

## Planning and Strategic Housing

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### Pre-Submission Draft Cassington Neighbourhood Plan – Regulation 16 consultation

Thank you for the opportunity to comment on the pre-submission Draft Cassington Neighbourhood Plan Regulation 16 consultation.

We welcome the further progress that is being made and having reviewed the plan, we remain of the overall view that it is comprehensive, well-structured and clearly focused on a number of issues of importance to the local community.

However, we note that some of the advice previously provided has not been reflected in this latest version of the Plan and therefore, where this remains valid, we have reiterated this advice within this latest response.

Set out below are some general and more specific comments which, for ease of reference, are set out in the same order as the plan itself.

### Sections 1 – 3 (Introduction and Background, The Neighbourhood Area and Planning Policy Context)

Section 1 provides a very helpful and succinct overview of the purpose of the NDP and its relationship to the West Oxfordshire Local Plan 2031, with Figure 1 usefully illustrating the basic conditions which the NDP must satisfy. I note that the introduction refers to the neighbourhood plan having an end-date of March 2040 whereas the front cover refers to the period up to 2041. This should be clear and consistent throughout the document.

As a minor observation, reference is made to the proposed review of the West Oxfordshire Local Plan commencing at the end of 2022 but plan preparation actually commenced in August 2022 with the aim of adopting this in 2024. It would also be useful to update the fact that the new Local Plan is now proposed to have an end-date of 2041 rather than 2040 as originally intended.

As we noted in our previous consultation response, Section 2 provides a very detailed description of the neighbourhood area, outlining a range of information on location, demographics, employment, household incomes, house prices, the environment, heritage, education, retail and so on. Whilst this is all very useful in setting the scene for the remainder of the NDP, it would benefit from some illustrations and images to help break the text up which is currently quite dense and heavy. As previously suggested, another option would be to include, at the end of this section, a bullet point type list of some of the key issues/characteristics so they can be seen 'at a glance' e.g. relatively high household incomes, high house prices etc.

Section 3 usefully outlines the relevant national and local planning policy context within which the NDP has been prepared. We note that at paragraph 3.5, the text continues to state that 'The WOLP 2031

*makes no development allocations in the Parish and defaults to National Planning Policy provisions on the Green Belt for managing development proposals'. Whilst it is the case that the Local Plan does not allocate any development sites within the Parish, this wording is perhaps rather misleading in suggesting that the District Council simply defaults to national policy when considering development proposals at Cassington, which is obviously not the case.*

This also comes across in the 4th bullet point of paragraph 3.6 where reference is made to defaulting to national policy, as if Local Plan Policy H2 (and the related provisions of Policy OS2) are of no direct relevance.

At para 3.7, reference is made to the Salt Cross Area Action Plan. By way of an update, the District Council are currently consulting on a series of proposed Main Modifications (MMs) to the AAP with the consultation closing in early November 2022. All of the responses received will be made publicly available and will be provided to the Planning Inspectors to take into account in producing their final examination report. The Council hopes to adopt the AAP in early 2023. It would be helpful if the text of the plan could be updated to reflect this current position.

Paras 3.10-3.12 make reference to the Oxfordshire Plan 2050 which I'm sure you are now aware is no longer being progressed. Instead Local Plans for the City and Districts will now provide the framework for the long term planning of Oxfordshire. I would suggest that all reference to the Oxfordshire Plan 2050 is removed from the document.

#### **Section 4 – Community Views on Planning Issues**

This section provides a brief overview of consultation carried out in preparing the NDP as well as the issues raised by the local community, focusing on questions which had been asked as part of the consultation regarding matters such as housing development, transport and traffic and village amenities.

The two observations previously made remain relevant. Firstly, in terms of the consultation carried out, it would be helpful to illustrate this with a simple timeline or similar. Secondly, in relation to the key issues raised, it would be useful to put some of the responses in graphic form e.g. a pie chart with the question that was asked and the percentage of responses, Y/N etc. Again, this would provide helpful information at a glance and help to break up the text a little.

#### **Section 5 – Vision, Objectives and Land Use Policies**

Section 4 provides an overall vision for the NDP which is generally supported. I note the reference to protecting the openness of the Green Belt and would simply observe that whilst the essential characteristic of a Green Belt is its openness and permanence, they are intended to serve five purposes including for example issues relating to encroachment and setting and character.

