

Rudby Neighbourhood Plan Consultation

Personal Details

We need to ask you for some personal details to validate that respondents have a relevant interest in the Regulation 14 consultation.

Please Note: *Anonymous submissions will not be accepted as a Regulation 14 submission. Please provide your name and postcode which will only be used in connection with the Neighbourhood Plan. Submissions may be published on the Neighbourhood Plan website as part of the evidence base of the Plan after the consultation is complete. By submitting this survey, you consent to your personal data being used for this purpose. If you don't want to provide your details, we will be unable to include your submission in the consultation. Submissions should be made by an individual person. Other household members should complete their own response.*

Please Confirm your Full Name.

Given Name

Frances

Surname

Cunningham

Postcode

TS15 0DL

Please tell us your reason(s) for participating in this survey

| Select all that are applicable | | | |
|---------------------------------------|-------------------------------------|--|--------------------------|
| Live in Rudby Parish | <input checked="" type="checkbox"/> | *Own a Business in Rudby Parish | <input type="checkbox"/> |
| Own Property in Rudby Parish | <input type="checkbox"/> | *Represent an organisation based in Rudby Parish | <input type="checkbox"/> |
| Work in Rudby Parish | <input type="checkbox"/> | *None of the above | <input type="checkbox"/> |

***If you are responding on behalf of a Business or Organisation, please provide its name.**

***If you responded: 'None of the above', please explain the reason for your interest in the Rudby Neighbourhood Plan**

Vision & Objectives

Vision Statement

The Neighbourhood Plan vision statement was developed in community workshops and endorsed by the results of a community questionnaire. It states:

The Parish will develop, but retain its unique identity, and be a strong, sustainable rural community with a thriving village at its heart. The village will remain distinct in character from nearby market towns and suburbs.

Objectives

1. **Housing:** To provide safe places to live which provide the mix of sizes, types and tenures which meet identified Parish housing needs.
2. **Built Environment:** To provide a good quality built environment incorporating Green Spaces and Green Infrastructure Corridors which retains the distinctive character of the Parish, and protects its heritage.
3. **Natural Environment:** To protect and enhance the Natural Environment and biodiversity, and mitigate the adverse impacts of development and climate change.
4. **Community:** To enable opportunities for social connection and social inclusion, and to sustain and enhance local services to ensure access for all groups of the population to leisure, recreation, health and education facilities which are viable at a village scale and which promote health and wellbeing.
5. **Economy:** To sustain existing employment and commercial services within the Parish, and to encourage establishment of new businesses of appropriate type and scale for the village and the surrounding rural area.
6. **Traffic & Transport:** To mitigate the adverse impacts of motor vehicles by good road design and where practical by encouraging safe alternatives to the use of private cars.

| Do you support or oppose the vision statement? | Support | Oppose * | Neither support or oppose | Don't know |
|--|---------|----------|---------------------------|------------|
| Select one option. | | | X | |

| Do you support or oppose the Neighbourhood Plan objectives? | Support | Oppose * | Neither support or oppose | Don't know |
|---|---------|----------|---------------------------|------------|
| Select one option. | | | X | |

***If you respond 'oppose' to either of these questions or to any of the policies questions which follow please explain your reasons in the comment box at the end of the response form.**

Rudby Neighbourhood Plan Policies (RNP)

The Neighbourhood Plan is put into effect through its Policies. These designate land for development or for protection, or set out requirements and decision criteria for planning applications. The full text of the proposed Policies and their justifications are set out in the Consultation Draft of the Neighbourhood Plan which can be:

- Downloaded from <http://www.rudbyparishcouncil.org.uk/NP-consultation.php>; or
- Inspected at The Hub, Northside, Hutton Rudby during its normal opening hours; or
- Inspected at Information Events to be held during the consultation period.

You will now be presented with a summary statement on what each policy aims to achieve, and then you will be asked whether you support or oppose the policy. There are 15 policies.

