

Salford Priors Neighbourhood Development Plan

Formal Consultation – Thursday 19th May to Friday 1st July 2016

Regulation 16 Representations:

Rep. No.	Policy	Representation	Reg.19 Request?
SPNP01	Objective 1 and associated Policies	<p>Historic England is pleased to note the prominent role afforded to the historic environment as part of the draft plan. We are supportive of the way the document sets out objectives aimed at the conservation of the local historic environment as well as ensuring that new development is of high quality, sustainable design.</p> <p>However, we note that this iteration of the plan fails to address several comments made in our letter of 31 July 2015 (our ref 1442). In that letter, we noted that there was no reference to the Warwickshire Council Historic Environment Record (HER) having been consulted as part of the process of allocating housing sites. Without such consultation, there remains a risk that undesignated Heritage Assets and potential archaeological remains are present on the site but have not yet been identified. We also have some concern that there appears to be no evaluation of the likely impact of new housing on nearby designated assets (for example the Grade I listed Salford Hall) from the allocated sites.</p> <p>Separately, we have previously suggested that in order to take a fully rounded approach to the historic environment, the draft plan should ensure that appropriate archaeological assessment is undertaken in advance of any new development beginning. This could be achieved by the inclusion of a new bullet point under Policy SP1: Protecting the Historic Environment - for example:</p> <p><i>(h) New development must take account of known surface and sub-surface archaeology, and ensure unknown and potentially significant deposits are identified and appropriately considered during development. Lack of current evidence of sub-surface archaeology must not be taken as proof of absence.</i></p>	Not indicated
SPNP02	SP4 Criterion b)	<p>We consider the suggested measures of “flood prevention and mitigation measures” are a form of flood risk mitigation as opposed to flood avoidance which should be considered first in accordance with the flood risk management hierarchy. The Sequential Test in the NPPF should be applied to avoid inappropriate development in the floodplain in the first instance.</p> <p>Sustainable construction should not be confused with flood prevention and mitigation measures. For example, it is not sustainable to build within the floodplain and then try to protect the dwelling. Sustainable construction could incorporate sustainable drainage, but, particularly on small developments, it will not prevent flooding. Sustainable drainage however, will minimise use of</p>	Not indicated

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	<p data-bbox="286 336 430 432">Proposed additional Policy</p> <p data-bbox="286 922 430 954">Appendix 2</p>	<p data-bbox="488 240 1823 300">resources, lower costs and also provide water quality benefits. It is recommended that reference to flood prevention and mitigation is taken out of sustainable construction.</p> <p data-bbox="488 336 1872 432">We recommend that the NDP should contain a specific policy on Flood Risk Management which should be broadly in accordance with Policy CS.4 of Stratford upon Avon's Interim Adopted Core Strategy with proposed modifications, (June 2015), and the NPPF.</p> <p data-bbox="488 469 1859 564">Consideration should be given to the following measures to protect and enhance the river corridors of the Ban Brook and River Arrow which are located in the Neighbourhood Development Area. This could include:</p> <p data-bbox="488 601 1872 660">Ensuring all new development is in Flood Zone 1. Only if there is no viable/available land in Flood Zone 1 should other areas be considered using the Sequential Test approach.</p> <ul data-bbox="533 697 1872 888" style="list-style-type: none"> • Opportunities to reduce flood risk elsewhere by allocating flood storage areas • Setting back development 8m from watercourses to allow access for maintenance and restoring the natural floodplain. • Ensure all SuDS features are located outside of the 1 in 100 year plus climate change flood extent • Open up culverted watercourses and remove unnecessary obstructions <p data-bbox="488 925 1872 1019">The allocated housing sites as shown on Figure A8 are all located in Flood Zone 1 (low risk), or Flood Zone 2 (medium risk), as defined by our Flood Map for Planning. SP7/6 is in Flood Zone 2 and SP7/7 is mainly Flood Zone 1 and partly in Flood Zone 2.</p> <p data-bbox="488 1056 1872 1279">Given the recent change in guidance regarding climate change, there could potentially be issues with bringing forward site SP7/6 for housing. At present, the whole site lies within Flood Zone 2, but could be more at risk due to future climate change predictions. As this looks like a small site, we would ask for a 600mm freeboard on the present 1000 year level, rather than a model rerun with the new allowances. However, this may create issues in relation to visual impact from a Local Authority point of view, or access to the property in relation to current standards for disabled people. We would expect a Flood Risk Assessment to be undertaken at the appropriate time if this site is taken forward.</p> <p data-bbox="488 1316 1850 1375">A FRA should also be undertaken for SP7/7, with the same requirements applied, although we expect this to be less of an issue.</p> <p data-bbox="488 1412 1850 1471">The main issue regarding sites in Flood Zone 1 is sustainable surface water drainage. We recommend that you consult Warwickshire County Council Flood Risk Management Team as Lead Local Flood</p>	

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		Authority on surface water drainage issues.	
SPNP03	Whole Document	Natural England do not have any further comments on this draft neighbourhood plan.	Not indicated
SPNP04	<p data-bbox="315 368 398 392">Vision</p> <p data-bbox="315 533 383 557">SP5</p> <p data-bbox="315 1118 394 1142">SP33</p> <p data-bbox="315 1442 394 1466">SP34</p>	<p data-bbox="479 368 1883 496">WP and WMP welcome and support the Vision of a safe and secure Parish of Salford Priors. This is consistent with paragraphs 58 and 69 of the National Planning Policy Framework (NPPF). It also adds support for the design measures and additional infrastructure provision required as part of development growth to achieve this.</p> <p data-bbox="479 533 1883 692">WP and WMP are pleased to see the requirement of part (h) of Policy SP5 that development proposals should incorporate Secured by Design measures to reduce crime and the fear of crime, and measures to increase road safety for all users. This fully addresses the comments submitted in August 2015 by WP and WMP. The inclusion of part 5 is also fully supported by the following National Planning Practice Guidance (NPPG):</p> <p data-bbox="479 729 1883 952"><i>'Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation.</i> (Paragraph: 011 Reference ID: 26-011-20140306)</p> <p data-bbox="479 989 1883 1078">Policy SP5 is therefore wholly effective and consistent with national planning policy, through the protection it will provide for the safety and security of the Parish. It will therefore be effective in soundness terms.</p> <p data-bbox="479 1118 1883 1214">WP and WMP very much welcome and support the inclusion of parts (a) and (n) within Policy SP33, which are the incorporation of the amendments we proposed to the Parish Council within our August 2015 representations.</p> <p data-bbox="479 1251 1883 1410">Part (a) of Policy SP33 will enable the emergency services to attend incidents and individuals quickly, which help to prevent crime and in certain cases, save lives. Part (b) will ensure that in the Parish incidences of deaths, injuries and property damage as a result of fire will be reduced. Both of the above combined enhance the consistency of the Plan with paragraphs 58 and 69 of the NPPF.</p> <p data-bbox="479 1442 1883 1465">The statement that financial contributions, including the Community Infrastructure Levy (CIL), will be</p>	<p data-bbox="1890 368 2063 432">Not indicated</p>

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	<p>Par 4.1</p> <p>Policy SP1</p> <p>Para 6.33</p> <p>Objective 4</p> <p>SP14</p>	<p>Flooding has not been identified in this list? There are a number of properties in Salford Seven that are internally flooded.</p> <p>Criterion g) This point could include reference to blue-green infrastructure? To allow developers to create swales within verges or adjacent to hedgerows that will create space for water as well as enhancing the environment? Its inclusion would also suggest to developers that they need to be considering maintenance or enhancing features that already exist within the proposed sites.</p> <p>Should the last sentence of this paragraph also include reference to 'ditches or watercourses'?</p> <p>WCC welcomes the inclusion to 'conserve its natural environment' in your vision statement and subsequent Objective 4 'To protect the environment of the parish. However, you may wish to aim to enhance it as well. Policy SP14 only refers to Woodland, Trees and Hedgerows and Policy SP18 Watercourses and Water Features, you may wish to think about other important ecological habitat such as wildflower grassland.</p> <p>To assist in the preparation of Neighbourhood plans Warwickshire County Council as placed a lot of ecological evidence on the http://maps.warwickshire.gov.uk/greeninfrastructure/ webpage. Here one can find:</p> <ul style="list-style-type: none"> • Local Wildlife Sites (county importance); these include those awaiting surveying (potential) and those already designated; • national south-north ecological flows for woodland and grassland species and how they could move to adapt to climate change; • local ecological routes (Connectivity); • as well as valuable habitats know by Defra as 'Habitat Distinctiveness'. <p>From this information you could prepare policies to protect and enhance existing important habitats and promote creation and enhancement that links these sites together. In essence this has being established within the Warwickshire Coventry and Solihull Green Infrastructure Strategy. This document has been written so that Neighbourhood Plans can adopt as a mechanism to achieve their own aims and objectives. It hopeful helps the re-invention of the wheel with every sub-regional strategy. Similarly, please feel free to link to and use the online maps as your evidence base on which you formed your Neighbourhood Plan.</p> <p>The first sentence could include reference to ditches or watercourses. After the 'Hedgerow replacement...' sentence, could insert a sentence to the effect that "Ditches/watercourses replacement</p>	

