

Wing Neighbourhood Plan

Consultation Comments

July 2023

Context

1. The Wing Neighbourhood Plan seeks to promote sustainable development within the parish including the need for a balanced range of new housing whilst also safeguarding existing open spaces for the enjoyment of residents. These objectives are clearly set out in paragraphs 3 and 4 of the Plan.
2. The NPPF 2021 makes clear that plans should contribute to the achievement of sustainable development and policies should be underpinned by **relevant and up-to-date evidence that is adequate and proportionate to support and justify the policies concerned** (para 7 page 13)
3. Policy ENV 2 of The Wing Neighbourhood Plan – Important Open Spaces C4 (page 27) identifies Bryher House Garden as an important open space due to its high local value for the contribution it makes to the village’s form, character and setting. As such the Plan proposes that unique consideration should be given to any development proposals or other planned works that might arise.
4. Policy ENV 3 of The Wing Neighbourhood Plan - Sites and Features of Natural Environmental Significance 4 (page 29), has identified Bryher House Gardens as ecologically important and as such the significance of the species, habitats or features present should be balanced against the local benefit of any development proposal.

Comments

5. Set out below are a number of grounds for objection to Bryher House Garden being specifically identified as an Important Open Spaces under Policy ENV 2 and Sites and Features of Natural Environmental Significance under Policy ENV 3
 - i. Important open spaces and frontages within the planned limits of development are already protected by the Local Plan policies and, within this, the open spaces specified in ENV2 have not been considered sufficiently special. This new policy appears to duplicate or is endeavouring to supersede existing policies. If new important open spaces are to be defined then a common assessment process and rationale should be applied as defined by the Local Plan policies.
 - ii. Sites and Features of Natural Environmental Significance are already afforded appropriate protection by national policy and policies CS21 and SP19 in the Local Plan. This new policy appears to duplicate or is endeavouring to supersede existing policies. If new Sites and Features of Natural Environmental Significance are to be defined then a common assessment process and rationale should be applied as defined by national and Local Plan policies.
 - iii. The evidence that has been presented in support of ENV3 reflects a subjective viewpoint and is not underpinned by professional ecological evidence or other empirical evidence.

- iv. The evidence set out in appendix 4 of the Plan is neither adequate or proportionate, relying heavily on subjective interpretations rather than supported by objective facts. The assessment process appears to include a notable level of bias and had this same bias been applied to other properties then numerous other gardens within the village would have also been included. By way of example, the gardens of both 4 and 6 Reeves Lane would likely receive very comparable assessments.
 - v. Bryher House Garden is bordered on 3 sides by listed buildings and the entire area falls within the Wing village conservation area, as such development of this land is already closely controlled to prevent any adverse impacts on the surrounding listed buildings, the village's form, character and setting.
 - vi. The supporting description for Bryher House Gardens given within the Plan comments on the views from the garden and includes the statement that *the site as described by local people: 'one of the best open views **from a** garden in the village'*. As this view is **from** the garden and as the garden is private with high boundary details on all sides, this view provides no public amenity. In recent public documents, the view back towards the property has been described by neighbours as an eyesore and thus again provides little public amenity.
6. In conclusion, it is incorrect and unnecessary to include Bryher House Garden in the assessment of Important Open Spaces or the assessment of Features of Natural Environmental Significance as this space is already appropriately protected by national and local planning policies. In addition, the justification provided fails to provide objective, adequate and proportionate evidence to support the inclusion of Bryher House Garden in Policy ENV2 and Policy ENV3. Bryher House gardens should therefore be removed from any special designations within the neighbourhood plan.