## Bishop's Itchington Neighbourhood Development Plan 2020 - 2031

## **Consultation Statement**

October 2021

## **Bishop's Itchington Parish Council**

With assistance from



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#### **1.0** Introduction and Background

1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood
 Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)<sup>1</sup> which defines a
 "consultation statement" as a document which –

(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 (b) evaluations beauth evaluated.

(b) explains how they were consulted;

(c) summarises the main issues and concerns raised by the persons consulted; and(d) describes how these issues and concerns have been considered and, whererelevant, addressed in the proposed neighbourhood development plan.

- 1.2 The Bishop's Itchington Neighbourhood Development Plan (HNDP) has also been prepared by taking into account the advice provided in Paragraph: 107 (Reference ID: 41-107-20200925) of the National Planning Practice (NPPG).
- 1.3 The Bishop's Itchington Neighbourhood Development Plan has been prepared in response to the Localism Act 2011, this gives parish councils and other relevant bodies, new powers to prepare statutory Neighbourhood Plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan, and neighbourhood plans form part of this framework.
- 1.4 Bishop's Itchington as a parish council is a qualifying body. As such the parish council applied to Stratford-on-Avon Council for designation of the neighbourhood area. The neighbourhood area covered by the BINDP is aligned to the current Bishop's Itchington parish boundary. This has recently been changed to include the new development (to be known as Bishop's Hill) at the old cement works. The additional area covered is bounded by the B4451 road and the railway line north of the existing boundary line. The revised parish boundary and neighbourhood area boundary was designated on 2<sup>nd</sup> April 2020 (Figure 1) and <a href="https://www.stratford.gov.uk/planning-building/Bishop's-itchington-neighbourhood-plan.cfm">https://www.stratford.gov.uk/planning-building/Bishop's-itchington-neighbourhood-plan.cfm</a>.

<sup>&</sup>lt;sup>1</sup> <u>http://www.legislation.gov.uk/uksi/2012/637/contents/made</u>

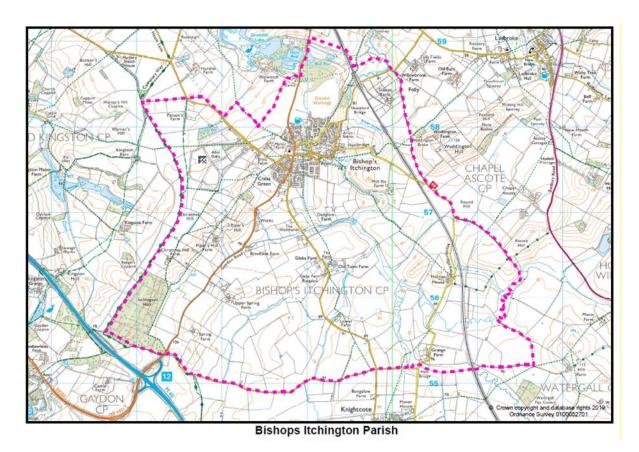
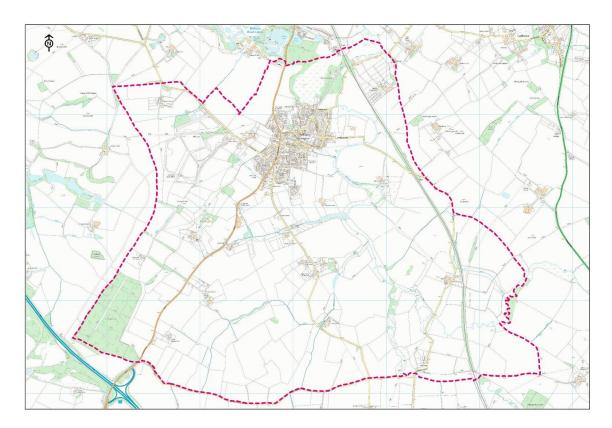


Figure 1. Designated Neighbourhood Area, 2020 (Source: Stratford on Avon District Council)

 The previous neighbourhood area boundary was designated by Stratford-on-Avon District on 13<sup>th</sup> January 2014 (Figure 2).



#### Figure 2. Designated Neighbourhood Area, 2014

- 1.6 The BINDP has been prepared by a working group comprising Parish Councillors and local residents was established to progress work on the plan. Further information on the background and work undertaken so far on the BINDP can be found at (https://Bishop'sitchington-pc.gov.uk/council/neighbourhood\_plan.aspx).
- 1.7 All information about the BINDP at each stage has been provided on the parish council web site (including minutes of the working group) and via articles and updates in the parish magazine and through regular emails.

Bishop's Itchington Neighbourhood Development Plan Consultation Statement, October 2021

#### 2.0 Pre-Regulation 14 Consultation

#### Village Survey 2016

- 2.1 To kick-start the preparation of the BINDP a Village Survey (VS) was undertaken in June/July 2016. The VS was distributed to all households, a prize of dinner for two at the Butcher's Arms was offered, the pub was one of three places in the village, the others being Bishop's Itchington News and the Greaves Club, where collection boxes were provided for completed survey forms to be dropped off. In addition, volunteers carried out a door-to-door collection of VS forms.
- 2.2 The VS was very comprehensive asking 55 questions, these covered:

### The Village Survey Asked for

- Household information (number of residents, age, etc.)
- Key issues in the parish
- Housing
- Services and community groups
- The character and environment of the parish
- Education
- Transport
- Jobs, employment and local business
- 2.3 340 completed VS forms were returned about 40% of households.
- 2.4 The full VS results can be accessed here (<u>https://Bishop'sitchington-pc.gov.uk/council/neighbourhood\_plan.aspx</u>). In summary, the VS revealed the following:

## What the Village Survey told us

- Many of you think that new large developments are inappropriate for the village but are not against small development schemes.
- There are concerns about parking and the speed of traffic through the village.
- There is support to improve and maintain the existing green spaces.
- There is support for the NDP to promote employment within the parish.
- 2.5 The VS was then used to identify issues and objectives, under 5 themes and the Vision for the BINDP.
- 2.6 In addition to the survey, over a period of time, the NDP team have been making presentations to the village at public events. There has been an "NDP Gazebo" staffed by the PC at the annual village carnivals, a presentation at the Memorial Hall in 2017 and an open coffee morning was held following the completion of the Village Survey to review the results, also in 2017.

Various pictures of these events can be seen in Appendix 5.

## **3.0** Regulation 14 Public Consultation 1<sup>st</sup> February 2021 – 28<sup>th</sup> March 2021

3.1 The public consultation on the Bishop's Itchington Regulation 14 Draft Neighbourhood Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area:
(i) details of the proposals for a neighbourhood development plan;
(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;
(iii) details of how to make representations; and
(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

- 3.2 The Bishop's Itchington Regulation 14 Draft Neighbourhood Plan was published for formal consultation for 8 weeks from 1<sup>st</sup> February 2021 to 28<sup>th</sup> March 2021.
- 3.3 The Regulation 14 consultation was publicised with an article in parish magazine, and email to all those on electronic mailing list.
- 3.4 Copies of the plan and supporting documents were made available on the BINDP consultation web site <u>https://bishopsitchington-pc.gov.uk/council/neighbourhood\_plan.aspx</u> (screenshot below). The link was and could be shared on social media, including facebook, Twitter and Linkedin.



Home / Neighbourhood Development Plan Consultation



#### Your Neighbourhood Development Plan is getting closer:

The Plan, once approved, documents your views and sits alongside Stratford District Council's Core Strategy when it comes to deciding planning applications. It can influence the type, scale and location of development within the Parish. It is therefore important for residents to look at the draft plan and to feedback comments on it (see below).



