

# **BIDFORD ON-AVON PARISH** NEIGHBOURHOOD **PLAN**

## **NEIGHBOURHOOD DEVELOPMENT PLAN**

Pre-submission Draft Policy Consultation  
24th September – 6th November 2015

[www.bidfordonavon-pc.gov.uk](http://www.bidfordonavon-pc.gov.uk)

## 1.0 INTRODUCTION

### The Rationale

Neighbourhood Development Plans (NDP's) are an important part of passing greater decision making from national and regional levels to local government and communities. As such our Plan is a community led framework for guiding future development, regeneration and conservation in our local area.

The NDP forms part of the statutory development plan for Stratford-upon-Avon district which gives it far more weight than other locally prepared documents. It does not have the power to stop all development, but it is a powerful tool in shaping that development in line with local wishes and the local environment.

### The Context

The National Policy Planning Framework (NPPF) makes it clear that the purpose of planning is to help achieve sustainable development. Sustainable development means ensuring that better lives for ourselves does not mean worse lives for future generations.

Sustainable development is about change for the better, and not just through the built environment. Our natural environment is essential to our wellbeing, can be better looked after than it has been, and more accessible for people to experience it, to the benefit of body and soul.

Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.

This should be a collective enterprise, yet, in recent years, planning has tended to exclude, rather than to include, people and communities.

The NPPF changes that, introducing neighbourhood planning and allowing people and communities a greater influence in the decision making process.

### The Core Strategy

The District Council is preparing a series of planning documents to guide development and change in the district up to 2031. They will determine how many new homes are built, how many new jobs are created and how people can travel to get to the things they need.

The most important of these documents is the Core Strategy, because it will set the course for everything to follow. It will present a vision of how the district will look and function in future years.

There are some big challenges facing the district, which the Core Strategy needs to address:

- Where should new homes be built and new jobs located?
- How can we meet the housing needs of local people?
- How can we reduce the impacts of climate change?
- How can we make sure everyone can reach the services they need?
- How do we protect our rich heritage and landscape?

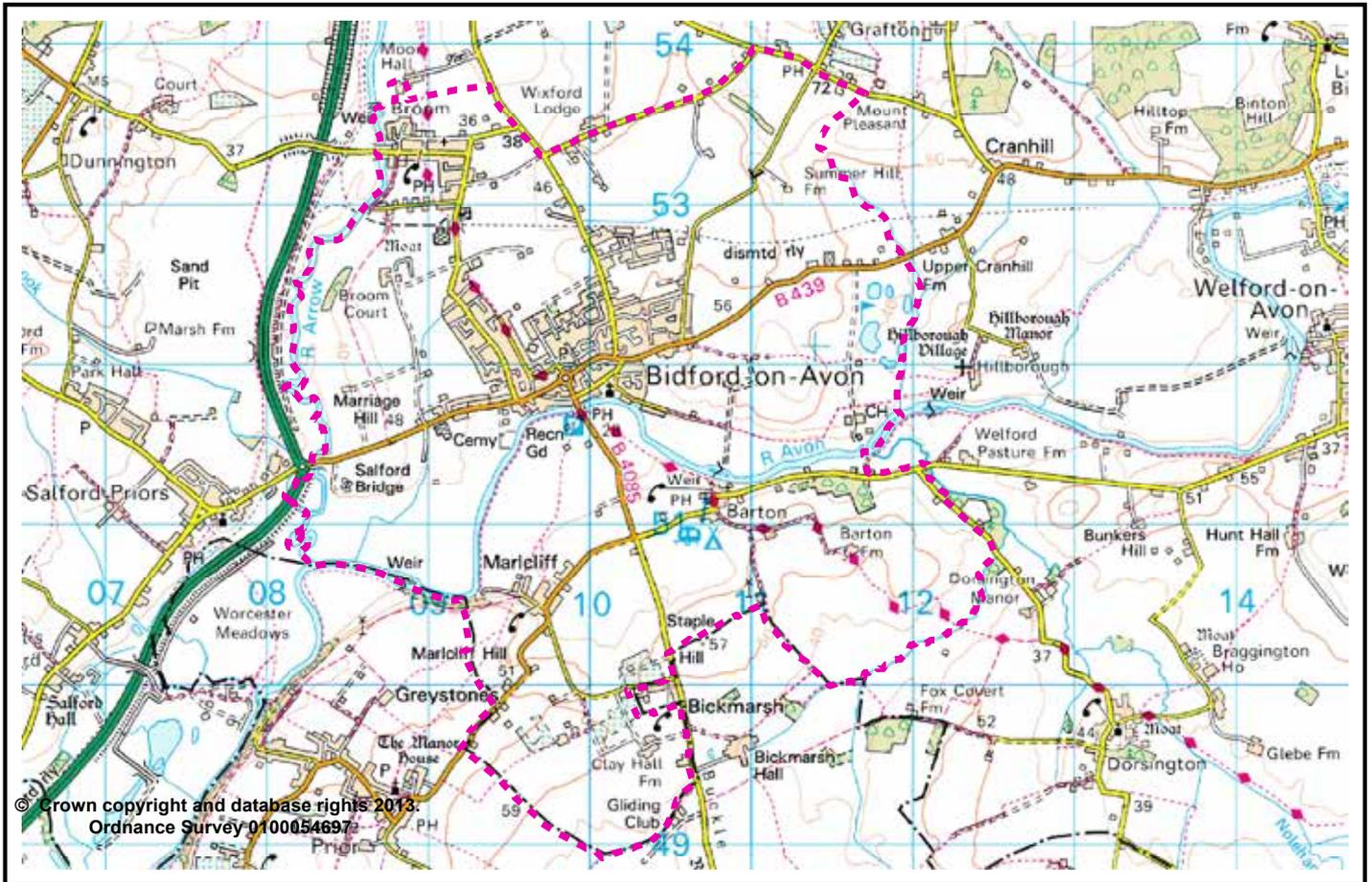
The Core Strategy sets out the District Council's views on land use and the environmental qualities for the district. The NDP takes this further and sets out what we are looking for across the Parish.

Our NDP sets out our vision for the Parish and contains policies to enable appropriate, sustainable development which will meet our need for houses, support job creation, safeguard existing amenities and create more.

## STRATEGIC OBJECTIVES

<b>Housing</b>	To provide a sufficient supply and mix of dwellings to meet the needs of the community during the Plan period
<b>Economy</b>	To protect and promote jobs for local people in order to advance economic development in the Neighbourhood Area
<b>Environment</b>	To safeguard our natural environment and built heritage and enhance biodiversity whilst providing access for all, improving the well-being of the community, recognizing the importance of mitigating climate change and working towards a more sustainable future
<b>Amenities</b>	To ensure that valued community assets, local shops and services are maintained and where possible enhanced in order to promote sustainable living

## The Neighbourhood Area

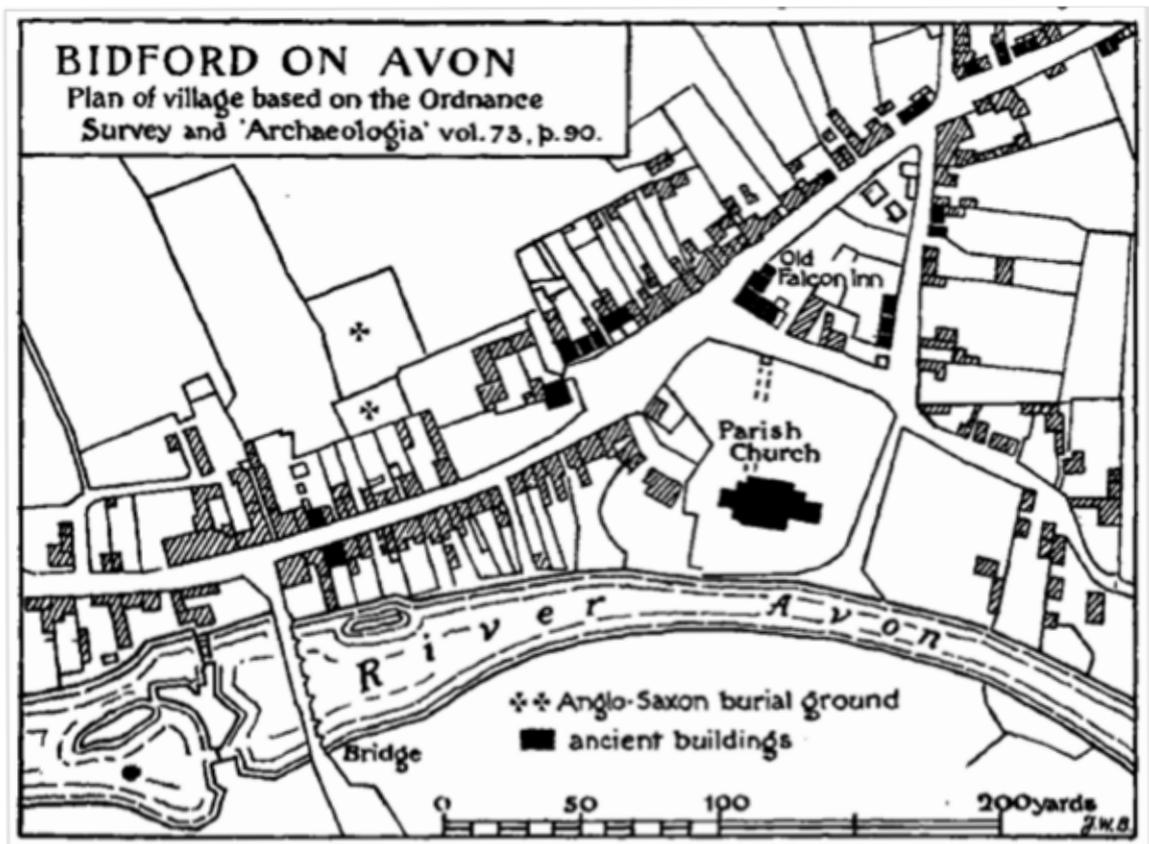


## 2.0 BACKGROUND

### Bidford-on-Avon - from rural village to main rural centre

The riverside village of Bidford-on-Avon is situated by the River Avon in the County of Warwickshire. To the east is Shakespeare's Stratford-upon-Avon; to the south is the small village of Honeybourne in the county of Worcestershire; to the west is the historic town of Evesham and to the north the Roman town of Alcester. It is within Stratford-on-Avon District Council (SDC) which is its Local Planning Authority (LPA).

The main character of Bidford-on-Avon lies in the central and oldest part of the village with its intimate scale, buildings and winding Main Street.



It is significant that all the buildings of 17th century are within 183 m from the church. Until the 20th century the village did not extend much further than the single street along the north bank of the river. In the interwar and post war years, some development spread along Victoria Road, to the west and Waterloo Road, to the east, and especially to the east of Waterloo Road in the form of sizeable Local Authority housing estates.

Then came the 1970s and the beginning of dramatic change. It started with the traffic congestion on the bustling High Street and the increasing demands from the local community that something be done! That something was the building of the relief road effectively, cutting the village in half! This undoubtedly started the demise of the High Street and opened the village up to large, new developments to the north of the said relief road.

Another decision that influenced the development in Bidford-on-Avon was being nominated one of the seven Main Rural Centres: the intention being that these towns and villages would be allowed to grow. Those Main rural Centres that were recognised Market Towns saw new development as business opportunities, but the smaller villages lacked the infra structure to allow for this rapid expansion. Bidford-on-Avon was one of the latter category and suffered, and continues to suffer, from this lack of investment.

So in 20 years, the population of Bidford-on-Avon rose from 2,822 in 1971 to a whopping 4,826 by 1991, and continues to grow. The current population of is now over 5,300 living in 2495 dwellings.

From being a relatively small community working locally, it has become a large village where over 75% of the working population commutes. From being a village with a cohesive community it has moved to one where a large proportion of the population come back home to eat and sleep.

We firmly believe that the Bidford Neighbourhood Plan will (as a part of the statutory core plan for Stratford-on-Avon) help to establish the principle of 'sustainable' development. It aims to properly shape any further necessary development closely in line with local needs and wishes. It also has a vital role to play in maintaining and enhancing the local environment for present and future generations.

## 3.0 NEIGHBOURHOOD HOUSING

### Strategic Objective

This Plan acknowledges that the Neighbourhood Area is required to play its part in the supply of housing for the district. Bidford-on-Avon has played a significant role already, contributing 450 new dwellings<sup>1</sup> since 2011.

Housing policies within this Plan seek to ensure that the level of new development is commensurate with the scale of the village taking account of the development that has taken place over the last 4 years.

The villages of Barton, Marlcliff and Broom are not considered to be suitable for new housing due to their inability to support sustainable development. Broom and Barton are also heavily constrained by conservation areas and neither village has the range of local facilities which would support sustainable living.

The District Council's study of the capacity of villages to accommodate growth which takes account of national and district planning policies, physical, environmental and landscape constraints and location in relation to employment, public transport and key community facilities has been taken into account during the preparation of this plan.

The Proposals Map demonstrates a number of constraints to development in the Neighbourhood Area, which have been taken into account when considering potential new sites for development. The south of the village is heavily constrained by the River Avon flood plain which has resulted in significant growth to the north of the village.

Growth to the north of the village has moved development away from the historical centre of the village creating an imbalance in the location of houses to local services.

### POLICY H1 - VILLAGE BOUNDARY

All new housing development will be confined to within the Village Boundary, as defined on the Proposals Map, and the sites allocated within Policy H2, unless supported by other policies in this Plan.

Proposals for new housing outside of these built up area boundaries will not be supported.

### EXPLANATION

87% of respondents to the questionnaire would prefer not to see any new development within the Neighbourhood Area. It is understood that the latest revised draft of the Stratford District Council Core Strategy will not require any further contribution towards the supply of housing in the district.

Small infill development on land within the Village Boundary will provide housing without significant damage to the character and setting of the village. This pattern of gradual and piecemeal development will ensure new dwellings contribute to the attractive appearance and character of Bidford-on-Avon and its sense of community.

## POLICY H2 - STRATEGIC RESERVE FOR FUTURE HOUSING NEED

This Plan supports the safeguarding of land west of Waterloo Road as shown on the Proposals Map for potential future housing development.

This site will only be released for housing during the plan period if it can be demonstrated through the submission of evidence that there is an identified local housing need for its early release.

Development on this site must not exceed 100 dwellings and will only be permitted providing the following requirements are met:

- a) A high quality design utilising the most up to date technologies in building construction and renewal technology;
- b) A high quality landscape led layout which takes account of the sensitive landscape in which the site is located;
- c) A sensitive external lighting scheme designed to minimise light pollution;
- d) Safe access and egress from the local highway network;
- e) Use of a high quality pallet of external materials which have regard to the sensitive rural location;
- f) Green travel measures are provided throughout the lifetime of the development including enhanced links with existing public transport; and
- g) A mix of dwellings that reflects the current housing needs at the time.

Development proposals must comply with other policies outlined in this Plan.