RNP1 - Sustainable Development

This policy positions the Neighbourhood Plan policies within the wider planning framework. If the Neighbourhood Plan is adopted, it will become part of the statutory development plan for the Parish, together with Hambleton's adopted Local Plan and national policies.

| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
|---------------------------------------|---------|----------|---------------------------|------------|
| Select one option. | | | X | |

RNP2 - Design Principles

This policy sets out design requirements for development in the Parish which focus on local character, climate change, and 'lifetime homes'.

| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
|---------------------------------------|---------|----------|---------------------------|------------|
| Select one option. | | X | | |

RNP3 - Housing Provision

This policy proposes an allocation of land south of Paddocks End for the development of approximately 25 homes to meet Parish housing need. It sets out the location, scale, and key features for the development.

| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
|---------------------------------------|---------|----------|---------------------------|------------|
| Select one option. | | X | | |

RNP4 - Windfall Housing

This policy sets out requirements for small scale developments whether as infill, on the edge of villages or in the open countryside.

| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
|---------------------------------------|---------|----------|---------------------------|------------|
| Select one option. | | X | | |

RNP5 - Affordable Housing

This policy sets out a requirement for local people to be given priority access to new affordable housing developed in the Parish.

| | | | | |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
| Select one option. | | X | | |

RNP6 - Redevelopment of Redundant Buildings in the Countryside

This policy provides support for the conversion of redundant buildings to uses which will enhance the rural economy.

| | | | | |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
| Select one option. | | X | | |

RNP7 -Safeguarding and Improvement of Community Facilities

This policy aims to secure the long-term future of facilities which are valued by the community.

| | | | | |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
| Select one option. | | X | | |

RNP8 - Communication Technology

This policy aims to ensure that new developments are suitably equipped to support domestic needs, home working, and the rural economy.

| | | | | |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
| Select one option. | | X | | |

RNP9 - The Transport Network and Parking Provision

This policy seeks to minimise any adverse impacts from parking arising from new development (particularly in the Conservation Area), and to facilitate the transition to electric vehicles.

| | | | | |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
| Select one option. | | X | | |

RNP10 - Natural Environment and Landscape

This policy provides protection for areas and natural assets which are important to the setting and character of the Parish.

| | | | | |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
| Select one option. | | | X | |

RNP11 - Biodiversity and Green Infrastructure

This policy sets out requirements for developments to protect and enhance biodiversity.

| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Select one option. | | X | | |

RNP12 - The Leven Valley

This policy sets out requirements aimed at protecting the special character of the Leven Valley.

| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Select one option. | | | X | |

RNP13 - Local Green Space

This policy provides protection for green spaces identified as being special to the community.

| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Select one option. | | | X | |

RNP14 - Significant Views

The policy seeks to safeguard views identified as being special to the community from being harmed by development.

| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Select one option. | | X | | |

RNP15 - Protection and Enhancement of the Conservation Area

This policy sets out requirements for development in the Conservation Area aimed at protecting and enhancing its character and appearance.

| Do you Support or Oppose this policy? | Support | Oppose * | Neither support or oppose | Don't know |
|---------------------------------------|----------------|-----------------|----------------------------------|-------------------|
| Select one option. | | X | | |

***If you responded 'oppose' to any of the questions on Vision, Objectives or Policies please explain your reasons in the comment box at the end of the response form.**

Comments

Do you have any comments or observations on the Neighbourhood Plan that you would like to make?

Having reviewed the proposed plan in detail I have identified a number of issues/amendments that I believe require consideration and assessment to ensure that the proposed final version of the plan is fully sound, justifiable and legally compliant which as it stands, I do not believe it is.

For ease of review by the committee I will list my comments in order they appear in the document. The majority are policy specific but there are also some more general comments later on.

If you require any further clarification on the meaning or context of my comments please do not hesitate to contact me.

Kind regards Frances Cunningham MRTPI

Page iii – Glossary – I note the definition of Broadacres, however I have significant concerns about the blurring of the line between Broadacres and their private development arm, Mulberry Homes Yorkshire.