Public Consultation (Regulation 14 Consultation): The public consultation runs from Monday 1 February until 28 March 2021 (8 weeks). If you have any questions regarding the consultation process please telephone the Clerk on 07450360453. Any questions relating to the plan will need to be submitted on the Comment Form (link below). During the consultation period, it is hoped to hold at least one virtual Information Session on zoom. Details of the meeting(s) will be advertised on the

- 3.5 A comment form was provided and downloadable from the consultation web page (Appendix 1). Completed comment forms were to be returned to: <u>clerk@Bishop'sitchington-</u> <u>pc.gov.uk</u>. A paper copy of the Neighbourhood Development Plan and/or the comment form could be obtained from the Clerk by telephoning or contacting the Parish Clerk by postal address.
- 3.6 With Covid-19 restrictions in place interested parties could request a telephone call by contacting the Clerk to Bishop's Itchington Parish Council. And a Zoom public meeting was held 15<sup>th</sup> March 2021. This was publicised via handbill, leaflet and using the parish notice boards (Appendix 2 and Appendix 3).
- 3.7 All consultation materials set out when and to whom comments should be returned i.e. the Clerk to Bishop's Itchington Parish Council.
- 3.8 A list of the consultation bodies' contact details was kindly provided by Stratford-on-Avon District Council and all those on the list were sent a letter by email or post notifying them of the Regulation 14 public consultation and inviting comments. This list included:

- Individuals and businesses (including landowners and developers)
- Adjoining parishes.
- Environment Agency
- Warwickshire County Council
- Local ward and county councillors
- Emails were also sent to local individuals and groups on the Parish Council mailing list.

The full list of consultees is reproduced in Appendix 4.

- 3.9 A copy of the Regulation 14 Draft Plan was sent to Stratford-on-Avon District Council.
- 3.10 Tables 1 and 2 set out the responses received to the Regulation 14 Consultation. Tables 1 and 2 also include a column setting out the Parish Council's consideration of the response and the agreed action. These agreed actions were used to make amendments to the Regulation 14 Draft prior to submission.

## Table 1. Bishop's Itchington Neighbourhood Development Plan – Stratford-on-Avon District Council Regulation 14 Responses and Recommended Action

#### Significant comments from Stratford-on-Avon District Council

Suggested new text <u>underlined</u> deleted text <del>struckthough</del>

Page number	Section	Comment	Steering Group Consideration	Final Change
Policies map	Allotments	Consideration could be given to the existing allotments as shown on the map and whether they need to be marginally expanded as not all allotments have been taken.	Discussed by Group - No plans for expansion, empty plots some time, but more interest.	No change.
Page 13	Paragraph 4.6	Work has commenced on a joint South Warwickshire Local Plan. This should be updated and reference made to the 'South Warwickshire Local Plan' rather than Core Strategy. An up to date link should also be included which is: The South Warwickshire Local Plan Stratford-on-Avon District Council		Amended
Page 15	Policy BINDP1	This policy is very long and complicated. Firstly, it would appear to be two policies combined. The first three paragraphs deal with the principle of new development and the remainder of the policy deals with design matters. The design element should be a separate stand-alone policy within the 'Built Environment' section of the Plan. However, the design elements are too extensive for a workable policy. It includes a	and revise criterion (s).	Policies separated out, see also new BINDP4. New (s) added on Secured by design. (s) [now (t)] "where necessary and achievable" added. References to "historic core" deleted.

range of different topic areas which in themselves could be separate policies (i.e. design principles; environment/biodiversity; natural environment; green and built infrastructure,	
design principles; environment/biodiversity; natural	
environment/biodiversity; natural	
environment; green and built infrastructure,	
carbon emissions etc). The policy should	1
be split into appropriate components and	
the design principle policy re-drafted.	
Criterion (a) refers to 'existing good quality	
examples of street layouts. It would be	
useful to explain where these have come	
from, what the existing examples are and	
what the evidence base is that is being	
referred to. It is too vague in its current	
form. Reference is also made to the 'historic	
core' of the village, however Bishop's	
Itchington does not have a Conservation	
Area. It would be useful to explain where	
the historic core is, confirm whether it has	
been mapped and provide an explanation of	
how the parameters have been	
assessed/created clarifying the evidence	
base for this.	
Criterion (s) may not be applicable in the	
majority of cases and there is a concern over	
how this can be insisted upon.	
Page 15 Policy BINDP1, criteria (q) Reference is made to space for off Amend as suggested. Amended as	oart of
road/pavement storage of refuse and BINDP4.	
recycling bins". This would not be supported	
as bin storage space on pavements is an	
unsafe obstruction being caused to	
pedestrians/users of the footway. Bin	

Page 17	Policy BINDP1, Figure 4, map of the Built up Area Boundary	storage should be in designated areas, generally within the curtilage of the plot. It is suggested that the word "pavement" is removed. Delete 'pavement'. This map is not the most up-to-date. The 2020 version has removed the hardstanding associated with the recreation ground from the BUAB.	Replace Figure 4 with 2020 version.	Figure 4 now replaced with new boundary.
Page 18	Policy BINDP1, Justification/background	In order to make it clear it would be appropriate to explain the situation with reserve housing sites that are being identified in the SAP, particularly as there are two sites on the edge of the village outside the BUAB in the SAP Preferred Options.	Add in reference to SAP and reserve housing sites.	Added to 5.4 - In addition, the emerging Site Allocations Plan identifies reserve housing sites, BISH.A* land north of Ladbrook Road (21 units), and BISH.B* land north of Hambridge Road (24 units).
Page 19	Policy BINDP1, Para 5.7	It is noted that the community survey identified a preference for development sites under 11 dwellings. There are unlikely to be many (if any) 'windfall' sites greater than this size within the BUAB. Smaller sites are unlikely to trigger an affordable housing requirement and therefore is an identified need for affordable housing is to be met, this will more than likely mean that these homes would more than likely need to be met on a site outside of the BUAB.	Comment noted, no change.	No change.
Pages 19- 20	Policy BINDP1, Table 2, Recent Development and Planning Approvals	The figures for the old cement works site in Table 2, page 20 are incorrect. It is understood that the correct figures are as	Amend as suggested.	Figures in Table 2 amended.

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		it is 'now nearing the end of its usefulness		
		and applicants seeking approval or local		
		needs housing under Policy BINDP2 may		
		have to provide more up to date evidence		
		of local need'. Whilst this may considered		
		to be the case, the Plan needs to make this		
		clear and commit the Parish Council to		
		commissioning a new survey. If it is felt to		
		be out of date, the detailed findings of the		
		survey should not be referenced and		
		instead commit to a new survey, which if		
		carried out in a timely manner could be		
		part of the submission version. It would be		
		preferable for the Plan to identify a		
		preferred site for a scheme, the site would		
		only be released in the event a need is		
		identified via a fresh survey commissioned		
		by the Parish Council.		
Page 22	Policy BINDP3	The policy does not take into account that	Not sure the Ettington and Fulready	Amended as follows:
_		generally homeworking does not require	example adds anything:	
		planning consent due to it being classed as	"The provision of space to provide	New development for
		an ancillary use of the dwelling. Therefore,	home working such as flexible space	homeworking that
		it is unclear as to how the policy can control	adaptable to a home office will be	requires planning
		homeworking in new development any	supported where it would not	permission will be
		more than it could in an existing building. A	undermine the housing mix	supported when it does
		good example of a homeworking policy is	proposed in policy H4. The provision	not lead to significant
		LE.3 of the Ettington & Fulready NDP:	of cabling or suitable ducting to	adverse impact on
		Ettington and Fulready NDP: Made Version -	support broadband will also be	residential amenity, car
		July 2018 (stratford.gov.uk).	supported."	parking, or in terms of
		It may be worth considering a policy similar	Either amend using this as a	vehicle trips to and from
1		to this.	template or use the following:	the site."

			"New development for homeworking that requires planning permission will be supported when it does not lead to significant adverse impact on residential amenity, car parking, or in terms of vehicle trips to and from the site."	
Page 22	Policy BINDP3, first para	It might be useful to make reference to Core Strategy Policy CS.22 as well as AS.10.	Add in reference as suggested.	Amended. "and other development plan policy" deleted.
Page 24	Policy BINDP4	As per the comments in relation to Policy BINDP1, this policy considers several different issues which should be separate policies. The first paragraph together with the criteria a) – e) relates to landscape character. The remaining text relates to the protection of specific views from the village which should be a separate policy. In terms of the individual criteria within the policies, reference is made to the 'historic core' (see comments on BINDP1) as they apply here. It would be useful to know whether the historic boundaries and features have been listed and mapped and if so where. In terms of the designated and non-designated heritage assets, again clarity is sought as to whether these have been mapped and confirmation of the archaeological sites referred to and clarity on whether these have been mapped.	Seek to identify the historic core. Designated heritage assets are identified in the Planning Policy Assessment and Evidence Base	Policies split and re- worded as BINDP4, 5 and 6. Reference to historic core removed. Reference to Historic England web site added to paragraph 6.14.