### EXPLANATION

Stratford-on-Avon District Council is currently preparing its Core Strategy<sup>2</sup> which will govern the spatial vision for new housing in the district up to 2031. Stage 1 of the Examination in Public is now complete. The Inspectors interim conclusions<sup>3</sup> on the stage 1 examination were published on 18 March 2015.

Stratford District Council has recently submitted the latest revised draft<sup>4</sup> of the Core Strategy in response to the Inspectors interim conclusions. Although the overall housing figure for the district has risen, no new housing allocation is required for Bidford-on-Avon. However, as a precaution, the Plan has identified a potential site as 'Safeguarded Land' which will be protected from development until such time as a specific evidence based need is established and then the site will be released for the appropriate development.

## POLICY H3 - PROMOTING AN APPROPRIATE MIX OF HOUSING FOR THE NEIGHBOURHOOD AREA

All development must demonstrate how the latest Housing Needs Survey or other relevant local evidence has been taken into account when determining housing mix.

### Market Housing

On sites of 5 or more dwellings the following market housing mix will be required:

35% = 2 bed dwellings or less

35% = 3 bed dwellings

30% = 4 bed dwellings or more

This mix of housing shall include semi-detached and terraced housing as appropriate.

### Affordable Housing

The 2012 Housing Needs Assessment highlights the following need across the Neighbourhood Area:

13 x 2 bedroom houses for affordable rent

1 x 2 bedroom bungalow for affordable rent

6 x 3 bedroom houses for affordable rent

1 x 4 bedroom house for affordable rent

3 x 2 bedroom houses for shared ownership

*Continued >*

1. Planning permissions granted since 2011

2. Stratford-on-Avon District Council Core Strategy Proposed Submission Version (June 2014)

3. Examination of the Stratford-On-Avon Core Strategy - Inspector's Interim Conclusions (March 2015)

4. Stratford-on-Avon District Council Core Strategy Proposed Modifications (July 2015)

Development will be expected to meet any unmet local need and thereafter provide affordable housing broadly in accordance with the following tenure split:

- 80% Affordable Rent
- 20% Shared Ownership

#### **EXPLANATION**

Mix will be subject to negotiation considering issues such as local need, viability and character of the area. Developers will be required to set out why they are not complying with the broad approach given in Policy H3 above.

The evidence from the SHMA and its update indicates that the provision of a greater number of smaller market homes on development sites to help meet the identified need should be encouraged. In light of the ageing population, the provision of small market bungalows will be particularly welcomed.

In the recent Neighbourhood Plan Survey<sup>5</sup>, 67% of respondents stated a preference to small family homes (2 and 3 bedrooms). 59% indicated a desire for low cost starter homes. This sector of market housing has been underprovided over the last 20 years so it is now time to redress this balance.

The National Planning Policy Framework sets out the definition of Affordable Housing and the associated tenure types within this .

The property types, sizes and tenures of the affordable housing on individual sites will vary subject to local needs. The latest Housing Needs Survey was conducted in 2012 and provides the most up to date analysis of local housing need at the time of writing.

A review of the local housing need will be undertaken within the first 5 years of the adoption of this Plan.

### **POLICY H4 - USE OF BROWNFIELD LAND**

The redevelopment of brownfield land will be supported subject to the following criteria:

- a) The new use would be compatible with the surrounding uses;
- b) Any remediate works to remove contaminants are satisfactorily dealt with;
- c) The proposal would lead to an enhancement in the character and appearance of the site; and
- d) The proposal would not conflict with any other policies in this Plan.

Unless specifically allocated in this plan, there is a general presumption against the development of greenfield land. Proposals for development on greenfield land must clearly demonstrate exceptional circumstances before proposals will be looked upon favourably.

#### **EXPLANATION**

It would be contrary to the principles of sustainable development to allow more homes on greenfield sites than would be necessary to meet identified housing need arising in the Neighbourhood Area.

For the purposes of this Plan, brownfield is previously developed land within the village envelope which is, or was, occupied by a permanent structure no longer in active use. It includes the curtilage of the developed land but specifically excludes any residential garden land. There is no presumption that the whole of the site will be suitable for development. This would need to be proven through the planning application process.

### **POLICY H5 - USE OF GARDEN LAND**

Development on garden land within the defined Village Boundary, as shown on the Proposals Map, will only be permitted if it can be demonstrated that proposals:

- a) Preserve or enhance the character of the area;
- b) Do not introduce a form of development which is at odds with the existing settlement character or pattern;
- c) Preserve the amenities of neighbouring properties; and
- d) Provide satisfactory arrangements for access and parking.

5. Table 6

6. Annex 2: Glossary (page 50)

## EXPLANATION

Development within the garden of existing houses can lead to inappropriate development with regard to neighbouring properties and poor means of access. Unless an adequate land area is available or can be assembled and demonstrated to be accessible and sustainable, without causing detrimental harm to the amenity of neighbouring dwellings or to the character of the area, then development will be resisted.

## 4.0 NEIGHBOURHOOD ECONOMY

### Strategic Objective

The National Planning Policy Framework identifies three dimensions to sustainable development, one of which is the economic role. The economic role is defined as “contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure”<sup>7</sup>.

To ensure that the Neighbourhood Area continues to have a vibrant and diverse economic make up, appropriate for its size and rural location this Plan proposes a number of economic policies with the theme of protecting and enhancing. Particular importance is placed on maintaining the commercial vitality of the Bidford-on-Avon Village Centre and the Waterloo Industrial Estate.

### POLICY ECON1 - PROTECTING AND ENHANCING EXISTING EMPLOYMENT SITES

Proposals for the change of use or redevelopment of land or premises identified for or currently in employment use will not be permitted unless:

- a) There is a sufficient supply of sites for a range of employment uses to meet both immediate and longer term requirements over the Plan period; and
- b) The applicant can demonstrate that the site/premises is no longer capable of meeting employment needs; or
- c) Development of the site for other appropriate uses will facilitate the relocation of an existing business to a more suitable site; or
- d) Unacceptable environmental problems are associated with the current use of the site and the proposal will remove them; or
- e) The site is located in the village centre and the proposed use will contribute to the vitality and viability of the village centre or forms part of a regeneration project; or
- f) Relocation of the employer will make better use of existing or planned infrastructure.

## EXPLANATION

The sustainability of Bidford-on-Avon is dependent upon the opportunity for local people to find employment. The businesses on the industrial estates provide both work opportunities for local people and training and development. There is also an inflow of workers from outside of the neighbourhood who spend money supporting retail and other service industries within the Neighbourhood Area.

### POLICY ECON2 - PROTECTING AND ENHANCING THE VILLAGE CENTRE

Proposals for the change of use or redevelopment of land or premises within the Village Centre, as defined on the Proposal Map, will only be permitted if it would not result in the loss of a shop or commercial premise.

Proposals for new retail or commercial premises will be supported where there is no conflict with other policies in this Plan.

The change of use of retail or commercial premises in the village centre to residential will not be permitted unless it has been proven that there is no alternative or viable use. Evidence of a robust marketing exercise will be expected as evidence to demonstrate that no alternative use is likely to come forward.

## EXPLANATION

The village centre has suffered a gradual loss of trade since the opening of the B439 in 1978. Nevertheless, the village centre is highly valued by residents and visitors and in order for it to remain as a retail and commercial area for the Neighbourhood Area, development which would reduce the retail or employment opportunity of the centre will be resisted.

---

7.Paragraph 7

## **POLICY ECON3 - PROMOTING HIGH SPEED BROADBAND**

All new residential or commercial development within the Neighbourhood Area will be expected to include the necessary infrastructure to allow future connectivity to high speed broadband.

### **EXPLANATION**

In an age where home based businesses and home working is encouraged in order to advance sustainable patterns of living and working, it is important that appropriate infrastructure such as high speed broadband is provided.

This Plan seeks to promote the future proofing of new residential and commercial development by requiring the infrastructure associated with the installation of high speed broadband to be provided at the build stage.

## **POLICY ECON4 - PARKING IN THE VILLAGE CENTRE**

Development which would adversely affect the current parking provision in the village centre will not be permitted.

### **EXPLANATION**

Current parking provision in the village centre must be maintained and, where possible, enhanced to facilitate ease of accessibility to the village centre and its businesses. Future developments within the village centre must provide adequate parking in accordance with adopted standards.

## **POLICY ECON5 - PROMOTING RIVERSIDE ACTIVITIES**

Development which promotes or enhances riverside facilities in order to facilitate and increase visitor numbers to the village as a whole and its businesses will be supported.

Financial contributions/CIL (Community Infrastructure Levy) receipts generated within the Neighbourhood Area will be used, where appropriate, to deliver such facilities.

### **EXPLANATION**

Bidford-on-Avon boasts an enviable natural resource in the form of the River Avon which attracts visitors to the Neighbourhood Area benefiting many local, particularly leisure and hospitality, businesses. Future developments must protect and where possible enhance the attraction of the river to visitors.

## **POLICY ECON6 - HOMEWORKING AND LIVE-WORK UNITS**

All new dwellings must include space to support home-working, with flexible space adaptable to a home office, and incorporate cabling to support broadband in accordance with Policy ECON3.

Proposals for small scale mixed use development (new build or conversion), comprising of commercial space and living space will be supported subject to the following criteria:

- a) Have suitable independent access to both uses;
- b) Have an appropriate level of off road parking to serve both uses;
- c) Have independent service facilities (e.g. kitchen, toilet etc.) for the workspace which do not rely on the living space;
- d) Be in reasonably accessible locations to service facilities by means other than a private vehicle;
- e) In the case of conversions, the building should be of a permanent and substantial construction, structurally sound and capable of conversion without major rebuilding or extension; and
- f) Have an adequate residential curtilage without having a detrimental impact on the building and its rural setting.

### **EXPLANATION**

Many residents have adapted to modern working patterns and are either employed to work from home or have established their own business within part of their home. It is likely that this pattern is likely to continue and potentially increase so new development must be able to accommodate and or adapt to the requirements of future owners to be able to home work.

Mixed use schemes where an occupier can work and live within the same planning unit has the benefit of removing the necessity to travel to work and therefore such schemes are a relatively sustainable form of development that would otherwise not be supported in rural locations.

## 5.0 NEIGHBOURHOOD ENVIRONMENT

### Strategic Objective

One of the three dimensions of sustainable development as outlined in the National Planning Policy Framework is the environmental role. This is defined as “contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”<sup>8</sup>.

We recognise the need to safeguard our natural environment and built heritage and enhance biodiversity whilst providing access for all and improving the well-being of the community.

We should protect the open rural nature of the landscape in which our villages are set and ensure that the identities of our separate settlements are maintained.

We should work towards a more sustainable future and recognise the importance of mitigating climate change, ensuring that better lives for ourselves does not mean worse lives for future generations.

### POLICY ENV1 - RENEWABLE ENERGY

Development proposals relating to the production of green energy will be supported providing they can be satisfactorily integrated into the character and appearance of the village and its environs. Proposals which fail to preserve or enhance the established character will not be supported.

All new developments should maximise energy efficiency through the provision of high energy efficient buildings.

### EXPLANATION

We are all charged by our future generations to work towards a more sustainable future and recognise the importance of mitigating climate change. We recognise the need to reduce carbon emissions and the use of fossil fuels and support developments that contribute to green energy production. However, their scale and appearance must not compromise the character of our villages.

### POLICY ENV2 - GREEN INFRASTRUCTURE

All development will be expected to protect mature and healthy trees and hedges. Where this is not possible, new trees and hedges must be planted to replace those lost with appropriate native species which are of nursery stock.

Developments will need to demonstrate they have been landscape led in order to avoid retrofitting of poor quality or token landscaping.

### EXPLANATION

We need to ensure the protection of the rural character of Bidford through the maintenance and enhancement of important landscape features such as trees, hedges and woodland.

### POLICY ENV3 - BLUE INFRASTRUCTURE

All development will be expected to safeguard existing rivers, streams and ponds both within and adjacent to development sites.

Development proposals which adversely affect existing rivers, streams and ponds will not be supported.

8. Paragraph 7

## EXPLANATION

Our rivers, ponds and other water bodies are significant landscape and ecological features. We need to safeguard them for their importance for biodiversity, for amenity and for water resources that we need.

We should maintain or improve their water quality in accordance with Water Framework Directive requirements<sup>9</sup>.

## POLICY ENV4 - REDUCING FLOOD RISK

All development proposals must incorporate suitable and sustainable means of drainage where site conditions are favourable. Where site conditions are proven to be unfavourable or unfeasible, an alternative drainage solution will need to be agreed by the council and the relevant water authority.

On large-scale developments such schemes will be expected to contribute to ecological enhancement as well as sustainable drainage.

The re-use and recycling of water within developments will be encouraged.

Proposals which do not satisfactorily demonstrate secure arrangements for the prevention of fluvial and pluvial flooding will not be supported.

## EXPLANATION

All our villages have suffered considerably from flooding in recent years. New developments must contribute to flood alleviation through provision of sustainable drainage systems, soft landscaping and permeable surfaces where possible. Larger developments offer the opportunity to include landscape and biodiversity enhancement in sustainable drainage systems.

The Environment Agency considers that water resources are under 'moderate stress'<sup>10</sup> in the locality with some areas under 'serious stress'. Therefore developments should include means of re-using and recycling water where possible.

## POLICY ENV5 - FOUL DRAINAGE

All development proposals must demonstrate that there are or will be adequate water supply and water treatment facilities in place to serve the whole development. Proposals that would result in an unacceptable risk to the quality and / or quantity of a water body or water bodies will not be permitted.

Proposals to expedite the improvement and upgrade the existing foul drainage network in the village will be supported.

All developments will be expected to demonstrate that there are suitable and satisfactory arrangements in place to deal with foul water.

## EXPLANATION

Local planning authorities have a general responsibility not to compromise the achievement of United Kingdom compliance with the Water Framework Directive (WFD<sup>42</sup>) (Directive 2000/60/EC). All surface water bodies need to achieve "good ecological status" by 2015. The Localism Act 2011 enables the UK government to require local authorities to pay if their inaction resulted in a failure to meet WFD requirements. The Localism Act 2011 also requires local planning authorities to co-operate on cross-boundary planning issues including the provision of water supply infrastructure, water quality, water supply and enhancement of the natural environment.

The effective management of waste water is considered critical in the pursuit of sustainable development and communities. It reduces the impact flooding can have on the community, maintains water quality and quantity and helps to enhance local amenity and biodiversity through the provision of green infrastructure.

Effective water management also reduces the movement of water and sewage thereby reducing energy requirements. The Parish Council will continue to work with Warwickshire County Council as lead local flood authority, the District Council, the Environment Agency and Severn Trent Water to achieve compliance with the WFD and aim to provide sufficient water to meet local needs.

9. Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy

10. Halcrow, Warwickshire Sub-Regional Water Cycle Study, Final Report (March 2014)

## **POLICY ENV6 - PROTECTION OF THE BEST AND MOST VERSATILE AGRICULTURAL LAND**

Development which would result in the complete or partial loss of the Best and Most Versatile Agricultural Land, as outlined on the Proposals Map, will not be supported.

Operational development or changes of use directly associated with, and necessary for, agricultural activity will be considered compatible with this Policy.

