

Bidford-on-Avon Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

Rep. No.	Policy	Representation	Reg.19 Request?
BNP01	Whole Document	<p>Thank you for the invitation to comment on the regulation 16 Neighbourhood Plan. Our comments remain substantively the same as those expressed in our earlier correspondence (29 October 2015) that is:</p> <p><i>"Thank you for the invitation to comment on the draft Neighbourhood Plan. Historic England are supportive of the content of the document, particularly its' emphasis on the maintenance of rural character and the commitment to resist development on green field sites. Given that the historic settlement core is largely comprised of designated heritage assets including the conservation area we consider the Plan takes a suitably proportionate approach to the historic environment of the Parish".</i></p> <p>Beyond these observations we have no other substantive comments to make. I hope this is helpful.</p>	Not indicated
BNP02	Whole Document	Natural England does not have any further comments on this draft neighbourhood plan.	Not indicated
BNP03	p.5 Footer	There are 5 documents referenced in the footer, but only one of them is indicated in the above text. There is a mismatch between the references in the text and in the associated footer e.g. page 11.	Not indicated
	Para 3.11	These definitions would prevent people who have moved away from the village (work / family etc) from returning to live in these properties? Could include a definition that covers individuals with a proved historical connection to the village who wish to return? (they were born / brought up there but have no living relatives?)	
	Policy ENV4	The sentence "Where site conditions are proven to be unfavourable or unfeasible, an alternative drainage solution will need to be agreed by the council and the relevant water authority." Could be removed, this is implied in the first sentence. Whilst I'm sure it is not intended this way, the sentence could be interpreted as a 'get out clause'? There is always a way to include some form of SuDS within a scheme.	
	Policy ENV5	The word 'foul' could be removed from this sentence? Improvements by a developer to the surface water or highway drainage systems could reduce foul flooding (by reducing surface water flows into the foul system). Including the word 'foul' may limit the scope of works that could be negotiated with future developers; or at least limit the solutions they will propose in their designs?	
	Para 5.24	Change the word "green" to "blue-green"? This may encourage a developer to provide larger corridors	

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	<p>Appendix 1</p> <p>Maps</p> <p>Blank Pages</p>	<p>which create enhancements for the environment, amenity and make space for water?</p> <p>The final paragraph refers to the table below, there is no table; unless it is a reference to the table on page 76? In which case it should probably state so as this is a look way through the document to look for the table!</p> <p>These 'Maps' pages do not have page numbers, s this intentional?</p> <p>If both of these pages were omitted, the back cover would print on the back of the last page (81) when printing double sided and it would save two pages of printing if printed single sided.</p>	
BNP04	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 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</p>	Not indicated

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		<p>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>	
BNP05	Whole Document	No comments.	Not indicated
BNP06	Whole Document	Having reviewed your document, I confirm that we have no specific comments to make on it.	Not indicated
BNP07	Whole Document	<p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution’s Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p><u>Gas Distribution – Low / Medium Pressure</u> Whilst there is no implications for National Grid Gas Distribution’s Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com</p>	Not indicated
BNP08	<p>Para 1.14</p> <p>Para 1.17</p> <p>Strategic Objectives</p> <p>Policy H1</p> <p>Policy H2</p>	<p>We note that it is claimed that account has been taken of SDC’s emerging Core Strategy: this is not the same as being in general conformity with the CS.</p> <p>We do not believe that the NDP includes policies to meet the need for specialist types of housing, for example housing for the elderly.</p> <p>Housing - We support the objective to provide a sufficient supply and mix of housing to meet the needs of the community, but are concerned that the proposed policies will not lead to this objective being fulfilled.</p> <p>The proposed built-up area is no longer relevant having regard to the recent planning permissions to the north and south west of the village. The new boundary should reflect the extent of these developments.</p> <p>We support this policy but the need for affordable housing is so great that allocations should be made</p>	Not indicated