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	<p data-bbox="324 300 398 331">SP16</p> <p data-bbox="324 890 398 922">SP17</p> <p data-bbox="257 1409 465 1441">SP 17: Table 7</p>	<p data-bbox="488 236 1234 268">with piped or culverted systems will not be supported”?</p> <p data-bbox="488 300 1861 464">Para 76 in the NPPF makes it clear that neighbourhood plans can only define local green spaces. Areas C and D are private land, currently owned by the County Council and are in agricultural use. The land benefits from permitted development rights under the Planning Acts which allows buildings and structures to be erected without the need for planning permission. This policy which seeks to protect open areas cannot be enforced in relation to the use and development of agricultural land.</p> <p data-bbox="488 496 1787 592">The areas contain valuable mineral resources which will be sterilized by the exclusion of mineral development. This would be contrary to para 143 in the NPPF which requires locations of specific mineral resources not to be sterilized.</p> <p data-bbox="488 624 1861 847">Both Areas C and D cover land which is defined in the draft Warwickshire Minerals Local Plan as being allocated for the future working of sand and gravel – Site 7 Salford Priors. This policy could prevent the delivery of the site and therefore the implementation of the Minerals Local Plan. Minerals provision is a strategic policy as defined in para 156 in the NPPF and therefore the Neighbourhood Plan needs to be in general conformity with this policy. A policy which seeks to restricts mineral development and sterilized valuable mineral resources will not be in conformity with para 156. Areas C and D should be omitted from the plan.</p> <p data-bbox="488 879 1839 1102">There is no map of Quarry Pools in Appendix 4. The Planning Practice Guidance (PPG) says that local green spaces need to be designated so they need to be mapped (Paragraph: 006 Reference ID: 37-006-20140306). Without a map delineating the extent of the area it could include extensive tracts of land contrary to para 77 of the NPPF. Marsh Farm Quarry is covered by an approved restoration plan for agriculture and extant planning permission for mineral development. The Planning Practice Guidance says that “Local Green Space designation will rarely be appropriate where the land has planning permission for development” (Paragraph: 008 Reference ID: 37-008-20140306).</p> <p data-bbox="488 1134 1861 1374">Quarry Pools, which exist to the north of the village, are not covered by the approved plan. A change of use from agriculture to nature conservation brings increase costs and responsibilities. An additional policy requirement on any changes to the approved plan may impact on deliverability of a scheme for nature conservation. It is not clear from the policy who is responsible for monitoring and managing the newly created local green space area covered by Policy SP17. The PPG says that “Management of land designated as Local Green Space will remain the responsibility of its owner”. Has the land owner agreed to this designation? The designation is contrary to para 77 of the NPPF and should be deleted.</p> <p data-bbox="488 1406 1861 1469">The Brooks: The 5 meter border would also be required to allow maintenance of the watercourse, on a new development WCC may require an even greater width protected strip. Would it be worth</p>	

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	<p>Objective 5 – Transport Matters</p> <p>SP33 and SP34</p> <p>SP34</p> <p>SP35</p> <p>Figure A3</p> <p>Figure A6</p> <p>Figure A14</p> <p>Appendix 3</p> <p>Appendix 4</p>	<p>mentioning “and to facilitate watercourse maintenance” in the reason column?</p> <p>The Plan sets out to achieve a strong focus on walking and cycling including the provision of appropriate infrastructure. The Plan also comments on the need to have appropriate off-street parking at new dwellings to address road safety issues related with parking on the road. The level of parking provided needs to recognise the importance of addressing road safety but be consistent with parking standards. We would welcome any further discussions on detail road safety matters. Further we wish to see those matters addressed in an accompanying Infrastructure delivery Plan for the Neighbourhood Plan including how these matters will be funded.</p> <p>We welcome the inclusion of planning policies SP33 and SP34. We note the Neighbourhood Plan would have access to Community Infrastructure levy and other contributions. Therefore we suggest that an Infrastructure Delivery Plan with priorities should also accompany the plan.</p> <p>Could the final sentence of this policy to read “waste services, the highways and drainage networks.”? This would support comments made above relating to page 36.</p> <p>Criterion d) Could the reference to green space be changed to blue-green spaces? Will support points above.</p> <p>This title belongs with the plan on page 60.</p> <p>Sites labelled No’s. 19, 20 and 22: All of these locations are within EA flood Zone 2 or 3 and may not be suitable for further development without the need for significant protection measures? See: http://watermaps.environment-agency.gov.uk/wiyby/wiyby.aspx?topic=floodmap#x=357683&y=355134&scale=2</p> <p>This location is indicated as being at significant risk of river flooding and development here maybe objected to by the EA?</p> <p>A point (No.37) could be added referring to blue-green infrastructure / ditches watercourses to strengthen the points made above?</p> <p>The Brooks: Re 5 metre border - See comments for page 42, above.</p>	
SPNP06	Whole document	<p>Thank you for consulting Sport England on the above Neighbourhood Consultation.</p> <p>Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal</p>	Not indicated

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		<p>recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations. http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>If you need any further advice please do not hesitate to contact Sport England using the contact details below.</p> <p>Yours sincerely</p> <p>Planning Administration Team Planning.central@sportengland.org</p>	

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SPNP07	Whole document	Network Rail has no comments.	Not indicated
SPNP08	Whole document	Having reviewed your document, I confirm that we have no specific comments to make on it.	Not indicated
SPNP09	Objective 3	<p>We write on behalf of Terra Strategic who, as you will be aware, have an interest in the site on Land off Evesham Road, Salford Priors (see attached plan). The site is currently allocated within the Salford Seven Neighbourhood Plan for 12 units (Figure A15 – SP7/7).</p> <p>We have read and considered the content of the Neighbourhood Plan for Salford Priors and recognise that the background work that has taken place so far is considerable. In particular, we were pleased to see that the Neighbourhood planning team recognise the very pressing problem of a significant ageing population within the village and a lack of opportunity to diversify the housing stock.</p> <p>The 2010 to 2015 government policy: Planning Reform Policy Paper stated that “Neighbourhood plans allow local people to get the right type of development for their community, but the plans must still meet the needs of the wider area”.¹ The Government state that they expect neighbourhood plans to take into account the planning authority assessment of housing and other development needs in the area. For Stratford on Avon District, this is primarily included in the Strategic Housing Market Assessment (SHMA). Both the evidence base for the District and the planning strategy for the District underpin the need for Neighbourhood Plans to be in place to direct and facilitate development, and this document is important when discussing the need for a Neighbourhood Plan.</p> <p>Neighbourhood Planning was introduced in 2011 by the Localism Act. This allowed local residents and businesses to have their own planning policies in a Neighbourhood Plan that reflects their priorities and deliver tangible local benefits. The Government’s aspiration for neighbourhood plans was to ensure that they made an important contribution to delivering housing and boosting local economic growth.</p> <p>In February 2011, Greg Clark MP stated in a speech to the Adam Smith Institute that “Planning should be a positive process, where people come together and agree a vision for the future of the place where they live. It should also - crucially - be a system that delivers more growth. Our aim with the Localism Bill is not to prevent new building, but to promote it”³. Mr Clark also went on to suggest that “Neighbourhood planning isn’t a way of a group declaring a UDI from the wider area they live in. Their plans must be consistent with the needs and ambitions of residents of the wider area too - including the need for economic growth”. In addition, he also suggested that “if there’s an overwhelming need for new homes in the local authority area, the neighbourhood plan is not a way for a neighbourhood to refuse to host its fair share”. This clearly highlights the Government’s intention for Neighbourhood Plans to offer communities such as Salford Priors the opportunity to secure a sustainable future for its residents and to ensure that development brings community benefits.</p>	Not indicated

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		<p>It is encouraging to see that the Neighbourhood plan has made an allocation for a total of 74 dwellings within Salford Priors village. However, new housing development of the right quantum in Salford Priors will perform an important economic and social role by providing land for aspirational and affordable housing, which expands the quality and choice of housing size and tenure. This, however, needs to be at the right critical mass as there are very few small developers able to bring forward sites of around 10-15 units. It is our view that Salford Priors (and indeed this site) is capable of providing additional housing which in turn can help address the issue of the ageing population and lack of housing for younger people appropriately.</p> <p>The current Neighbourhood Plan appears inflexible in its allocation approach to new housing. Increased new development will bring with it new families, couples and single people, who will provide increased levels of disposable income that will (in part) be spent locally supporting existing services and facilities.</p> <p>Paragraph 7 of the National Planning Policy Framework (NPPF) identifies that the economic role of sustainable development is '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'. This is taken forward in paragraph 9 of the NPPF which notes that pursuing sustainable development involves 'making it easier for jobs to be created in cities, towns and villages'. Also at Paragraph 7, the social role is described as 'supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.'</p> <p>The above highlights the duty on the Salford Priors Neighbourhood Plan to plan positively for housing growth, job creation, economic development and social cohesion in alignment with the Framework to ensure the community thrives.</p> <p>Salford Priors is a Category 2 Local Service Village (LSV) in the emerging Core Strategy. These settlements are broadly 'earmarked' for around 84 dwellings for the new plan period (to 2031), insofar as the Proposed Modifications Core Strategy states at CS.16 (B.) Local Services Villages at 'Category 2 – approximately 700 homes in total, of which no more than around 12% should be provided in an individual settlement.' There are 10 Category 2 LSVs and the above translates to 84 dwellings in any one settlement, or higher if supported by the Parish Council.</p> <p>We are of the opinion that this can only be achieved by the level of development the Council supports</p>	