### **EXPLANATION**

The National Planning Policy Framework ensures protection against the loss of the best and most versatile agricultural land from significant development<sup>11</sup>.

Our best agricultural land should be protected both to maintain the rural surroundings of our villages and to ensure it continues to contribute to production of food.

## **POLICY ENV7 - PROTECTION OF LANDSCAPE, SKYLINES AND IMPORTANT VIEWS**

In order to maintain the distinctive character of the Neighbourhood Area, all new development must have regard to the landscape character and historic landscape features and retention of important landmarks, skylines and views.

Proposals which have an adverse impact on the landscape, skylines or important views will not be supported.

### **EXPLANATION**

We should protect the open and rural nature of the land surrounding built up areas of the parish to ensure the separate identities of our different settlements and retain its distinctive features, skylines and important views.

## **POLICY ENV8 - PRESERVATION OF HERITAGE ASSETS**

Proposals which cause harm to the special historical or architectural fabric and interest of listed buildings and Scheduled Ancient Monuments and their settings will not be supported.

Proposals, including changes of use, which enable the appropriate and sensitive restoration of listed buildings, will be supported.

All proposals must as a minimum preserve the important physical fabric and settings of listed buildings and Scheduled Ancient Monuments.

Development within and adjacent to all heritage assets will be strictly controlled. Development which fails to preserve or enhance the character or appearance of the Conservation Area will not be supported.

### **EXPLANATION**

Our villages contain a number of listed buildings, Conservation Areas and important architectural fabric. We need to ensure that these buildings and structures are protected and enhanced and that they are not compromised by new developments.

## **POLICY ENV9 - PROMOTING HIGH QUALITY DESIGN**

All development proposals must demonstrate how local character has been taken into account during the conception and evolution of a design. Proposals that do not positively contribute to local character will not be supported.

All development proposals will be expected to demonstrate how the design has been influenced by the need to plan positively to reduce crime and the fear of crime and how this will be achieved.

The density of development must enhance the character and quality of the local area whilst preserving the amenity of neighbouring residential homes, being commensurate with a viable scheme and infrastructure capacity.

---

11. Paragraph 112

## EXPLANATION

The local character of our villages, including buildings and other structures made from materials of local origin and its spatial forms, should be protected, enhanced and not compromised by inappropriate new developments.

## POLICY ENV10 - NATURE CONSERVATION

A Biodiversity Action Plan shall be prepared for the Neighbourhood Area in consultation with key stakeholders and the public. All proposals should take account of the Local Biodiversity Action Plan and show what effect, if any, they will have on local biodiversity. Where development involves a loss of biodiversity or habitat, appropriate habitat should be created in mitigation.

## EXPLANATION

We should protect and enhance green spaces and the landscape features and habitats such as woodland, hedges, orchards, rivers, streams and ponds that support a wide biodiversity. A Local Biodiversity Action Plan is a means of ensuring this protection.

## POLICY ENV11 - MINERALS AND AGGREGATES EXTRACTION

Where mineral extraction occurs this must be clearly time limited. Measures must be in place from the outset to minimize the impact of extraction on residential areas and local roads. Restoration to an agreed appropriate after use such as agriculture, habitat creation or informal recreation must be achieved within clear time limits.

## EXPLANATION

Parts of the Neighbourhood Area, particularly around the village of Broom, have seen extensive mineral extraction and suffered its impacts. We should ensure that where future mineral extraction occurs it is clearly time limited, that the impact on residential areas and its roads is minimised and that restoration to suitable uses such as agriculture, recreation and habitat creation is also achieved within clear time limits.

## 6.0 NEIGHBOURHOOD AMENITIES

### Strategic Objective

Existing community facilities play an important role in maintaining a strong and vibrant community. The loss of existing community facilities will be resisted unless it can be demonstrated that the facility is no longer viable or that the facility is no longer in active use and has no prospect of being brought back into use. Proposals which enhance and improve existing community facilities will continue to be encouraged where they represent sustainable development.

## POLICY AM1 - PROTECTING AND ENHANCING HEALTH OPPORTUNITIES

Providing access to health care is essential to maintain a healthy community. General population increase and a specific increase in older age groups have placed considerable strain on health care provision within the Neighbourhood Area.

Proposals which would adversely affect the provision and delivery of health care will not be supported.

Proposals which would enhance and expand existing health care facilities will be supported providing they do not conflict with adjoining land uses.

## EXPLANATION

The health centre plays an important role in the lives of our community. A large number of respondents were very or fairly satisfied with the service provided. When the health centre moved out of the village centre, it was said that other health services would be available.

Respondents to the 2015 Neighbourhood Plan Questionnaire requested additional services to be provided on the health centre site including physiotherapy, district nurses, NHS dentistry, chiropody, optometry, minor injuries, mental health support and complimentary therapies.

Many respondents felt that a footpath between the surgery and Bidford-on-Avon would be beneficial, because at present the safest option is to use a vehicle, given that there is only a grass verge to walk alongside the very busy road.

## **POLICY AM2 - PROTECTING AND ENHANCING EDUCATION AND LIBRARY FACILITIES**

Sustaining and increasing the opportunity to access education should be delivered through the protection and expansion of the existing primary school and the library but such expansion should not be at the expense of the existing play areas, sports areas and landscape.

Proposals which adversely affect the provision and delivery of education and learning in the Neighbourhood Area will not be supported.

This Plan supports the review of transport arrangements for secondary school pupils travelling outside of the Neighbourhood Area for access and safety.

### **EXPLANATION**

In order to accommodate the additional primary school pupils associated with the recent rapid growth in housing within the Neighbourhood Area, proposals to expand the existing school will be looked upon favourably.

Around 357 secondary school pupils are bussed to schools in Alcester, Stratford-upon-Avon and Chipping Campden.

The library is run by volunteers and is used by all generations in the village. Future development will be expected to contribute towards the ongoing maintenance of this important village facility.

## **POLICY AM3 - PROTECTING AND ENHANCING SPORTS AND RECREATIONAL SPACES (FORMAL)**

Existing sports and recreational spaces will be protected and enhanced, where appropriate by CIL funds, in order to ensure a suitable quantum and quality of recreational and amenity space is available for the Neighbourhood Area.

The following areas of formal open space have been identified on the Proposals Map. Development which adversely affects these important spaces will not be supported:

### **Bidford-on-Avon**

1. Big Meadow and Monie Meadow
2. C of E Primary School Playing Fields
3. Dugdale Sports Fields
4. Marleigh Park
5. Jubilee Close
6. Wards Lane
7. The Leys
8. Crawford Hall and associated Sports Clubs
9. Friday Furlong
10. Bramley Way

### **Broom**

1. Kings Lane
2. Millers Bank

### **EXPLANATION**

74% of residents expressed the view that they would like to see an upgraded village hall and indoor sports facility in Bidford-on-Avon. The Crawford Hall and Broom Village Hall provides the only indoor facilities within the Neighbourhood Area for potential recreational use. Proposals which would expand these important community assets to widen the range of facilities and services provided and enhance the opportunity for sports and recreational use will be supported.

An expansion of the Crawford Hall would supply a safe place for the younger generations to go to keep fit and active, both physically and mentally. The lack of secondary schools in the village make some after schools activities non accessible to some pupils, as bus passes are limited to one bus and parents may be unable to fetch them at later times in the day. The provision of such facilities would mean long-term improvement to individual's health and well-being.

## POLICY AM4 - PROTECTING AND ENHANCING INFORMAL OPEN SPACES

Existing informal open spaces will be protected and enhanced, where appropriate by CIL funds, in order to ensure a suitable quantum and quality of amenity space is available for the Neighbourhood Area.

Local Green Space designations will be used to ensure that important local pockets of green space, whether private or public, will be protected from any development.

The following areas of Local Green Space have been identified. Development which adversely affects these important spaces will not be supported:

### **Bidford-on-Avon**

1. Green area at Dugdale Avenue
2. Green area Paddock Close
3. Green area Lambourne Close
4. Green area St Laurence Way
5. Green area St Laurence Way
- 6a. Green area The Leys – Orbit Housing
- 6b. Green area The Leys – Orbit Housing
7. Green area Crompton Avenue – Orbit Housing
8. Green area Hill View/Wessons Road
9. Green area on Friday Furlong

### **Broom**

1. Green area at Malt House Close

## **EXPLANATION**

The National Planning Policy Framework allows local communities, through the preparation of Neighbourhood Development Plans, to be able to identify for special protection green areas of particular importance to them<sup>12</sup>.

The Framework states that, “By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period”.

## POLICY AM5 - ALLOTMENTS AND GROWING SPACE

Any development proposal that would result in the partial or entire loss of an existing allotment within the Neighbourhood Area will not be supported unless it can be clearly demonstrated that there would be a positive improvement to existing provision or a net increase in provision elsewhere.

Proposals for the provision of new allotments in appropriate and suitable locations will be supported. Proposals for new allotments should clearly demonstrate the following:

- a) There are no adverse impacts on the landscape or character of the area;
- b) There are satisfactory arrangements for parking;
- c) There are satisfactory arrangements for water supply; and
- d) There would be no adverse impacts on neighbouring uses.

All new dwellings should be designed with private and secure gardens of at least 80sqm in order to facilitate individual homeowners with the opportunity to grow their own food.

## **EXPLANATION**

Despite the statutory obligation on local authorities to provide allotments where there is a demand, there are still very few sites being created each year. However the trend in people wanting to grow their own food is on the rise, and currently it is estimated that over 90,000 gardeners want an allotment and are on waiting lists.

Trends show that during times of recession people turn back to the land, wanting to reconnect with something tangible while at the same time experiencing home-grown food, which costs less and is better for us. The Dig for Victory campaign during

12. Paragraph 76

the 1940s coupled with the grey of the post war years saw a rise in people taking up allotments. At its height there were over 1.5million allotment plots across the UK. The 1970s with its three day week and trade union unrest saw another desire for self-sustainability, immortalised in the BBC show The Good Life. Today, with our economic uncertainty on a global scale, the desire for more space to grow food locally and experience life's simple pleasures has reignited the call for more allotments. Figures suggest there are approximately 330,000 allotment plots in the UK, but to meet the current demand we need in the region of at least a further 90,000 plots<sup>13</sup>.

The Neighbourhood Area has approximately 78 allotment plots of various sizes on two different allotment sites (75 Riverside Allotments on land south of Salford Road, and 2 larger sized allotments on land north of Stratford Road). Many allotment holders are longstanding and therefore plots rarely change hands. However, there are approximately 15 people on the waiting list for plots. This evidence demonstrates a significant need for additional plots within the Neighbourhood Area.

It is clear that we have a responsibility to protect allotments for current and future generations and address any shortfall within this Plan.

All housing developments should take into account of the health and well-being of the future occupiers of those developments. Sufficient amenity space, either private or shared, should be provided within each development and made available in perpetuity for those residents.

These areas of vegetable and flower production are also valuable sources for wildlife and enable parts of the community the opportunity to grow their own food, bringing a sense of well-being.

## **POLICY AM6 - PROMOTING WALKING AND CYCLING**

The Neighbourhood Area has a wealth of public routes which should be protected, enhanced, expanded and positively utilised in all new development. Where appropriate, the use of CIL funds will be used to enhance and expand these routes.

All new development must demonstrate how walking and cycling opportunities have been prioritised and connection made to existing routes.

Proposals which either adversely affect existing walking and cycling routes or fail to encourage appropriate new walking and cycling opportunities will not be supported.

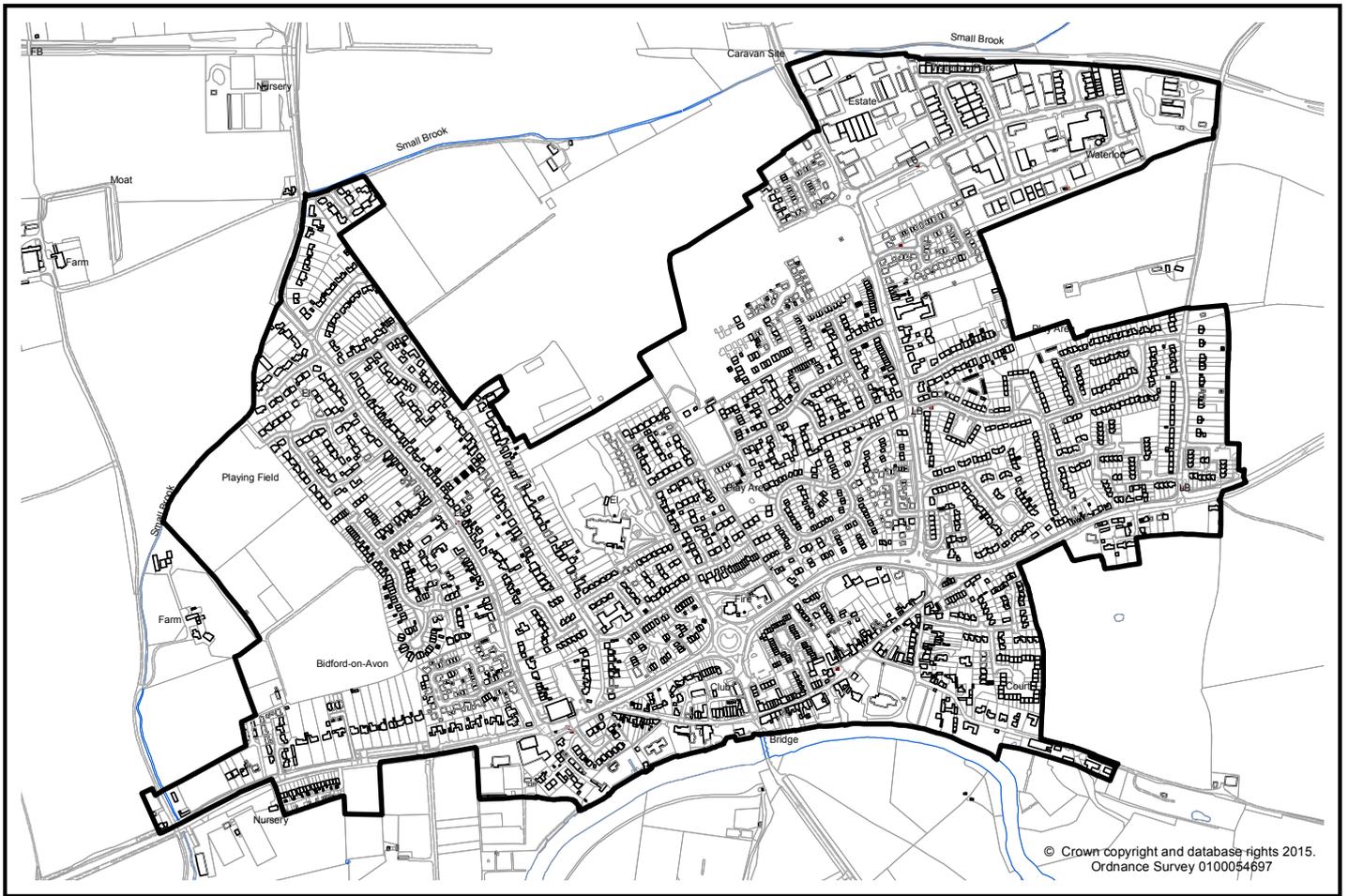
### **EXPLANATION**

Public footpaths and bridleways are an important part of our heritage and have been used over centuries. They continue to be a key means of linking our settlements with the surrounding countryside.