Broadacres is its pure housing association arm with Mulberry Homes Yorkshire its private side, so where there are discussions about mixed schemes private market and social housing it is wrong to state that this is Broadacres. This will NOT be purely Broadacres, but in fact the FOR profit arm that will be developing.

As such there needs to be a clear separation and split to identify, which is the NOT for profit social housing and which is FOR profit private housing.

This leads onto another important consideration that during the formation of the neighbourhood plan the Neighbourhood plan there had been in-depth discussions with Broadacres and they have promoted a number of sites under their name, however these are FOR profit schemes and as such not a normal housing association. As such there appears to be a bias in favour of Broadacres, giving them an unfair market advantage. This would render this plan NOT legally compliant and unjustifiable.

There is a need to engage with the other social housing providers within the area about the provision of social housing. More importantly there is a need not to provide an unfair market advantage to Broadacres private arm for the provision of private market housing. This is providing an unjustifiable market advantage to one private developer over another. Any private developer could deliver the housing mix and simply transfer the affordable housing stock to an agreed social housing provide by a S106 agreement. This could be any of the 3 main housing associations who work in this area, but the plan gives the impression that Broadacres are the only housing provider.

Page 1, para. 4 – The parish as identified, is this the same as the area covered by the adopted affordable housing area? As this previously covered Potto and Crathorne.

There needs to be a clarification and the removal of any discrepancies between the Neighbourhood plan and the Hambleton affordable housing policy for the area.

Page 2, para 5. This doesn't state the threshold for adoption.

Page 3, para 7 – “general conformity” – the plan supply for housing is far in excess of the local plan so this should be rephrased.

Page 5, para 24 – this states a 50% threshold; however, I was of the understanding that it was 50% approval of a minimum voting population?

Page 8 – para 36, there appears to be a typo on the 3rd line where presumably it should read of “Anglo origin”

Page 9 para 40, the 2011 census, as the 2021 census has now been undertaken, this should be updated prior to its final submission and publication.

Page 16, 5.2 POLICY RNP2.

There should be an addition to policy point 1 b) that includes the conservation area and its protection, particularly the impact upon the setting of external works, such the painting of house frontages in colours which detract from the setting of the conservation area.

The omission of the conservation area and its protection here is unjustifiable.

Page 19, para 82 – states the support for retirement / supportive living but this has not been addressed within the local plan, reducing the plans effectiveness.

Page 20, para 84. Yet again it states Broadacres – but this was a market appraisal to justify a private and affordable scheme as such it is a private development, therefore not Broadacres but Mulberry homes. Needs clarification

Should Boradacres plans be included as an addendum to clearly identify their intentions.

Page 20, para 86. – no definition here of local connections

Page 21, para 88 – this omits the 5 self-build’s already delivered/under construction

Page 21, para 90 – does not cover the second set of 5 self-build’s approved with outline consent.

Page 22, para 93 – this discusses affordable housing. However, it has been recently observed that the one shared ownership property in Paddock’s end, did not sell when locally advertised and had to be advertised to a wider area beyond the village limits and was put on the open market. The plans affordable housing strategy needs to address this to ensure that housing stays within the parish for perpetuity.

It would be better if the shared ownership in future could not be sold within the parish that instead it was taken back into the social housing stock (bought out by Broadacres) and returned for social rent.

The failure to sell this property locally also raises a more significant question over the need and demand for shared ownership properties within the village.

The tenure of properties needs addressing as currently this is not identified or justifiable.

Page 22, para 94 – states Broadacres is in discussions as the site developer – yet again needs correcting as if it is Broadacres then this site will be 100% affordable, otherwise it is an incorrect statement as it will be Broadacres private arm. This once again is not sound or effective.

Page 22, para 95 – this does not seem correct, why a reduction of 5 houses, there are 10 affordable houses to be built upon this site?

Page 23, POLICY RNP3 HOUSING PROVISION

In the first instance I object to this policy and the allocation as this policy will push ALL of the new houses within the previous and next 20 years to one area of the village with NO improvements to highways.