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	SP8	<p>in LSVs. This would be more appropriate in Salford Priors because unlike other settlements of a similar size, it benefits from many successful businesses, including shops, a post office, school and pubs.</p> <p>We believe that sustainable development is best achieved through the delivery of sites close to services and facilities that already exist in towns and villages, rather than large scale development on greenfield land in isolated locations.</p> <p>Moreover, the Site Allocations policy document will, in due course be seeking to allocate a further 3,000 dwellings (in addition to the 14,600 OAN figure for the Core Strategy) within MRCs and LSVs throughout the District, unless of course a Neighbourhood Plan has successfully planned for an appropriate level of development.</p> <p>Policy SP8 allocates 12 new homes for Land opposite Cleeve View, Evesham Road, Salford Priors. This policy restricts the potential of the site to be able to accommodate additional housing which in turn will provide land for aspirational and affordable housing which expands the quality and choice of housing size and tenure within Salford Priors.</p> <p>Land opposite Cleeve View sits within the Salford Priors Conservation Area. Policy SP8 states that development proposals will be supported when they are limited to 1.5 storey height properties built in a 'cottage courtyard' style. We consider this is to be overly prescriptive for a Neighbourhood Plan, contrary to NPPF para 60 as follows:</p> <p>"Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness."</p> <p>The proposals would include the provision of affordable homes which would include starter homes, affordable rent and shared ownership properties. Future generations need housing choice; community facilities, and safe and accessible routes to travel on whether by walking, cycling, public transport or car. They also need shops and services that will continue to remain open and viable – not just those reliant on passing trade, who can be more at risk of changes to shopping patterns.</p> <p>We urge you, the Neighbourhood Planning team to reconsider the approach being taken at the present time with regards to the amount of housing being allocated on Land opposite Cleeve View, Evesham Road, Salford Priors. We also ask for you to engage with us and our clients Terra Strategic, in further in discussions over the site capacity, potential scheme design and the planning gain associated with the new development proposals.</p>	

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	SP17	<p>(page 116).</p> <p>We object to my client's land being included as part of Church Fields Local Green Space, and consider this to be unnecessary when protecting views of St Matthews Church. We consider the inclusion of my client's land does not protect the church given the distance from the church and intervening features such as hedgerows and trees.</p> <p>However should the remainder of my client's site be allocated for development my client would offer as a gift the land in question to allay residents' concerns as set out above.</p>	
SPNP11	General comments	<p>Owing to some Internet problems I was unable to download the form, I did fill one in at the Bloor presentation, stating my objections to the fact that every owner of pasture and agriculture growing land are jumping on the bandwagon to offer up their land for housing developers, I refer in particular to planning application for multiple housing on the field at the rear of Cleeve View, and behind listed thatched cottages, also plans to build in the field near the church and behind the bell inn and Meadow view, except that it won't be a meadow view, if this goes ahead ,they will cash in at the expense of the beauty, horse grazing , dog walkers and wildlife, Does the title conservation area mean nothing , unless to collect planning permit revenue for the tiniest home improvement? I also object very strongly to the proposed gravel pit, we already are suffering disturbance from extra container lorries to and from the Sandfield farm site, the dust from this excavation is a major health issue our village as we know it will be destroyed, along with its eco system.</p> <p>Furthermore I would like to complain on behalf of all the distressed pets and owners in the village because of the terrifying noise from fireworks, that follows every little village event. They were so loud after the Queen's birthday fete ,my dog ,despite wearing a calming collar ,was screaming, and violently sick, I really thought he was having a heart attack, some peoples dogs cats bolted and were not found until the next day cowering some distance from their homes, it is unacceptable, if I were to make half that noise at that time of night I would be looking at an ASBO charge, shooting the same-- many a time I have been woken in the early hours , because of someone shooting some poor rabbit or pheasant, as a animal lover I find it very distressing , the pheasant shoot is situated near to my property, and spoils my enjoyment of my garden.</p>	Not indicated
SPNP12	SP9	<p>I object to SP9 development for two reasons; the land that is too good to be taken out of food production and the changes to the village of Salford Priors....</p> <p>1) There surely must be more suitable land for development. It seems crazy to take away prime agricultural (irrigated) farm land. One day the country could have to depend on its own land for food so in my view less productive land should be used for housing.</p>	Not indicated

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		<p>2) Salford Priors was once a small rural village and over the last few decades, and it looks like over the next decade, we are to see more large housing developments that will continue to change the character of the village. Our family have lived in the village for 5 generations - I am sure there are others who chose to move to Salford Priors to be in a small rural setting which is gradually been taken away from the families who have invested in the area and have settled in the village. Recent permission given to the housing development on Station Road almost fulfils the housing quota for Salford Priors. Can Salford Priors not avoid another development of this a size?</p>	
SPNP13	SP9	<p>I am writing on behalf of Orchards Cookery who is concerned about its existing use and how it may disturb residents should houses be built on the surrounding fields. It is a lively, residential cookery school where 48 young people are trained and young staff live on site. There is a bar and dancefloor at the school (that faces the new proposed development) which is used until late most nights of the week. The bar was built to keep the students out of the village as they sometimes disturbed the locals when returning back from the pub. The school is not a suitable neighbour to a quiet residential setting and we would hate conflict to arise between the school and new unsuspecting neighbours.</p> <p>Orchards Cookery is an Award Winning Cookery school ("Cookery School of the Year", "Britain's Favourite Cookery School" voted by the public and "Best Large Cookery School" being some of the National Awards recently won) and we hope that our county is proud to have such a business, training over a thousand young people each year and helping them find employment in the catering industry. The school also employs 26 staff and has been running for 14 years.</p> <p>The school has heavily invested in The Orchards, buying back grade two listed barns that were sadly sold off in the 80's and then left to fall down. The school has restored listed buildings and rebuilt the courtyard at the back of the farm house and the site is a wonderful example of farm diversification. It would be nice to be able to keep it in a farm setting (where the students can not disturb anyone in the evenings) as opposed to being part of a housing development where its charm and the significance of the listed buildings may be lost.</p>	Not indicated
SPNP14	SP9	<p>We object to this proposed development and would suggest that other sites in Salford Priors would be more suitable for development and given below are our reasons for this:</p> <p>It is prime agricultural land which is Classified as high grade and has excellent drainage. As an example they can expect a yield of ten tons of runner beans per acre. This is due to the quality of the ground; it is fully irrigated and good drainage. The development of such land would be in contradiction of Policy SP 15. Such land should not be used for development when other local land is available.</p> <p>There is also a fruit and vegetable pack house. This company employs between 40-60 people (depending on the season), and about 90% of these employees live within ten miles of the factory.</p>	Not indicated