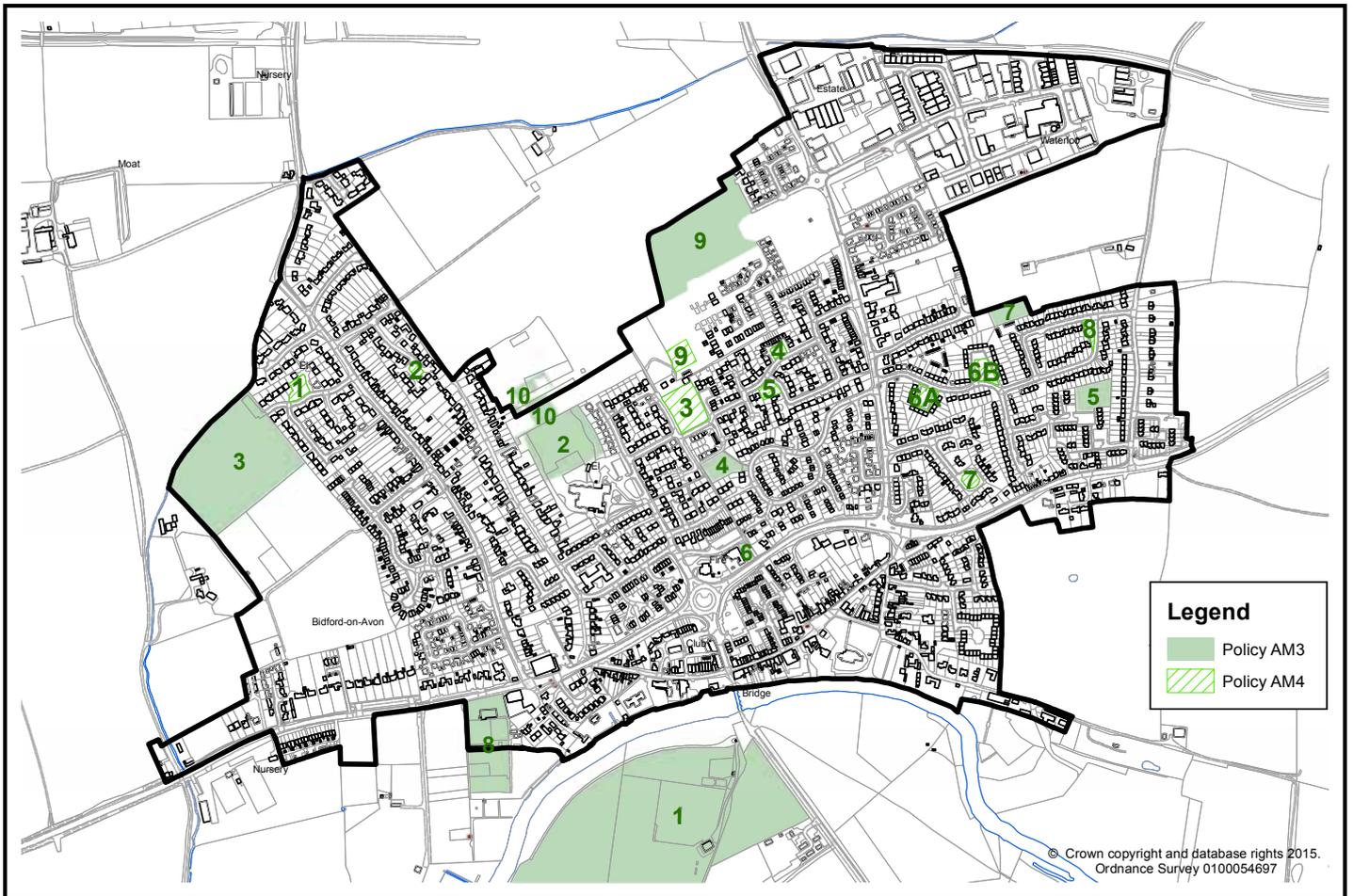
These Public Rights of Way and walking and cycling routes within the villages which give access to schools, shops and other amenities, should be protected and enhanced where possible. The encouragement of walking and cycling is a key part of improving the health and well-being of our communities and of reducing our carbon emissions.

---

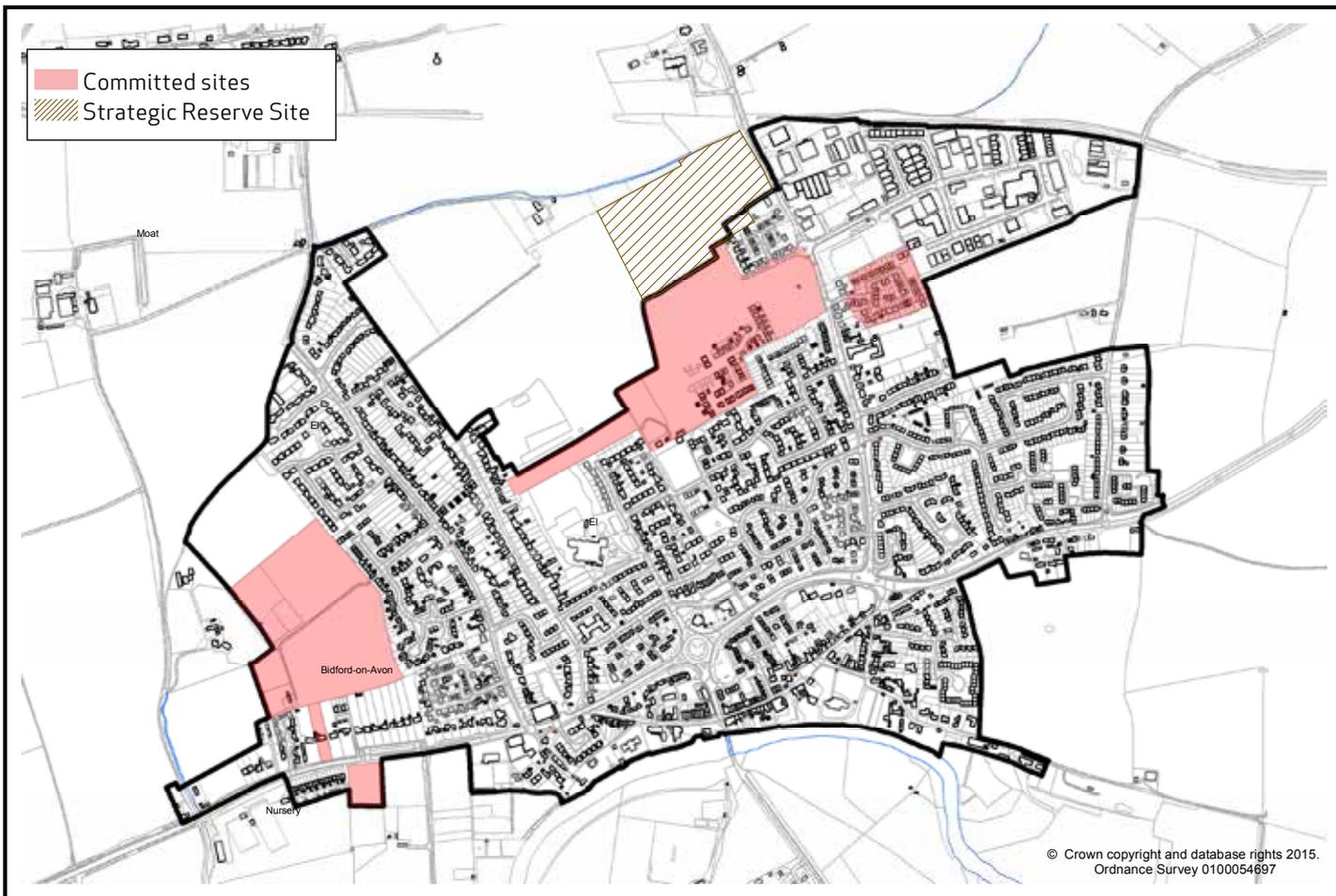
<sup>13</sup>. Source: The National Allotment Society ([www.nsalg.org.uk](http://www.nsalg.org.uk))



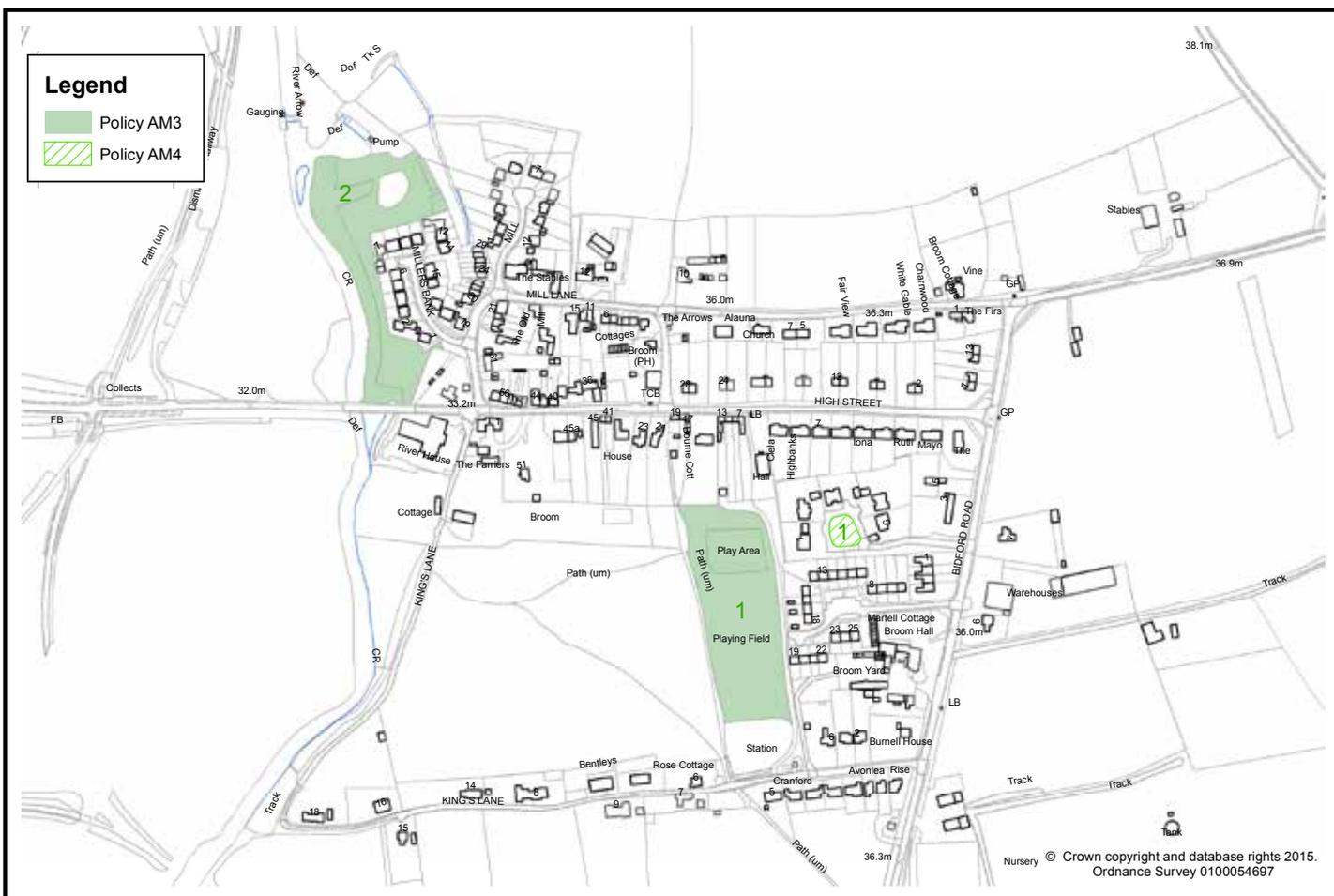
**Policy H1** – Bidford-on-Avon Village Boundary Map



Bidford-on-Avon Formal Public Open Spaces – **Policy AM3**: Informal Public Open Spaces – **Policy AM4**



**Policy H2 – Strategic Reserve Site**

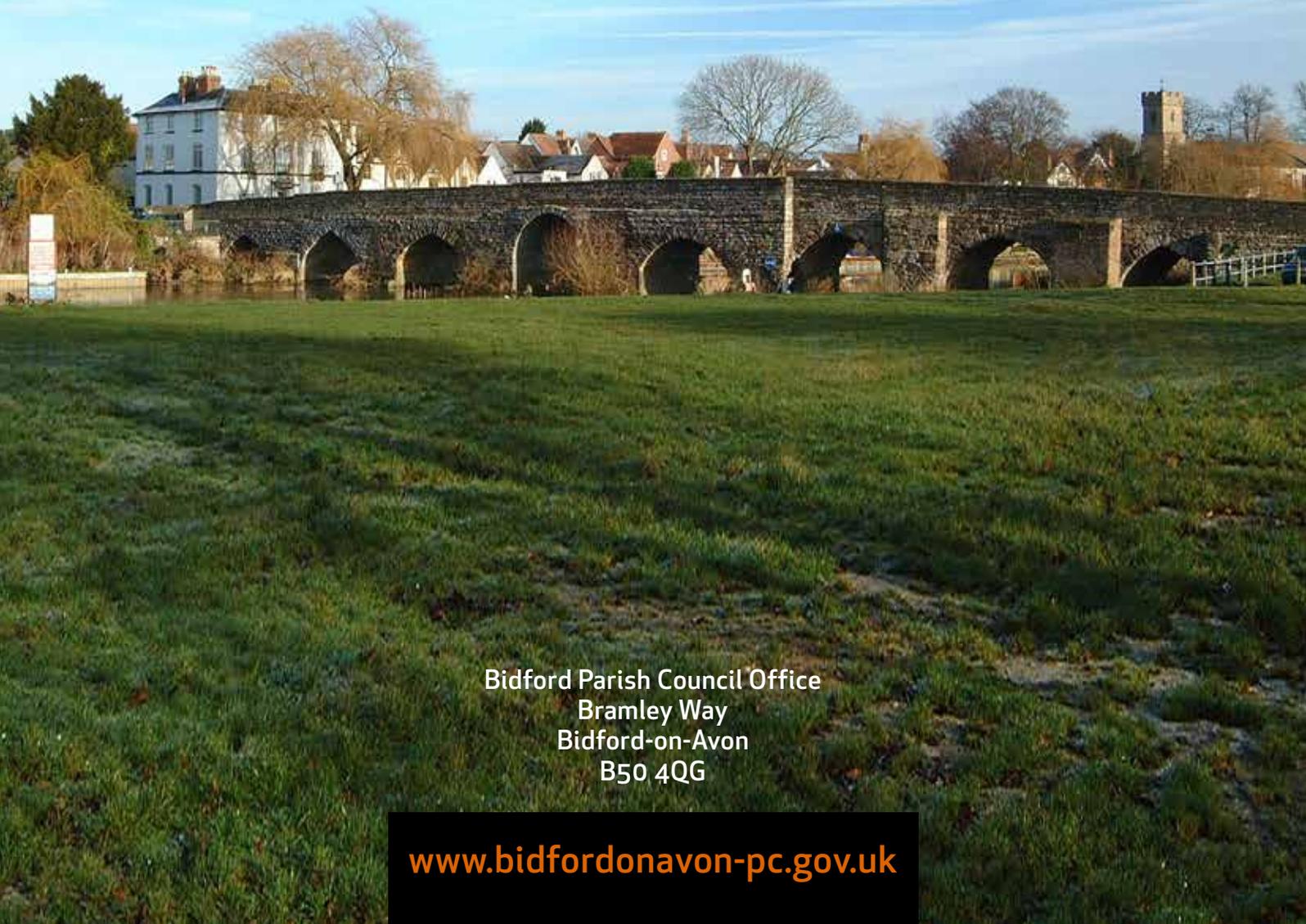


Broom – Formal Public Open Spaces – **Policy AM3**; Informal Public Open Spaces – **Policy AM4**





# BIDFORD ON-AVON PARISH NEIGHBOURHOOD PLAN



Bidford Parish Council Office  
Bramley Way  
Bidford-on-Avon  
B50 4QG

[www.bidfordonavon-pc.gov.uk](http://www.bidfordonavon-pc.gov.uk)

# Town and Country Planning Act 1990

## Neighbourhood Planning (General) Planning Regulations 2012 (as amended)

### Bidford-on-Avon Neighbourhood Development Plan Regulation 14 - Pre-submission consultation and publicity

Notice is hereby given that Bidford-on-Avon Parish Council as the Qualifying Body has prepared a neighbourhood development plan entitled the 'Bidford-on-Avon Neighbourhood Development Plan' for their Parish with the help of the local community and has formally published its Pre-submission Draft Plan for public consultation.

