for the modifications to be considered ‘so significant as to change the nature of the Plan’. As other factors have been considered to cross that threshold, it would be possible to revert to the earlier proposal which extended the settlement boundary to include the Tinkers End site (though this would require careful consideration of consequential changes to text in various parts of the proposed WNP). On balance WTC feels it is best to leave the WSB and related policy for Tinkers End unchanged from that shown in the Reg 16 consultation

Crevichon Properties

This weighty submission is similar if not identical to that made in support of earlier planning applications for housing on the site south of Buckingham Road. The more recent of those applications was rejected by BC and an appeal against that rejection has been submitted recently. In the intervening time the evidence was submitted by Crevichon and their associates in the consultation stages leading to the currently proposed modification of the Neighbourhood Plan.

WTC is not in a position to comment on the nature and vigour of Crevichon’s marketing, save to observe that it is remarkable that, despite the site having been allocated for light industrial uses for many years, it has (if the response is correct) succeeded in generating no viable interest at all. As WTC has already observed further employment opportunities are needed within Winslow if it is not to become almost entirely a dormitory town. This site, remote from existing residential properties and adjacent to the forthcoming railway station and improved bus facilities, is in an ideal position to provide those opportunities. The improved ease of inward commuting for work will ensure access to a wider range of skills for any employer based in Winslow.

It is true that the application for planning permission for redevelopment of the Station Road site has a protracted history, but the parties are currently in the final stages of reaching a section 106 agreement and there is correspondingly good reason to think that permission will be granted in the near future. It is to be noted that Crevichon makes no mention of the fact that, with the proposed Station Road development, Winslow will meet the housing requirements imposed on it by VALP. It is conspicuous, too, that Crevichon does not mention the additional burden the housing it proposes would impose on the town’s existing infrastructure, particularly its medical and educational facilities and its road network. These are all already stretched, so further development will impose a burden which would have a significant adverse impact on the current population of the town, but the proposal says nothing about relieving that burden.

Whilst the evidence from Thrive Homes seeks to demonstrate a shortage of affordable housing in Winslow, it appears that the basis of this case has not taken account of what has been delivered over the past 8 years when all new development has included 35% affordable housing. Thrive’s proposals to deliver more than 50% affordable housing on this site would be a challenge to the principle of achieving a comprehensive mix of housing types, sizes and tenures in all housing areas.

Land & Partners

Land & Partners are experienced promoters of development sites in Winslow, having been involved in the sites east of Furze Lane (now built out) and in the southern parcel of WIN001 (shortly to begin construction). Their proposal for development to the west of Furze Lane is recognised by them and us as a bid for future consideration – and as with other such submissions as this stage, we consider it a marker for a site that might be put forward for allocation in the next (revised) Neighbourhood Plan. For reasons recited above, it has not been necessary for WTC to consider any additional sites for residential development, and it therefore would not be appropriate to take forward any such suggestions for specific sites at this time.

Llew Monger

WTC does not have (and does not have the resources to obtain) the evidence on which it might seek to designate sites adjacent or in proximity to the settlement boundary as reserve or protected sites, but it may be possible to achieve such designation when the NP is next revised alongside the making of the Buckinghamshire LP. In the meantime WTC is content to rely on proposed Policy 1B, a repeat of the corresponding provision in WNP2014, which (save for WIN001, as a new allocation made by VALP) has served the town adequately hitherto.

WTC shares Mr Monger's concerns about the redevelopment of the Winslow Centre site, the development of the rugby field and the delivery of the Sports Hub, but considers that its proposed Policies relating to these topics go as far as they can to protect the town's interests without imposing what might be an unmanageable and possibly counter-productive straitjacket on the proposals. In particular, requiring BC to provide a Sports Hub before any of the development value of the other sites is realised, as Mr Monger suggests, may well introduce a hurdle which cannot be overcome.

