

## Betley Balterley and Wrinehill NDP

### Responses to Initial Comments of the Independent Examiner

14th July 2021

#### **Examiner's Comments:**

##### ***Regulation 16 Comments***

*4. I would firstly like to offer the Parish Council the opportunity to comment on the representations that were submitted as part of the Regulation 16 consultation. I am not expecting a response in respect of every point, just those that the Parish Council feels it wishes to respond to.*

#### **Parish Council Response:**

Please refer to the Table 'Betley, Balterley and Wrinehill NDP Parish Council Consideration of Reg 16 Responses'.

##### ***Policy BBW3: Housing Mix***

*6. Can the Parish Council elaborate on how the housing for local people element of the policy will work, if a proposal meets the requirement of complying with Policy BBW 2?*

#### **Parish Council Response:**

Policy BBW2 was prepared to support small schemes for market housing that may come forward within the village envelope. Perhaps this should be made clearer in the Policy text, by referring to 'market housing' in the title and second paragraph.

The second part of BBW3 ('Housing for local people and those with a local connection') was added following the Reg 14 consultation and was intended to be applied to schemes for affordable housing, including exception schemes that might come forward outside the village envelope and in the Green Belt. This is an important policy principle, which is designed to meet the needs of the community as has been expressed over the past 25 years by members of the community.

*Is the trigger only through the delivery of affordable housing which has to be of a scale set out in the local plan affordable housing policy?*

#### **Parish Council Response:**

As the village of Betley is inset within the Green Belt and the remainder of the Parish is washed over, it is unlikely that there will be many opportunities for affordable housing to be provided as part of larger market housing schemes under Policy CSP6 – Affordable Housing. This sets out in 3. that 'New residential development within the rural areas, on sites of 5 dwellings or more will be required to contribute towards affordable housing at a rate equivalent to a target of 25% of the total dwellings to be provided.' Part 4. Goes on to say 'In some areas the local need for affordable housing may be for less than 25%. In this case a financial contribution to off site affordable housing provision will be required at the equivalent rate to meet priority needs elsewhere.'

The NDP Steering Group and PC are aware that consultations on the emerging NDP have shown that local residents have expressed a need and desire for more smaller and affordable dwellings in the Parish. The Reg 14 version of the NDP identified a site at East Lawns as a 'housing opportunity site', but consultation responses showed significant local concerns about this proposal and it was removed from the submission plan. However the Steering Group and PC would like to work with local housing providers to deliver new housing specifically for local people already living in the Parish to be available in perpetuity for both the young and elderly people wishing to remain living in the Village and to enable the latter to “downsize” - see Parish Council Action 3.

The preference would be for schemes under BBW3 to be in the village envelope, but the PC recognises that in reality, there may be more opportunities for local occupancy limited, affordable schemes on the edge of the village, in the Green Belt, subject to Green Belt policies in the NPPF, exceptional circumstances such as an identified need at the time, and saved policies of the Local Plan.

BBW3 and / or the supporting text could be amended to refer to exception schemes under NPPF paragraph 145 f).

*I assume that it is not seeking to control the occupation of infill or small-scale development within the village envelope.*

**Parish Council Response:**

Correct.

*If it is, I would need to be satisfied by evidence that such a restriction is justified?*

**Parish Council Response:**

See above.

*If it is through development for social housing only, as has been suggested by reference to the East Lawns Garage site – is that restriction to persons with a local connection actually a housing allocation policy, rather than a planning policy.*

**Parish Council Response:**

The PC would like to see the wording retained in the NDP, but it is accepted that it is more likely to be relevant as a housing allocations policy rather than a planning policy. If the Examiner prefers, this part of the Policy could be moved to the supporting text. The need is for affordable housing and the description ‘social housing’ may therefore be misleading. Affordable housing, as envisaged here, can comprise rented housing, shared ownership, or dwellings owned outright (with appropriate provision to ensure such housing remains affordable).

*Is the expectation that the support for persons downsizing, only related to people living in what is social housing?*

No. This also refers to people living in larger market housing and wishing to move to smaller, more appropriate housing designed for older people.

***Policy BBW10: Recreation and Open Space Facilities***

*8. Can the Parish Council confirm that the areas shaded in a very light mottled green on Maps 11B and 11C are not proposed to be designated as incidental open space – they are a different shade of green from the key and are not numbered but I do need that to be confirmed.*

**Parish Council Response:**

Correct. The mottled green areas are on the OS map base and are not intended to show incidental open space.