The plan sets out a vision for the future of the Parish and planning policies which will be used to determine planning applications within the neighbourhood area. In accordance with Regulation 14 of Part 5 of The Neighbourhood Planning (General) Regulations 2012 (as amended), the Parish Council must now publicise the Pre-submission Draft Plan for a minimum 6 week period inviting feedback from organisations and residents on the Pre-submission Draft Plan.

A copy of the Pre-submission Draft Plan and supporting documentation are available on the Parish Council's website. Alternatively, hard copies of the documents are available for inspection at the Parish Council office and Bidford on Avon Community Library during normal working hours.

The consultation starts on Thursday 24th September 2015. Representations on the Pre-submission Draft Plan may be made to the Parish Council by no later than **5pm on Friday 6th November 2015**. You are encouraged to submit your representations electronically. This can be done by using the on-line form available on the home page of the Parish Council website at [www.bidfordonavon-pc.gov.uk](http://www.bidfordonavon-pc.gov.uk). If you want to post your response, please send to Bidford on Avon Parish Council, c/o Post Office, Salford Road, Bidford-on-Avon, B50 4AW, or hand deliver to the Parish Council Office, Bramley Way, Bidford-on-Avon B50 4QG

All representations received will be collated and will inform possible future modifications to the Pre-submission Draft Plan prior to submission to the Local Planning Authority.

# Bidford-upon-Avon Neighbourhood Development Plan

## Pre-Submission Consultation Responses – November 2015

Rep Code	Full Name	Organisation represented (where applicable)	Summary of Third Party Response	Neighbourhood Plan Steering Group Response
001	Elisabeth Uggerloese	Resident	<p><b>Supports all Policies</b>  <b>Made comment on Policy AM6</b> – Support/It is important CIL funds are used to improve cycle paths - extending the number and making them safe</p>	<p>Noted.  <b>Action</b> – may wish to consider somewhere in the Plan having a list of ‘community projects’ which future CIL money could be spent on.</p>
002	Angus MacDonald	Resident	<p><b>Supports all Policies</b>  <b>Made the following comments:</b>  <b>Policy H1</b> particularly support the refusal of planning applications off Salford Road and between Victoria and Waterloo Roads for residential developments outside the Village Boundary.</p> <p><b>Policy H2</b> – There must be strict adherence to these requirements  <b>Policy H5</b> – Proposals requiring existing satisfactory dwelling(s) to be demolished would not be supported.  <b>Policy ECON2</b> Strongly support efforts to enhance the viability of the village centre.  <b>Police ECON3</b> Any extra cost of high speed broadband infrastructure should not be disproportionately passed on to residents.  <b>Policy ENV11</b> Restoration of parts of sites already exhausted should be achieved before further extraction</p>	<p>Noted.  H1 does not state any application will be refused. All applications are considered on their own merits and in light of relevant material planning considerations.</p> <p>Noted.  This requirement is not part of H5.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

			<p>occurs.</p> <p><b>Policy AM1</b> The construction of a pedestrian pathway between the village and Bidford Health Centre would be supported.</p> <p><b>Policy AM2</b> It is particularly important that there is no further adverse reduction of play and sports outdoor areas. As the number of children increases the proportional play area per child decreases</p> <p><b>Policy AM5</b> 80sqm is a minimum requirement.</p> <p><b>Policy AM6</b> Any proposed footpath to the Health Centre could be shared with a cycling route.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
003	Sarah Brooke-Taylor	WRCC CV35 9EF	<p><b>Objects as follows:</b></p> <p><b>Policy H1</b> We are concerned because Policy H1 would appear to contradict the Parish Council’s previously-expressed support for the proposed rural affordable scheme which we have been working on in Broom for a number of years. It is disappointing that the proposed Broom rural affordable housing scheme is not identified as a suitable housing needs site and that provision is not made to support local needs schemes outside of the Bidford Village Boundary.</p> <p><b>Policy H2</b> We are concerned because Policy H2 does not include the proposed Broom rural affordable housing scheme site which would appear to contradict the Parish Council’s previously-expressed support for this local needs scheme. Policy H2 makes no provision to support local needs schemes.</p>	<p>Noted.</p> <p><b>Action</b> – the creation of a new policy which considers ‘Rural Exception Sites’ would be a positive approach to this.</p> <p>A Rural Exceptions Policy would resolve this.</p>
004	Alex Grieve	Resident	<p><b>Supports Policies</b></p> <p><b>Made the following comments</b></p> <p><b>Policy H2</b> The mix of dwellings submitted in the plan may need to be formulaic, according to current information. The key point here is that the mix of current housing</p>	<p>Noted. The mix requirement is likely to be fluid with variations expected during the lifetime of the plan. Regular</p>

		<p>needs to be considered at the time, which in future may well inform the need for a higher proportion of bungalows for the elderly.</p> <p><b>Policy H3</b> the mix of dwellings submitted in the plan may need to be formulaic, according to current information. The key point here is that the mix of current housing needs to be considered at the time, which in future may well inform the need for a higher proportion of bungalows for the elderly.</p> <p><b>Police ECON3</b> This is essential</p> <p><b>Policy ECON4</b> Better use could be made of the car park behind the Fire Station. Perhaps people are not aware of its existence?</p> <p><b>Policy ECON6</b> but I think the extra parking, kitchen and toilet arrangements described, whilst "independent", are likely to be subsumed into everyday domestic use in most cases.</p> <p><b>Policy ENV11</b> Mineral extraction companies are capable of agreeing to anything to be allowed to proceed, then going out of business before remediation. A condition of contract should be the creation of an escrow account at the outset to contain the remediation costs and avoid future disappointment. This could take the shape of an insurance arrangement and need not require collateral.</p> <p><b>Policy AM1</b> Further thought needs to be given to residents travel to and from the GP Surgery - especially as the population is currently well supplied with elderly people and will only be more so in future. The complementary medical arrangements referred to in the NDP would be a real advantage and a useful</p>	<p>Housing needs surveys will be required.</p> <p>See comments above.</p> <p>Noted.</p> <p>Noted. <b>Action</b> – Upon reflection I think this policy may need amending. Have we defined the village centre?</p> <p>Unfortunately, planning cannot control this from happening.</p> <p>Noted.</p> <p>Noted. <b>Action</b> – Do we specifically want to refer to a future pedestrian and cycle link to the GP surgery?</p>
--	--	--	---

			<p>improvement.</p> <p><b>Policy AM3</b> Vital to preserve these amenities, but also to consider indoor sports facilities, as much of our leisure time is in the evenings (which are dark for many months a year) and bad weather is not unusual.</p> <p><b>Policy AM6</b> Cycling and cyclists present probably the greatest health risk for the community as injury can happen at any time, without warning. Cycling is an unregulated activity, our provisions for cyclists are slender and most motorists seem to lack the skill or the consideration to share the roads safely with cyclists.</p>	<p>Noted.</p> <p>Noted.</p>
005	G J Nicholson	The Inland Waterways Association	<b>Support policies</b>	Noted.
006	Mark Shaddick	Resident	<p><b>Generally supports the policies.</b></p> <p><b>Objects to</b></p> <p><b>Policy H2</b> – Creation of a Strategic Reserve will identify potential for future planning applications for developers rather than merely provide a 'strategic buffer.' We should not score an 'own goal' by creating such a reserve!</p> <p><b>Made the following comments</b></p> <p><b>Policy ECON1</b> – Any proposals to retain/extend the economic viability of the village centre should be encouraged: if appropriate by offering low(er) cost rental for new business/economic opportunities</p> <p><b>Policy ECON2</b> –Any proposals to retain/extend the economic viability of the village centre should be encouraged: if appropriate by offering low(er) cost rental</p>	<p>There is significant benefit in having a strategic reserve for housing in the village. This will enable the release of a preferred site should the need arise and makes the plan more robust at a time where there is uncertainty over housing numbers and housing land supply.</p> <p>Noted.</p> <p>Noted.</p>

		<p>for new business/economic opportunities</p> <p><b>Policy ECON3</b> – Where in the Neighbourhood Plan do we state the vital need for high speed broadband as a prerequisite for all new housing developments? This omission should be addressed.</p> <p><b>Policy ENV4</b> – How do we address areas of existing flood risk such as the Budgens/bottom of Waterloo road? Can a planning gain opportunity be exploited to install suitable pluvial water redirection?</p> <p><b>Policy ENV7</b> – I understand that, some years ago, St Laurence church has agreed that it could install a telephone mast if circumstances dictated this. Given its present parlous financial state this revenue-generating opportunity may prove strongly tempting for the church's PCC. Can this policy provide a real basis for objection in this particular case?</p> <p><b>Policy ENV8</b> – Rather than simply support preservation can this policy be extended to encourage favourable consideration to a facility allowing display Of a local archives as well a museum centre as available in Alcester? We have a large number of heritage assets located in Warwick museum and elsewhere which should be properly housed in their place of origin!</p> <p><b>Policy ENV9</b> –Can 'local character' be more closely defined to reduce subjective interpretation regarding future proposed developments?</p> <p><b>Policy AM1</b> – Provision of a footpath to the out-of village health centre should be the first priority of any future building development. Better still would be exploration of its relocation to Friday Furlong, if necessary via planning gain funding. The current Stratford Road location remains</p>	<p>I believe ECON3 and the explanatory text explains this.</p> <p><b>Noted. Action</b> – This could be one of the projects on the CIL shopping list.</p> <p>It is not appropriate for this policy to restrict specific forms of development from coming forward or being considered.</p> <p><b>Noted. Action</b> – consideration could be given to an allocation for such a facility but a location/specification would need to be established and depending on where/what it is further consultation may be necessary for such a proposal.</p> <p><b>Noted. Action</b> – This policy could be strengthened by the introduction of specific design parameters.</p> <p><b>Noted.</b> The health centre is highly unlikely to move particularly given the historic availability of a site on Friday Furlong.</p>
--	--	---	--

			<p>a source of bitterness and resentment for many Bidford residents.</p> <p><b>Policy AM6</b> – I note the inclusion of 'protection' of existing public routes: I'm not sure what degree of monitoring takes place to ensure that such footpaths, etc currently in use are not blocked by residents, farmers, etc: I think of the time it took to remove the blockage for The Gunnel' as an example.</p>	<p>Noted. This policy is designed to ensure that new development, which can be controlled, does not affect these important rights of way.</p>
007	Mr Ken Catherall	Resident	<p><b>Supports the policies</b></p>	<p>Noted.</p>
008	Katherine Elizabeth Franklin	Resident	<p><b>Objects to a number of policies</b></p> <p><b>Policy H1</b> Bidford has already had too much development - way over that previously agreed. Bidford is a village and should be maintained as such - it does not have the infrastructure of a 'main rural centre' and Alcester as a Town should take more of the burden. No more development should be suggested as it will merely present developers with an opportunity that is not welcome.</p> <p><b>Policy H2</b> – Bidford has already had too much development - way over that previously agreed. Bidford is a village and should be maintained as such - it does not have the infrastructure of a 'main rural centre' and Alcester as a Town should take more of the burden. No more development should be suggested as it will merely present developers with an opportunity that is not welcome.</p> <p><b>Policy H3</b> –No new housing should be suggested - it is unsustainable and not welcome.</p> <p><b>Policy H4</b> –There are no 'exceptional circumstances' to</p>	<p>Noted. However, the strategic direction of the Core Strategy must be represented in the NDP. Government policy on sustainable development, 5 year housing land supply and the effect of appeal decisions are all external influences on the village. We are where we are and we cannot simply block all new development.</p> <p>Noted. See above comments.</p> <p>Noted. See above comments.</p> <p>Bidford is not constrained by</p>

			<p>prefer Greenbelt to Brownfield; and further Greenbelt development is unacceptable and unsustainable.</p> <p><b>Policy ENV4</b> – There must be NO 'large scale developments'.</p> <p><b>Policy ENV11</b> – There should be a 'no minerals and aggregates extraction' policy. The area has suffered the results of such extraction already. The extraction companies rarely keep their promises.</p> <p><b>Made the following comments</b></p> <p><b>Policy ECON2</b> – There will have to be rigorous scrutiny of 'marketing exercises' as they could well be biased.</p> <p><b>Policy ECON5</b> – Care will need to be given to ensuring the riverside is not spoiled or development takes place that will then be put to unsuitable use in the future.</p> <p><b>Policy ENV6</b> – There must be no more new development estates in Bidford - they are unsustainable</p> <p><b>Policy ENV9</b> – There must be no more unsustainable development</p> <p><b>Policy AM1</b> – The health service provision is already under strain making any further development unsustainable.</p> <p><b>Policy AM2</b> – The library MUST be maintained in the village</p> <p><b>Policy AM5</b> – There should be no more new dwellings.</p> <p><b>Policy AM6</b> – Cycleways utilising former railway lines in the area should be promoted and developed.</p>	<p>Greenbelt. <b>Action</b> – A similar policy was used in the Kineton NDP. The examiner required modification to this policy. The additional test over and above the NPPF was not accepted by the examiner. Noted.</p> <p>Noted. It would not be appropriate for the Plan to veto development of this nature.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. See above comments. This plan cannot veto new development.</p> <p>There is no evidence to reinforce this statement.</p> <p>Noted.</p> <p>See above comments. Noted.</p>
009	Joy Keeley	Resident	<p><b>Supports the policies</b></p> <p><b>Made the following comment</b></p>	