Since 2016 there is the new SPAR and petrol station, 16 houses at Paddocks End, 25 on the site opposite SPAR which has its conditions discharged and the proposed 25 houses, 5 new houses at Deepdale a total of 71 houses and SPAR + Petrol station.

The traffic in this area of the village often leads to a number of near misses with car incidents (hits) having occurred around the SPAR interchange.

All of these houses and the shop and petrol station in one area, with no improvements to highways, drains, surface water etc and a significant loss of biodiversity.

There is also no assessment of the impacts of the combined developments and the risk of an explosive incident at the petrol station and in combination with the proximity of the Hazardous Sabc pipeline and the cumulative impact rather than the simple standoff of distance.

Hambleton Planning department currently uses a simple formula for assessing the pipeline impacts, whereby each development is treated in isolation. This HSE standard has been revised and now requires the cumulative effect of ALL hazards to be assessed against proximity of existing and proposed housing and population. Together with outdoor activities such as playgrounds, playing fields and cricket pitches and must consider common parking areas including supermarkets.

HSE Land use Planning Methodology 2015 and subsequent revisions; Article 18 of the Town and Country Planning Order 2015; Article 14 of The Town and Country Planning Order 2012 requires consultation with the HSE on Planning around Major hazard establishments.

North Yorkshire County council is responsible for the risk register and pipeline emergency plan and should be fully consulted on the CUMULATIVE impacts of the proposed plans and developments. Not just using SABICS and HDCs simplified 5, 10,15m rule which is not inline with current guidance and regulation.

Overall, the proposals highlight an unfair distribution of housing within the village which have not been fully justified within the development of the plan.

The assessment criteria for site selection also failed to consider the cumulative impacts upon an area of the village or a fair distribution of housing. If this had been this site would have scored red and the only site and area of the village not affected by development is the Enterpen/ Belborough area and site assessed.

As Rudby has also been subject to a lesser extent a number of new builds.

If the plan still proceeds with the allocation, I believe there needs to be some significant amendments to the policy (additions in red, comments in blue):

Policy RNP3 Housing Provision

An allocation for residential development of approximately 1.7 ha of land to the south of Paddocks End as shown on the Policies Map (Figure 6) is supported. Development proposals which are consistent with the design brief set out below will be supported:

- 1. The site will deliver **approximately no more than** 25 homes.*
- 2. The housing mix will be predominantly 2 and 3 bed homes and will include a high proportion of bungalows / **should include a minimum of xxx % of bungalows**. The proportion of affordable housing delivered on the site will be in alignment with the adopted local development plan policy*
- 3. Vehicular access will be from Paddocks End **and improvements to the highways interchange**. Any culverting of Hundale Gill will be kept to the minimum necessary to achieve access, **with improvements to the Gill to improve the flow and reducing any negative impacts downstream**.*
- 4. **A pedestrian access to the village shop will be provided from the north east corner of the site.** – OBJECT TO THIS – SEE COMMENTS BELOW*
- 5. The site layout should facilitate the provision of a footpath/cycleway connecting the site to Langbaugh Road **via the existing public highways through Paddocks End and along Garbutts lane**. (In reality as this crosses 3rd party land and is not deliverable as part of the scheme it should not be included).*
- 6. Public open space in line with the adopted development plan policies will be delivered on site. This will be located to preserve and enhance Hundale Gill and incorporate opportunities for delivering net biodiversity gain. **There should be NO loss of the ancient hedgerows on site.** (in the subsequent justification section there should be reference to the Hedgerows Act)*
- 7. The site design will incorporate a Sustainable Urban Drainage Systems (SUDS).*
- 8. As far as practical existing mature hedgerows around and within the site will be retained, and any unavoidable losses will be offset by replacement planting elsewhere on site. **The loss of any section of the ancient hedgerow will have to far outweigh the harm and deliver substantial public benefits. The important bat corridors and mature trees onsite must be retained.***
- 9. An integrated landscaping and public open space design will be provided which demonstrates how the development meets open space and recreational space standards and how net biodiversity gains will be achieved.*

Policy point 4 – A new pedestrian access is of serious concern. The access proposed is along a private driveway of 2 houses with approx. 7 cars, it then meets and crosses over the private driveway of a further 5 houses with an additional 10/12 cars. The landowner only owns part of the route and it requires crossing the land of a further 2 private landowners. The delivery of this is not within the ownership of the site and therefore cannot be included.