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		<p>Housing close to the factory would generate a quantity of complaints because of the noise of plant running twenty four hours a day. As it is local residents are far enough away for there to be no problem.</p> <p>There is a very successful residential cookery school at The Orchards with over sixty staff and students on site, mostly aged between 17 and 25 years of age. There is a licensed bar here too and the first action of close neighbours would take would be to curtail their activities with complaints of noise. These students have an excellent training with interviews and job offers even before their courses are completed.</p>	
SPNP15	SP9	<p>I am writing to say that I object to SP9. I grew up at The Orchards and I have built a successful business there. Salford Priors is a beautiful village. Residents have chosen to live in a village and not a small town. There has already been/and there is further planned development in the village and I feel the rural part of living in a village will change.</p> <p>The farm also has a very successful packaging business operating from it that I am not sure is a suitable neighbour. I understand that some people in the village do not like the lorries coming and going from the farm but this is modern farming. The fields suggested for housing are amazing fields and produce high yields of fresh produce. The soil is excellent for growing as it drains well can be planted and ploughed through most of the British weather conditions. I know they say the land according to Defra is not grade 1 land. I think this is because it drains so quickly but the farm has an inbuilt irrigation system and a reservoir – and with this it makes it the best growing land in the area.</p> <p>This is very valuable food growing land and any farmer will tell you that. It needs preserving and protecting for future generations. With a population that is rising we need to keep hold of land that we can grow food on. There must be more suitable land for development. Farming creates little income these days which is a shame but should we allow land of this quality to be sold off to developers. This proposed development is about money, not about those who live in the village.</p> <p>The Orchards is a very lively and noisy place and is likely to upset any new neighbours. There was a successful Mill operating in Broom. Houses were built next to it and it was later shut down as the new residents complained about its existing use. We fear that this development proposal is a threat to Orchards Cookery and Angus Soft Fruits.</p>	Not indicated
SPNP16	SP9	<p>I live in the Managers Flat at Orchards Cookery. From my personal experience of living next to the cookery school I would not recommend SP9 as a suitable housing development because it is too close to the cookery school and the residents will not be happy with the existing noise created by those using the school (and the fruit packing site). It is a very noisy site!</p>	Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>The staff and students who live at The Orchards let their hair down and enjoy themselves in the evenings, which is wonderful to see. Now there is a licenced bar at The School the staff and students do not disturb anyone as they are able to stay on site in the evenings – in the past they were quite noisy going through the village to and from the pub. They are in a safe environment here where they can't cause any problems or disturb anyone.</p> <p>If houses are allowed to be built next to them I envisage endless problems, not only with the cookery school functioning as it is, but also with Angus Soft Fruits which is a thriving, growing business. Careful consideration must be taken into the suitability of the site with regards to the surrounding businesses who are already well established and have invested in a suitable setting. They are both very noisy to live next to – please note, I am not moaning about the noise, I just think that you should know from someone who does live next to both businesses that housing next to them would be a disaster.</p>	
SPNP17*	<p>Para 3.12</p> <p>SP1</p> <p>SP2</p> <p>SP2 - Table 2</p>	<p>The Examination of the CS has concluded and the Inspector has issued his final report and list of main modifications. The CS is to be considered at Cabinet and Full Council on Monday 11 July for adoption.</p> <p>Criterion (a) - It would be helpful for those particular elements or features that contribute to "distinctive character" to be identified. Otherwise, this Policy would appear to contribute little in the way of "added value" to emerging Core Strategy policies.</p> <p>Criterion (a) looks to maintain the character of the settlements of the Parish, including their settings, spaces and built form. How would the allocation of 66 new dwellings as set out in Policy SP9 achieve this?</p> <p>Are the Buildings of Local Importance identified/officially recognised as being such? If not, the basis of this policy is questionable...how were they assessed? You will need to ensure that the buildings have been identified through a consistent and robust methodology in a supporting document. Reasons should be given as to why each particular building has been included – why is it locally important?</p> <p>It may be helpful to include a definition of 'locally important' at the beginning of this policy to provide some context for the subsequent list. This could include local historic connection, fine examples of local vernacular/use of local material, important contribution to character/setting etc.</p> <p>Table 2 on p.19 includes the name of the building and its location; the table is listed in alphabetical order by building name. However, the associated maps at Appendix 1 are shown by location only. I note that the individual sites at Appendix 1 are numbered...would it be better to list the table by settlement/location and also include the numbering system within the table, for ease of cross-reference and clarification?</p>	Yes

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	<p data-bbox="293 469 427 496">Para 6.10</p> <p data-bbox="331 564 389 592">SP4</p> <p data-bbox="331 1378 389 1406">SP5</p>	<p data-bbox="488 272 1845 432">There are 29 individual buildings/locations listed at Table 2 but there are only 24 sites shown on the maps at Appendix 1. Some research appears to indicate that The Moat House, Little Ragley, The Old Forge, The Old Vicarage and Hawkfield are missing from the maps. Additionally, some buildings have been marked on the map in an incorrect location (i.e. sites 9, 14 and 22). Therefore, there is inconsistency and confusion over the presentation of the data.</p> <p data-bbox="488 469 1845 528">There is no summary of reasons for identifying each of these buildings as locally important contained in Appendix 1, as stated.</p> <p data-bbox="488 564 1809 624">The requirement to exceed national standards may be contrary to national planning policy and the imposition of national standards.</p> <p data-bbox="488 660 1854 751">Criterion (a) includes a reference to 'measures' to reduce and adapt to the impacts of climate change. A definition of what measure is needed, either in the policy or in its explanation. This will enable the applicant to understand how to comply with the policy.</p> <p data-bbox="488 788 1868 1342">Criterion (c) seeks to include measures to reduce energy consumption or provide energy from renewable or low carbon sources. Following the Government's Housing Standards Review, these issues will not be covered by planning, but will be dealt with by Building Regulations. In March this year, the Government announced new housing standards which will deal with energy, water and access. This is in order to streamline the approach to housing sustainability standards, by replacing the numerous voluntary imposed by LPA across the country. As a result, it has phased out sustainability standards for housing such as the Code for Sustainable Homes and Life time Homes. This also includes Merton Rule style policies, which required a percentage of energy to be generated on-site. Energy and water efficiency measures and access will be covered by Building Regulations, in line with the Government's Zero Homes approach. From 2016, all new homes will have to be built to zero carbon standards. To achieve this requirement, homes will have to be built using higher energy efficiency standards and renewable energy technologies on site, such as solar PV and ground source heat pump. Where it is not possible to achieve all the carbon emissions savings on-site, for development of 10 homes or more, the remaining carbon emission savings may be offset through the Government's allowable solutions. Building Control Part L ` Conservation of Fuel and Power in new dwellings relates to regulated carbon emissions only, i.e. heating and lighting; not unregulated which includes white goods. The policy should be amended to reflect this change.</p> <p data-bbox="488 1378 1861 1437">Policy pretty much repeats Policy CS.9 in the Core Strategy – it would be helpful to incorporate a local perspective.</p>	