		Criteria d) and e) are separate issues to that of 'landscape character' in that they refer to impacts on specific habitat designations which could be a separate policy.		
Page 28	Figure 5, Historic Environment Housing Assessment Sensitivity	The source quotes 'Stratford on Avon District Council', however it should be clear which document this figure has come from.	Add in correct reference.	Added.
Page 29	Policy BINDP5	The current wording based on protection cannot be guaranteed, therefore it is suggested amending the text as follows: Delete: The community facilities listed below and shown on the Policies Map will be protected Add: The retention of the following community facilities will be supported	Amend as suggested.	Amended [now BINDP7].
Page 29	Policy BINDP5	Do the sites 2, 3, 8, 9 and 10 comply with the criteria set out in Policy CS.25 Healthy Communities? Given the revised legislation on Use Class Orders and permitted change of use without the requirement for prior planning consent, will the policy be able to protect shops?	Re-consider Policy BINDP5 in relation to CS.25 and changes to Use Classes Order.	It is possible to protect – but not stop any lawful changes of use – the two are not incompatible. No change.
Page 31	Policy BINDP6	This doesn't read as a policy and should be re-written. Please see policies CSL.2 of the Claverdon NDP or policy LA.3 of the Ettington & Fulready NDP as examples of policies that have passed examination regarding sports facilities.	Amend based on the Ettington and Fulready example: "Existing formal and informal sport and recreational facilities in the Neighbourhood Area will be protected, enhanced and expanded where appropriate and achievable. The loss of any facility will only be permitted if a facility of equivalent scale and quality is provided in a	Amended – minus reference to CIL.

			suitable location within the community unless there is clear evidence that the existing facilities are not viable or well used. Where appropriate, Community Infrastructure Levy (CIL) funds will be used to enhance sports and recreation facilities in order to ensure a suitable quantum and quality is available for the Neighbourhood Area."	
Page 32	Policy BINDP7, Local Green Space 4	It is unclear as to how this meets the tests as set out in the NPPF. There should be clear evidence as to how it meets these tests otherwise it should be removed.	This is set out in the Background/Justification to Policy BINDP7, however, to aid clarity add a table setting out how each space meets the NPPF tests.	Summary Table 4 added.
Page 37	Policy BINDP8, Other Open Spaces	This policy as currently written is not precise enough and it is unlikely to meet the basic conditions. The term 'open space' is vague and it would be useful to know what land this term includes, for example is it public realm, private land or both? How can equivalent or 'better' space be provided elsewhere in the village?	Opens spaces to be mapped.	Add open spaces to Policies Map.
Page 39	Policy BINDP10	On street charging points are not practical due to cables acting as trip hazards. This infrastructure would create street clutter due to its design and as such would automatically fail to meet the provisions of the policy. There is also an additional issue of this infrastructure needing to be sited on highway land, which is the responsibility of	Policy to be re-worded.	Amended as follows: "Where on-street or off- street communal car parking is provided this should also include post mounted or street light mounted charging points the provision for

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N N	Warwickshire County Council and would not		EV charging.	Such
l t	be on land in the ownership of an individual		infrastructure shou	ld be
ā	applicant. Therefore, it is unclear how this		sited and designe	d to
l r	policy would meet the provisions of the		avoid street kerl	bside
	basic conditions.		clutter and be safe f	or all
			users of streets	_and
			highways that fac	cility.
			However, it must	
			accepted that	EV
			charging will require	
				•
			use of a free-star cable between charging point and vehicle."	nding the

#### Schedule of minor comments from Stratford-on-Avon District Council

Suggested new text <u>underlined</u> deleted text struckthough

Page number	Section	Comment	Suggested response
General	Policies Map	It is not clear why this is a separate document and it is suggested that this is incorporated into the Plan for ease of reference.	This is done for the reasons of practicality – download times, reading pdfs etc. Consider adding to BINDP subject to file size/practicality.
General	Policies Map	The reference numbers are difficult to read and the boundaries of a couple of the smaller sites are unclear. NB. The map may need updating subject to other comments regarding the proposed policies.	Amend to make clearer.
General	Policies Map	The Policies map is missing a BUAB even though this is shown in Figure 4 and mentioned at para. 5.5.	Add BUAB to Policies Map.
General	Policies Map	It is not clear why this is a separate document and it is suggested that this is incorporated into the Plan for ease of reference.	See above.
Page 7	Figure 3, NDP Process	6th box. Add ' <u>District</u> ' after the word 'Avon'.	Amend as suggested.
Page 7	Figure 3, NDP Process	There is a spelling mistake in the following text 'Submit to Stratford-on-Avon District'. Delete 'S <del>trateford</del> ' and replace with ' <u>Stratford</u> '. Add 'Council' at the end of the sentence.	Amend as suggested.
Page 9	Paragraph 2.5, penultimate sentence	Delete 'the' after 'of'.	Amend as suggested.
Page 11	Paragraph 3.7, second sentence	There appears to be some text and it is unclear what it relates to as the table is referenced 'Table 1' below. Delete text <del>'Table 10'</del> .)	Amend as suggested.

Page 13	Paragraph 4.5	This should be updated to read 'consultation took place on Preferred Options in Autumn 2020'.	Amend as suggested.
Page 13	Paragraph 4.1, 5th sentence	Delete 'maps' and replace with 'map'.	Amend as suggested.
Page 19	Paragraph 5.5., third sentence	Delete 'Area' and replace with 'Areas'.	Amend as suggested.
Page 21	Paragraph 5.14, third sentence	Replace the full stop with a comma in the number '1,000'.	Amend as suggested.
Page 23	Paragraph 5.20, bullet point 6	Add a full stop at the end of the sentence for consistency.	Amend as suggested.
Page 23	Paragraph 5.23, Parish Council Supporting Action 2	Replace 'other' with 'others'.	Amend as suggested.
Page 24	Policy BINDP4, criteria (d)	There is a bracket missing at the end of criteria (d).	Amend as suggested.
Page 36	Ridge & Furrow, second sentence	Delete 'manged' and replace with 'managed'.	Amend as suggested.

# Table 2. Bishop's Itchington Neighbourhood Development Plan – Regulation 14 Responses and Recommended Action

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
1	Inland Waterways Association (Warwickshire branch))	<ul> <li>Whilst the Bishop's Itchington parish does not include any of the navigable waterways which comprise our chief area of interest, we are pleased to support in general terms any neighbourhood plan which is well thought out and written in a robust fashion, so as the[y] help preserve the unique character and appearance of the area.</li> <li>We hope the plan will be accepted in order to conserve and improve the existing village facilities and vistas whilst defending the parish from ill-conceived and out of keeping development in the future.</li> <li>The IWA (Warks branch) does not feel it is our place to comment on any individual aspects of your plan but offers it's support for the adoption of the plan as a whole. We feel it covers the needs of the local community in an excellent fashion.</li> </ul>	Supporting comment noted.
2	Sport England	Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the <b>National Planning</b> <b>Policy Framework</b> (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports	Comments noted. No change to BINDP.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		facilities of the right quality and type in the right places is vital	
		to achieving this aim. This means that positive planning for	
		sport, protection from the unnecessary loss of sports facilities,	
		along with an integrated approach to providing new housing	
		and employment land with community facilities is important.	
		It is essential therefore that the neighbourhood plan reflects	
		and complies with national planning policy for sport as set out	
		in the NPPF with particular reference to Pars 96 and 97. It is	
		also important to be aware of Sport England's statutory	
		consultee role in protecting playing fields and the	
		presumption against the loss of playing field land. Sport	
		England's playing fields policy is set out in our Playing Fields	
		Policy and Guidance document.	
		https://www.sportengland.org/how-we-can-help/facilities-	
		and-planning/planning-for-sport#playing_fields_policy	
		Sport England provides guidance on developing planning	
		<b>policy</b> for sport and further information can be found via the	
		link below. Vital to the development and implementation of	
		planning policy is the evidence base on which it is founded.	
		https://www.sportengland.org/how-we-can-help/facilities-	
		and-planning/planning-for-sport#planning_applications	
		Sport England works with local authorities to ensure their	
		Local Plan is underpinned by robust and up to date evidence.	
		In line with Par 97 of the NPPF, this takes the form	
		of assessments of need and strategies for indoor and	
		outdoor sports facilities. A neighbourhood planning body	
		should look to see if the relevant local authority has prepared	
		a playing pitch strategy or other indoor/outdoor sports facility	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
Reference	Name	<ul> <li>strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</li> <li>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These</li> </ul>	
		should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. <u>http://www.sportengland.org/planningtoolsandguidance</u>	
		If <b>new or improved sports facilities</b> are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. <u>http://www.sportengland.org/facilities-planning/tools-</u> guidance/design-and-cost-guidance/	
		Any <b>new housing</b> developments will generate additional demand for sport. If existing sports facilities do not have the	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.	
		In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how <b>any</b> <b>new development</b> , especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.	
		Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		NPPF Section 8: <u>https://www.gov.uk/guidance/national-</u> planning-policy-framework/8-promoting-healthy- communities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing	
		Sport England's Active Design Guidance: <u>https://www.sportengland.org/activedesign</u>	
3	Severn Trent	Policy BINDP1 – New Development within Bishop's Itchington – Severn Trent is supportive of this policy. We are supportive of subsection (b) and would encourage you to go further existing features such as watercourses and ditches should be preserved as it is important that development does not prevent future discharge of surface water to natural outfalls such as watercourses, ditches or soakaways or disconnect land drainage from the watercourses.	Amend Policy BINDP1 (b) [now BINDP4] to include "makes a positive contribution to local landform, watercourses"
		We are supportive of subsection (n) to include water efficient design and would encourage you to include the optional higher water efficiency target of 110 Litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We therefore encourage inclusion of the following policy wording:	Comment noted, no change. The Written Ministerial Statement to Parliament of the Secretary of State (CLG) on 25 March 2015 included the following: "From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of
		<i>'Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is</i>	new dwellings". The additional wording does not have