WTC is also well aware that many residents wish to see the rugby field designated as Local Green Space. However, its allocation for housing development was approved in the 2014 referendum which preceded the making of WNP2014, when the development of the Grange and Glade estates (for which former Policy 3.I provided) was about to begin, and that allocation conferred a development value on the site. WTC does not understand how the modification of a NP can, unilaterally, deprive the landowner of that development value. And, of course, the housing to be accommodated on this site is an integral part of the Plan's provisions to meet the targets set for Winslow in VALP.

Network Rail has a statutory obligation to return the site of its construction depot to agricultural use once it is vacated (it was in the recent past rough pasture land). WTC does not consider there is any purpose to extending the settlement boundary to include the site, and designating it for a medical centre, in the absence of evidence (a) that it is suitable for such a purpose and (b) that the ICB (formerly CCG) or the practice have any wish to construct medical facilities on it.

The project for the construction of an all-purpose Community Centre was abandoned, for the reasons given at paragraph 4.48, and at a time when Mr Monger was a WTC councillor. He has also been unable to identify a site available to WTC on which such a building could be constructed: the site to which he refers is currently the football pitch on the recreation ground, used by Winslow Town Football Club, and is the subject of a lease which does not expire until 2037, well beyond the end of the Plan period.

WTC does not consider that the modified proposals for the Winslow Centre site differ fundamentally from those in WNP2014 save that it is now proposed that (a) the library should be rehoused on the site in purpose-built accommodation; (b) part of the housing allocation required by VALP should be constructed on this site; (c) a possible 30 extra homes may be built; and (d) the allocated number of extra-care homes has been increased. WTC considers (a) to be not merely acceptable but desirable since the current building has no intrinsic merit justifying its retention and the proposed replacement offers greater space and improved facilities; and that (b) and (d) are unavoidable, in the absence of any other suitable site, if the VALP allocations are to be met. It is acknowledged that (c) is not inherited from WNP2014 or imposed by VALP, but WTC considers it to be an acceptable feature of the proposal to complete the development of the site.

Mr Monger's other points have been addressed elsewhere in this document, or in the submission materials, and WTC's comments are not repeated.

Gladman Developments Ltd

In WTC's view proposed Policy 1B, when read with NPPF paragraph 80, is perfectly clear and requires no elaboration. As Policy 1A(b) states, the purpose of a settlement boundary is to contain the spread of the town; the incremental erosion of the integrity of the boundary proposed at paragraphs 4.2.4 and 4.2.5 of the response would wholly undermine its purpose.

The arithmetic questioned at paragraph 4.3.2ff is simply explained. A total of 382 homes have been built, or are in the course of construction, on the development east of Furze Lane. To that number should be added 315 on WIN001, 75 on the rugby field and Winslow Centre site, 65 on the Station Road site and 30 in Granborough Road, making an overall total of 867, three short of the VALP allocation of 870, although if an additional 30 are built on the Winslow Centre site the target will be exceeded. The 83 extra care homes meet a separate VALP allocation of exactly that number of C2 dwellings, and none of them can be counted as a contribution to the 870 (C3 dwellings).

The land at Little Horwood Road referred to at paragraph 5.1.1ff lies outside the settlement boundary. There is no evidence that there is sufficient demand for housing on that site, nor that it should be given priority for development over other possible sites, and if it were developed in this plan period Winslow would substantially exceed its VALP housing allocation while lacking the infrastructure to support it. This too is seen as a bid for future consideration, and a marker for a site that might be put forward for allocation in the next (revised) Neighbourhood Plan

Gladman's other points have been addressed elsewhere in this document, or in the submission materials, and WTC's comments are not repeated.

Buckinghamshire Council

Policy 3: already dealt with above.