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	SP6	<p>The policy duplicates some of the principles set out in Policy CS.3: Sustainable Energy of Stratford District Submission Core Strategy and its proposed modifications. Given that the Core Strategy has been through EiP and it is anticipated that it will be adopted by the Council on Monday 11 July 2016, I consider that the policy is redundant and should be omitted from the Salford Priors NDP. However, if the examiner is minded to retain the policy, I would like to offer the following comments:</p> <p>The NPPF recommends that development plans are positively framed. Development plans are to include positive strategy for low carbon and renewable energy schemes. Paragraph 97 of the NPPF states that policies should be designed to maximise renewable and low carbon energy development, whilst ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.</p> <p>The first paragraph states 'Larger scale renewable energy installations, such as full –sized wind and solar farms should not be supported...'. It is unclear what is meant by full sized or larger. The size of commercial scale wind and solar energy schemes may vary in size. Recommend that the term is deleted and the text is amended to read 'Large scale commercial renewable energy installations, such as wind and solar farms....'</p> <p>There are a number of other issues such as cumulative impact, residential amenity, shadow flicker, direct and reflected light relation to commercial scale wind and solar energy schemes that could be helpfully included in the policy. These are set out in Section 3 'District Resources' Policy CS .3 ,part B and D of the Proposed Core Strategy. Furthermore, the policy could be strengthened by including reference to the Stratford District Renewable Energy Landscape Sensitivity Study (July 2014). The study was produced to assist decision makers in determining applications for the commercial wind and solar energy in our district.</p> <p>The use of word 'minimal' is vague and too subjective and would be difficult for the decision maker to interpret. The requirement in policy criterion c) does not provide information about how the noise levels would be assessed, i.e. does it refer day and night time noise, background noise?</p> <p>Similarly, it would be difficult to assess whether the development proposal's impact on wildlife is minimal as required by criterion e). The policy should be reworded to provide further clarity of these policy issues.</p> <p>It would be expedient to ensure that the policy includes a requirement for supporting information, which assesses the extent of environmental effects of any proposal and how they can be satisfactorily mitigated.</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
	<p data-bbox="331 240 387 264">SP7</p> <p data-bbox="331 922 387 946">SP8</p> <p data-bbox="331 986 387 1010">SP9</p> <p data-bbox="322 1347 396 1370">SP10</p>	<p data-bbox="486 240 1823 363">Core Strategy approach does not provide for dwellings in Rushford/Pitchill and Abbots Salford other than to meet a local need. A NDP can propose development in other locations to that specified by a Local Plan/Core Strategy but there should be clear justification for doing so based on local circumstances.</p> <p data-bbox="486 403 1854 560">With 60 dwellings already committed in Salford Priors, it is uncertain why a further large site on School Road for 60 units is being promoted in the NP as this would exceed significantly the scale of housing expected in the LSV according to Policy CS.16 as proposed to be modified, i.e. no more than around 84 dwellings. Having said that, it is a matter of local choice if the community seeks to plan for a scale of development above that given in the Core Strategy.</p> <p data-bbox="486 600 1861 691">There is no reference to a settlement boundary for Salford Priors. Should this be defined and indicated on a map? Outside such a boundary, there will only be scope for "rural exception housing" (i.e. local needs schemes) falling within Part 6 of Core Strategy Policy CS.15.</p> <p data-bbox="486 730 1854 788">Each allocated site quotes a number of dwellings. Should each state 'up to...' or approximately...' since the sites may be able to accommodate more than the quoted figure.</p> <p data-bbox="486 828 1805 885">General – There is no justification or explanation for the Policy. Is there evidence to show that the quoted sites are deliverable?</p> <p data-bbox="486 925 1787 949">Criterion d) What is the reasoning/justification for providing parking for some existing dwellings?</p> <p data-bbox="486 989 1832 1080">Criterion d) The phasing plan is very prescriptive although it is reasonable to expect development of the site and off-site works to take place concurrently. It is unclear whether points 3 and 5 of Phase One of the Phasing Plan can be achieved within public highway or on land controlled by site owner.</p> <p data-bbox="486 1120 1861 1211">Criterion e) 3 hectares is a large area for a village green. Is this correct? What is the justification for such a large tract of land to be put to this use? What land does it refer to (i.e. is there a preferred site in/adjacent to the village)? Does it need to be mapped?</p> <p data-bbox="486 1251 1850 1308">The final paragraph beginning "The allocation does not affect..." reads more like explanatory text, not policy.</p> <p data-bbox="486 1348 1839 1439">There could be difficulties in identifying certain sites in hamlets that are not restricted to meeting a local need (see comment on Policy SP7 above) but restricting all other sites in this way. There needs to be clear evidence put forward to justify this approach.</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>Whilst welcoming the possibility of rural 'exception' schemes, over and above whatever site-specific allocations may be included in this Plan, There is a need identified in the 2008 Housing Needs Survey commissioned by the Parish Council which remains unmet. In order to gain the confidence of Registered Providers, there will need to be an express commitment to support specific schemes on named sites. Is a more up-to-date Housing Needs Survey required to underpin evidence for such proposals?</p> <p>General – There is no justification or explanation for the Policy.</p>	
	SP11	<p>Setting a maximum of 20 dwellings per hectare (dph) is a very low density and does not necessarily reflect rural character. There needs to be clear evidence put forward to justify this approach.</p> <p>This Policy should clarify whether this is a gross or net figure. Accompanying text may be required to justify why 20 dph is the appropriate figure. Is it intended that this policy would apply to replacement or single dwellings? Is the figure appropriate in such circumstances?</p>	
	SP13	<p>Is Policy SP13 unduly strict and would it have the unintended consequence of seeing applications for demolition and rebuild as opposed to conversion? As such, if Policy SP13 remains in its current form, does the NDP need to include a policy against the demolition of existing buildings?</p>	
	SP14	<p>The wording of this policy may need to be clarified or strengthened to prevent circumstances where a tree/hedgerow was substantially cut down but left in situ, which would comply with the letter of this policy but not its overriding objective.</p> <p>Is it reasonable to require replacement if there are genuine safety reasons for removal? There is no obligation to replace trees/hedgerows unless they are protected.</p> <p>Can this policy legally be implemented? How will suitable alternative locations be found, particularly if the trees cannot be replaced elsewhere onsite, and additional land is in third party ownership? How would this policy be enforced to ensure replacement trees/hedgerows were planted?</p> <p>Is Table 5 necessary if Policy SP14 applies to all trees? What additional protection does a locally important identification bring? Perhaps Policy SP14 could encourage the protection of all trees/hedgerows where appropriate and actively prevent loss of those locally important trees listed in Table 5.</p>	
	SP14 Table 5	<p>These trees need to be shown on a map to avoid any potential confusion as to which trees are being referred to. It may also be necessary to provide some context as to why these particular trees have</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>been identified (e.g. local character, rare species locally etc) and to ensure that a consistent methodology has been applied to their identification.</p>	
	SP15	<p>The majority of the parish is classified as Grade 2 agricultural land. It would be helpful to map this classification. Is Grade 3a data available? Notwithstanding this, the implication of this policy is that development on Grade 3b, 4 and 5 land would be acceptable in principle. Would this result in development in locations that may otherwise be unsustainable?</p>	
	SP16	<p>The protection of large tracts of agricultural land in this way is not considered to be lawful. The areas are too far from the communities they serve, they are not demonstrably special or local in character (in accordance with NPPF para 77 – Local Green Space designation).</p> <p>The term ‘open space’ usually refers to land actively used for leisure and recreation e.g. parks and playing fields. It appears that this policy is seeking to designate land better termed ‘areas of restraint’ in order to protect the character of each individual settlement. As such, it may be more appropriate to move this policy under Objective 1.</p> <p>This policy may require justification to ensure that the land has been identified through a consistent and robust methodology in a supporting document. Reasons should be given as to why each particular site has been included – why is it important that this particular land is protected from development?</p>	
	SP17	<p>This policy would be stronger if it used the wording of, and complied with, paragraphs 76 and 77 of the NPPF regarding Local Green Space.</p> <p>The Pool by Worcester Meadows Special Area of Protection (SAoP) lies within a Protected Open Space in Policy SP16 (Area A) so has duplicative protection. Also, part of pasture land (Area B) in Gerrard Close Pond SAoP has planning permission for residential development (see 14/01126/OUT).</p> <p>Is there evidence to show other sites and how they were assessed/rejected?</p>	
	SP19	<p>Policy SP19 is missing from the NDP.</p>	
	SP20	<p>The second sentence needs more consideration as accessibility for all users will not always be appropriate. Suggested amended wording: “Where proposals include new routes these should provide direct, legible connections to the existing network of routes, with clear signposting when necessary, and appropriate levels of accessibility”.</p>	
	SP22	<p>The car parking standards specified within the Policy are too prescriptive and are unlikely to be</p>	

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		<p>enforceable. Any policy on car parking should be consistent with Core Strategy policy CS.25C.</p>	
	SP24	<p>A 12 month marketing period to demonstrate a site is no longer viable as an employment site may be unreasonably long in some circumstances.</p> <p>Second paragraph – amend to read “Small-scale proposals for new employment opportunities...”. Consideration should be given to what is meant by ‘small-scale’ in terms of assessing appropriateness of overall scale of development. This definition should be included within the Policy.</p>	
	SP26	<p>This policy doesn’t add much to Policy CS.21 in the Core Strategy. Also, there is a policy distinction between sites within a Local Service Village and other locations, in that new build dwellings are acceptable in the former so there isn’t a policy preference towards conversion of existing buildings.</p> <p>There is a difference between live/work units and homeworking, in that live/work units will invariably require planning permission for either conversion or new build, whereas homeworking can be operating a business out of a room in an existing dwelling, not necessarily triggering the need for ‘change of use’. Does homeworking need to be mentioned?</p>	
	SP27	<p>The approach of this policy is similar to that taken in the Vale of Evesham Control Zone in Policy COM.11A in District Local Plan and Policy CS.14 in emerging Core Strategy. Only land south of A46 in the Neighbourhood Plan area lies within the Control Zone and there is no justification for applying this approach over the rest of NP area, particularly as various A and B class roads run through it.</p> <p>Criterion b) An existing business should not have to demonstrate that they have looked at the possibility of wholly relocating before having the opportunity to expand on their existing site.</p>	
	SP28	<p>Criterion c) encourages formal recreation proposals that would not require ‘large’ new buildings. Not entirely sure how this can be defined. Is this policy too restrictive as drafted? Should consideration be given to the possibility of new infrastructure in appropriate circumstances?</p>	
	SP30	<p>The aim of Policy SP30 is acknowledged although it is queried how the second half of this policy would work in practice. In a physical sense, allocated site SP7/8 will unite the two halves of the village and resolve this policy objective. How could other sites, unless they too were located in the same vicinity achieve this objective? Would deleting “to unite the two halves of the village” be more appropriate?</p> <p>As written, this is not a ‘land use’ based policy and is more aspirational in nature. Therefore, it will need to be put in a separate section of the Plan, since non-land use based policies are not examined against the Basic Conditions.</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
	<p data-bbox="327 272 394 296">SP32</p> <p data-bbox="282 564 439 588">Appendix 3</p> <p data-bbox="282 1214 439 1238">Appendix 4</p>	<p data-bbox="488 272 1771 328">The community should seek protection of these buildings under the Assets of Community Value Regulations 2012, as set out in part 5 of the Localism Act 2011.</p> <p data-bbox="488 368 1872 456">This policy may wish to include the ability for the loss of an existing community asset site provided the asset can be relocated elsewhere on an appropriately located site and provided that the replacement provision is of the same or better quantity or quality (akin to Policy SP35(a)).</p> <p data-bbox="488 496 1088 520">It would also be helpful to map these assets.</p> <p data-bbox="488 560 1794 616">The list of design principles are prescriptive and numerous. As such, these guidelines may be too onerous if the building in question is not a listed building.</p> <p data-bbox="488 655 1805 711">Criterion 5) requires previous alterations to the building deemed 'unacceptable' (by whom?) to be removed and replaced through the current proposal. It is not reasonable to insist upon this.</p> <p data-bbox="488 751 1827 871">Criterion 18) states that any sub-division of a large internal space will not be appropriate. However, there may be circumstances where this is appropriate (i.e. in order to create bedrooms at first floor level in a barn). It would be worth talking this through with a Conservation Officer to ascertain whether this criterion is acceptable.</p> <p data-bbox="488 911 1827 1174">Criterion 27 states that garaging must be met within the original building. This is onerous and impractical. By looking to comply with all other design criterion (relating to use of existing openings for example) there may not be opportunity to include a garage within the original structure. Attempting to 'shoehorn' a garage into a traditional barn may appear incongruous and destroy the character and appearance of the building, thus failing to uphold many of the other design criterion listed. The most appropriate solution may be the construction of a 'cart shed' style garage/storage building within the designated curtilage, which would complement the building. As such, these two criteria require re-thinking.</p> <p data-bbox="488 1214 1850 1302">The maps included are poor. They are difficult to interpret due to lack of detail/helpful features in order to confirm where they are (i.e. no buildings shown). There are many areas of different coloured shading on each map with no key to explain their significance.</p> <p data-bbox="488 1342 1850 1461">There is no explanation as to why these particular sites are of importance and are included within the Plan. Have they been chosen from a shortlist? If so, what is the list and who has provided it? What were the criteria for choosing these sites? Have WCC Ecology been contacted to provide advice/justification for including them? This section needs to be considered in more detail and provide</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		both evidence/justification and better maps.	
SPNP18	SP2 SP4 SP6 SP11 SP16 SP18	Any replacement building should only be allowed if it shows the highest possible standards of design and construction, whilst at the same time blending in with the local environment. Any development within the expected flood plain should only be allowed in exceptional circumstances. The use of turbines at any major weirs should be considered. Housing, other than affordable, should not exceed 16 per hectare. Development on such areas should only occur as a last resort. The ability for small unpowered craft such as canoes to navigate towards the Avon from approved launching points should be considered as part of the informal usage policy for recreational activities.	Not indicated
SPNP19	SP1 SP9 SP11 SP16	I FULLY agree with the policy. It is a great plan for the area and will 'draw together' the 2 ends of the Village and fill the gap. It is entirely what is needed. New housing on the Orchard farm site, and MOST importantly protecting the open space between Tothall Lane and the B4088 which Warwickshire County Council (WCC) wants to destroy with a quarry in an area that is peaceful, abundant with wildlife and where people live. This is VITAL to the sustainability of the Village. The School needs to be protected from falling numbers of new pupils, and the misconceived quarry proposed by WCC will kill the village of Salford Priors in one fell swoop. Depends. The Orchard Farm proposal goes for more than 20, so given the space there it should be fine. ABSOLUTELY..... AND NO Quarry from WCC.	Not indicated
SPNP20	Whole Document	Supports all policies within the NDP – No further comments expressed.	Not indicated
SPNP21	SP1 SP3	I would like to be reassured that all policies apply equally to all areas of the parish. The outlying settlements have a tendency to be ignored in some village plans. I recognise that mineral policies are the responsibility of County, but in this instance the potential implications of large scale future sand and gravel operations far outweigh the extensions of the areas of housing development, Moreover, the current local environment of the parish has already experienced visual and environmental damage from existing incomplete restoration operations, but	Not indicated