It would also be beneficial if the vision made more explicit reference to addressing the impacts of climate change. Whilst Section 4 explains that the local community saw climate mitigation and biodiversity as less of a priority than flood risk, traffic and local character, they still scored highly and given that the District Council has declared a climate and ecological emergency, reference to these issues within the overall vision would be strongly supported. The current reference to the green infrastructure network, could for example, be altered slightly to refer to mitigating climate change and enhancing biodiversity value, not just improving connectivity. This would be consistent with Part A of Policy CAS1 (see further comments below).

The four plan objectives are noted and supported in principle. As a general observation, it would be helpful if the policies that follow link not only to relevant local plan policies but also the NDP objectives so that the inter-relationship between them is clear.

Set out below are some more specific comments on the plan policies themselves:

### **POLICY CAS1: CASSINGTON NATURE RECOVERY NETWORK**

The Council supports the inclusion of this policy, which aims to support the Nature Recovery Network (NRN). We note the intention of the NRN is to become an expanding and increasingly connected network of wildlife rich habitat allowing designated sites and adjoining areas to function as stepping stones or wildlife corridors.

We welcome the inclusion of text within Part B of the policy, which specifies the need for development to provide at least 10% net biodiversity gain in line with the Environment Act.

We support Part C of the policy which now makes clear that development which fragments the network or affects its functionality will be resisted unless suitable alternative provision can be provided.

### **POLICY CAS2: ACTIVE AND SUSTAINABLE TRANSPORT**

We welcome the amendments made to Part B of the policy to make reference to multi-functional routes. This part of the policy could be expanded further by including reference to greening of these routes through tree planting, as an example. It would also link well with the overall intentions of Policy CAS1 on nature recovery and biodiversity value.

We also welcome the changes made to Part C of the policy to make this more robust, however I note the phrase 'should be resisted' and would suggest this is strengthened to 'will be resisted' in line with Policy CAS1.

As previously advised, it may also be helpful if the policy could be made more relevant to the locality which could also help attract funding for any identified measures. This could be as minor as tree planting/ benches or signposting along the routes.

The policy could also add further information about the creation of new active travel routes. The policy is still very much focussed on maintaining the current network, which is important, however more information could be included about the importance of improving the network and linking new development to the existing built up area of development. It could also make mention of the opportunity to seek contributions from development towards general improvements to the network. Planning Practice Guidance (PPG46) recognises the ability of neighbourhood plans to identify the need for new or enhanced infrastructure and where identified, this should be prioritised.

In doing so, the policy could usefully link to the list of potential projects identified at paragraph 6.4, a number of which have an active travel dimension to them.

### **POLICY CAS3: DARK SKIES**

As previously advised, the overall intention of this policy is supported given the low levels of lighting in the village. I do wonder if this policy is slightly too onerous by expecting *all* development to demonstrate how it intends to prevent light pollution. This may not be applicable to some more minor applications and it seems disproportion for example for householder extensions in the built up area to consider this. I feel this is much more necessary for housing development and applications in the rural surrounds where light spillage could have a detrimental impact on the landscape character and dark-sky quality.

Policies EH2 and EH8 of the WOLP 2031 provides some useful text, particularly the latter policy which could usefully be referenced.

### **POLICY CAS4: CASSINGTON CONSERVATION AREA**

It is important for Neighbourhood Plans to avoid simply repeating national or local planning policies. Policy EH10 of the WOLP 2031 sets out the requirements for proposals in Conservation Area in some

detail, with the wording having been carefully agreed with Historic England and endorsed by the Inspector in his final report.

I question therefore what value the first sentence of this policy offers over and above the provisions of the Local Plan or NPPF.

I would suggest that, if possible, the policy should be made more locally specific, possibly by summarising the core elements of the Design Code attached at Appendix B so that they are clearly embedded within the policy itself and so it is clear how a decision maker should react to them.

**POLICY CAS5: DESIGN CODE FOR CASSINGTON VILLAGE**

To make Policy CAS5 more bespoke to Cassington, it would be worth considering whether any key elements from the Design Code could usefully be included within the policy itself, which would also help embed these recommendations and provide relevant context.

**POLICY CAS6: LOCALLY LISTED BUILDINGS**

This policy has been amended since the previous version of the Plan but I would suggest that this needs to be further re-worked.

It is not clear why the local listed building referred to in the first sentence of this policy is not listed alongside those in the policy itself.