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	<p>Policy H3</p> <p>Policy AM1</p> <p>Policy AM4</p>	<p>to enable more affordable housing to be delivered.</p> <p>The percentages can only be applied as a guide, particularly with reference to smaller sites. This should be made clear in the Policy. We are concerned that the Policy falls short in its promotion of housing for the elderly. We note what para. 3.14 (referring to the SHMA) says about a need for the provision of small market bungalows in light of the ageing population. In the Neighbourhood Plan Survey 53% wished to see bungalows built, 32% wished to see residential care and 31% wished to see housing suitable for the disabled. These are high proportions and these need to be reflected in a Policy and a Proposed Allocation. The recent planning permissions make no provision for these house types: our client's site (see attached plan) should be allocated in the NP so that provision for up to 23 bungalows, both market and affordable, for the over-55's can be built to meet an identified need.</p> <p>The second sentence of this Policy is far too vague and should be removed.</p> <p>We object to the whole of the Chestnut Way site as being designated as Local Green Space as to do so would prevent identified development needs being met, i.e. bungalows for the elderly. We object to the wording of the penultimate sentence in the Policy. Using the term "very special circumstances" is inappropriate as this has a special meaning when dealing with the Green Belt. We suggest the following wording:</p> <p><i>There will be a general presumption against development which harms the character of the Local Green Space. Where development does take place, commensurate provision will be made in the form of land elsewhere in the village or an equivalent commuted sum.</i></p>	
BNP09	General comments	<p>RPS is instructed to prepare and submit these representations on behalf of its client Miller Homes. The Parish Council will be aware of RPS involvement on behalf of Miller Homes, having made representations to earlier versions of the NDP. RPS (Paul Hill) has also met with several members of the Parish Council having attended and spoken at previous committee meetings in relation to Miller Homes land interests Between Waterloo Road and Victoria Road.</p> <p>The NDP is in the fortunate position that it now benefits from an adopted district level plan. The Stratford-on-Avon District Core Strategy (SDCS) was adopted by Stratford's Council on 11 July 2016, serving as the principal planning document guiding future development in the District.</p> <p>RPS has observed a number of changes which have been made to the NDP since the Pre-Submission plan in September 2015, for which RPS prepared comments for Miller Homes. It is considered that these representations complement those submissions and will be considered as part of the Examination of the NDP.</p> <p>The Parish Council will be aware of the recent planning appeal determined in the village (Land at</p>	Not indicated

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		<p>Waterloo Road, APP/J3720/W/15/3089709) which was allowed on 20 June 2016 for 200 dwellings, access and associated infrastructure at Waterloo Road.</p> <p>This site was previously identified in an earlier version of the NP (dated 24 September 2015), as part of Policy H2: Strategic Reserves for Future Need, where it was included as a strategic reserve site for up to 100 dwellings. RPS, was however, subsequently advised on 29th March 2016, following the close of the Public Inquiry sessions into the appeal, by Avon Planning Services representing the Parish Council that the Parish Council as Qualifying Body as withdrawn Policy H2 from the draft NDP, citing potential impacts on the Minerals Safeguarded Areas and Grade 2 Agricultural land.</p> <p>The Parish Council will be aware of the appeal decision from Inspector Sproule (20 June 2016) and in particular paragraphs 103 and 104, where in approving the appeal, the Inspector gave limited weight to the views of Avon Planning Services on minerals safeguarding and agricultural land quality. Given these observations and approval of Millers site for 200 dwellings, the site needs to be re-instated in the NDP as a housing commitment on the map on page 78. Additionally and critically, the NDP landscape evidence base, which forms Appendix 2 (Landscape Character Assessment) needs to be re-considered in light of this decision. If it assists the Parish Council, RPS would be prepared to send a copy of its detailed Landscape and Visual Impact Assessment, which not only considered the site, but also the wider context of Bidford.</p> <p>In addition to the above, the following comments on the specific polices in the June 2016 consultation are provided below:</p> <p>Policy H1 It is proposed that the village boundary is redrawn to reflect the most up-to-date map of housing and employment commitments in the village. Specifically, this should reflect the inclusion of Land at Waterloo Road within the committed supply of development at Bidford.</p> <p>Policy H3 Though the principle of this policy has not changed, there has been a shift in the proportions of market and affordable housing proposed under this policy. The NDP has been drafted against evidence prepared by Stratford-on-Avon District Council, noting that it will be flexible to respond to future housing mix evidence.</p> <p>The timing of the consultation was perhaps unfortunate here, though shortly before the NDP was published, the District Council adopted the SDCS along with Main Modifications needed to make the Plan sound. In particular, Main Modification 18 adopted by the Council deals specifically with housing mix in the District. This proposes a different mix than proposed in the NDP for both market and affordable housing.</p>	