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		this is not mentioned.	
	SP4	Climate change has a wide range of implications for everyone, and the Climate Change Act makes it imperative that we accept our need to act locally to reduce carbon emissions, and also to cope with the consequences that we are starting to see now. In relation to flood prevention, it is not only the implications for the Avon floodplain and immediate areas around housing of which we need to be aware. The removal of large volumes of sand and gravel from the catchment areas immediately around the Ban Brook and County Brook, will increase both their potential for experiencing floods and damaging low flows. The ecological implications of that are significant, as well as the propagation of impacts downstream. SUDS, both in new developments and as retrofit, can make a contribution to addressing some of the local challenges, and can bring other benefits too if properly designed. Water, energy and waste need to be managed concurrently. In the new housing there are possibilities for making genuine and significant contributions to this agenda. Energy can be recovered from waste water, as heat or chemically by AD and similar. Ground source heat pumps can become standard. Grey water can be cleansed and reused locally.	
	SP5	The potential implications of a new sand and gravel operation are significant for road safety, and footpaths as well as visual amenity.	
	SP7	This seems logical.	
	SP9	This is an opportunity to provide housing and other facilities that can genuinely unite the village and develop a sense of core. The village green element could include a pond, as a focal point that is entirely consistent with English villages and would bring ecological benefits and amenity. Water in the landscape can be a key component in maintaining individual health, encouraging gentle exercise by walking, and providing educational opportunities for children. There is no evidence that well designed ponds create hazards for drowning.	
	SP11	I do not feel that I have sufficient evidence about high density figures to be certain that this is the appropriate threshold. This parish needs young people to choose to live here, and so needs affordable housing. Elsewhere in Europe, high density attractive and sustainable housing is achieved, and I see no reason why this could not be done here too.	
	SP14	The policy seems rather weak, in merely seeking 'retention'. Why can it not be ambitious and seek enhancement? The greatest risk of loss here is mineral development, though, not housing.	
	SP15	However, I do note that current agricultural practices appear to be moving our land and soils further away from sustainability. The loss by erosion of topsoil, excessive use of pesticides and chemical	

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		fertilisers, illegal water abstractions and so on have already damaged agricultural land in this parish. It will take a long time to recover, even if such practices change.	
	SP17	It would be helpful to identify in the Plan for this parish, what considerations would be acceptable and appropriate to 'outweigh' these Green Spaces.	
	SP18	Water can be a wonderful resource in any region. Water enhances biodiversity of plants and animals, and adds to scenic quality. Its presence can contribute to the health of a whole community by providing a focus for informal recreation, and improve the physical and mental wellbeing of its inhabitants, if it is carefully managed and accessible. At present the two small streams that run through our parish are not in the best state ecologically, and have suffered damage from farming in particular. The policy is very loosely worded. I would like to see enhancement of the actual state of water features, not just their retention, and improved access to them as well. We should imagine a world where our children could paddle in streams without risk, and could enjoy pond dipping and 'fishing', and where everyone could walk alongside our streams and ponds and enjoy the beauty of the water. A village pond, designed into the proposed Village Green, would be a huge benefit, but it would need including in phase 1 of the proposed development. It would also have SUDS benefits.	
	SP20	I would like to be certain that the proposals also paid attention to the areas around the smaller settlements around the main built up area of the village. We too would like access to cycle routes, footpaths (towards Bevington, statutory footpaths are ploughed out and custom and practice rights of way over decades have been locked off, for instance).	
	SP21	Again, the gravel proposals are the greatest risk to road safety of all users.	
	SP24	Again, the gravel proposals offer the greatest challenge to achieving this outcome.	
	SP30	The proposal to create a village centre with a visual and functional focus would be very welcome.	
	SP31	An opportunity was lost when the Memorial Hall was converted many years ago. The conversion offered certain advantages, but was insufficiently ambitious, and over-constrained by sentiment (in my view) about the original building. After the rebuilding, it became almost impossible to have a decent drama group or concerts for instance, because the provision for the stage was so reduced. And the height of the roof is too low to allow indoor sports activities that might appeal to younger users such as badminton or volleyball. I also think now that the new proposals are again too limited in scope. The TOPS building is a pretty horrible thing, with limited uses. Why could we not aspire, in a growing and 'younger' village, to something really good, not just 'retention' of the current facilities...? Yes, there are financial issues, but new development could bring Section 106 agreements.	