Policy EH9 of the WOLP 2031 states that where proposals affect the significance of non-designated heritage assets (which includes locally listed buildings), a balanced judgment will need to be made when considering the scale of any harm or loss, the significance of the asset and the public benefits of the development. This needs to be reflected in this policy.

It might also be useful to make the policy itself, or at least the supporting text, more specific by identifying those features of the buildings/ structures that are of particular importance, perhaps drawing on the Conservation Area Character Appraisal.

Finally, I note that the 'greyed out' area does not incorporate all the policy text although I assume this is just a formatting error.

**POLICY CAS7: LOCAL SERVICES AND COMMUNITY FACILITIES**

This policy usefully identifies a number of specific, local services and community facilities, with the intention being to protect them from inappropriate development/loss in accordance with policies E5 and EH5 of the WOLP 2031.

It might be worth adding a sentence about other unidentified community facilities that may still be important to the community so it is not assumed that by not listing these, their loss would be supported.

Section B could also be strengthened by making clear that development proposals that not just affect the use of these facilities but also seriously undermine their quality will be resisted, unless suitable alternative provision is made which outweighs the loss or harm.

I note that the wording in Part C has been tweaked to make this slightly more robust which is welcome but I would suggest that this needs to be tightened up further particularly given that many community facilities are at risk of closure in rural areas and therefore their retention is an important consideration in supporting local communities. A part change of use can undermine a facility/ business as a whole, particularly in the longer term as it reduces the ability of the operation/premises to adapt to changing circumstances and therefore wherever possible these spaces should be retained to provide future flexibility to adapt and grow. Therefore, I consider that this element of the policy remains too positively worded and a part change of use should be resisted (not supported) unless it can be robustly evidenced

to clearly demonstrate that it will not impact on the long term operation of the facility/ business as a whole. This should include viability evidence where deemed necessary.

### **POLICY CAS8: ZERO CARBON BUILDING**

The Council is supportive of the commitment to reducing carbon emissions and this approach follows the Government's movement toward a zero carbon future including their recent publication Net Zero Strategy: Build Back Greener, published in 2021.

In light of the District Council having declared a climate and ecological emergency, we welcome the fact that the NDP includes such a policy. It would be useful for this to be reflected more strongly in the plan's vision or overarching objectives as mentioned earlier in this response.

The policy is split into 5 parts, the first of which sets out a requirement for all development to be 'zero carbon ready by design'. The second part of the policy appears to 'borrow' from the District Council's Area Action Plan (AAP) for Salt Cross by identifying a requirement where feasible for all buildings to be certified to Passivhaus or equivalent standard with a space heating demand of less than 15KWh/m<sup>2</sup>/year.

I have two observations on this. Firstly, it would be useful to clarify what is meant by 'where feasible'. The supporting text at paragraph 5.26 explains that this is to do with factors such as topography and site orientation but given that the requirement relates to building fabric efficiency, the link is unclear.

Secondly, whilst I note the reference to the issue of viability at paragraphs 5.26 and 5.32, the text is rather general and I assume therefore that the NDP is not supported by any sort of viability assessment. This may be an issue at examination if there is push-back from landowners/developers which may well be the case. To suggest that high land values '*ought to be sufficient to ensure requirements to tackle improving energy and carbon performance are viable*' is unlikely to be sufficiently robust when the NDP is considered at examination.

As a very minor observation, Parts D and E of the policy could usefully be more closely aligned in terms of terminology with Part D making a distinction between major (and presumably therefore minor) development and Part E making a distinction between householder and non-householder planning applications. These should be consistent so as to avoid any confusion and provide greater clarity on how the policy will be applied by decision-makers.

Please also refer to the comments made by the Climate Change Manager at the end of this response.

### **POLICY CAS9: INFILL RESIDENTIAL DEVELOPMENT AND POLICY CAS10: AFFORDABLE HOUSING**

Having reviewed Policy CAS9 of the Plan, it appears that no amendments have been made to this policy.

In terms of Policy CAS10, I note that the text has been amended in the first section of Part C to provide more flexibility although it is still considered to target 1 and 2 bed homes too heavily (see further advice from the Council's Housing and Development Officer within this response).