			<b>Policy H1</b> – 87% of the people who responded to the questionnaire did not want any other development in Bidford.	Noted.
010	James Robert Langridge	Resident	<b>Supports the policies</b>	Noted.
011	Jane Hosell	Resident	<p><b>Objects to some Housing Policies</b></p> <p><b>Policy H3</b> – No Bungalow provision For market provision. No small detached dwellings.</p> <p><b>Policy H5</b> – We live on property built on garden land which we feel should not have been permitted due to close proximity of road.</p> <p><b>Made the following comments</b></p> <p><b>Policy ECON4</b> – We lived previously in church street where we were constantly experiencing parking issues from dentists and church patrons due to lack of adequate parking provision.</p> <p><b>Policy ECON5</b> – Bidford needs water play area plus swimming pool facility</p> <p><b>Policy ECON6</b> –Recent new build still does not provide sufficient parking and this needs to be addressed by planning committee. An example is new build at the bank with 1 space only per dwelling on a site already congested with cars. Squeezing in housing for profit without thought about practical or aesthetic look.</p> <p><b>Policy ENV1</b> – Keep bidford green</p> <p><b>Policy ENV3</b> – Drainage and capacity needs to be addressed before build not after.</p> <p><b>Policy ENV4</b> – As before, all issues which have been highlighted via up to date survey not out of date needs to be considered before passed for planning</p> <p><b>Policy ENV5</b> –Not sure how this can be supported as it</p>	<p><b>Action</b> – reference to bungalows could be introduced.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. <b>Action</b> – One for the CIL list?</p> <p>Noted. <b>Action</b> – residential parking could be added to Policy ENV9.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

			<p>hasn't to-date as far as residents are concerned!</p> <p><b>Policy AM1</b> – Support/ So why was the health centre allowed to move to a site with no footpath provision and no bus shelter or footpath for ages?</p> <p><b>Policy AM2</b> – Bus fares too expensive here for young people</p> <p><b>Policy AM5</b> – Present small new build have hardly got any garden at all so why were these passed? Like shutting the stable door after the horse has bolted.</p> <p><b>Policy AM6</b> – Need to make main roads safer first before we can encourage cycling.</p>	<p>Noted.</p> <p>This is outside of the remit of the NDP.</p> <p>Noted.</p> <p>Noted.</p>
012	Natural England	Statutory Consultee	<p><b>Generally supportive –</b>  <b>Made the following comments</b></p> <p><b>Policy H2</b> – Contradicts Policy ENV6 (more available under comments made under ENV6).  To ensure any proposed development is unlikely to lead to significant and irreversible <u>long term</u> loss of BMV agricultural land, Natural England would advise that this policy is updated to consider the impacts on the land and align with objectives under ENV6</p> <p><b>SSSI</b> – The Broom Railway Cutting is an SSSI and lies within the NDP area. <b>Natural England</b> would like to see reference to the site in the plan to ensure adequate consideration is given from any proposed development within the neighbourhood area</p> <p><b>Policy ENV2</b> – pleased to note the proposed plan embraces the principles of green infrastructure (GI) by incorporating provision of green space which offers the potential to deliver multiple benefits for both people and wildlife providing opportunities for recreation, biodiversity enhancement and access to nature</p>	<p><b>Action</b> - Policy ENV6 refers to a proposals map which does not exist. There is no map which shows BMV agricultural land so this reference in the policy needs to be changed.</p> <p><b>Action</b> – We should reference this specific site in Policy ENV10.</p> <p>Noted.</p>

			<p><b>Policy ENV6</b> – Protection of Best Most Versatile (BMV) Agricultural Land that Policy H2 is updated to consider the impacts on the land and align with objective under ENV6 – it is noted that the Strategic Reserve Site mentioned under H2 is Grade 2BMV and therefore any future development may impact on BM&lt;V Land. This results in this policy being contradictory to Policy ENV6.</p>	<p>Noted. <b>Action</b> – This needs to be addressed. Suggest ENV6 refers to the strategic reserve being an exception.</p>
013	WCC	Consultee	<p><b>Supports policies</b>  <b>Suggested another H Policy – Extra Care Housing-Led Development</b></p> <p>This would be on Land owned by WCC and referenced under No. 13 Land West of Grafton Lane: approx.. 7.9 hectares which WCC proposes to develop as follows:</p> <ol style="list-style-type: none"> <li>1. an appropriate proportion of land to accommodate an Extra Care Housing Scheme comprising between 50 and 100 apartments (subject to demand) and associated communal facilities (including, where possible, facilities available to the local community</li> <li>2. An appropriate proportion of the land for conventional housing (providing both affordable and market housing)</li> <li>3. An appropriate proportion of the land to the north of the site for a new POS, comprising playing fields, structural landscaping an informal OS</li> <li>4. Approx. 0.9 hectares of land along the eastern boundary of the site to Grafton Lane to accommodate structural planting and, where necessary, highway improvements.</li> </ol>	<p>Noted. <b>Action</b> – An additional policy relating to Rural Exception Sites should be included. However, specific reference to the site of Grafton Lane was not agreed at a meeting before Christmas so reference to this will not be included.</p>

014	Bidford Health Centre (Stansgate)	Local Service	<p><b>Support policies</b>  <b>Made the following comment</b>  <b>Policy AM1</b> – make the following suggestion to improve the policy</p> <p>Insert a plan to identify the location of the new health centre, which is not clear from the txt. I attach a location plan showing land owned by the medical centre and suitable for expanded health care facilities. I suggest the plan is called AM1 – Bidford on Avon Health Centre, Stratford Road, Bidford on Avon</p> <p>Also add  <i>Additional services suitable for the new health centre site include physiotherapy, district nurses, NHS dentistry, chiropody, optometry, minor injuries, mental health support, complimentary therapies, care home and/or nursing home for the elderly</i></p>	<p>I do not believe that it is necessary to include an additional plan. The extent of land ownership is of course different to the land which is currently established medical facilities.</p> <p><b>Action</b> – discussion on this will be necessary. Does the NDP wish to specifically allocate land at the existing medical centre site for other health uses? If so, what? where? etc. NB further consultation may be necessary if an additional policy is included at this stage.</p>
015	Mr and Mrs Reynolds	Residents	<p><b>Support the policies</b>  <b>Made the following comments</b>  <b>Policy H1</b> – Glad to see tightening of the village boundary  <b>Policy H3</b> – more bungalows for the elderly  More explanation regarding the expansion of the village amenities</p>	<p>Noted.  Noted. Action – this will be considered in the review of policy H3.</p>
016	D E Harman	Resident	<p><b>Support the policies</b>  <b>Made the following comment</b>  <b>Policy H1</b> –His home, 45 Salfrd Road, should be within the village boiundary – the map shows it outside</p>	

017	Mr and Miss Moule	Residents	<p><b>Generally support policies</b>  <b>Made the following comments:</b></p> <ul style="list-style-type: none"> <li>- Change the word “whopping” growth to significant or rapid</li> <li>- Support release of the strategic site only local need can be demonstrated</li> <li>- More should be said about the history and character of the village so outlying housing and new housing are seen as integral to the core village</li> <li>- Future housing developments must seek to maximise density through high quality design layout and construction so as to make most effective use of “precious” land. Too much development in Warks. Is low density and makes poor use of land.</li> <li>- Despite governments attempts to water down and undermine policies towards affordable housing the commitment to securing maximum affordable housing for families, single people and the elderly should be paramount. RTB, the bedroom tax, relaxations on S106 are further diminishing the ability to provide affordable housing. Building sustainable communities is heavily reliant on providing low cost housing for people who are intrinsically linked to the village for local employment, using local services, as well as supporting relatives and the wider community.</li> <li>- There needs to be better connectivity around the vital role of new house development and their residents performing an integral role in supporting/using local shops and businesses. The</li> </ul>	<p>Noted. <b>Action</b> – Agree that this term is not appropriate language.</p> <p>Noted.</p> <p>Noted. <b>Action</b> – DO we agree with this?</p> <p>Covered in Policy ENV9</p> <p><b>Action</b> – There is no policy on affordable housing in the NDP. Are we happy with this? Policy CS.17 in the Core Strategy covers this but do we want to add anything further?</p> <p>This is outside of the control of the NDP.</p>
-----	-------------------	-----------	---	--

			<p>nature of newcomers often commuting to jobs elsewhere will also tend to use shops elsewhere. While inevitable, emphasising their integral link with the village should be made more strongly as a planning objective for achieving village sustainability. Also, stronger reference is needed about improving and strengthening local services and infrastructure especially shops and community facilities to emphasise the NP is about the range of land use</p> <ul style="list-style-type: none"> <li>- Given the recent problems with Bidford Bridge there is an omission about safeguarding the bridge when new house and businesses dev</li> <li>- Development across South Warks will add more traffic pressure on it. The need for highway measures to protect this heritage asset needs to be included</li> </ul>	<p>Noted. <b>Action</b> – Not sure how much stringer this can be?</p> <p>This was a freak event. The Bridge is a SAM so it will be safeguarded.</p> <p>Noted.</p>
018	Warwickshire and West Mercia Police	Statutory Consultee	<b>In principle supportive of the policies</b>	Noted.
019	Historic England	Statutory Consultee	<b>Support the policies</b>	Noted.
020	The Coal Authority	Statutory Consultee	<b>Support the policies and have no comments to make</b>	Noted.
021	National Grid	Statutory Consultee	<p><b>Support the policies</b>  <b>Made the following comment</b>  An assessment has been carried out with respect to National Grid electricity and gas transmission apparatus which included high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distributions intermediate and High Pressure apparatus.</p>	Noted.

			National Grid has identified that it has no records of such apparatus within the NP area	
022	Sport England	Statutory Consultee	<b>Supports the policies</b>	Noted.
023	RPS (on behalf of Miller Homes who have a land interest on Land West of Waterloo Road)	Planning Consultant	<p><b>General Comments</b> It is not clear what the plan period is. Reference is made to the Core Strategy but it is not explicitly clear if the two are aligned.</p> <p><b>Policy H1</b> – The Strategic Role of the Core Strategy must be acknowledged in the NDP. The explanatory text of the policy refers to no need for additional houses but the housing numbers and distribution are not yet resolved.</p> <p>The August 2015 Modifications to the Core Strategy propose an uplift of just under 1000 homes for the main rural centres. Bidford will need to consider how it addresses this need.</p> <p><b>Policy H2</b> – Support the inclusion of the site in the NDP. Object to the provisions of the policy which limits the release of the site to ‘meet an identified housing need’. To be consistent with the NPPF and the emerging CS, the NDP should not place unquantified or unsubstantiated clauses relating to local need against this policy.</p> <p>The size of the strategic reserve has decreased despite the number of dwellings for MRC’s going up. A development cap of 100 is not self grounded in evidence.</p> <p>The plan should be amended to show the whole of the</p>	<p>Noted. <b>Action</b> - The Submission Plan will need to be clear on the title/front page.</p> <p>Noted.</p> <p>Noted. The potential uplift in number for Bidford has been positively planned for in the identification and allocation of a strategic reserve site in the village.</p> <p>Since 2011 440 new dwellings have been permitted in Bidford. There are further sites in planning or at appeal. In order to manage the growth of the village in a sustainable way it is necessary to prevent the unrestricted sprawl of the village. The NDP has planned positively for an additional site in the event that the uplift requires further land to be found for development purposes.</p> <p>Noted. The current appeal on the site</p>

			<p>site controlled by Miller Homes</p> <p><b>Policy H3</b> – The plan provides no evidence of the particular housing mix specified and risks conflict with the Core Strategy.</p> <p><b>Policy H4</b> – There is no sequential test in the NPPF for brownfield over greenfield land.</p> <p><b>Policy ECON2</b> – Disappointed to see the strategic reserve for employment need has been removed. There is no justification why this has been removed. The removal of the opportunity to add employment to the village appears to conflict with the statement that the village needs employment to retain sustainability.</p> <p><b>Policy ECON6</b> – The policy includes a strong mandate for every new home to include ‘flexible space’ but there has been no consideration of the practicalities of this or a</p>	<p>will no doubt be determined prior to the plan progressing to examination/ referendum and will need updating accordingly.</p> <p><b>Action</b> – We need to provide some evidence in the explanation. Evidence presumably comes from the survey results. The mix proposed is not quite within the broad parameters of the Core Strategy. 2 beds or less needs to increase to 40%, 3 beds need to increase to 40% and 4+ beds need to reduce to 20%.</p> <p><b>Action</b> - A similar policy was used in the Kineton NDP. The Examiner has recommended modifications to bring it in line with the NPPF. I suggest we consider the same here.</p> <p><b>Noted.</b> It is not necessary to explain why a policy has been removed from a previous iteration of a plan. The consultation Statement supporting the submission of the NDP to SDC may include information about why policies were changed/removed.</p> <p><b>Action</b> – A clearer understanding of what is meant by flexible space is necessary. I am less concerned about</p>
--	--	--	---	--

			<p>definition of what a flexible space comprises of.</p> <p><b>Policy ENV1</b> – Policy lacks definition and is not implementable. There is no justification as to what energy efficient means and does not provide any evidence as to why it is appropriate to go above national standards.</p> <p><b>Policy ENV7</b> – Policy is not in accordance with the NPPF and is not flexible enough to respond to emerging housing and employment need in the MRC.</p>	<p>the practicalities because internal house design should be sufficiently flexible to accommodate such a requirement.</p> <p><b>Action</b> - The last sentence of Policy ENV1 may need rethinking as it is a little vague.</p> <p>The policy is not contrary to the NPPF and can remain as written.</p>
024	Pegasus Group (on behalf of Persimmon Homes on land interest at Marriage Hill Nurseries)	Planning Consultant	<p><b>General Comments</b> Due consideration has not been given to previous representations on the draft plan.</p> <p><b>Policy H1</b> – Insufficient sites have been identified for housing given the increase in housing requirement across the district. No flexibility for sustainable housing sites to come forward located outside the village boundary. Represents unnecessary restrictions on development coming forward. Contrary to NPPF and draft Core Strategy.</p> <p>Policy H2 – Not is conformity with Policy CS.16 which</p>	<p>Regard has been given to the comments received. Just because the comments have not been incorporated into the latest draft is not an admission that they have not been considered.</p> <p>The NDP has planned for the proposed housing numbers in the August 2015 Core Strategy. The Core Strategy is undergoing further examination in January 2016. Any further conclusions from the Inspector will be considered in the context of further modifications.</p> <p><b>Action</b> - Lessons from the Kineton Examiners report should be noted.</p> <p>The NDP has planned positively for</p>