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	Policy ECON3	<p>For the NDP to be found sound, it needs to offer the flexibility to respond to local housing market conditions. The strategic policies offered within the SDCS should be used as a starting point, however Policy H3 should reflect the need for local marketing advice which should be undertaken on a site by site basis to ensure that the right mix for each new development is proposed.</p> <p>Access to high speed broadband is something that consideration has been given to within the SDCS. This is building upon the Government's goal to roll out high speed broadband to the whole country. This policy will largely be achieved through the wider strategic aims of the Core Strategy and the national programme to upgrade the broadband infrastructure area in the District. Support should also be given to the ability for broadband infrastructure to be provided via telephone line or cabling. RPS is not aware of evidence provided by the Parish Council to demonstrate that all new developments can secure high speed broadband. The policy should therefore be amended to require new developments to explore the potential for including high speed broadband, as opposed to including it.</p>	
	Policy ECON6	<p>The policy includes a strong mandate for every new property to include a 'flexible' space, suitable to adapt into a home office. RPS previously made submissions relating to this policy, challenging the NDP to define what was meant by a 'flexible space'. Such a definition offers no certainty that the policy can be reasonably delivered and it is not yet known whether the NDP proposes details which may frustrate the delivery of development in the NDP area. The policy should be re-drafted accordingly.</p>	
	Policy ENV1	<p>Similar to the wording of ECON6, this policy lacks definition and fails to be implementable. The policy offers no justification as to what energy efficient means and why the policy seeks to go beyond the current national standards, implied by the phrase 'maximised'.</p> <p>As part of the Main Modifications to Core Strategy Policy CS2, the Council has included reference to developments reducing energy demand through energy efficiency measures (Main Modification 8 refers). The evidence behind this policy has been thoroughly tested and appear to fulfil the aims of the NDP policy. The second paragraph of this policy should be removed from this policy, as this is adequately covered by Core Strategy Policy CS2.</p>	
	Policy ENV4	<p>The principles behind this policy are broadly supported, which aim to minimise the risk of flooding and reduce the impact on the existing infrastructure.</p> <p>There is however, some concern over the recent introduction of text within this policy relating to water efficiency measures beyond BREEAM 'good' standards. No evidence has been provided as part of the NDP to demonstrate that this is achievable. The Parish Council should be mindful of Main Modification 5 to the SDCS, which sets out that all residential development should incorporate water efficiency measures in line with Building Regulations. This is considered a more reasoned approach which the</p>	