As set out in our previous consultation response, our main concern is that the current wording of the neighbourhood plan could be construed as giving the impression that Cassington does not have a role to play in meeting West Oxfordshire's overall housing requirement, which is not the case. This concern does not appear to have been addressed in this later iteration of the plan.

As you know, Policy H1 of the West Oxfordshire Local Plan 2031 identifies a housing requirement of at least 15,950 homes in the period 2011 – 2031 with the Eynsham – Woodstock sub-area being anticipated to provide around 5,596 homes.

Cassington is identified as a 'village' in the Local Plan settlement hierarchy (see Table 4b) with Policy OS2 identifying that such villages are suitable for limited development. It clearly therefore has a role to play, albeit a relatively limited one in the context of Policy OS2 and the location of the village within the Oxford Green Belt.

In light of the above, we previously suggested that paragraphs 5.32 – 5.34 of the neighbourhood plan could be amended as shown below and this advice remains valid although I note that some of this text has been incorporated:

*'The West Oxfordshire Local Plan identifies an overall housing requirement of at least 15,950 homes in the period 2011 – 2031. Cassington is located within the Eynsham – Woodstock sub-area which is anticipated to accommodate around 5,596 new homes. The majority of these new homes will be provided through strategic allocations at Eynsham as well as other allocated sites at Woodstock, Long Hanborough and Stanton Harcourt.*

*In addition to these housing allocations, the Local Plan anticipates around 289 new homes coming forward from unallocated windfall sites across the sub-area in the period 2017 – 2031.*

*Because Cassington is located within the Oxford Green Belt, in addition to meeting the relevant criteria of Local Plan Policies OS2 and H2, in accordance with national policy (NPPF paragraph 149) any such windfall housing provision will need to comprise:*

- *Limited infilling.*
- *Limited affordable housing for local community needs.*
- *Limited infilling or the partial or complete redevelopment of previously developed land provided it would not have a greater impact on the openness of the Green Belt than the existing development and not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need.*

*This is reflected in the wording of Policy CAS9'.*

As a general comment, the text within the amended Plan at para 5.32 is not formatted well so it is difficult to read and understand and should have a separate paragraph number. In particular it should be made clearer which wording is taken from the NPPF and which from the West Oxfordshire Local Plan 2031.

As previously advised, Policy CAS9 could then be redrafted and potentially combined with Policy CAS10 – Affordable Housing. A suggested form of words was provided and this is repeated in the text box below which would also help to pick up on a number of other issues including:

- The degree of specificity in the policy regarding size and tenure of new affordable homes.
- A concern that the definition of 'infill' as set out in the current draft plan is too restrictive, and;
- A concern that setting a maximum ceiling of 10 new affordable homes over the plan period, based on a 'point in time' housing needs survey is too restrictive.

Suggested wording:

### **Policy CAS9 – Providing New Homes**

***In accordance with Policy OS2 of the West Oxfordshire Local Plan, favourable support will be given to limited housing development which respects the character and local distinctiveness of Cassington and would help to maintain the vitality of the village.***

***In the context of Cassington, given its location within the Oxford Green Belt, in accordance with national policy, unless there are very special circumstances, any such housing development is anticipated to comprise the following:***

- a) Limited infilling;***
- b) Limited affordable housing for local community needs;***
- c) Limited infilling or the partial or complete redevelopment of previously developed land, provided it would not have a greater impact on the openness of the Green Belt than the existing development, or cause substantial harm to the openness of the Green Belt and contribute to meeting an identified affordable housing need.***

***In respect of criteria a) above, 'limited infill development' will be classed as development on sites which form a small gap in an otherwise continuous built-up frontage provided that gap does not comprise an important feature.***

***In respect of criteria b) above, 'limited affordable housing for local community needs' is taken to mean that which is necessary to meet a locally identified need for new affordable homes. Any such proposals must be located on previously developed or undeveloped land, either within or adjoining the built up area.***

***Any new affordable homes proposed beyond the built up area of Cassington will be classed as 'Rural Exception Sites' for the purposes of Policy CAS9 and therefore subject to the relevant considerations of Policy H3 of the West Oxfordshire Local Plan 2031 and national policy set out in the NPPF.***

***In terms of property sizes, new affordable homes will generally be expected to comprise a mixture of 1 and 2-bed properties, unless there is clear evidence of local housing need that would support an alternative mix.***

***In terms of tenure, a mix of options should be provided, broadly comprising around 25% low cost home ownership and 75% affordable housing for rent (including both affordable rent and social rent) unless there is clear evidence of need that would support an alternative mix.***

## **Section 6 – Implementation:**

I note that a number of local infrastructure improvements have been listed on page 38, many of which appear to be sensible but it would be useful to understand if these have been produced in collaboration with Oxfordshire County Council to ensure they are consistent with their approach. As mentioned earlier, this could usefully link more closely to Policy CAS2 on active travel.

