

Marton Neighbourhood Plan: CEC Regulation 14 Comments

The Borough Council congratulates the Parish Council on preparing a clear and comprehensive Neighbourhood Plan and for the way in which the Plan has been prepared, closely involving the local community. The Plan is the product of a very significant amount of hard work by volunteers and continuous engagement with the local community which has clearly shaped the content of the Plan.

These comments are in relation to the Regulation 14 Pre-Submission consultation, specifically consider the policy approach taken by the Parish Council and to provide guidance on whether the plan and its proposals are clear and unambiguous. More general comments are also included for consideration.

General Recommendations:

In General the document is well prepared and set out in a logical way. Further consideration should be given to consolidation of the multiple maps included into a smaller number of 'key maps'. Also the maps are not clearly referenced or labelled with specific headings, amending this would assist the user of the document. For ease of use the maps should each be referenced in the contents page.

The sequence of objective followed by policies is helpful to demonstrate the connection between the two. The sections here may be enhanced by including a 'justification' section within each, to summarise the evidence gathered and the background issues that have led to the policy choices. A summary of the findings of the key documents would be suitable here to frame the objective and policy choices made. In some instances this is partly achieved and incorporated within the existing text, separating this out under a separate justification section would lend the document greater clarity.

Consideration may wish to be given to the identification of policies and the sequential referencing. Many planning policy documents abbreviate the title of the section and include a relevant reference in sequence. For example Residential and Commercial Development would become RCD1, RCD 2, RCD3 etc., in using the document this is often helpful.

Marton Neighbourhood Plan: Policy Comments	
Policy/Issue	Comment
1. General	Include Neighbourhood Plan Design Guide as an appendix to the document.
2. Residential and Commercial Development. Policy (a) p.31	The policy as written is not clear. Suggest: 'Development will be supported on brownfield sites'
Residential and Commercial Development. Policy (C) p.32	The approach would be consistent with that of the adopted Local Plan and the emerging Cheshire East Local Plan Strategy. The Interim Views of the Inspector lend caveated support to the proposed Settlement Hierarchy and the Spatial Distribution of Development as outlined in CELPS policy PG2.

Residential and Commercial Development. Policy (E) p.32	C and E address a related issue and would be best placed next to each other in the sequence.
Residential and Commercial Development. Policy (G) p.32	The text as drafted does not constitute a planning policy and should be removed or reworded. Suggest: New homes, extensions and other buildings should be of a quality and form appropriate of their local context and meet the quality and design standards outlined in the Neighbourhood Plan Design Guidance at appendix X.
Residential and Commercial Development. Policy (H) p.32	Policy is repeated in 5. Protecting Community Assets. Suggest removing from section 1 and incorporating into section 5.
Residential and Commercial Development. Policy (B, D, F, G, I, J, K, L, M) p.32	The policies B, D, F, G I, J, K, L, M address the detail of built form of new development and it's relationship and impact on the character of the village. Consideration should be given to consolidating these policies and grouping together sequentially.
Residential and Commercial Development. Policy (M) p.32	The second sentence is not policy and should be removed. Some definition to the meaning 'small scale' would help to make the policy more clear.
2. Transport, Schools and Parking. Policy (a) p.33	To ensure the policy is clear, suggest: Proposals that improve the safety of children and parents will be supported including the improved provision of parking within the curtilage of the school.
3. Protecting our Environment. Policy (a) p.34	The Landscape Study does not assert that the landscape is of high value in it's own terms but that it is a 'highly valued local resource' would suggest to use this phrase in the policy.
4. Protecting our Environment. Policy (b) p.34	The policy is not clear and unambiguous and may best be described as a community aspiration. Suggest: Where appropriate, contributions from development will be pooled to maintain, expand and enhance the network of public footpaths, bridleways and cycleways
Protecting our Environment. Policy (D) p.34	The policy would benefit from a separate heading of 'Local Green Space' and include a separate demonstrating how the policy meets the criteria established in paras. 76,77 and 78 of the NPPF.
Protecting our Environment. Policy (E) p.34	The first sentence is not clear. Suggest replacing the first sentence with: Development proposals must not harm the Marton Oak or it's setting.
Protecting our Environment. Policy (F) p.34	Hedgerows are dealt with under provisions made by the Hedgerows Regulations 1997 and Trees are dealt with under provisions made by the Town and Country Planning

	Act 1990 (as amended). The policy as written does not clarify on what basis the hedgerows and trees are valued. Suggest that this is specified within the policy. For clarity suggest that the word supported be replaced with the word permitted. Suggest that 'adequate compensatory provision being made' is replaced with 'appropriate mitigation'
Protecting our Environment. Policy (H) p.34	Remove word 'potential' and 'respected' and Suggest: 'Development proposals must demonstrate that the views are retained and integrated within the proposal.'
Protecting our Environment. Policy (I) p.35	For clarity suggest: Verges, trees and hedgerows along country lanes should be retained.
5. Traffic and Safety	Suggest re wording the policy for clarity: The impact of the private car on the street scene should be minimised wherever possible. Appropriate new development will: <ol style="list-style-type: none"> 1) provide off-street parking; 2) not result in clutter of the public realm; and 3) not result in a reduction of safety for pedestrians and cyclists
Protecting Community Assets (a) p.36	The policy as written is ambiguous and could be clearer, and, as written, is also potentially in conflict with the NPPF. Some consideration should be given to paragraph 137 of the NPPF here in re-wording the policy and the references held in the Spatial Policies Map. Not all development is detrimental to the setting of heritage assets and therefore in some circumstances may contribute to enhancing the asset itself. This should be recognised within the policy. Suggest: 'Marton's historical assets, including the ancient oak tree and the listed buildings integral to the character of Marton, should be preserved and enhanced. The Spatial Policies Map identifies locations where the setting of a heritage asset is particularly sensitive to development. In these locations development will only be permitted where proposals make a positive contribution to enhance the asset and its setting'.
Protecting Community Assets (b) p.36	Unless the Davenport Arms is listed as a asset of community value, specific reference is not required. Suggest second sentence altered to read: 'changes of use that require planning permission will require a marketing...' Should the Parish Council wish to apply to designate assets of community value this can be done via CEC. If this is undertaken the plan would benefit from a list of specific designated community assets against which the policy would be used.
Small Business	The policy is ambiguous as written and would benefit from defining what type of proposal is referred to – does this for

Support (C) p.37	example include residential development that would increase the local market? Or relate more closely to commercial developments?
Small Business Support (D) p.37	The policy is written in the style of an objective and may better be expressed as a community action similar to comments above on 'Protecting our Environment'
Small Business Support (E) p.37	The policy as written could be clearer – are the proposals referred to in relation to residential development and extensions to existing homes. Does the policy intend to allow additional buildings with the curtilage of existing residences to accommodate office space, where this would not normally be allowed for example? Consideration should be given to the circumstances under which this policy will apply and how it may allow development not currently permitted in order to support the objective of promoting home working.