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	<p data-bbox="277 300 443 331">Policy ENV7</p> <p data-bbox="277 790 443 821">Policy ENV9</p> <p data-bbox="277 1342 443 1374">Policy AM5</p>	<p data-bbox="488 236 1541 268">NDP should mirror to be in consistency with the strategic policies in the SDCS.</p> <p data-bbox="488 300 1839 432">The policy makes reference to the protection of important features which contribute towards the distinctive character of Bidford identified in the Bidford on Avon Landscape Character Assessment (February 2016). The document available on the Parish Council's website refers to the 'Final Report', published March 2016, which is appended to the NDP.</p> <p data-bbox="488 464 1854 528">Figure 1 of the March 2016 publication refers to six Parish Landscape Character Areas defined outside of the village boundary proposed as part of Policy H1.</p> <p data-bbox="488 560 1854 756">Whilst this is published as a final report, the document excludes a chapter relating to landscape area PLCA:B (Bidford on Avon Northern Terrace Farmlands). This area covers much of the area covered by the recently approved site at Waterloo Road. It is unclear why the Parish Council has published a partially complete evidence base document, though in the interests of consistency, Figure 1 of the Landscape Character Assessment and the supporting text should be amended to include reflect recently committed development, excluding these areas from the study's area of search.</p> <p data-bbox="488 788 1868 952">The policy requires that all development must demonstrate how local character has been accounted for during the conception and evolution of design. Though the NDP does not include a character design guide, it is the case that larger schemes will include Design and Access statements that do just this. It may become more difficult for smaller developers and particularly self-builders who may find this difficult to justify without any clear guidance supporting the NDP.</p> <p data-bbox="488 984 1872 1181">Within the supporting text of the policy, reference is made to materials of local character being informed by 'materials of local origin'. Whilst this clearly will have been the case in the older properties in the Parish, it may not be the case for a number of more recent properties. The NDP needs to be careful here, as without clear guidance it is suggesting a link between local character and local materials, which may not always be practical or feasible. Additionally, this may also have cost implications for development which has not been considered as part of the NDP.</p> <p data-bbox="488 1212 1839 1308">It is therefore proposed that references to 'materials of local origin' is removed from the explanation supporting Policy ENV9, replaced with text supporting new development that is in keeping with the existing character of the village.</p> <p data-bbox="488 1340 1868 1404">The principles of this policy are generally supported, which favours the retention of existing allotments and the promotion of new publicly accessible areas to grow local produce.</p> <p data-bbox="488 1436 1861 1468">RPS does raise concern in relation to the last clause of this policy, which includes a requirement for all</p>	

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	Policy AM6	<p>new developments of 3 beds or more to include private gardens of a minimum of 10.5m long gardens to allow for home growing. This is an onerous stipulation which has no policy grounding. There are no national size requirements for gardens and the inclusion of such a requirement may affect the viability of the site and its ability to deliver a number of key benefits including affordable housing and may not be achievable or desirable in all instances.</p> <p>The purpose of allotments, like any other form of public provision, is to ensure choice and opportunity of open spaces. This is why an area for potential allotments and an orchard has been set within the now approved development in Land West of Waterloo Road. This provision is considered appropriate to meet the need arising from the development in addition assisting with existing need. As detailed in the Illustrative Masterplan submitted with the planning application for Land at Waterloo Road, there would be range of garden sizes which will allow residents the choice to use the garden for different purposes, which can include growing food.</p> <p>The requirement of the policy to mandate 10.5m gardens for 3+ bedroom properties has the potential to frustrate committed development in the NDP area from coming forward which would impede the delivery of housing recorded against the Stratford Core Strategy. It is considered that this clause does not meet the test of basic conditions and should be removed from the policy.</p> <p>The principles behind this policy are supported and have been enshrined within the development proposals at Land at Waterloo Road, which has been designed in a permeable and inclusive way to encourage walking and cycling within the village and the wider area.</p> <p>There is some confusion with the second paragraph of the policy which states that all new development must demonstrate how walking and cycling have been prioritised <u>and connection made to existing routes</u>. The NDP has not identified these existing routes, nor explained how this would operate in practical terms. It is therefore unclear if the policy is referring to Public Rights of Way or the Sustrans cycle routes or potential future routes in new development sites and at present this clause remains ambiguous.</p> <p>It is unfeasible to suggest that all new development should connect to existing routes and it is proposed that this paragraph is amended to read "...consideration should be given to existing routes" as a more practical policy approach.</p>	