Policy 12: the sites identified as Local Green Space meet the NPPF paragraph 102 criteria in that they are (as the Policies Map shows) all in close proximity to the community, special to the community because of their recreational value (in the case of the Recreation Ground as a playing field), and are local in character and not extensive tracts of land. It should also be noted that all of the sites are already designated as Local Green Space in WNP2014. The modified WNP has excluded some that were listed in 2014 because they do not meet the current NPPF criteria, or because VALP proposals require development to encroach on them (but the modified WNP indicates an intention to designate alternative LGS in the next revised WNP when appropriate specific areas will be identifiable).

Referendum: we have noted your determination that a referendum will be required, and that some text will need to be revised accordingly.

Paragraph 1.9c: The circumstances under which the modified Plan was prepared and consulted on were significantly influenced by the pandemic. Review of the evidence that was used in support of WNP2014 indicated that very few of the sources had been updated – and the documentation supporting the submitted modified Plan already notes this.

Biodiversity and Heritage: It seems that BC and WTC have fundamentally different views of how these issues should be handled within Development Plans. Just as a NP should not repeat matters dealt with in a LP, we think it is also clear that a NP should not include policies which are applicable throughout the LP area, nor should it seek to duplicate sources of information that are best managed in coherent and continually updated central repositories maintained by bodies which have the resources (which WTC does not) to obtain that information and to manage it. The suggestions now made by BC were not raised during the preparation of the modified WNP, but appeared first only in their response to the final public consultation.

Objectives: WTC agrees with this suggested change.

Policy 4: WTC does not have the resources to conduct or commission a character assessment and in any event intends to rely on national or Buckinghamshire-wide codes, as stated at paragraph 4.33. It does, however, refer to the appraisal of the town's Conservation Area which already provides a very useful guide to the characteristics of the town, which we have seen used successfully to underpin design proposals for new developments. The first suggested drafting change to para 4.34 is not agreed; WTC does not wish to see developments which do not meet recognised standards within the town.

The second suggested change is agreed where solar PV would cause **significant** harm to the conservation area or to the setting of a listed building or other heritage assets.

Policy 5: Winslow already has full-fibre broadband covering most of the town, including the sites identified at Policy 5A(a) and C. It would be a simple matter to extend the coverage to the site mentioned at A(b) if the site is developed, and WTC is confident it would be extended regardless of any NP Policy. WTC will consider whether it should ask for The Bell to be designated as a community asset, though this designation is independent of the NP (the closure of The George referred to in BC's comments was only temporary and it has now reopened).

Paragraph 4.44: 12,000 (not 12,500) is WTC's best estimate of the size to which the patient population of the area served by the existing facilities will grow during the Plan period. It is not, and cannot be, a precise figure.

Policy 10: the conditions which must be met before commercial property may be converted to residential under permitted development (Class MA) are prescribed by the Town and Country Planning (General Permitted Development etc) (England) (Amendment) Order 2021, and they do not include any requirement of prior marketing. WTC is unaware of any power reposed in it to add further conditions of its own devising. It does not consider the suggested revised or additional policy wording improves on the current wording. The measure which WTC believes is more relevant would be the adoption of an Article 4 Direction for the Shopping Area to exclude properties in this area from class MA, and as already noted WTC is supporting a request by local traders for such a Direction (again independent of the NP).

Policy 13: WTC does not consider that the first two suggested changes of wording improve upon the existing wording, read with the relevant VALP Policies (see the earlier response relating to this Policy). The third and fourth suggestions appear to add nothing to existing requirements of net biodiversity gain (NPPF Section 15).

Archaeology: paragraph 194 of NPPF is directed to local planning authorities (which WTC is not) and there does not appear to be any benefit in repeating its requirements in a NP.

Biodiversity: once again this appears to run contrary to the principles outlined above of the NP dealing with locally-specific policy issues rather than ones that must apply throughout the LP area. Implementation of the NP will be by BC as the LPA and therefore any monitoring of biodiversity net gain would need to be by BC – WTC has no resources to undertake such work. Information about notable and protected species is held by others and we do not consider it helpful for the NP to include such information which inevitably will become out of date; those requiring such information should always consult the live sources of relevant data.

7th October 2022