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		<ul> <li>calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. Developments should demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures'</li> <li>Reasons for supporting the inclusion of this wording within policies include:</li> <li>National Planning Policy Framework (July 2018) Paragraph 149 states:</li> <li>"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, costal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure."</li> </ul>	sufficient regard for national policy and is not necessary to meet the Basic Conditions.
		We are also supportive of subsection (o) we believe that 'semi-permeable paving' should however just be 'permeable paving'. We would encourage you to include the following policy wording regarding sustainable surface water management following the drainage hierarchy and SuDS specific policies:	Amend "semi-permeable" to "permeable".

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		<ul> <li>'All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.'</li> <li>Reasons for including this wording within your policies include:</li> <li>Planning Practice Guidance Paragraph 80 (Reference ID: 7- 080-20150323) states:</li> <li>"Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:</li> <li>1. into the ground (infiltration);</li> <li>2. to a surface water sewer, highway drain, or another drainage system;</li> <li>4. to a combined sewer."</li> <li>'Developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate.</li> <li>All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape.</li> </ul>	Add suggested text to criterion (o).
		All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.'	
		The supporting text for the policy should also include:	Add suggested text to Background/Justification of BINDP1 [now BINDP4].
		Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.	
		Policy BINDP7 – Local Green Space / Policy BINDP8 – Other open Spaces – Severn Trent are supportive of Local Green Spaces, it is important that planning policy does not prevent flood resilience works from being carried out if required in the future. Green spaces can also be enhanced where a good SuDS, scheme that incorporates design principles to enhance biodiversity and amenity as well as attenuation. We would therefore recommend the following policy wording is added:	Comment noted. No change. Such development would not be incompatible with the designated local green spaces and protected open spaces.
		'Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.'	
4	Coal Authority	No specific comments to make.	Noted.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
5	Natural England	Natural England does not have any specific comments on the draft Bishop's Itchington Neighbourhood Development Plan.	Noted.
6	Place Partnership Limited (PPL) on behalf of Warwickshire Police (WP)	<ul> <li>Place Partnership Limited (PPL) is instructed by Warwickshire</li> <li>Police (WP) to submit representations to the public</li> <li>consultation on the Bishop's Itchington Neighbourhood</li> <li>Development Plan (BINDP).</li> <li>The BINDP, when 'made', will provide the planning framework</li> <li>for the Parish over the next ten years. Its policies will</li> <li>therefore be critical to ensuring that developments are safe</li> <li>and accessible, so that crime and disorder, and the fear of</li> <li>crime, do not undermine the quality of life or community</li> <li>cohesion, as required by paragraphs 91(b) and 127(f) of the</li> <li>National Planning Policy Framework (February 2019) (NPPF).</li> <li>Therefore, the purpose of this response is to propose</li> <li>amendments that will enable the BINDP to promote design</li> <li>measures that will reduce crime. It is in this positive and</li> <li>constructive spirit that WP would like to submit</li> <li>representations in relation to the following parts of the</li> </ul>	
		<b>Bishop's Itchington NDP 2031 Vision – Page 11</b> Whilst WP support Bishop's Itchington's vision of creating a strong sense of community, the Parish has been identified as an area where future development should meet the identified needs of the community under paragraph 5.1.10 of Policy CS.15 – 'Distribution of Development.' Therefore, it will be important that both existing and future residential	Comment noted. This matter is addressed by Core Strategy policy. No change.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		development maintain a safe, secure and low crime environment.	
		This is recognised by the following:	
		• Paragraphs 8, 20, 35-37, 91(b), 95 and 124-127(f) of the NPPF;	
		• Policies CS.1 and CS.9 (point 7 and paragraph 3.8.2. and 3.8.3) of the Stratford-on-Avon Core Strategy 2011-2031 (adopted July 2016);	
		<ul> <li>Development Requirements Supplementary Planning Document (adopted July 2020); and</li> </ul>	
		National Design Guide (2019).	
		In view of the above, WP propose the following amendment to the Vision:	
		In 2031 Bishop's Itchington will have retained and developed a strong sense of community. This will have been sustained by enabling families to stay close together through all stages of life. New housing and commercial development will have seamlessly integrated with and helped to preserve the peaceful rural environment and the distinct character of the village <b>through creating a safe, secure and crime free</b> <b>environment.</b>	
		Table 1. Key Issues and BINDP Strategic Objectives – Page 12	Comment noted. No change.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		WP are disappointed that Secured by Design (SBD) and emergency services infrastructure has not been included within the table of Strategic Objectives, given that housing and development has been highlighted as a key theme in the Parish. To promote a crime free and safe environment for existing and future residents and ensure the emergency services do not become stretched, WP requests an additional strategic objective within this section:	
		SO(?) Proposals for residential development should incorporate Secured by Design and where necessary, emergency services infrastructure.	
		The inclusion of SBD within the list of objectives is fully in accordance with paragraphs 91 (b), 95, 124 and 127 (f) of the NPPF and the following:	
		• Point 7 and paragraph 3.8.5 of Policy CS.9 of the Stratford- on-Avon District Council Core Strategy 2011-2031 (adopted July 2016);	
		<ul> <li>Development Requirements Supplementary Planning Document (adopted July 2020); and</li> </ul>	
		• The National Design Guide.	
		To give a brief summary of SBD, it is a long-running flagship initiative of the National Police Chiefs' Council (formerly Association of Chief Police Officers). Its objective to is to design out crime during the planning process. It is a highly respected standard in the sector, supported by numerous	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		public bodies (including Stratford-on-Avon District Council) and professional bodies. SBD is therefore a vital guidance resource for planners. SBD was created in 1989, is available online, regularly updated and consequently there is no danger of it ceasing to exist during the lifetime of the Neighbourhood Plan.	
		It should though be highlighted that incorporating SBD will not though negate the need for additional emergency services infrastructure in relation to new developments. Not least because there is no statutory power under which police, fire & rescue and ambulance services could be reduced because of a given scheme incorporating SBD. Policy BINDP1 – New Development within Bishop's Itchington – Pages 15-16	
		Whilst WP support the policy to ensure development is of sustainable design, the criteria does not refer to SBD or emergency services infrastructure, which is important in maintaining a safe and cohesive community within the Parish. It should also be noted that applicants can gain free advice on implementing SBD within their proposals from WP's Design Out Crime Officers.	
		Given the above, WP suggest that the following point should be included within the list of criteria set out in Policy BNDP1:	Add following to Policy BNDP4 "s) proposals for residential development should utilise Secured by Design principles"
		(?) Development proposals for residential development within the Parish should refer to Secured by Design within the Design and Access Statement. Applicants should also be aware that they can seek further information from	Add following text to Background/Justification of BTNP1:

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		Warwickshire Police's Design Out Crime Officers on how to include Secured by Design measures within their proposals, as well as referring to the Official Police Security Initiative Design Guides via the following link:  https://www.securedbydesign.com/guidance/design-guides.The inclusion of the requested points would be in accordance with the following:	"Applicants should also be aware that they can seek further information from Warwickshire Police's Design Out Crime Officers on how to include Secured by Design measures within their proposals, as well as referring to the Official Police Security Initiative Design Guides via the following link: https://www.securedbydesign.com/guidance/design- guides."
		<ul> <li>Paragraphs 91(b), 95, 124 and 127 (f) of the NPPF;</li> <li>Point 7 and paragraph 3.8.5 of Policy CS.9 of the Stratford- on-Avon District Council Core Strategy 2011-2031 (adopted July 2016);</li> <li>Development Requirements Supplementary Planning Document (adopted July 2020); and</li> <li>The National Design Guide.</li> </ul>	
		The following content of National Planning Practice Guidance also explains why strong planning policies concerning this issue are very important to have:	
		'Good design that considers security as an intrinsic part of a masterplan or individual development can help to achieve places that are safe as well as attractive, which function well, and which do not need subsequent work to achieve or improve resilience Good design means a wide range of crimes from theft to terrorism are less likely to happen by making those crime more difficult.'	
		Paragraph: 010 Reference ID: 53-010-20190722 Revision date: 22 07 2019	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		Overall, WP wishes to emphasise that they welcome the opportunity to submit comments to the BINDP and look forward to continuing this positive constructive dialogue with the Parish Council. Should there be any queries about the response, please do not hesitate to contact us and we would be pleased to assist.	
7	Warwickshire County Council – Flood Risk Management Team, Lead Local Flood Authority	Page 10, Section 3.4; Page 32, Policy BINDP7 local green space - We support the protection, improvement and maintenance of existing green spaces and creation of new green spaces. We would encourage the creation of protected green spaces within areas of flood risk, to ensure these areas remain free from built development.	Comments noted, no change.
		Page 12, Table 1, Housing and Development, SO2; Page 15, Policy BINDP1 – You could include an additional point to state that all developments will include sustainable drainage systems. You could add a new objective stating that developments need to consider their flood risk and include sustainable drainage systems when building on greenfield and brownfield sites. Please note that major planning applications, in line with the National Planning Policy Framework, will require a site specific Flood Risk Assessment and this must be submitted to the Lead Local Flood Authority for review. Page 12, Table 1, Natural and Built Heritage, SO4; Page 15, Policy BINDP1 point c and f; Page 24, Policy BINDP4 landscape character - We support the protection of open spaces and river corridors and the use of blue-green infrastructure – this could be developed to mention the benefits of open space as	The following comments are addressed in SADC Core Strategy Policy CS.4. There is no need for duplication in the BINDP. No change.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		flood risk management to retain water. Above ground SuDS could be utilised in open spaces.	
		Page 15, Policy BINDP1 General comments – You may wish to consider including a section specific to flood risk and surface water drainage on the basis that there are watercourses that run through the communities, and the surface water flood risk outline associated with them on the gov.uk website shows some parts of the community at high risk. We are also aware of reports of flooding in the area in the past that should be considered in any flood risk assessment. We would be happy to discuss this further if required.	
		Page 16, Policy BINDP1, point n and o – We support the use of SuDs features including rainwater harvesting and permeable paving. You could include a point that the Lead Local Flood Authority requires SuDS to be designed in accordance with CIRIA 753 SUDS Manual.	
		Page 19, Section 5.8 – You could include a point to state that any new development in the village achieves the following: developments include sustainable drainage and that any development does not increase flood risk elsewhere.	
		Page 25 and 26, Section 6.3, SEO 2 and SEO 3 – We support the protection and maintenance natural and manmade watercourses, wetland habitats, and green habitats.	Add SuDS to Glossary.
		Page 51, Glossary – You could include a definition of SuDs here as it is mentioned earlier on in the document.	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
8	Highways England	Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road	Comments noted, no change.
		Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.	
		In responding to Local Plan consultations, we have regard to DfT Circular 02/2013 -The Strategic Road Network and the Delivery of Sustainable Development ('the Circular').	
		This sets out how interactions with the Strategic Road Network should be considered in the making of local plans. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.	
		We have undertaken a review of the Bishop's Itchington NDP and note that the SRN closest to the NDP area is the M40 Motorway, with M40 Junction 12 just outside the boundary of the plan area.	
		However, as the plan does not introduce any new development sites or transport related policies that are likely to impact upon our network, we consider that the contents of the plan are for local determination, and we have no further comments to make.	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
9	S Wilson	5.4 implies that reserve sites won't be identified within the BINDP, which means that control of development locations is in the hands of SDC.	Comment noted. There is no requirement for an NDP to identify housing or reserve housing sites. No change.
		On a previous public consultation at the Community Centre, there were possible reserve sites identified within the village for proposed new developments, this took the form of a large map with sticky dots on it – what happened to that?	This map was part of the awareness raising for they Survey. The information gathered was used to inform preparation of the BINDP.
		The fact that BI has delivered over 120% of its housing 'allocation' in CS.16 as it currently stands, means we should come right at the bottom of the list when releasing sites for development. Sites selected by SDC for future new developments may be very unlikely, but not impossible, ergo having preferred sites enshrined within our NDP would protect the village from unwanted developments in undesirable locations.	Comment noted. There is no requirement for an NDP to identify housing or reserve housing sites. No change.
		Is it also possible to list within the NDP, locations that are definitely not preferred for development, I'm thinking specifically of the land to the rear of Butcher's Close which has been a source of concern to residents surrounding the proposed site on two occasions now.	NDPs must be prepared positively to state where development is not preferred is contrary to national policy and guidance. No change.
10	National Grid	An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.	Comment noted, no change.
		National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
11	Canals and Rivers Trust	The Trust does not own or operate any inland waterways or associated infrastructure within the Plan area and accordingly I can confirm that we have no comments to make.	Comment noted, no change.
12	Gladman	<ul> <li>Policy BINDP1 – New Development within Bishop's Itchington</li> <li>7.2.1 Policy BINDP1 identifies that new development will be supported in principle when consistent with the policies of the adopted Core Strategy. While development outside of the built-up area boundary (BUAB) will be restricted to those supported by policies in the BINDP and adopted Core Strategy. As currently read, the policy takes a restrictive approach to new development rather than that required by the Framework.</li> </ul>	Comment noted, no change. The BUAB is part of the adopted development plan.
		7.2.2 Gladman do not support the use of settlement boundaries whereby the delivery of otherwise sustainable development is prevented from coming forward. The NPPF is clear that development, which is sustainable, should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the NPPF 2019. Additionally, identified within paragraphs 11 and 16(b) of the NPPF 2019 requires policies to be sufficiently flexible to adapt to a rapid change and prepared positively.	Comment noted, no change. The BUAB is part of the adopted development plan.
		7.2.3 Within the Background/Justification for this text reference is made to CS.16, in particular to approximate development identified to Category 1 Local Service Villages. While according to the Parish Council figures the number of houses which have been approved in the area exceeds the	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
Reference		25% threshold set out in CS.16. Within the PPG it is stated that;	
		"Neighbourhood Planning Bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change and allows plan to remain up to date over a longer time scale."	
		7.2.4 It is imperative therefore that the Neighbourhood Plan enables the future development of housing to come forward both inside and outside the settlement boundary in order to be flexible if future need changes. Gladman would reiterate that this is especially pertinent due to the anticipated emerging SWLP and the reference to specific policies within the Core Strategy may render the Neighbourhood Plan out-of- date and ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004.	Comments noted. There is no requirement on NDPs to allocate housing sites. No change.
		7.2.5 Gladman recommends that specific reference to policies within the Core Strategy are removed and sufficient flexibility is provided within the policy wording to ensure the Neighbourhood Plan aligns with the emerging SWLP.	NDPs are assessed for general conformity against adopted strategic planning policies, NOT emerging planning policy. No change.
		7.2.6 Within Policy BINDP1 references are made to developments exceeding minimum standards for energy efficiency and seeking to be carbon neutral. As set out in the Written Ministerial Statement 2015 which made clear that technical standards which relate to construction, internal layout or performance can only be progressed through a Local Plan based on need and viability. In addition, while Gladman	BINDP1 does not set a minimum standard or seek for development to be carbon neutral, BINDP1 seeks to reduce carbon emissions and energy consumption. No change.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		recognise the importance of achieving carbon neutrality it is not considered that the BINDP is the most appropriate mechanism to be setting such aspirations. This is a strategic issue which should be dealt with through the emerging SWLP.	
		7.2.7 The policy then identifies a number of criteria, relating to good sustainable design, that all development will be assessed against. The majority of these criteria are close reiterations of policies within the adopted Core Strategy including CS.6 Natural Environment, CS.7 Green Infrastructure and CS.9 Policy Design and Distinctiveness. In order to be in line with Basic Condition (e), the Neighbourhood Plan must take care that these policies are in general conformity with the policies of the adopted Core Strategy, while incorporating flexibility in light of the emerging SWLP. Additionally, and as shown above, this one policy links to a number of policies within the Core Strategy as such it may be more efficacious for readers to split this policy and have a separate design policy.	Check BINDP1 with Core Strategy policies and remove any duplication.
		Policy BINDP4 – Landscape Character	
		7.3.1 This policy identifies that all new development must have regard to the landscape character and historic landscape character of the neighbourhood area. This then lists a number of criteria against which development proposals will be assessed. The criteria identified covers a range of topics including heritage, design, biodiversity and geodiversity and not limited to landscape character. It is Gladman's recommendation that this policy is split so as to be more concise. Also, any reference to heritage and the impact that	Comments noted, no change.