### **Other consultee comments:**

As part of this latest Reg-16 consultation, we have also received updated comments from other Officers within WODC and these are provided below for your information and suggested action:

#### ***Climate Change Manager***

Policy CAS2: Active Travel

- Can the NP suggest potential enhancements to the existing Active and Sustainable Travel Network?
- Avoid the use of the term 'where practicable' as this provides a get out clause.
- Home working and shared mobility options should be encouraged.
- All development proposals should promote green and active travel through prioritising walking, cycling and public transport.
- Adequate space should be provided for sheltered, safe, secure and well-lit cycle storage on site. Within the design if a non-domestic development, a sufficient number of spaces should be provided for cycle storage.
- Infrastructure should be provided for the charging of electric vehicles, scooters and bikes, in line with the Oxfordshire Electric Vehicle Infrastructure Strategy (OEVIS).
- Section C - can a policy be negatively worded?

#### Policy CA5: Design Code for Cassington Village

- Has the Design Code been prepared with climate considerations?

#### Policy CAS8: Zero Carbon Building

- Section B – Avoid the term 'wherever feasible'.
- Section C - Is there sufficient evidence to require development to be net zero carbon rather than 'zero carbon ready'?
- Section D - Embodied carbon emissions should be minimised not just reduced.
- Section E - The fabric of development should be designed to standards of ultra-low energy demand. Energy budgets (EUI targets) using predicted energy modelling should demonstrate these targets:
  - Residential <35 kwh/m2.yr
  - Office <55 kwh/m2.yr
  - Research labs <55-240 kwh/m2.yr
  - Retail <80 kwh/m2.yr
  - Community space (e.g. health care) <100 kwh/m2.yr
  - Sports and Leisure <80 kwh/m2.yr
  - School <65 kwh/m2.yr
- Development should be fossil-fuel free.
- Development should have a net zero-operational carbon balance and deliver 100% of energy consumption using renewables.
- Thermal comfort and the risk of overheating should be assessed and passive design measures to mitigate for overheating risk should be prioritised over the use of more energy-intensive alternatives.

#### **Conservation and Design Officer for West Oxfordshire**

I still have a concern about Policy CAS8 Zero Carbon Building. Although this seems to relate largely to new build, it does refer to refurbished buildings in para C. So, I think it should mention our Sustainability Standards Checklist, particularly related to a section for heritage assets / traditional buildings with guidance.

Para 5.16 - The Design Guide was adopted in April 2016 not 2015 and is no longer in draft form as shown on page 4 of the Cassington Design Code.

My previous comments regarding the Design Code still stand and it would benefit from extra work/ advice from a specialist.

There are 53 pages in total and for a village the size of Cassington, it could have been set out in just 20 pages if well executed.



It is cumbersome in areas, and whilst they have made it clearer by separating their two character areas, I'm not sure that this is concise enough, and I suspect that there are clearer defined character areas than just two. e.g. mapping regression could have helped with setting out and understanding the settlement pattern etc.

Using the numbering to denote the WODC design guidance is confusing and could be misleading when reading the specifications: For example: Page 30 – 3. Geology and Landscape – I noted that there was nothing about the geology of the area only reference to landscape. Understanding the underlying Geology is key to understanding the make-up of the area and why the structures are built of a specific stone, brick or timber. Then I noticed that there is reference to geology in 4. Local Character which is confusing for the reader

Page 13 of the Code showing a map of the Cassington Historic Built Environment is a little confusing – it shows the historic core in blue – separating it from the Conservation area which is obviously historic core too. I understand this to mean that there is more of the historic core than has been encompassed by the conservation area. However, this needs to be explained a little more – maybe by having an overlaid map showing the entire historic core as one.

I still recommend that clearer character area assessments are undertaken using mapping, images etc. (e.g. see attached Oxford's Character Area Guidance).