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	SP34	I am not sure why some of the listed ones are 'essential' and others not, and why this listing is appropriate for a Local Plan. Policing, for instance, is not a parish level responsibility. Sports facilities (tennis court, badminton, volleyball etc) could be.	
	SP35	Again, we seem only to be aspiring to 'retention' In the initial opening part of the sentence, not 'enhancement'. It's too limited. A well-designed village pond on the new village green, with recreational opportunities for pond dipping, seats, walking, and enjoyment of open water, would be excellent.	
SPNP22	SP7	<p>We would like to express our concern over two major points: 1. The addition in the plan of the sites included as a result of the 'Call for Sites'. 2. Protected Open Spaces. In detail:</p> <p>1. The addition in the plan of the sites included as a result of the 'Call for Sites'. Given the Plan's statement (3.12)- "All other settlements in the parish (Abbot's Salford, The Bevingtons, Dunnington, Iron Cross, Pitchill, and Rushford) are considered to be only appropriate for development that is restricted to small-scale community-led schemes which meet a need identified by the local community" - we feel those sites backed by the steering group, after the Call for Sites exercise, should have been, and now should be, appraised and considered by the hamlet communities in which they are situated. We are not saying we are against those sites, but they, and their inclusion in the plan, have not been subjected to the same review and consultation processes that other development sites have rightly enjoyed, for instance Orchard Farm and Evesham Road. We note that Stratford District Council has also raised the issue in its part of the current plan consultation process saying "Core Strategy approach does not provide for dwellings in Rushford/Pitchill and Abbots Salford other than to meet a local need. A NDP can propose development in other locations to that specified by a Local Plan/Core Strategy but there should be clear justification for doing so based on local circumstances." The note from the steering group on our original comments (page 45 of current consultation document) states: "No change. The approach set out in the NDP seeks to provide more housing in the smaller villages/hamlets. This based on sound evidence and community consultation." However, we fail to see any sound evidence or any evidence of meaningful community consultation on the Call for Sites' chosen sites? There certainly was consultation on the site proposals for Orchard Close and Orchard Farm, in Salford Priors, for which the Plan steering group stated (page 12, 4.2 of draft plan): "It was agreed that the same process should be followed as that which was carried out during the previous 'Call for Sites' exercise". However the process appears to have been very different. Unlike the Orchard Farm and Close process, there was no explicit warning that the November 2014 consultation meetings would announce the Call for Sites' chosen sites, either in pre-meeting literature or on Facebook, although on the latter, there were 'sneak peeks' about rural employment and conversion of agricultural building. In addition, according to the Plan consultation document (2.15): "No formal surveys or questionnaires were undertaken. Instead, comments were written down by Steering Group</p>	Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>members and Post- It notes were available for members of the public to leave comments." Meanwhile, the 2015 literature and Facebook posts about Orchard Farm, for instance, made clear what the meetings were about and they were followed by a questionnaire delivered to every house in Salford Priors village, with a team of volunteers deployed to collect and opportunities to reply further augmented by a box in the post office, or " or via email was left after two failed attempts to collect the questionnaire at the door". With specific reference to the site SP7/1, we would like to enquire as to how the local need was identified other than by the comments of the quoted' local resident', who is the owner of the site concerned and therefore may be considered to have a vested interest in its development. The Plan steering group comments "support noted" to the site owner's words: " I have consulted a number of my fellow Rushford residents, and without exception, they are unhesitatingly supportive of the development proposal SP7/1 (for two units land adjacent B4088) defined within the Draft NDP. "The consensus I have gauged within the neighbourhood is that this measured, appropriate and empathetic development would have a most positive impact upon the hamlet. For example, it would serve to bridge the two halves of Rushford to create a potentially safer and united sense of community." However, there is no evidence given of community support, or indeed that Rushford is in two halves. It's a hamlet with a handful of houses in a rural setting, not a linear development. The site in question is just a field between our two houses and our views were certainly not sought. Obviously we have a particular interest in the potential development of that site. So, in fairness to our fellow residents and the site owner, can we suggest a proper, independent survey is carried out to record everyone's views be carried out, in order to identify whether there is a perceived need to develop Rushford and exactly how an infill development in an area that is not built up would "create a potentially safer and united sense of community"? We would suggest similar independent consultations should be carried out on all of the sites selected after the Call for Sites exercise. These meaningful consultations are particularly important, as the draft plan also states those sites' development "will be permitted" and that neighbourhood plans can "grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order. (NPPF, para. 183)".</p> <p>2. Protected Open Spaces The plan states (6.2, policy SP1) that development proposals will be expected to maintain "the distinctive and separate character of each of the seven settlements of the parish, including their settings, spaces and built form". On page 39, table 6 Protected Open Areas, two areas have been put forward: "B. Site runs from the public footpath opposite Salford Hall to the public footpath through Orchard Farm and crosses Evesham Road to the East border. This open space separates Salford Priors from Abbot's Salford" "C. Site runs from Tothall Lane to the B4088. This open space separates Salford Priors from Iron Cross and Dunnington." Given the original ethos, there is not obvious reason why those should be singled out. Surely all the hamlets' distinctive identities and separateness should be similarly protected? When we suggested (see plan comments pages) that similar protection is given to all hamlets, the steering group commented "No change. The policies of</p>	

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	SP10	<p>the plan adequately deal with this issue." However, we cannot find any policies that explain why just Iron Cross, Dunnington and Abbot's Salford have been given the ring of confidence. We feel these policies, and why other hamlets have not similarly been given the opportunity to maintain their separateness, could be explained and evidenced more clearly.</p> <p>As per previous comments: We would like to express our concern over two major points: 1. The addition in the plan of the sites included as a result of the 'Call for Sites'. 2. Protected Open Spaces. In detail:</p> <p>1. The addition in the plan of the sites included as a result of the 'Call for Sites'. Given the Plan's statement (3.12)- "All other settlements in the parish (Abbot's Salford, The Bevingtons, Dunnington, Iron Cross, Pitchill, and Rushford) are considered to be only appropriate for development that is restricted to small-scale community-led schemes which meet a need identified by the local community" - we feel those sites backed by the steering group, after the Call for Sites exercise, should have been, and now should be, appraised and considered by the hamlet communities in which they are situated. We are not saying we are against those sites, but they, and their inclusion in the plan, have not been subjected to the same review and consultation processes that other development sites have rightly enjoyed, for instance Orchard Farm and Evesham Road. We note that Stratford District Council has also raised the issue in its part of the current plan consultation process saying "Core Strategy approach does not provide for dwellings in Rushford/Pitchill and Abbots Salford other than to meet a local need. A NDP can propose development in other locations to that specified by a Local Plan/Core Strategy but there should be clear justification for doing so based on local circumstances." The note from the steering group on our original comments (page 45 of current consultation document) states: "No change. The approach set out in the NDP seeks to provide more housing in the smaller villages/hamlets. This based on sound evidence and community consultation." However, we fail to see any sound evidence or any evidence of meaningful community consultation on the Call for Sites' chosen sites? There certainly was consultation on the site proposals for Orchard Close and Orchard Farm, in Salford Priors, for which the Plan steering group stated (page 12, 4.2 of draft plan): "It was agreed that the same process should be followed as that which was carried out during the previous 'Call for Sites' exercise". However the process appears to have been very different. Unlike the Orchard Farm and Close process, there was no explicit warning that the November 2014 consultation meetings would announce the Call for Sites' chosen sites, either in pre-meeting literature or on Facebook, although on the latter, there were 'sneak peeks' about rural employment and conversion of agricultural building. In addition, according to the Plan consultation document (2.15): "No formal surveys or questionnaires were undertaken. Instead, comments were written down by Steering Group members and Post- It notes were available for members of the public to leave comments." Meanwhile, the 2015 literature and Facebook posts about Orchard Farm, for instance, made clear what the meetings were about and they were followed by a questionnaire delivered to every house in Salford</p>	

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		<p>Priors village, with a team of volunteers deployed to collect and opportunities to reply further augmented by a box in the post office, or " or via email was left after two failed attempts to collect the questionnaire at the door". With specific reference to the site SP7/1, we would like to enquire as to how the local need was identified other than by the comments of the quoted' local resident', who is the owner of the site concerned and therefore may be considered to have a vested interest in its development. The Plan steering group comments "support noted" to the site owner's words: " I have consulted a number of my fellow Rushford residents, and without exception, they are unhesitatingly supportive of the development proposal SP7/1 (for two units land adjacent B4088) defined within the Draft NDP. "The consensus I have gauged within the neighbourhood is that this measured, appropriate and empathetic development would have a most positive impact upon the hamlet. For example, it would serve to bridge the two halves of Rushford to create a potentially safer and united sense of community." However, there is no evidence given of community support, or indeed that Rushford is in two halves. It's a hamlet with a handful of houses in a rural setting, not a linear development. The site in question is just a field between our two houses and our views were certainly not sought. Obviously we have a particular interest in the potential development of that site. So, in fairness to our fellow residents and the site owner, can we suggest a proper, independent survey is carried out to record everyone's views be carried out, in order to identify whether there is a perceived need to develop Rushford and exactly how an infill development in an area that is not built up would "create a potentially safer and united sense of community"? We would suggest similar independent consultations should be carried out on all of the sites selected after the Call for Sites exercise. These meaningful consultations are particularly important, as the draft plan also states those sites' development "will be permitted" and that neighbourhood plans can "grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order. (NPPF, para. 183)".</p> <p>2. Protected Open Spaces The plan states (6.2, policy SP1) that development proposals will be expected to maintain "the distinctive and separate character of each of the seven settlements of the parish, including their settings, spaces and built form". On page 39, table 6 Protected Open Areas, two areas have been put forward: "B. Site runs from the public footpath opposite Salford Hall to the public footpath through Orchard Farm and crosses Evesham Road to the East border. This open space separates Salford Priors from Abbot's Salford" "C. Site runs from Tothall Lane to the B4088. This open space separates Salford Priors from Iron Cross and Dunnington." Given the original ethos, there is not obvious reason why those should be singled out. Surely all the hamlets' distinctive identities and separateness should be similarly protected? When we suggested (see plan comments pages) that similar protection is given to all hamlets, the steering group commented "No change. The policies of the plan adequately deal with this issue." However, we cannot find any policies that explain why just Iron Cross, Dunnington and Abbot's Salford have been given the ring of confidence. We feel these policies, and why other hamlets have not similarly been given the opportunity to maintain their</p>	