	evelopment may have upon heritage should make clear, in	
	ne with National Policy, that:	
sul ass of	where a development proposal will lead to less than ubstantial harm to the significance of a designated heritage sset, this harm should be weighed against the public benefits f the proposal including, where appropriate, securing its ptimum viable use."	
de	3.2 Also, the distinction between designated and non- esignated heritage assets is important and the protection ven to each.	Revise criterion (b) of BINDP4 to distinguish between designated and non-designated heritage assets.
provie vie ass neu be ph be tha ph rat sig Bau sur cou ma	3.3 The policy goes on to identify five views which are to be rotected, advising that development which affect these ews may need to provide a landscape visual impact sessment which should identify any mitigation considered ecessary to make the development acceptable. In order to ecome a protected view, it must be demonstrated that a hysical attribute elevates a view's importance beyond simply eing a nice view of the open countryside. Gladman consider nat to be valued, a view would need to have some form of hysical attribute that would 'take it out of the ordinary' other than selecting views which may not have any landscape gnificance and are based instead on community support. The ackground/Justification text identifies that "Responses to the urvey held within the parish also resulted in considerable oncern that the views over the local countryside should be naintained." Gladman do not consider that this constitutes a ufficient nor robust evidence base with which to support the	Review and revise evidence base where considered necessary.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		<ul> <li>protect views it must be based on appropriate NPPF evidence such as a landscape character assessment, undertaken prior to the Neighbourhood Plan being submitted for independent examination.</li> <li>Policy BINDP10 – Electric Vehicle (EV) Charging Infrastructure</li> <li>7.4.1 While Gladman support the Steering Groups ambition to reducing carbon emissions and the use of EV Charging Points, Gladman contend that this must be demonstrated and justified through the evidence base and should be subject to viability testing to ensure that the policy is deliverable.</li> </ul>	Comment noted, no change.
		7.4.2 Given the context of the BINDP and the emerging Local Plan, this policy would be more appropriately contained and tested through the SWLP.	
13	Historic England	Historic England is supportive of both the content of the document and the vision and objectives set out in it. We commend the general emphasis placed upon the maintenance of local distinctiveness through good design and the conservation of landscape character, building upon the findings of the local authority Historic Environment Assessment and associated Sensitivity Analysis. This and other documentation including from the Warwickshire Historic Environment Record provides a very thorough evidence base providing a solid platform for the policies and proposals put forward.	Supporting comments noted.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		In this respect we fully support the well thought out policies for the conservation of local distinctiveness and the protection of the built environment and archaeology and rural landscape character including green space, biodiversity and important views. We also commend the approaches taken in the Plan to ensuring that the design of new development is positively guided by the considerable research undertaken and thus can take cues from the historic character and vernacular of each locality, as currently expressed in paragraph 6.10.	
		In this respect we suggest that this stance could be strengthened by also making direct reference within Policy BINDP4 to the Historic Environment Assessment/Historic Environment Record information and the need for those proposing new development to show in their planning applications how this information has been appropriately addressed in proposed designs.	Revise BINDP4 as suggested.
		Beyond those observations we have no further substantive comments to make on what Historic England considers is a very good example of community led planning.	
14	Harris Lamb on behalf of Barratt David Wilson Homes	As referred to in our representations it is our view that the draft Neighbourhood Plan is not in conformity with the adopted Core Strategy or the emerging Site Allocations Plan. It will also be rendered out of date, at least in part, when the Site Allocations Plan is adopted, and as a whole, once the emerging joint Stratford-upon-Avon and Warwick District Local Plan is adopted. This is due to the fact that the emerging Neighbourhood Plan fails to recognise that the Site Allocations Plan makes Reserve Housing Site allocations at Bishop's	The BINDP must be in general conformity with the strategic policies of the adopted Core Strategy and take into account emerging planning policy. There is no requirement for the NDP to identify housing or reserve housing sites. The NDP will sit alongside adopted plans and any subsequently adopted plan. Where there is conflict the latest adopted plan will take precedence. Parts of the NDP may or may not b, therefore, out of date. No change.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		Itchington, and as the housing requirement in the Core	
		Strategy will soon be out of date.	
		We are of the view that the Neighbourhood Plan should be amended in order to ensure it is in conformity with the Core Strategy and future proofed to help ensure it remains an up to date plan as the emerging replacement Local Plan progresses and once the Core Strategy housing requirement is out of date. This can be done by making a housing allocation to the east of the settlement.	
		The western section of the site is identified as a Reserve Housing Site in the Preferred Options version of the Stratford Upon Avon Site Allocations Plan. It is identified as a proposed Allocation BISH.02, with a potential capacity for development of 24 dwellings. It is classified as "green" in terms of all assessment criteria included within the Site Allocations Plan, with the exception of the fact that there is local wildlife site within the site. The area of wildlife interest can, however, be excluded from the developable area. BDWH have submitted Representations to the Preferred Options Consultation document supporting the identification of this site as a Reserve Housing Site allocation and suggesting that it can be extended further eastwards to where the River Itchen forms a clear and defensible boundary. It is our view that the most appropriate solution for future housing in the parish would be to allocate both Reserve Housing Site and the land to the east, as a housing allocation.	
		If the Site Allocations Plan progresses as drafted it will, in all likelihood, result in the development of proposed allocation	