The proposed site is also a significant traffic risk, as the narrow footpath and zebra crossing at SPAR which already causes a number of significant high-risk interactions between pedestrians and vehicles and there have been a number of near misses, whereby accidents have only been prevented by emergency stops.

The majority of those entering the petrol station or leaving the loading bay exit do not stop regardless of the give-way signs or zebra crossings. I have personally had to jump out of the way of cars when on the zebra crossings to avoid being hit when walking.

The introduction of another route is a recipe for disaster and some pedestrians will get hit. In addition, the main route is along a private driveway thereby creating a conflict between pedestrians and vehicles where there is not room to pass both. This is unacceptable and a number of planning applications elsewhere have been rejected on this basis.

When the Paddocks end development was proposed, a footpath along the side was rejected by highways in favour of a new “proper” footpath along the side of Garbutt’s Lane. Which it did in fact take 4 years after the occupation of the houses to be built. When in fact Broadacres were obliged to commission this prior to occupation but they failed to deliver on their planning conditions, so I do not feel we can trust Broadacres to meet their planning obligations.

There is also no inclusion of a Traffic assessment of the junctions where this is proposed and no census of the usage to even understand the complexity of the interchange.

The lack of an assessment and understanding here is compounded and reflects a lack of knowledge and care by the committee here.

Before this progresses and is included within any policy a full transport assessment and a minimum of a 9 day census of this area needs to be completed.

The inclusion of this footpath proposal without full assessment within the policy is completed unjustifiable, unsound, it is not legally compliant and clearly demonstrates a lack of duty to cooperate.

Page 23, para 98 – states about the selection criteria- however this selection criteria failed to account for the cumulative impact of developments and a fair and even spread of developments throughout the village. Which is severely lacking in passing the soundness test.

Page25 para 105- this clearly states that the route is requested but that it needs to cross 3rd party land so cannot form part of the development. So, by its own admission cannot be included within the policy.

In addition, this should clearly state that the link should be via Paddocks end and the main highways footpath along Paddocks end.

Page 25, para 107 – this also needs to include Bat corridor provisions and reference to the hedgerow Act.

Page 26, para 111 – this process and the criteria failed to ensure that development was distributed fairly around the village, so that no one point of village infrastructure was overburdened,

Page 27, policy RNP4 Windfall housing – this fails to include criteria for outline consents for approx. 5 houses, there is the ability to influence the scale and design of a scheme.

Page 28, para 121 – this states application for 2 or more dwellings, but does not address the large schemes for self-builds, this needs to be addressed and included within the policy.

Page 28, POLICY RNP5 AFFORDABLE HOUSING.

1. Unless the application demonstrates that local occupancy restrictions would have a material adverse impact on access to grant funding for affordable housing, occupancy will be prioritised in perpetuity to a person in housing need and resident or working in the Parish, or who has strong links to the Parish in conformity with Hambleton’s Local Occupancy Criteria, both on initial occupancy and on subsequent changes of occupancy. A cascade approach to the locality issue will be adopted. The locality to which the occupancy is to be applied is taken as the Neighbourhood Area, and then to other rural parishes in the Stokesley Area, unless otherwise agreed with Hambleton District Council and the Parish Council.

Does this align with HDC/Broadacres policy on the affordable housing area for this village/service village area. As previous the adopted policy did include Potto and Crathorne within the Hutton Rudby affordable housing policy – this needs to be addressed and strengthened. A revision of the adopted policy is required to ensure that the 2 are compatible.

2. Applications for rural exception sites will only be supported where all housing delivered by the development is subject to local occupancy restrictions to provide housing for those located within the neighbourhood plan area.

Page 29, para 123. the sixth line states local occupancy restrictions, as above is this the same as the HDC plan and does it include Potto and Crathorne?