			<p>identifies broad locations for growth. Contrary to Para 49 of the NPPF.</p> <p>The plan is premature in light of the CS. The Steering Group should look for additional sites which could come forward in the plan period.</p> <p>The NDP group has continually failed to consult with our client.</p> <p>An appraisal of all available sites should be carried out.</p> <p><b>Sustainability Appraisal</b> - should have been carried out.</p> <p><b>Policy H3</b> – Precise mix of houses is a matter for the developer to determine. The restrictive nature of this policy could affect viability. Policy also fails to set out what proportion of affordable housing will be required from developments.</p>	<p>growth and has identified a site for development. This will be released should the housing numbers for the MRC's or Bidford specifically be increased. There must be a back stop. The NPPF does not expressly say that housing will continue to be built on all sites once the OAN has been met. The whole point of a Development Plan is to positively plan for development at a district or local level and once this has been achieved and the OAN met there should not be a presumption that development continues at an unrestricted rate. The Courts has determined that NDP's can be prepared in advance of the host authority's development plan. Prematurity is therefore not a material issue.</p> <p>Consultation has been carried out in accordance with the regulations.</p> <p>There is no requirement for an SA to be carried out for the NDP.</p> <p>It is entirely reasonable for a housing mix policy to be included in the NDP as long as there is evidence to support the mix chosen and it is within the parameters of CS policy CS.18.</p>
--	--	--	--	---

			<p><b>Policy H4</b> – The general presumption against the redevelopment of greenfield sites is not compliant with the NPPF. Recommend this policy be deleted.</p> <p><b>Policy ECON1</b> – Policy wording is overly restrictive.</p> <p><b>Policy ENV6</b> – The current wording of this policy is not in accordance with paragraph 112 of the NPPF and would stifle sustainable forms of development. It is overly restrictive.</p> <p><b>Policy AM1</b> – The provisions of this policy are unclear and greater clarity is considered necessary in order to avoid ambiguity. It is not clear what types of proposals the policy is referring to and how such proposals could affect the provision and delivery of health care.</p> <p><b>Policy AM2</b> – The provisions of this policy are unclear and greater clarity is considered necessary in order to avoid ambiguity. It is not clear what types of proposals the policy is referring to and how such proposals could affect the provision and delivery of education and library facilities.</p>	<p><b>Action</b> – The steering group should consider if an affordable housing policy is necessary. If not a reference to provision in accordance with Policy CS.17 may be advisable. Affordable Housing mix specified??</p> <p><b>Action</b> – the Kineton NDP examiner has recommended modifications to this policy which should be considered by the Steering Group.</p> <p>It is not considered that the wording of this policy is in conflict with the NPPF.</p> <p><b>Action</b> - This policy was Examined under the Kineton NDP and will need reviewing/modification.</p> <p><b>Action</b> – more clarity is needed in the explanatory text.</p> <p><b>Action</b> – more clarity is needed in the explanatory text.</p>
--	--	--	---	---



## Bidford-on-Avon Neighbourhood Development Plan

### Pre-Submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General)

#### Regulations, 2012

#### Appendix 1 - Comments from Stratford-on-Avon District Council

**NP comments in red**

**Policy related comments:**

Section	Reference/page	Comment
<b>1.0 Introduction</b>	The Rationale, p.2	Second paragraph, first sentence ‘...gives it more weight than other locally prepared document...’ Suggest that they could include an example, such as Parish Plans. <b>Agreed.</b>
<b>3.0 Neighbourhood Housing</b>	Strategic Objective, p.4	The basis of the housing policies (subsequently set out) does not appear to be well justified. There is no explanation of how the housing-related provisions of the emerging Core Strategy have been translated into the subsequent policies of the Plan. <b>We can simply add some contextual background to the housing strategy and refer back to the Core Strategy.</b>
<b>3.0 Neighbourhood Housing</b>	Strategic Objective, p.4	The third paragraph concerning the villages of Barton, Marlcliff and Broom requires clarification or re-drafting. More particularly, it is fundamentally at odds with the Parish Council’s previously-expressed support for a ‘Local Choice’ scheme at Bidford Road, Broom. This is a serious issue as, amongst other things, the District Council has already resolved to commit significant grant funding to support that scheme. The scheme would also involve our partners in committing significant sums of money, so it’s vital that there is no uncertainty as to the continued support of the local community. <b>The inclusion of a Rural Exceptions Policy which refers to the villages as well as Bidford itself is highly recommended.</b>
<b>3.0 Neighbourhood Housing</b>	Strategic Objective, p.4	The fifth paragraph refers to a Proposals Map demonstrating a number of constraints to development in the Neighbourhood Area, which have been taken into account when considering potential new sites for development. This appears to be missing... <b>There are a couple of references to the Proposal Map which is not included in the NDP. Reference to this needs to be deleted and proper reference to the maps made.</b>

<p><b>3.0 Neighbourhood Housing</b></p>	<p>Policy H1, p.4</p>	<p>Support the identification of a village/built-up area boundary but would make the following observations:</p> <ul style="list-style-type: none"> <li>• The boundary should include the strategic reserve site referred to in Policy H2 - <b>Agreed</b></li> <li>• Is it appropriate to include areas of open space on the edge of the village within the boundary (e.g. Dugdale Sports Field (AM3 (3)))? If so, then for consistency, surely all of Crawford Hall and associated Sports Club (AM3(8)) should also be included – <b>We need to relook at this. Perhaps it would be better to exclude it?</b></li> <li>• Consistency in the inclusion of farm buildings/small holding land: e.g. the site on Grafton Lane has been included but sites at Home Farm, west of Waterloo Road and Marriage Hill Nurseries, south of Salford Road have been excluded – <b>We perhaps need to double check the boundary but I am not overly worried about inconsistencies.</b></li> <li>• The boundary appears to slice through the North of the Bramley way site which is currently under construction. <b>We need to check this against the approved plans for that site.</b></li> </ul>
<p><b>3.0 Neighbourhood Housing</b></p>	<p>Policy H1, p.4</p>	<p>Objection is raised to this Policy as presently drafted. In certain circumstances it could prejudice the delivery of the proposed 'Local Choice' scheme at Broom. This scheme forms one of three schemes within the District Council's Rural Housing Programme 2015 and inability to deliver that scheme would seriously destabilise the whole Programme. This scheme is also one into which the District Council's has already agreed to make significant capital; investment by way of grant funding and its partners have also already invested significant time and money in drawing up detailed proposals.</p> <p><b>We need to consider a Rural Exceptions policy. This would overcome this objection.</b></p> <p>Under one scenario, it is possible that in the event that the Plan is in due course "made" and forms part of the statutory development plan, this policy (and, in particular, the restriction of development outside "these built up area boundaries") would take precedence over other policies and consequently frustrate delivery of the Broom scheme.</p> <p>At the very least, the Policy should be amended to make clear that the restriction in the second paragraph does not apply to community-led 'Local Needs' schemes promoted under Part 7 of emerging Core Strategy Policy CS.15. In the alternative, local community support for the proposed scheme could be confirmed by the inclusion of an additional policy making a site-specific allocation for this purpose: this would be preferred.</p> <p>On a point of detail, there is an inconsistency between the wording used in Policies H1 and H2. Policy H1 refers to "the sites allocated" by Policy H2, whereas Policy H2 itself refers only the "safeguarding" of one particular site.</p>

		<p>The explanation for the Policy is considered unsatisfactory given the points made here.</p> <p>Reference to the Rural Exceptions policy should be included in the explanation to policy H1.</p>
<p><b>3.0 Neighbourhood Housing</b></p>	<p>Policy H2, p.5</p>	<p>This Policy is insufficiently justified and conflates different issues as drafted. This Policy differs from an earlier iteration in that it now purports to safeguard only one site for possible future release (land west of Waterloo Road).</p> <p>The steering group made the conscious decision to reduce the area of land to be 'safeguarded' for future housing.</p> <p>The specific concerns about the policy are as follows:</p> <ul style="list-style-type: none"> <li>• The policy states it "<i>Supports the safeguarding ...</i>" of the reserve site. This wording is ambiguous but implies that actual safeguarding will be achieved through some other mechanism. At the very least this matter requires clarification. <b>Similar wording has been subject to an Examination (Kineton) and therefore with modification/amendment for clarity is not ambiguous.</b></li> <li>• There is no clear reasoned justification for the safeguarding of this site – as opposed to other sites – or for the limitation on the overall scale of development to 100 dwellings. There is no objection to this overall limit as such: the concern relates to the absence of a reasoned justification for this figure. In the absence of a reasoned justification, this figure appears arbitrary. <b>Justification is contained within the Site assessments and public opinion in the survey. Perhaps the explanatory text needs to be more clear on this. 100 units was identified based on the site area and acceptable densities. Again perhaps this needs to be clearer in the explanatory text.</b></li> <li>• The purpose of safeguarding – and, ultimately, releasing – this site for housing is unclear given the strategic context set by the emerging Core Strategy. The second paragraph refers to the site only being released in the light of evidence of "local housing need". It is not clear whether this "local housing need" relates to: <ul style="list-style-type: none"> <li>(i) The District's objectively assessed need (as per emerging Core Strategy Policy CS.16) or;</li> <li>(ii) To a purely local need; such as that identified in the 2012 Survey for Bidford-on-Avon parish.</li> </ul> <p><b>Reference to 'local' housing need was deleted in the Kineton policy. The purpose of the policy is to assist in district wide need as well as local need.</b></p> </li> </ul> <p>If the latter approach is intended then, combined with the issues raised above in relation to Policy H1, the inference is that a 'Local Need' scheme should be directed to <i>this</i> site, rather than the site presently proposed in Broom. This would appear to be at odds with the Parish</p>

		<p>Council’s previously-expressed support for the Broom scheme. <b>This is not at odds because it is district wide need and the local needs scheme in Broom is still supported and will be covered in a new policy on Rural Exceptions.</b></p> <p>In practical terms, development to meet a purely local need is unlikely to require up to 100 homes in one go. For example, the 2012 Survey only identified a need for a total of 24 homes. Additional need could, of course, be identified in subsequent surveys. A phased approach to release and development may be warranted, but if so it should take place in the context of a masterplan for the whole site: the need for such a masterplan is not mentioned in the Policy.</p> <p>Also in practical terms, it is not considered that criteria (a) – (g) create any real “added value”. It would instead be preferable for the site-specific requirements to be identified in the Policy. <b>The criteria based policy approach does add value. However, some of the criterion were deleted in the Kineton examination so a review of this is needed.</b></p>
<p><b>3.0 Neighbourhood Housing</b></p>	<p>Policy H3, p.5-6</p>	<p>Although it is always helpful for neighbourhood plans to include policies dealing with the optimum housing mix for a particular locality, concern is raised that this policy is poorly drafted and conflates different issues. <b>I disagree that it is poorly drafted.</b></p> <p>From the outset, it is important to bear in mind that this policy presumably relates to supply brought forward under Policy H1. This, in turn, is presumably intended to contribute towards meeting District-wide housing requirements. In these circumstances it is not clear how this policy relates to Part B of Core Strategy Policy CS.18. <b>A cross check with the modified CS.18 will be needed.</b></p> <p>The first part of the Policy relates to market housing on sites of five or more dwellings. From a practical point of view and in view of the Plan’s reliance on supply from unidentified windfall sites, it is unlikely that many sites will exceed this threshold. <b>It is as likely as it is unlikely during this time of uncertainty. Suggest this threshold remains.</b></p> <p>The second part of the Policy refers to the findings of the 2012 Survey. As already noted, it is proposed that part of this need will be met within the proposed scheme at Broom. It is not at all clear, though, how the remaining need will be met or what mechanism will be used for this purpose. <b>Remaining unmet need will be met through unbuilt planning permission, the potential for other rural exception sites to come forward and windfall sites (including those at appeal).</b></p> <p>It is also unclear how the proposed tenure split for any further affordable housing has been derived. In any case, it appears at odds with Part C of emerging Core Strategy Policy CS.17. In the absence of any evidence indicating the alternative proposed tenure mix to be justified by local circumstances, objection is raised on that basis. <b>We need to ensure that the policy does</b></p>

		<p>not conflict with CS.17 unless there is local evidence to justify a deviation.</p> <p>The commitment to undertake a review of local housing need within the first five years of the adoption of the Plan is welcomed, but in the meantime, it is recommended that the Policy be re-written taking into account the above issues. <b>Noted.</b></p>
<b>3.0 Neighbourhood Housing</b>	Policy H4, p.6	<p>There is no assessment of the likely capacity of brownfield sites, although it is likely such capacity will be limited. It is considered that reference to development of greenfield sites in 'exceptional circumstances' only is inconsistent with the NPPF. <b>This policy was examined under the Kineton plan and modifications were recommended. A review of this policy in light of the Kineton plan may be needed. A policy clearly promoting a brownfield first approach was always going to raise issues!</b></p> <p>The second paragraph of this policy states "Unless otherwise specifically allocated in this plan, there is a general presumption against the development of greenfield land." For the avoidance of doubt, there is no objection to this approach per se. However, as noted above in relation to other policies, it is possible to envisage a scenario whereby it could frustrate the delivery of the proposed 'Local Choice' housing scheme at Broom. Therefore, it is recommended that the second paragraph of the Policy be redrafted and, separately, an estimate of the capacity of brownfield sites be included in the plan. <b>Noted. As stated previously this policy will need a review.</b></p> <p>The accompanying explanation defines Previously Developed Land (PDL) as being within the village envelope. PDL may exist outside the village envelope and as written, this suggests that such sites would not be considered suitable. Further text clarification may be required setting out this policy distinction, if such a distinction is indeed appropriate. <b>This is a fair point. The NPPF is generally supportive of the redevelopment of brownfield sites, particularly where they are unsightly or derelict – to sustainable forms of development. I don't think we should be discouraging reuse or redevelopment of PDL outside of the village.</b></p>
<b>4.0 Neighbourhood Economy</b>	Policy ECON1, p.7	<p>It is considered that the connection between (a) and (b) should be 'or' not 'and' as satisfying (a) would seem to be independent on (b). <b>Noted.</b></p>
<b>4.0 Neighbourhood Economy</b>	Policy ECON2, p.7	<p>The first paragraph of the policy refers to land and premises within the village centre being defined on a Proposals Map, but there is no such map in the neighbourhood plan. Does this refer to the 'proposed village centre boundary' map as shown on p.218 of the Core Strategy (as submitted September 2014 showing subsequent modifications) June 2015 in relation to Policy CS.22 'Retail Development and Main Centres'? If so, this needs to be made clear. <b>We need to be clear which map/boundary we are referring to so the wording needs to be amended</b></p>

		accordingly.
<b>4.0 Neighbourhood Economy</b>	Policy ECON3, p.8	<p>Whilst the principle of this Policy is supported, it may have implications for the specification of new affordable homes. It is not clear how this Policy will be implemented and enforced. Affordable homes should be connected to high speed broadband as much as market homes. Clarity needs to be given to implementation. The use of appropriately worded planning conditions will be the mechanism for securing this infrastructure and developments should be encouraged to outline this requirement in their supporting documents e.g. sustainability appraisals.</p>
<b>4.0 Neighbourhood Economy</b>	Policy ECON5, p.8	<p>Although supportive of the principle of this Policy, there are concerns about its application and implementation. The inclusion of the second paragraph within the policy is questionable. There is an inference that financial contributions might be sought (presumably via S.106 Agreements). However the scale of any such contributions – which could represent an additional cost for housing schemes – is not quantified. There is a concern that, in practice, it may be unworkable. The policy does not refer to S106. The financing of riverside activities will be made through CIL when it is adopted by SDC. Perhaps clarity is needed.</p> <p>Policy Explanation – It is recommended that the last sentence which reads ‘Future developments must protect and where possible enhance the attraction of the river to visitors’ is better placed within the policy. Agreed.</p>
<b>4.0 Neighbourhood Economy</b>	Policy ECON6, p.8-9	<p>Is the requirement for all dwellings to include space for home working reasonable? How is home working space defined? How would this policy be enforced i.e. prevent a work space being turned into an additional bedroom? The Kineton Examiner modified the policy from ‘must include’ to ‘are encouraged to provide’. This is disappointing because the policy become rather meaningless with no teeth now.</p> <p>There are concerns about its application and implementation and the potential implications for the delivery of affordable housing, in particular. In practical terms, it really consists of two separate policies: the first relating to all new dwellings and the second promoting live-work schemes. The particular concerns relate to the first part of the Policy. Home working should be equally catered for in affordable homes as well as market homes and we should not draw a distinction between the two. Perhaps the policy could be clearer in its approach to both home working and specific live/work schemes.</p> <p>Amongst other things, the Policy requires that “All new dwellings must include space to support home-working, with flexible space adaptable to a home office ...”. The understanding is that this Policy would apply to all new homes – both market and affordable. Whilst having</p>