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		BISH02 in the relatively near future. If this site is allocated for residential development in the Neighbourhood Plan it will provide the Parish Council with the opportunity to put a policy in place to guide its development. There, are however, in our view significant advantages in allocating the land to the east of this site for residential development as well.	
		The allocation of the site as a whole will help ensure that the Neighbourhood Plan is forward facing and responds to the increased housing requirement that will arise as a consequence of the Joint Local Plan review. It will deliver market and affordable housing to support the village's population. The site is well contained by the River Itchen, which prevents the further expansion of the village eastwards.	
		The proposed development can help create access to the River Itchen. It is envisaged that the development of the site will create new areas of publicly accessible open space along the length of the river to the benefit of the village as whole. The open space will be of a high quality and well landscaped. BDWH would welcome the opportunity to work with the village on the vision for the development of this site.	
15	Harris Lamb on behalf of Barratt David Wilson Homes	Paragraph 1.5 of the Neighbourhood Plan advises that the emerging Plan is being prepared to be in accordance with the Stratford Upon Avon Core Strategy, and the District's emerging Site Allocations Plan. The Site Allocations Plan is being prepared to be in conformity with the Core Strategy, which is essential given that it is a Part 2 Plan.	Paragraph 1.5 is factually correct. No change.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		Policy CS.16 – Housing Development, requires the provision of "at least" 14,600 dwellings during the course of the Plan period. In addition, it requires the preparation of a Site Allocations Plan that identifies Reserve Housing Sites that can provide the equivalent of 20% of the total housing requirement at 2031. The Preferred Options version of the Site Allocations Plan, which was the subject of Public Consultation between October and December 2020, identifies two Reserve Housing Site at Bishop's Itchington to meet this requirement.	The identification of reserve housing sites does not have to be a matter for the NDP. This matter can be left to the Site Allocations Plan. No change.
		The Neighbourhood Plan does not identify Reserve Housing Site at Bishop's Itchington. It does not, therefore, meet the requirements of the Core Strategy of the emerging Site Allocations Plan in this regard. No sound rationale is provided for this within the Neighbourhood Plan. There are, therefore, two possible outcomes. Firstly, the Neighbourhood Plan risks been found unsound at the examination stage as it does not meet the requirements of the Development Plan. The alternative is that the Neighbourhood Plan is found sound, but is rendered out of date as soon as the Site Allocations Plan is adopted making a Reserve Housing Site Allocation at Bishop's Itchington. The Neighbourhood Plan will, therefore, be a short term plan with a timescale likely to run into a matter of months before it is out of date.	The identification of reserve housing sites does not have to be a matter for the NDP. This matter can be left to the Site Allocations Plan. No change. Neighbourhood plans are not tested for "soundness", the test is - is the NDP in general conformity with the strategic policies for the area? The NDP meets this test. No change. The NDP will sit alongside adopted plans and any subsequently adopted plan. Where there is conflict the latest adopted plan will take precedence. Parts of the NDP may or may not b , therefore, out of date. No change.
16	Harris Lamb on behalf of Barratt David Wilson Homes	We support the Neighbourhood Plan Vision, in terms of enabling families to stay close together through all stages of life. In order to do so additional housing development will be required in all of Stratford's sustainable settlements to meet the needs of their growing populations. If insufficient housing	Supporting comment noted.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		is made available as new households form there will be increased pressure for them to leave the area due to the lack of available housing stock.	
17	Harris Lamb on behalf of Barratt David Wilson Homes	We believe an additional strategic objective should be added to the "Housing and Development" Key Issues. The emerging Neighbourhood Plan is being prepared to cover the period to 2031. During the course of this period the District Council will adopt a new joint Local Plan to replace the existing Core Strategy and the emerging Site Allocations Plan. This document will include a new housing requirement for the area and necessitate the identification of additional residential allocations. This should be reflected in the Neighbourhood Plan if it is intended to guide development for a period up to 2031. A new Strategic Objective should be added advising residential allocations will be made within the Neighbourhood Plan to add flexibility, and ensure that the document does not become out of date as soon as the replacement Local Plan is prepared. As detailed elsewhere in our 'Omission Site' representation we are of the view that a residential allocation should be made to the east of Bishop's Itchington to the east of Old Road and the north of Hambridge.	There is no requirement for the NDP to identify housing or reserve housing sites. These matters can be left to the emerging South Warwickshire Local Plan and the Site Allocations Plan – no change to objectives.
18	Harris Lamb on behalf of Barratt David Wilson Homes	Paragraphs 5.1 to 5.8 fail to recognise that a new Local Plan is being prepared for Stratford Upon Avon and Warwick District Council. Once it is adopted it will render the adopted Core Strategy and its housing requirement out of date.	Update paragraphs 5.1 to 5.8 where necessary.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		In any event the Core Strategy was adopted on the 11th July 2016. Paragraph 73 of the Framework advises that Local Planning Authorities should update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement as set out in their adopted strategic policies. However, when strategic policies are five years old the housing requirement in the Local Plan is out of date, and the five year housing land supply position should be tested against the housing requirement that arises from the Standard Method.	This is a strategic matter for the District Council to consider and address. No change.
		The Core Strategy was adopted in July 2016. That being the case the five year period expires in July 2021. The housing requirement in the Core Strategy will, therefore, shortly be out of date for the purposes of the five year housing land supply calculation. The Neighbourhood Plan ignores this position. The Neighbourhood Plan can assist with addressing this matter by identifying a residential allocation.	This is a strategic matter for the District Council to consider and address. No change. There is no requirement for the NDP to identify housing sites. No change.
19	Harris Lamb on behalf of Barratt David Wilson Homes	We have a series of concerns with Policy BINDP1. The Policy advises that outside of the built area boundary development will be restricted to those forms of development supported elsewhere in the Plan, including Core Strategy Policy AS.10 – Countryside and Villages. There is consequently a presumption against residential development outside of the settlement boundary.	This reflects the position in strategic planning policy. No change.
		This part of the Policy fails to recognise that Core Strategy Policy CS.16, confirms that the housing requirement in the Core Strategy is a minimum. In addition, it is necessary for a	These are matters for the District. No change.

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		Site Allocations Plan to be prepared that identifies Reserve Housing Sites with the capacity to deliver 20% of the overall housing requirement. The District Council have commenced work on a Site Allocations Plan that has now progressed through the Preferred Options consultation stage. The Site Allocations Plan has identified land to the east of Bishop's Itchington as Reserve Housing Sites. This section of BINDP1 fails to recognise the requirements of Policy CS.16 of the emerging Development Plan, and therefore has the potential to be out of date immediately.	
		The third paragraph of the Policy is ambiguous. It advises that development should "seek to minimise resource use." However, the term "resource" is not defined. It is not clear to the reader of the Plan how this can be achieved and what is expected from this Policy. Furthermore, this has potential viability implications for certain schemes, and this requirement has not been viability tested.	Clarify the term "resource".
		The third part of the Policy also advises that development should "exceed" minimum standards for energy efficiency. These "standards" are not defined. It is not clear what the Policy expects in this regard. If the "standards" being referred to are Building Regulations they are subject to a separate regime and should not be controlled through the planning process. Dual regulatory control should be avoided.	The policy states "should" this is an encouragement to exceed standards set elsewhere e.g. through Building Regulations. It Is not a requirement. No change.
		In addition, whilst the Policy makes reference to developments that are in accordance with the provisions of a Core Strategy being supported, no reference is made to the requirements of the National Planning Policy Framework. The	The NDP must be in general conformity with the strategic planning policy for the area and have regard to national planning policy and guidance. This has

Respondent Reference	Respondent Name	Comment(s) made	Recommended Action
		National Planning Policy Framework was produced in 2019 and is, therefore, more up to date than the Core Strategy. The National Planning Policy Framework is a material consideration of significant weight in the plan making and determination process. The Policy should be amended to reference the provisions of the Framework and advise that developments in accordance with the Framework will be supported.	been carried out in preparing the plan. Ahead of submission a Basic Conditions Statement will be prepared setting out how these basic conditions have been met in more detail. No changes based on this comment, but consequent changes may be made based on the Basic Conditions Statement.
20	Harris Lamb on behalf of Barratt David Wilson Homes	Policy BINDP2 – Local Housing Needs, creates an illogical position whereby the Policy supports the provision of affordable housing to meet locally arising need. However, it does not support the development of market housing to meet a locally arising need. This means that if a household cannot afford their own property this policy can be used to support the development of a housing. However, if a household is able to afford their own house they are discriminated against as the policy prevents the delivery of market housing. Paragraph 5.12 of the Plan identifies the various criteria to be used in establishing if someone has a "local connection" for the purposes of this policy. These criteria could equally apply to a household who are able to afford their own property and those who are not and therefore are inconsistent with Policy BINDP2. There is no reasonable justification for this position. It is accepted that there is an affordable housing need within Bishop's Itchington, but there is also a market housing need as well, The policy should be redrafted to reflect the need for both forms of housing in Bishop's Itchington.	Policy BINDP2 is an affordable housing policy. This is a legitimate concern to seek to address through the NDP. No change.

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# 4.0 Strategic Environmental Assessment/Habitat Regulations Assessment (March 2019)

- 4.1 In preparing the Bishop's Itchington Neighbourhood Development Plan, the HNDP has been subject to Strategic Environmental and Habitat Regulations Assessment screening by Malvern Hills District Council <u>https://Bishop's Itchingtonndp.co.uk/wp-content/uploads/2020/06/SEA-HRA-Screening-Opinions-February-2020.pdf</u>.
- 4.2 The screening has been consulted on with the relevant statutory bodies. The screening concluded:

"The SEA screening exercise featured in Section 2 concludes that the draft Bishop's Itchington Neighbourhood Plan may require a full Strategic Environmental Assessment to be undertaken. This is because the Neighbourhood Plan proposes a land allocation for development adjacent to an existing allocation in the SWDP."