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BNP10	<p data-bbox="297 240 421 296">General comment</p> <p data-bbox="297 400 421 427">Policy H2</p>	<p data-bbox="488 240 1845 363">The NDP could usefully make additional reference to the now adopted district council's Core Strategy as it currently focuses on the NPPF. Whilst the policies should be consistent with both, it is the Core Strategy that now takes the primary role and together with the NDP when adopted, will form the development plan for decision making.</p> <p data-bbox="488 400 618 427"><u>Comment</u></p> <p data-bbox="488 435 1861 558">We have no objection to the principle of the policy but consider it should be extended to be consistent with CS.15 (g) and AS.10 (a) of the Core Strategy to include community-led schemes brought forward to meet a need identified by that community. A scheme at Bidford Road, Broom should be specifically identified. In addition the local connection criteria should reflect that used by the District Council.</p> <p data-bbox="488 598 645 625"><u>Justification</u></p> <p data-bbox="488 633 1861 756">CS.15 (g) and AS.10 (a) support local need schemes. On sites within and adjacent to settlements they allow for small-scale community-led schemes brought forward to meet a need identified by that community. They relate to all settlements which in this case would include Bidford on Avon, Broom, Barton and Marlcliff.</p> <p data-bbox="488 796 1861 1046">Such schemes can include Local Market Housing. The concept of local market housing was introduced by the District Council as an integral part of its Local Choice initiative embodied in the Supplementary Planning Document 'Local Choice – Meeting the Needs of Rural Communities' which was adopted in April 2007. Through policy COM 1 of the Local Plan Review 1996-2011 the District Council encouraged its local communities to promote sustainable development on small scale schemes that meet identified local needs in the Main Rural Centres and Local Centre Villages. The SPD contained guidance on how to identify development needs, how proposals should be promoted and how the suitability of proposals would be assessed.</p> <p data-bbox="488 1086 947 1114">More specifically the SPD outlines:</p> <ul style="list-style-type: none"> <li data-bbox="488 1121 1861 1177">a. What is meant by local need and how research and surveys should be used to identify the nature of local need <li data-bbox="488 1185 1760 1241">b. That the principle embodied in policy COM 1 is one of being community-led and that it is the community that must identify the local need <li data-bbox="488 1249 1809 1305">c. The three types of housing need that can be identified and addressed through a COM.1 proposal being: <ul style="list-style-type: none"> <li data-bbox="488 1313 976 1340">i. Affordable housing for local people <li data-bbox="488 1348 1563 1375">ii. Specialised types of housing for local people such as extra care or key worker <li data-bbox="488 1383 1816 1439">iii. Local market housing, that is to say homes built for sale to local people enabling them to satisfy their housing need through their own resources. 	Not indicated

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	Policy H3	<p>The SPD sets out a model definition of local connection and sales procedures. It is now identified as a specific category of local needs housing in Housing Need Surveys which are carried out in parishes throughout the District. It is therefore clear to Parish Councils when the results of their Needs Survey are collated, whether there is a need for local market housing and this can inform their decision on the type of local housing needs scheme to promote and the mix of housing to be included. The success of the COM 1 policy in promoting local needs housing in rural communities has informed the Core Strategy which states that 'the flexibility of a local approach is widely supported by communities', that 'the Council believes that it is desirable to continue to support development that meets the specifically identified needs of a community' and that policy CS15 'endorses the approach to local needs but extends it to all settlements across the District.</p> <p>Furthermore, it should be extended to identify a specific site at Bidford Road, Broom that has been in discussion and where proposals for an exception site have evolved with local liaison over many years, has been the subject of local consultation, pre application advice from the district council and is now a planning application. It has the support of the Parish Council. The proposal is to meet an identified need for 6 affordable houses and 6 local need market houses. The need is identified in the Parishes Housing Needs Survey of 2012 and relates to a cluster approach where the needs of a group of settlement are met in one location. In this case, to meet the need of Broom, Barton, Marlcliff and local market housing need for Bidford on Avon. The site should be specifically identified on plan and in the policy wording. It is shown on the enclosed 7458-101 Rev A Location Plan.</p> <p>With regard to local connection criteria in paragraphs 3.11 and 3.12, as specified this is not consistent with that used by the district council in the SPD as above. There is no reason why Bidford on Avon should be treated any differently to other areas of the district and these paragraphs should be amended to be brought into line.</p> <p><u>Objection</u> The policy is too prescriptive and is not therefore in accordance with policy CS.18 of the Core Strategy. Indeed it should refer to mix in accordance with CS.18 rather than try to set its own as there is no evidence to suggest Bidford on Avon should be dealt with any differently. Wording currently in paragraph 3.13 suggests flexibility but this should be embodied in the wording of the policy.</p> <p><u>Justification</u> The CS Inspector in reporting on CS.18 Housing Mix and Type (Inspector's Report 429) confirms the most comprehensive evidence base for CS.18 is the Strategic Housing Market Assessment (SHMA) November 2013. Furthermore, paragraph 9.54 of the SHMA makes clear that the mix is not "<i>intended to be prescriptively applied to every site given that some sites and locations may be more appropriate for different types and densities of housing development.</i>"</p>	