### ***Strategic Housing and Development Officer***

The mix proposals still target 1 and 2 bed homes, although it does also state that it would be possible to adjust this with clear evidence. I would still recommend removal of the '1 and 2 bedroom' and leave flexibility.

Para 5.38 refers to 'starter homes'. I would recommend removal of this term as it is becoming increasingly redundant. The policy itself refers to 'affordable home ownership products' that I think is a better term.

The policy reads as if it will seek affordable and social rent. Trying to get both on a small development would be problematic. If a registered provider was involved they would seek only one form of rental tenure on a small site.

### ***Forestry and Landscape Officer***

Within the Design Code on p.43 it states that 'Proposals to fell any tree having a diameter of 9" (225mm) or more measured at 2'0" (600mm) above the ground will not be supported unless it can be demonstrated there is sufficient justification to remove the tree or it is dead, dying, dangerous or diseased'. I am not clear if 'proposals' in the text means development 'proposals' that require planning permission or proposals to fell trees, above the size specified, that are not related to a specific development proposal. If the intention is that the policy means only trees to be felled as part of a planning application that will be ok because, usually, as trees are a material planning consideration, efforts would be made to retain trees of amenity value as part of normal DM practice using existing Local Plan policies. 'Sufficient justification' to remove a tree could be its lack of amenity value as well as its physical condition.

If the policy is to try to resist the felling of trees generally (not connected to planning applications) then this is more problematic. There is no legal requirement to notify the LPA before carrying out work to trees outside the Conservation Area (unless a TPO applies) and no legal mechanism for dealing with such situations. Also, within the Conservation Area, the law requires prior notification of works to trees much smaller than specified in this proposed policy. It might be worth seeking clarification on this point.

## **Senior Infrastructure Delivery Officer**

Although proposed development in Cassington might be limited, any new development has the potential to impact on the local environment and place pressure on local services and facilities. New development should contribute positively to the local environment and be supported by appropriate infrastructure.

Not only should new development be properly served in respect of essential day-to-day infrastructure, but it should also minimise the impact upon existing infrastructure. This is a key requirement of the West Oxfordshire Local Plan 2031.

Planning Practice Guidance in relation to neighbourhood planning recognises the ability of Neighbourhood Plans to identify the need for new or enhanced infrastructure, but requires them to prioritise the infrastructure requirements and ensure that any requirements do not undermine the deliverability of the plan in terms of viability.

Provision of the necessary physical and community infrastructure arising from proposed development should therefore be an important consideration for a Neighbourhood Plan, identifying where appropriate and justified a wide range of potential infrastructure requirements.

Funding for new infrastructure can be provided through developer contributions in a number of ways including planning obligations (e.g. Section 106 legal agreements) and the Community Infrastructure Levy (CIL).

Planning obligations towards supporting infrastructure have to meet the following tests of being:

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind to the development

Whilst West Oxfordshire District Council has not yet introduced a Community Infrastructure Levy (CIL), it is considering doing so. CIL is a more general charge placed on development, such as new homes, which is applied according to the scale and type of development. The funds are used to help fund a broad range of supporting infrastructure and are not tied to a particular development.

In order to mitigate the impacts of new development (where necessary), the Parish Council could, where appropriate, consider strengthening page 44 of the Neighbourhood plan to more fully emphasise the prioritisation and provision of infrastructure and financial contributions from developer funding/developer contributions.

Set out below is some suggested wording which you may like to consider including within the Cassington Neighbourhood Plan to help ensure that, where appropriate, any new development makes appropriate provision through developer contributions.

*Where policies in this plan require contributions to community infrastructure, they will be made through Section 106 agreements and/or the Community Infrastructure Levy (CIL) where applicable in accordance with Policy OS5 – Supporting Infrastructure - of the West Oxfordshire Local Plan 2031 (adopted September 2018) and, once adopted, the District Council's Developer Contributions Supplementary Planning Document (SPD).*

## **Summary**

In summary, we welcome the progress being made with the Cassington NDP which overall is a thorough and well-written document.

However, as previously advised, there are areas of the plan that require strengthening, in particular the supporting evidence that will be needed to justify the requirements of Policy CAS8 – Zero Carbon Buildings when the plan is considered at examination and the restrictive nature of policies CAS9 and CAS10 as outlined above.

I trust this is of assistance and if you require any further assistance, please do not hesitate to contact me.

Yours sincerely

Kim Hudson  
Principal Planning Policy Officer