Page 29, para 125, The criteria states lived in village for 1 year or family member in village for 1 year. These criteria should be tightened up and be more in line with the local restrictions in Swainby whereby the criteria are to have lived in the village for 3 years, or a family member for 3 years. To ensure that local housing needs are met.

As the policy currently stands anyone can move into a rental property in the village, particularly a poor one and then be entitled to socially housing 12 months following. This increases the number of people willing to take on an unsuitable property and increases the numbers moving to the village as they have the knowledge that they only have to suffer it for 12 months knowing then that they can apply for social rent as they will then be deemed in housing need. This will reduce the ability for those with long-term connections to obtain an affordable property, particularly the young as they will be lower down the list than those deemed at greater housing need.

Page 30 – para 128. By delivering an affordable housing supply 30% this is likely to increase the likelihood of supplying housing to a wider area than the Neighbourhood plan area.

This section and policy also misses a golden opportunity to tackle the issues of Empty homes. The plan should include an Empty home policy which aims to tackle long-term empty properties and deliver them into the local housing stock. A lot of councils and areas have targeted empty properties through policy to enhance the housing stock available to local people. I urge you to consider adding such a policy.

Page 32, POLICY RNP6 REDEVELOPMENT OF REDUNDANT BUILDINGS IN THE COUNTRYSIDE – addition re loss of housing stock required.

Proposals for the conversion or re-use of buildings into live-work units or business premises for artisan-style food, traditional rural craft or trade, or other appropriate small scale business uses will be supported where the buildings to be converted or reused are of a construction and location that is suitable for the proposed development without the need for major, additional construction works and will not lead to a significant loss of housing stock or negatively impact upon the local highway infrastructure.

Page 32, para 136. This does not address junction issues, there is an omission about parking and its severe impacts upon major junctions within this. Whilst there may be road capacity, there are major issues at specific junctions (such as around the cenotaph).

Page 34, Policy RNP7.

I question the inclusion of 1.i) Fishponds at Campion Lane, are these not privately held and only available to members of the Middlesborough angling club, whereby the majority of users drive to the site and park badly on the roadside. This is not really a village/community facility and thereby should not be included.

PAGE 35 – POLICY RNP8 and particularly Para. 147.

Para 147 is inaccurate and misleading, whilst telcomms masts are PD, there are very strict criteria for them, in addition to this the majority of telecoms masts require Prior approval under Part 16 of schedule 2 of the GPDO 2015.

The prior approval process is a formal process which enables the consideration of specific design and siting elements.

As such a design criterion could be incorporated into the plan, other areas have done so and the majority of local plans include a stringent telcomms policy.

In addition to this areas such as the Yorkshire Dales have served Article 4 directives.

Therefore, there is an ineffective policy in RNP8 and this should be carefully reworded to include a fair telecoms policy.

Page 37 – POLICY RNP9 – TRANSPORT NETWORK.

This policy is missing the opportunity to make a real positive impact, I suggest the following additions in red should be made to the policy to improve its effectiveness.

1. Development should encourage active forms of transport by:

a) linking the site to the existing footpath and pavement network except in the case of development in the countryside;

*b) making improvements to footpath and pavement connectivity wherever possible with access to the school, to retail facilities, to social facilities and to recreational facilities prioritised **and identified**; and*

*c) to the extent appropriate for the size of the development incorporating footpaths or cycleways within site layouts **ensuring no conflict with existing roads and junction interchanges through the creation and connection of new footpaths/cycleways.***

*2. Allocated off-street parking provision for the residents of each dwelling within new residential developments must meet or exceed the numbers of spaces for rural areas set out in North Yorkshire County Council's Interim Parking Standards 2015 **and** or its successor documents and incorporate electric vehicle charging facilities.*

3. In developments of more than one dwelling, an appropriate provision for parking needs of intermittent users such as visitors and tradespeople must be made within the development site.