		<p>no objection to the principle, it is essential that its implications for the delivery of affordable housing are considered. Designing-in dedicated works space, whilst commendable in principle, will have cost implications. It is important that those implications are discussed with the Council's partner housing associations, in order to avoid prejudicing the delivery of schemes. <b>Noted. Further discussion may be needed with the RP's. Perhaps it would help if examples are included in the explanatory text e.g. small studies provided within larger house types, desk space within bedrooms and reception rooms within smaller house types...</b></p>
<p><b>5.0 Neighbourhood Environment</b></p>	<p>Policy ENV1, p.9</p>	<p>It is suggested that the title of the policy might be helpfully amended to read 'renewable and low carbon energy'. Similarly, It is suggested that it would better to refer to 'renewable and low carbon energy', rather than 'green energy' within the policy wording, for the avoidance of doubt. <b>Agreed.</b></p> <p>Whilst the level of energy efficiency in homes is set now by the Building Regulations following the Government's abolition of Code for Sustainable Homes and other similar standards, the policy might encourage development to go beyond Buildings Regulations standards for energy efficiency wherever possible. <b>Agreed.</b></p> <p>There are practical concerns about the application and implementation of this Policy as written, particularly in relation to the delivery of affordable housing schemes. The Policy is effectively two policies. It is the second paragraph of the Policy which is of particular concern. Strictly speaking, it is not solely about "renewable energy". It states "All new developments should maximise energy efficiency through the provision of high energy efficient buildings". <b>The policy is in effect in two parts. Perhaps this could be made clearer?</b></p> <p>It is assumed that this Policy applies to residential and non-residential buildings alike. There is concern that the wording is too vague to provide certainty in its application since the District Council's partners require certainty at an early stage as to the standards they should be applying in the design process. <b>The policy relates to residential and non-residential buildings – perhaps this needs stating. The only way to make it less vague is to outline a specific standard and be more rigid and prescriptive but this is likely to attract more objections.</b></p>

<p><b>5.0 Neighbourhood Environment</b></p>	<p>Policy ENV2, p.9</p>	<p>Green Infrastructure comprises much more than trees and hedges so the title is rather a misnomer. <b>Either we change the title to Tree and Hedges or expand the policy to include other elements of green infrastructure.</b></p>
<p><b>5.0 Neighbourhood Environment</b></p>	<p>Policy ENV4, p.10</p>	<p>The inclusion of a policy on flood risk is welcomed. The policy could be strengthened by including that sustainable urban drainage schemes should be constructed in line with the Warwickshire Sustainable Urban Drainage Systems (SUDs) manual. Applicants should ensure that the design of SUDs should support the findings and recommendations of the Warwickshire Surface Water Management Plan, the Warwickshire Sustainable Urban Drainage Manual and the District Council's Strategic Flood Risk Assessment. Where SUDs are proposed, it should be supported by a groundwater risk assessment and arrangements put in place for the whole life management and maintenance. You may also wish to consider the requirement for development to include permeable paving. <b>Agreed.</b></p> <p>Furthermore, Policy ENV4 should require new homes to include water efficiency measures that go beyond the current Building Regulations and non-domestic buildings should as a minimum reach 'Good' BREEAM standards. A further update to the Water Cycle Study has been carried out and set out the evidence and recommendations for water efficiency measures in domestic and non-domestic buildings. This is based on evidence from Severn Trent Water 'Water Resources Management Plan' (WRMP). Stratford district and West Midlands generally is located within an area of moderate stress. The WRMP has concluded that any growth and increase in population will further exacerbate the issue. In addition, key resources of raw water (canals and rivers) supplying the district are considered to be close to their limit of water they can continue to yield for abstraction, before ecosystems and other users reliant on these resources would be adversely affected. <b>Agreed.</b></p>
<p><b>5.0 Neighbourhood Environment</b></p>	<p>Policy ENV5, p.10</p>	<p>The requirement for all new development proposals to demonstrate that adequate water supply and water treatment facilities are in place to serve the whole development is somewhat onerous and disproportionate to some forms of development. Consideration should be given to possible thresholds of development that would need to comply with the policy principle. It is worth noting that under Section 94 of the Water Industry Act 1991, water companies have a general duty to provide effectual drainage to accommodate planned development. Furthermore, they are also required to manage their assets efficiently to minimise customers' bills. Consequently, there will often be limited headroom as water companies do not generally provide significant amounts of spare capacity to accommodate speculative development. Where liaison through the planning process identifies a need to provide additional capacity, the required infrastructure upgrades are planned to ensure the delivery of planned development is not unduly delayed. <b>Agreed – thresholds need revisiting. Obligations under the Water Industry Act are noted but this does not alleviate local concerns over a timely delivery, funding etc.</b></p> <p>Consideration should be given to the Council's Water Cycle Study (March 2014) which has assessed the impact of the proposed growth in the emerging Core Strategy on the district's</p>

		<p>water environment. The study included an assessment of capacity waste water treatment works (WwTws); sewer system network; fluvial flood risk; surface water flooding and constraints to the sustainable urban drainage. Bidford on Avon was included in the study and capacity issues at the WwTW and sewer system network were not identified as problematic. Please note that the emerging Core Strategy Policy CS.4 contains a principle relating to Water Quality and development would not be permitted which would affect the negative impact on water quality either directly through pollution of surface or ground water, or indirectly through overloading the Waste Water Treatment Works. <b>Agreed. This is an important piece of evidence which we can reference.</b></p>
<b>5.0 Neighbourhood Environment</b>	Policy ENV6, p.11	<p>The first part of this Policy is inconsistent with the NPPF and should not be applied to any scale of proposed development. It is considered that the first sentence in the explanation to the policy is more accurate. <b>This issue has arisen in the Kineton examination and through other consultation responses. Amendments are likely to be necessary for the plan to pass the examination.</b></p> <p>On a point of detail, there is reference to land "... as outlined on the Proposals Map ...". As previously mentioned, no such Proposals Map is included in the Plan. This point is, of course, of fundamental importance when considering the suitability of potential housing sites and indeed more generally in understanding the Plan in its entirety. <b>This reference needs deleting.</b></p>
<b>5.0 Neighbourhood Environment</b>	Policy ENV7, p.11	<p>What is the landscape character and what are the historic landscape features this policy is specifically looking to maintain/preserve? Have they been assessed and quantified? The policy also looks to retain important landmarks, skylines and views...have these been identified and assessed? It is considered that these elements would need to be quantified and mapped, spatially. It is considered that the policy and justification requires more work in order to be justified. <b>This is the work that Betina is looking at alongside the White Consulting evidence. We may need to show important views on a map for clarity.</b></p>
<b>5.0 Neighbourhood Environment</b>	Policy ENV8, p.11	<p>The policy states that proposals that cause harm to listed buildings and scheduled ancient monuments and their settings will not be supported. As written, this does not comply with the NPPF or related Core Strategy policies, since it is too restrictive. The NPPF looks to assess the significance of the harm and establish whether the harm is more or less than 'substantial' in order to ascertain whether the proposed development is acceptable. As such, there is a balancing exercise to be carried out and as such some harm may be deemed acceptable in certain circumstances... It is considered that the policy will need to be re-drafted to take account of this. <b>This policy need rewording along the lines of the test set out in the NPPF. The aim and objective of the policy is fine.</b></p>

<p><b>5.0 Neighbourhood Environment</b></p>	<p>Policy ENV10, p.12</p>	<p>There are concerns about the application and implementation of this policy. There is reference to the preparation of a Biodiversity Action Plan. By whom, and within what timescales? Who will be responsible for its implementation? The Policy then requires that all proposals should take account of it. This could potentially affect proposals for housing schemes by, for example, imposing obligations for wildlife habitat creation on or off site. Whilst having no objection to this in principle, it is crucial to the viability and progression of housing schemes that any obligations are identified and quantified at an early stage. The Policy, as presently drafted, appears too vague to be implementable. <b>If the PC is not intending to prepare a BAP then this policy should be rethought.</b></p>
<p><b>6.0 Neighbourhood Amenities</b></p>	<p>Policy AM1, p.12</p>	<p>Whilst supporting the principle of this Policy, there are ambiguities which could have adverse implications for the delivery of affordable housing. The second paragraph could be interpreted and inferred as applying to all new housing proposals (including affordable housing), unless mitigated through the payment of contributions towards the improvement of healthcare facilities. If this is indeed the intention of the policy, concern is raised that this Policy could be unworkable without quantifying the cost implications. <b>My understanding is that this is not the intention of the policy and that the author of this comments has wrongly assumed this meant financial contributions will be sought.</b></p> <p>It is considered that the Policy should be re-written to remove any ambiguity over the circumstances in which (pending introduction of the Community Infrastructure Levy) developer contributions might be sought from residential development (including affordable housing). In the alternative, the preference would be for the Plan to broadly quantify local healthcare (and, indeed, other infrastructure needs) relative to the anticipated volume of housing development giving rise to such needs during the remainder of the Core Strategy period and identify a strategy for the resolution of those needs. As it currently stands, the Policy does little to create "added value" in the context of the emerging Core Strategy. <b>I don't think there is any ambiguity. However, some examples in the explanatory text may be a good idea.</b></p>

<p><b>6.0 Neighbourhood Amenities</b></p>	<p>Policy AM2, p.13</p>	<p>Whilst being supportive of the principle of this Policy, there are similar concerns as with Policy AM1 above. Additionally, there are the following Policy-specific concerns:</p> <ul style="list-style-type: none"> <li>• There appears to have been no assessment made of whether the expansion of the existing school and library is physically possible within the identified constraints. This is important because it might act as a constraint to housing delivery or (at the very least) alter the basis of contributions sought from residential developments (pending the introduction of CIL). <i>It is unclear what physical constraints are suggested? Physically there is ample room for the school to expand if necessary. The intention of this policy is to facilitate this happening by providing a positively worded policy to support such an expansion.</i></li> <li>• Is the inclusion of the 3<sup>rd</sup> paragraph supporting the review of transport arrangements for secondary school pupils appropriate in a Neighbourhood Plan? <i>From the text it would appear that this policy does suggest this however, this is not a land use issue so it may need to be put into the explanatory text.</i></li> <li>• The explanatory text refers to the possibility of future development being expected to contribute towards the ongoing maintenance of this facility. Aside from an apparent mismatch with the Policy itself, the main concern is that any potential contributions liability of new residential development is not quantified. <i>Clarity is needed here. Suggest that the sentence is reworded to say "Future development will be expected to continue to contribute to the ongoing maintenance of this important village amenity in accordance with the Education Authority's recommendation".</i></li> </ul>
<p><b>6.0 Neighbourhood Amenities</b></p>	<p>Policy AM4, p.14</p>	<p>Formal Local Green Spaces need to meet the criteria in paragraphs 76 and 77 of the NPPF and it is unclear whether this exercise has been undertaken for those proposed. Also, some of the open spaces identified in Policy AM3 might justify being designated as such, as might allotments covered in Policy AM5. <i>The comment seems to suggest that AM3 Am4 and Am5 could be rolled into one policy. Clarification should be sought from SDC if this is the case. Further additions to the explanatory text will be necessary to explain why the allocations fall within the NPPF and PPG guidelines.</i></p>
<p><b>6.0 Neighbourhood Amenities</b></p>	<p>Policy AM5, p.14-15</p>	<p>The second paragraph of the Policy refers to the provision of new allotments in "appropriate and suitable locations". Apart from the fact there is no clear strategy for implementing this Policy, the accompanying criteria seem vague and there is an indirect risk this could potentially frustrate or delay housing delivery. <i>I fail to see how this will frustrate the delivery of housing. Is there a site where new allotments could be specifically allocated? If so lets think about actually allocating some land?</i></p> <p>The final paragraph refers to "all" new dwellings, but takes no account of the particular circumstances of flats or maisonettes. There does not appear to be any justification or explanation as to where the minimum figure of 80 square metres for gardens associated with all new dwellings comes from. Is this figure reasonable/practical for all dwellings? Could this</p>

		<p>have implications for plot sizes/size mix of dwellings? Clarification of these points is required. 'All new dwellings' could be amended to 'All new dwellinghouses (excluding flats)'. Some rationale behind the figure of 80sqm will be needed.</p>
<p><b>Potential Omission Policy: Extra Care Housing</b></p>	<p>Omission Policy</p>	<p>When addressing the issues relating to the Housing section of the Neighbourhood Plan, it is recommended that the Parish Council should also give consideration to whether the Plan should allocate a site for an Extra Care Housing scheme. <b>To be discussed. Any allocation such as this may necessitate a further targeted consultation. If an allocation is to be considered favourably then you may wish to consider the other portion of the land controlled by Miller Homes as a potential site. You have already consulted on this site so you may not need a further round of consultation if this site is chosen for such a development.</b></p> <p>Following discussions with officers of the Warwickshire County Council in this respect, attention is drawn to land west of Grafton Lane, Welford-on-Avon. This land was, in fact, identified as reserve site "H2b" in the earlier iteration of the Neighbourhood Plan. For the avoidance of doubt, there has been no detailed assessment of the physical suitability of the site for this type of development and therefore it is not the intention to propose a positive recommendation for its allocation in the Plan for this purpose at this stage. However, as the land is in the ownership of the County Council, this may help expedite delivery of an Extra Care Housing scheme along with a package of community benefits, should a need and business case for such a scheme be confirmed. If the Parish Council wishes to consider this option, a draft policy for the site can be provided. <b>This site has been discussed with WCC and SDC. It is unlikely that this site will be considered in the NDP due to local opposition and other more suitable sites. There is concern over the suitability of Grafton Lane for such a development and there is concern about the enabling development (c.30 dwellings) that would be needed to fund such a scheme.</b></p>