

From: Caroline Cahill
Sent: 03 April 2025 11:09
To: Programme Officer
Subject: Local plan MIQs response

Policy DEN1

2. *What is the evidence to justify an approach to designate an additional site/sites in the Neighbourhood Plan? What is the evidence to justify the housing target of 100 additional dwellings and would this ensure that development is directed to the most sustainable settlements?*

3. *What is the evidence that there are suitable sites available for designation? Would this approach provide the necessary certainty for the development plan process? In taking this approach would the Plan accord with a Plan led approach?*

Response

Denmead Parish council (DPC) commissioned a publicly funded report to assess all available sites, from AECOM. All of these sites are situated outside the current development boundary, and this boundary will need to be changed to accommodate any new sites allocated for development.

However, following public consultation DPC published a document with the allocated site stating *“Both WCC and DPC planning consultant advice that we should rely on the ‘technical information’ available from WCC in terms of assessment of site delivery rather than the AECOM assessment as AECOM do not have access to the level of information available to WCC.”*

Freedom of information requests have shown that no such advice was provided to DPC and the AECOM report should not have been dismissed, making the DPC statements misleading.

The AECOM report provided a detailed site assessment for every available site around Denmead. The steering group used all available evidence and scored each site to identify the sites most closely meeting the criteria deemed important to Denmead community (weighted score).

However, DPC ignored all of this evidence when deciding which sites to put forward for community consultation. The options put forward included the lowest scoring and most unsuitable sites while ignoring the most suitable site scored green and highest scoring. DPC further requested developers to detail what they would provide for the community over and above the Cil / S106 contributions.

DPC ignored their own documented requirements which assessed and weighted sites and their requirement to include in any allocation 10% of small sites. The small infill site within existing dwellings would help to provide meeting the NPPF requirement for 10% allocation of small sites and DPC’s own requirements.

DPC also dismissed sites located on roads with existing dwellings and not included in the development boundary, despite being closer to the village centre than other parts of the settlement which are within the current development boundary. These roads were not included

in the current development boundary based on an “observation “ by parish councillors that it lies south or north **but not unconnected** to the village. DPC are unable to provide any evidence for not including these intrinsic parts of Denmead within its development boundary. By not including such sites (Bunkers Hill, Well Hill) within the settlement boundary the policy DEN1 does not meet the following NPPF requirements, and prevents suitable sites from being allocated for planning:

NPPF paragraph 89, which states ‘.....sites that are physically well related to existing settlements, should be encouraged where suitable opportunities exist?’”

NPPF paragraph 8 in particular point (b):

“to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;”

DPC have not provided clear evidence of how they chose the sites put forward in the allocation options for public consultation, since their own FAQs document is inconsistent and flawed. DPC ignored their own detailed published evidence for sites, ie AECOM report, summary sites table of sites by total score and weighted score, making the plan unsound.

The FAQ’s document published by DPC is misleading since it contains incorrect answers for example DPC uses the answer “*because the site has been refused planning previously because it lies outside the development boundary*” to dismiss suitable sites but it included a site in its allocation options which also had planning dismissed for the same reason. This reason cannot be used to include and exclude sites, it does not provide a clear and easily understood methodology and it has not been consistently applied, making policy DEN1 unsound.

The independent evidence shows there are a number suitable sites available for allocation which clearly meet the community aspirations of the most important criteria but have been ignored in the selection process. This approach does not provide the required certainty for the development plan or meet NPPF requirements for planning.