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	SP15	<p>our county is proud to have such a business, training over a thousand young people each year and helping them find employment in the catering industry. Cookery School of the Year”, “Britain’s Favourite Cookery School” (voted by the public) and “Best Large Cookery School” are some of the National Awards recently won by the school. The school has invested heavily revitalising and preserving a crumbling listed building and putting it to good use as a bar and as a result has been able to 'contain' its young enthusiastic and rather noisy customers on site, keeping them from disturbing the community as they were prone to in the past when they walked back from the pubs in the village. The siting of the school on a Farm which is separated from the village and neighbours by farmland is one reason the family has been able to invest in the buildings. Had the school been in a location with neighbours it is unlikely they would have relished the thought of up to 74 young people staying up late next to them each night and the school could not have developed in the way it has. For this reason we do not think it wise to develop closer to the school.</p> <p>Developing prime agricultural land is short-sighted. It may not be needed now but in an increasingly unstable world this land may be needed to feed future generations.</p> <p>Whilst a lot of this policy is good and will benefit the community. This Policy appears to have been drafted in such a way that the existing Playing Field (SP35 a) could be being lined up to be sold off and/or developed for more houses, whilst moving its facilities to another site. Is the plan to move facilities to the village centre green intimated in d) above which sounds as if it refers to SP9 - Land at Orchard Farm? If this is the case for the same reasons given I would object to taking away prime agricultural land and to spoiling landscape and heritage, when there are more suitable areas for development.</p>	
SPNP24	SP1 SP2 SP9 SP14	<p>It is vital that within the necessary development of our historic village we maintain both the rural nature of the area and the historic buildings. I believe this plan successfully outlines how to do this.</p> <p>The village has a long historical heritage and one of its great charms is the fact there are well maintained buildings and an unspoiled rural environment. It is vital that despite any necessary developments that this is maintained and I believe that this document lays out a plan for doing that.</p> <p>See previous comments under SP1.</p> <p>This is a well thought through development that will have the dual advantage of providing a centre for the village, a feature that has never existed due to its historic inception, whilst at the same time providing housing for an expansion of the village to prevent its demise in the future.</p> <p>Very important for the preservation of the rural environment and its wildlife.</p>	Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
	<p>SP15</p> <p>SP16</p> <p>SP17</p> <p>SP27</p> <p>SP30</p>	<p>This is a particular problem with a proposal by Warwickshire County Council to develop gravel extraction on much of the agricultural land within the parish and in particular immediately adjacent to the boundaries of the Salford Priors village. This will not only destroy much of the rural environment that previous sections of this report want to protect but will also completely put off any developers mentioned under SP9 as they will not be able to sell the development with extraction sites in the near vicinity.</p> <p>Basically the same comments as under SP15.</p> <p>As comments under SP15.</p> <p>Again very important to maintain the quiet rural atmosphere.</p> <p>This is important to correct the historic development of the village and create the desired socially coherent environment.</p>	
SPNP25	<p>SP7</p> <p>SP9</p> <p>SP11</p> <p>SP16</p> <p>SP25</p> <p>SP34</p>	<p>We support most of this however object on the grounds of based upon land banking with the infills proposed and the existing 60 at the Alamo why do we need another 60 at orchard farm. It is unfortunate that we are unable to partially vote. We accept that we have to take infill properties however the 60 at orchard farms is well in excess of our land banking requirement.</p> <p>Why do we need an additional 60 above and beyond Alamo?</p> <p>Density still way too high for rural street scene.</p> <p>However Why have the urban open spaces within the village not been selected to be protected?</p> <p>No solar panels or windfarms.</p> <p>Yes support but is this ongoing to contribute to the parish funds?</p>	Not indicated
SPNP26	Whole document	Supports all policies within the NDP – No further comments expressed.	Not indicated
SPNP27	<p>SP1</p> <p>SP7</p> <p>SP8</p>	<p>This policy is particularly important to local residents. The historic environment of the area is key to the quality and character of the parish.</p> <p>The policy allows a good amount of development within the parish without destroying the historic character and infringing on listed buildings and sites of historic importance and interest.</p> <p>This is a reasonable sized development that will fit in with the surrounding area without infringing on</p>	Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
	SP16	the conservation area or buildings and sites of historic interest detrimentally. This policy is particularly important to the area.	
SPNP28	Whole document	Supports all policies within the NDP – No further comments expressed.	Not indicated
SPNP29	SP1 SP2 SP3 SP5 SP6 SP7 SP9 SP11 SP30	<p>Serious attention has been given in the Plan to preserve, enhance and protect the history, character and identity of the Parish.</p> <p>I completely agree with points all points made in Policy SP2.</p> <p>If approved, the conditions submitted in Policy SP3 will offer important and necessary protection to the Rural Character and Environment of Salford Priors.</p> <p>We do not have to travel far to witness ugly and inappropriate development. Policy SP5 is important.</p> <p>Whilst acknowledging the need for sustainable, renewable energy, the conditions suggested in SP6 are sensible.</p> <p>Salford Priors has not turned its back on new housing development. The schemes listed are both sensible and achievable. The sites suggested in SP7, together with the SDC approved development on land adjacent to the Alamo factory site, will see new homes growth of more than 140 units.</p> <p>The idea of homes developed around a newly created Village Green is interesting. It is also a good example of the community working with the land owner in order to create a scheme that truly benefits the village.</p> <p>I support building density restrictions. SP11 however may need greater controls.</p> <p>The development described earlier at Orchard Farm for homes and a Village Green could do much to encourage a more integrated community.</p>	Not indicated
SPNP30	SP1 SP2 SP4 SP5	<p>This will help preserve property character in the Parish.</p> <p>Provides contingency for dangerous or outdated buildings.</p> <p>Guidance to exceed minimum standard of sustainability is a form of 'succession planning' for development.</p> <p>Again gives a framework to character and style that is preferable in an extending village circumstance.</p>	Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
	SP6	Gives protection to the community and countryside whilst not forbidding appropriate installations.	
	SP9	Beneficial development. Offering properties in excess of minimum demanded shows a willingness to change and avoid possible stagnation. Forward looking.	
	SP10	Village and Hamlet style retention, whilst allowing internal development, not disconnected, external dormitory style mini hamlets.	
	SP11	Character retention to deter over-development that is out of character.	
	SP12	Exceeds minimum criteria for affordable housing, enabling local people to enter the property market as buyers or renters.	
	SP13	Good permissible use of otherwise derelict or v. difficult to maintain buildings.	
	SP22	Will design reduced congestion. Exceeds present standard and aims to reduce street congestion in new build areas where the industry standard is 1.5 car parking places to each property.	
	SP24	Aims to support appropriate styles of rural industrial development and supports local business and economy.	
	SP25	Encourages diversification and may enable survival of local businesses.	
	SP26	Life/work balance encouraged by this policy.	
	SP27	Looks to defend communities from excessive heavy traffic.	
	SP29	Encourages local mini-business and good for local economy/jobs.	
	SP30	Community Cohesion is actively supported through policy.	
	SP31	Developing existing community buildings is worthwhile.	
	SP32	I believe the time-scale should be extended from 12 to 24 months.	
	SP33	Self-explanatory and beneficial.	

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	SP34	Standard and expected.	
	SP35	Retention, development and expansion of community assets helps sustain the Neighbourhood and parish.	
SPNP31	SP9	<p>I am writing on behalf of Salford Priors Against Gravel Extraction (SPAGE) to declare our support for the Salford Priors NDP. SPAGE represents a large number of residents in the Salford Priors area who are objecting to Warwickshire County Council's desire to position a quarry in this area.</p> <p>We currently have a petition of over 1,000 signatories that was submitted against WCCs Minerals Plan 2017-2032 Site 7 in Salford Priors. As part of this canvassing we have made our neighbours and community aware of the NDP and in particular the proposal to develop the Orchard Farm site in particular. The over whelming feedback was that it should act as bringing the two ends of the settlement together and add to its sense of community and give a feel of cohesiveness. The fact that the local population have been involved in the NDP process and voted in favour of it is heartening.</p> <p>While strongly advocating the NDP, SPAGE believes that Site 7 in Salford Priors will undermine the NDP. The quarry will be in very close proximity to the Orchard Farm site. Besides the environmental and health issues, we believe it will present to future residents the success of the project must surely also rest on the ability of the developers to sell the majority of the new builds on the open market. This begs the question of whether people will want to buy a house next to a quarry site that will take years to complete. We see the main aim of the NDP as engaging and listening to the community about future development. Given the strong opposition to a quarry from the community we believe that the proposed Site 7 at Salford Priors undermines the NDP.</p>	Not Indicated

SPNP17* - Comments originally forwarded to the PC/NDP Steering Group at Regulation 14 (pre-submission) Consultation.