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	Policy ENV4	<p><u>Objection</u> Parts b), c) and e) are more onerous than the Core Strategy.</p> <p><u>Justification</u> CS.4 Water Environment and Flood Risk includes significant detail on measures development should take into account and this NDP policy goes even further with a level of requirements over and above. There is no evidence why Bidford on Avon should have more onerous requirements.</p>	
BNP11	Policy AM1	<p>The Pre-Submission Consultation Response (November 2015) commented upon representations made by Bidford on Avon Health Centre about Policy AM1 as follows:</p> <p><i>I do not believe that it is necessary to include an additional plan. The extent of land ownership is of course different to the land which is currently established medical facilities.</i></p> <p>Action – <i>discussion on this will be necessary. Does the NDP wish to specifically allocate land at the existing medical centre site for other health uses? If so, what? where? etc. NB further consultation may be necessary if an additional policy is included at this stage.</i></p> <p>Bidford on Avon Health Centre is the only surgery in the NP area and with room to expand, so implementing the aspirations of Policy AM1 appears to be targeted there. However, nowhere in the NP is the location of the existing medical centre identified. Furthermore, arising from the previous NP consultation other parties were concerned about a lack of clarity with Policy AM1; one party wrote: <i>"The provisions of this policy are unclear and greater clarity is considered necessary in order to avoid ambiguity. It is not clear what types of proposals the policy is referring to and how such proposals could affect the provision and delivery of health care."</i></p> <p>With the above comments in mind, Bidford on Avon Health Centre supports Policy AM1- "protecting and enhancing health opportunities". In doing so, it suggests the wording of Policy AM1 is improved and clarified with the following:</p> <p>POLICY AM1 - PROTECTING AND ENHANCING HEALTH OPPORTUNITIES</p> <p><i>Providing access to health care is essential in maintaining a healthy community. General population increase and a specific increase in older age groups have placed considerable strain on health care provision within the Neighbourhood Area.</i></p> <p><i>Proposals which would directly adversely affect the provision and delivery of health care within the Neighbourhood Area will not be supported. Proposals which enhance and expand existing health care</i></p>	Not indicated

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		<p><i>facilities within the Neighbourhood Area will be supported providing they do not conflict with adjoining land uses.</i></p> <p><i>Bidford on Avon Health Centre relocated from the High Street to the former Crabtree Garden Centre, Stratford Road, Bidford-on-Avon in 2013. In 2016 it was the only health centre/doctor's surgery located within the Neighbourhood Area. Additional facilities at the new Bidford on Avon Health Centre may include physiotherapy, district nurses, NHS dentistry, chiropody, optometry, minor injuries, mental health support, complimentary therapies, care home and/or nursing home for the elderly. The location of the health centre and associated land suitable for additional facilities as set out above is at Map 7.</i></p> <p>It is necessary to insert a plan to identify the location of Bidford on Avon Health Centre, which at the moment is absent from the text and policy maps. I attach a location plan showing land owned by the health centre and suitable for the additional health care facilities as set out in Policy AM1 and paragraph 6.3. The plan should be called "Map 7 - Bidford on Avon Health Centre and area of possible expansion of health care facilities."</p> <p>The type of additional facilities identified by existing NP paragraph 6.3 requires a significant amount of land and the facilities cannot be accommodated within the existing health centre building and car park, nor as an extension to the existing building. The purpose of Map 7 is not to establish land ownership for its own sake but to identify where the expansion of the health centre can reasonably and sustainably take place, within strong defensible boundaries comprising mature trees/hedges and the former railway line at the rear. Moreover, the land edged red includes large former garden centre buildings.</p> <p>The first paragraph of Policy AM1 (its existing wording) specifically refers to older age groups placing "considerable strain on health care provision within the Neighbourhood Area." Therefore it is appropriate that the rest of Policy AM1 explains how that need will be met. Accordingly, the proposed additional facilities at Bidford Health Centre should include a "care home and/or nursing home for the elderly." It is highly sustainable for accommodation for the elderly to be located adjacent to the existing health centre and its future complementary health facilities.</p> <p>NP Paragraph 6.4 is an aspiration to create a footpath link between the health centre and Bidford on Avon. That aspiration is more likely to be achieved if there is a clear encouragement elsewhere within Policy AM1 to create more facilities at the health centre, on land identified by Map 7.</p> <p>In summary, Policy AM1 is laudable but it can be improved. Unfortunately, the existing wording of Policy AM1 and the lack of a Policies Map associated with Policy AM1 hinders understanding and</p>	