#### 4.3 The screening also concludes:

"The HRA screening exercise featured in Section 3 concludes that the draft Bishop's Itchington Neighbourhood Plan does not require a full Habitats Regulation Assessment Appropriate Assessment to be undertaken. There are no internationally designated wildlife sites within the Bishop's Itchington Neighbourhood Area, with Lyppard Grange SAC and Bredon Hill SAC falling within a 20km radius. The impact on these sites as a result of the land allocations contained within the SWDP has been assessed in the SWDP HRA AA, and although the draft Bishop's Itchington Neighbourhood Plan does deviate, the level of such allocations are considered small enough to conclude that it is unlikely to have a negative impact on any internationally designated wildlife sites and as such, the recommendation is made that a full AA is not required."

### Appendices

#### Appendix 1. Regulation 14 Consultation Response Form

# **Bishop's Itchington**

# Neighbourhood Development Plan

# Regulation 14 Consultation [01/02/21 - 28/03/21]

ALL RESPONSES MUST BE RECEIVED BY 28 MARCH 2021

# **Representation Form**

#### PLEASE COMPLETE AND RETURN ONE FORM FOR EVERY COMMENT MADE

Name	
Organisation	
Address	
Email	
Tel. No.	

Please state to which part of the Draft Neighbourhood Plan your representation refers. (Please indicate with X)

Page Number	
Policy Number	

Are you supporting, objecting, or making a comment? (Please indicate with X)

Support	
Object	
Making a Comment	

Please Turn Over

Please use the box below for any comments.

I also consent to my details being shared with Stratford on Avon District Council for the purpose of the District Council carrying out their duties at Regulation 16 consultation, please tick this box □

Thank you for your time and interest. Please return this form to the Parish Council office or via email to: <u>clerk@Bishop'sitchington-pc.gov.uk</u>

#### Appendix 2. Handbill for Neighbourhood Plan Zoom Meeting



The Neighbourhood development plan is now complete and a requirement of the regulatory process in producing a Plan is that everyone living or working within the designated area must be consulted and we are now at this stage. The Plan has been available for viewing both online and in print since 1<sup>st</sup> February with an opportunity for you to comment and give your feedback.

We have received a number of responses through the Comments Form on the website and would now like to offer parishioners the opportunity to meet the team behind the plan in person – albeit virtually – in order to answer any questions you may have regarding the process and purpose of the plan. Any additional questions should be sent in advance of the meeting to Karen Stevens our Clerk. Deadline for questions to submitted is **12 noon on Thursday,11<sup>th</sup> March 2021**.

You are invited to a public Zoom meeting on **15<sup>th</sup> March 2021 at 6.30pm**. Please contact Karen Stevens, our Parish Clerk if you would like to be sent a link to join the meeting. Don't forget to email in your questions by **12 noon on Thursday,11<sup>th</sup> March 2021**.

We look forward to 'seeing' you there.

### Appendix 3. Regulation 14 Publicity Leaflet



Work is ongoing with Bishops Itchington developing a Neighbourhood Development Plan (NDP).

## What is neighbourhood planning?

Neighbourhood planning was introduced through the Localism Act of 2011.

Neighbourhood planning is not a legal requirement, but a right which communities in England can choose to use – Bishops Itchington has chosen to do so.

A Neighbourhood Development Plan (NDP) establishes a vision and planning policies for its area, as well as proposals for the future development and use of land. The policies will be a significant consideration when Stratford District Council makes decisions on planning applications that fall within the plan's geographic area.

Neighbourhood planning enables communities to play a much stronger role in shaping the areas in which they live and work and in supporting new development proposals. This is because unlike the parish, village or town plans that communities may have prepared, a neighbourhood plan forms part of the development plan and sits alongside the Local Plan prepared by the local planning authority. Decisions on planning applications will be made using both the local plan and the Neighbourhood Plan, and any other material considerations.

### Where are we now?

Some of you will remember the village survey conducted back in 2016 – this formed the basis of a draft Plan which has subsequently been presented to Stratford District Council for review. Part of the regulatory process with developing a Neighbourhood Plan is that everyone living or working within the designated area has to be consulted on the Plan and we are now at this stage - it has been passed for the presubmission consultation, Regulation 14 stage.

A copy of the Plan for you to review can be found on the Parish Council website – select "The Parish Council" tab, then click on the "Neighbourhood Plan" tab - a copy of the Plan can be found here. If you don't have internet access and you wish to see a copy, please phone the PC office (01926 613902) and request a hard copy – we will deliver one to you.

If you have any comments or questions, there is also a "Comments Form" on the website – please use this to correspond. The PC will not be responding to questions

individually as and when they are raised – all comments will be collated and followed up at the end of the consultation. Similarly, please request a hard copy Comments Form if required.

The public consultation will run for 6 weeks from 1<sup>st</sup> February 2021.

In normal times, there would be some form of public meeting or workshop where the public can engage with councillors regarding the Neighbourhood Plan, however, this will not now be possible. Instead, and for any interested residents, we plan to hold a public Zoom meeting, most likely towards the end of February – please keep an eye on the local FB pages and the PC noticeboard for further news of this.

The Parish Council thanks you for your attention.

Bishop's Itchington Neighbourhood Development Plan Consultation Statement, October 2021

#### Appendix 4. List of Regulation 14 Consultees

Akins Ltd Ancient Monuments Society Arqiva **Birmingham International Airport** CABE Canal and River Trust Capital and Property Projects Coal Authority Council for British Archaeology Council for British Archaeology Cotswold Conservation Board Coventry Diocese DAC Secretary **Civil Aviation Authority** Coventry Airport **CTC** - National Cycling Charity **CTC** - National Cycling Charity Historic England **English Heritage Parks and Gardens Environment Agency Environment Agency** Force Crime Prevention Design Advisor **Forestry Commission Forestry Commission** Garden History Society Georgian Group Glide Sport UK Homes England Highways Agency (Midlands) Inland Waterways Association Joint Radio company

Kernon Countryside Consultants

London Oxford Airport

MBNL(Acting for Everything Everywhere)

Ministry of Defence

Accessible Stratford

Mr Butler (CPRE)

CPRE

National Air Traffic Services

National Grid Gas Distribution

National Grid UK Transmission

National Planning Casework Service

National Trust

National Trust

Natural England

Natural England

Network Rail

Ofcom

Off Route Airspace

SDC Conservation

WCC Principle Highway Control Officer

**Ramblers Association** 

SDC Planning and Environment

Royal Agricultural Society of England

RSPB

Severn Trent Water

Severn Trent Water

Sport England West Midlands

Sport England West Midlands

Stratford-on-Avon Gliding Club

Stratford-on-Avon Gliding Club

Sustrans

**Thames Water Utilities** 

- Thames Water Utilities
- The Design Council
- **Theatres Trust**
- Upper Avon Navigation Trust Ltd
- Victorian Society
- Warwickshire Badger Group
- Warwickshire Bat Group
- Warwickshire Police
- Warwickshire Police
- Warwickshire Police Road Safety
- Warks Primary Care Trust
- NHS Property Services Ltd
- Warwickshire Rural Housing Association
- Warwickshire Wildlife Trust
- Warks Wildlife Trust
- WCC planning
- WCC Archaeology
- WCC Extra Care Housing
- WCC NDP Liaison Officer
- WCC Flood Risk
- WCC Ecology
- WCC Forestry
- WCC Fire & Rescue Service
- WCC Gypsy & Traveller Officer
- WCC Health & Communities
- WCC Highways
- WCC Land Registry
- WCC Libraries
- WCC Rights of Way
- Wellesbourne Airfield
- Wellesbourne Airfield
- Western Power Distribution

Woodland Trust Warwickshire Rural Community Council Warwickshire Amphibian and Reptile Team Stansgate Planning Coventry and Warwickshire Partnership NHS Trust South Warwickshire Clinical Commissioning Group Community Forum - Stratford area Stratford Business Forum Strutt and Parker **Bromford Housing Group** Stonewater Housing Association Fortis Living Housing Association Warwickshire Rural Housing Association Orbit Group Waterloo Housing Group Shakespeares England SSA Planning, Nottingham SDC Planning Policy Wormleighton Parish Meeting Farborough Parish Council Avon Dassett parish Council **Burton Dassett Parish Council** Ward Member Napton & Fenny Compton Ward Member Red Horse Ward Member Bishops Itchington

Ward Member Southam South

County Councillor

Daventry District Council

### **Appendix 5: Photos from community engagement events**

The NDP Gazebo at the village carnival July 2017





Coffee morning in the Community Centre May 2017 - results of village survey presented to the community.









### Community Groups fair in the Memorial Hall Feb 2017 – NDP table



he Planning People

For more information on the contents of this document contact:

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