

Matter 11 – Dr Peter King

Q11.1 *This is the subject of a separate response to which Tony Helliwell will speak.*

Q11.2 *Bearing in mind the modifications suggested by the Council, are the provisions and requirements of Policy 24A on telecommunications and broadband development justified, effective and consistent with national planning policy?*

Fast broadband should always be available wherever practicable. The necessity of this has been amply demonstrated with the prevalence of homeworking during the pandemic. There may be rural areas where it is not practicable. If so, this may be a reason for not developing in those areas without special circumstances.

Q11.3 *Bearing in mind the modifications suggested by the Council, are the provisions and requirements of Policy 24A on telecommunications and broadband development justified, effective and consistent with national planning policy?*

The right place for solar panels is on roofs. Large areas of solar panels on agricultural land take that land out of production, when it should to be reserved for the production of food. They are also liable to be a blight on the landscape. At the very worst this should be limited to grade 4 and 5 land, but most grade 5 land is SSSIs or other protected landscape, where solar panels ought to be unacceptable.

Q11.5 *Does the proposed monitoring framework set out in document SD11 provide an adequate range of indicators? Should targets be added to the monitoring framework as appropriate?*

The housing trajectory on p.272 of the Plan tends to front-load the housing target, by requiring a lot of development in the next few years. This is setting up the Plan to fail to provide a 5-year housing land supply, by creating short term targets very considerably higher than the market is likely to be able to deliver. If for several years, the district fails to meet such an ambitious target, developers will be able to argue that the Plan has failed to allocate sufficient land and is therefore “out of date”. That in turn means that WFDC will receive and be expected to grant applications for sites that it would otherwise reject. Instead the Plan should provide for a steady rate of delivery throughout the Plan period. This frontloading has the implication that WFDC thinks its target is in fact too low and that it will increase it when the Plan is reviewed. Nevertheless, modest over-delivery compared to a reasonable steady target should not be discouraged.

Q11.6 *Is the classification of strategic policies set out in Annex 1 of document SD11 consistent with national planning policy’s advice about the nature of strategic policies (NPPF 2019, paragraph 21)?*

It is important that the Plan should distinguish strategic and non-strategic. This is in accordance with NPPF to give scope for Neighbourhood Plans, making it clear where neighbourhood policies are entitled to conflict with Plan policies, in which case the Neighbourhood Plan policies take precedence.