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		implementation of the policy. The problem can be remedied by amending the wording of Policy AM1 as suggested above by Bidford Medical Centre and by the inclusion of "Map 7 - Bidford on Avon Health Centre and area of possible expansion of health care facilities".	
BNP12	Policy ECON1 Policy ECON2 Policy AM1	Care needs to be taken when considering the re-development of the 'Old Bidford Health Centre' site in the High Street. Its use for employment should be considered seriously. The response to Policy ECON1 also applies. Many employment opportunities for physiotherapy, occupational therapy and anti-natal classes could be considered once intermediate care nurses leave the 'Old Bidford Health Centre'. We believe that the village of Bidford on Avon will always need a viable community pharmacy to provide access to health care for the local community within the village boundary.	Not indicated
BNP13	Para 1.14 Paras 1.15 and 1.16 Para 2.1 Para 2.5 Para 3.1 Para 3.2 Para 3.8 Para 3.20 Map 1	Delete 'emerging' and replace 'will determine' with 'determines'. Can now be deleted. Insert 'area' after (SDC) in last line. There are eight Main Rural Centres. Delete 'emerging' in last line. Figure is now 770 new dwellings due to recent appeal decisions. Replace 'latest version of the 'with 'adopted' and delete reference to footnote 8. Statement is not consistent with national policy and should be deleted. The BUAB to be used on the District Council's Policy Map which reflects policies in the Core Strategy and other current circumstances is different in various ways from Map 1 and ideally the two should be consistent: - show site west of Waterloo Road recently allowed on appeal as a Housing Commitment and include in the Village Boundary (Note that BUAB has excluded area of public open space at western end of site shown on indicative layout in the outline application - Marriage Hill Nurseries site should be within BUAB - Public open space off Dugdale Avenue need not be within BUAB - Areas to north of Salford Road and south of Tower Hill been included in Village Boundary; this is	Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
		likely to lead to these areas coming under pressure for development - Extent of Village Centre is different and will need to be justified (also suggest it is shown in a different colour for clarity).	
	Policy ENV4	Delete 'relevant' from first line.	
	Policy ENV5	Replace 'permitted' with 'supported' in last line of first paragraph.	
	Para 5.22	Also refer to Maps 4, 5 and 6.	
	Policy AM4	Local Green Spaces do not seem to have been robustly justified as required by paragraphs 76-78 in NPPF and referred to in 6.10 in explanation – maybe there is an evidence base assessment that hasn't been seen.	
	Appendix 1	Amend references to Stratford-upon-Avon NDP and Town Council in 5th paragraph. Surprise there isn't a reference to providing a new pedestrian/cycle bridge between the village centre and Big Meadow as this would be a great way of linking the two and avoid having to seek refuge on the existing road bridge. However, it wouldn't come cheap (c£0.5m) and would need to have control over an appropriate piece of land on north bank of river. May be scope to do a deal with owners of The Frog PH who could see it as an opportunity?	