4. Any residential development in the Conservation Area expected to result in a net increase in parking demand must meet the increase in demand by off-street parking provision within the development. Parking demand will be assessed using the parking provision standards set out in North Yorkshire County Council's Interim Parking Standards 2015 or its successor documents.

5. Applications for non-residential development in the Conservation Area should provide estimates of the parking demand that would be generated and an assessment of impact on neighbour amenity.

6. Improvements to parking within the village in particular the conservation area and junctions which are detrimental to highway safety.

Page 38, para 160 – this paragraph is not ambitious enough and is missing an opportunity to improve the parking in congested areas of the village. The parking in and around the cenotaph is a particular issue and causes major highway problems. An ambition to reduce the impacts of parking upon this set of junctions should be targeted.

In addition to this the parking within this area has a significant determinantal impact upon the setting of the cenotaph.

Page 42, Policy RNP11 BIODIVERSITY AND GREEN INFRASTRUCTURE.

A bullet point should be added to the end of the policy which support hedgerows, for example.

RNP11.

1)...

2)...

3)...

4)...

5) No net loss of hedgerows over xx metres and no loss of ancient /historic hedgerows.

In the subsequent justification – there should be an inclusion and assessment in line with the Hedgerows act.

Page 43- Para 181 – this paragraph states 90% of respondents thought green spaces and corridors were important. It is important that this is carried through to policy RNP3 in that there should not be a loss of the historical hedgerow on site which is an important green corridor and frequent bat corridor.

Page 47 – POLICY RNP14

I have significant concerns over this policy as it is exceptionally restrictive to development in certain areas of the village in particular the Belborough/Drummock and Linden close area of the village over-looking the playing fields,

By the acceptance of this policy by default all development will be forced away from this side of the village to either Rudby or Garbutt's lane.

Whilst views are important this is unjustifiable as a specific policy and one way of ensuring that NO development can occur within this area of the village.

I note for example a number of fir trees have been planted in this area which in their own right are not considered development and are outwith of planning control. These will impact upon the view and this policy will be useless!

Page 50 – POLICY RNP15 – There is nothing within this policy which ensures and maintain the setting and character of the conservation area. For example, the insensitive painting of house frontages within the conservation area or the installation of solar panels on front facing roofs which significantly impacts upon the value and amenity of the conservation area has been ignored. This policy should seek to rectify this and stop this practice.

There is also no protection for the setting of the Cenotaph which has deteriorated over the years, with often no views of this due to bad parking and obstruction of a bus stop rendering a community facility unusable.

Page 53- point 12 – reducing the fear of crime – the creation of new footpaths along unlit walkways will not seek to reduce crime in fact is likely to increase this.

Page 57 – bullet 9 – is the 13 affordable houses just the neighbourhood plan area or the affordable housing area (Potto/Crathorne etc)

Page 74 and 74 – the inclusion of V26 and V28 seem to be a duplication of others in the area and to prevent any development on these fields. There are a greater proportion of protected views over this small area than the rest of the village.

Page 83/84 – note not all of the hyperlinks work – meaning the policy documents had to be sought out rather than easy links, making it difficult to read all the background data for the plan.

There are further omissions from the NP including a policy on street scene. This should focus upon boundaries to the highway including footpaths as per the Planning definition of highway. There seems to be a trend especially along Doctors lane to build fences and gates along the highway (footpaths are included within the definition of highway under the TCPA) which are over 1m in height which actually require planning permission under Part 2 of schedule 2 of the GPDO 2015.

The fences and gates along doctor's lane require planning but instead seem to have sprung up, this is setting a trend.

There is no allocation of possible future leisure or tourist facilities within the plan area. For example, the potential for small CL or CS sites or a motorhome aire which would enhance small scale tourism with the area and provide additional revenue to local businesses.

Finally, whilst acknowledged, the impacts of windfall housing have not been fully assessed. By its own admission the village has been subject to significant windfall housing in the last 4/5 years. The number stated in the plan is 13, if this proceeds at the current rate for the next 15 years, the windfall will be 39 houses. This is far in excess of the site allocation, so perhaps a consideration of the proportion of windfall development permitted within the plan area.