

Welford-on-Avon Neighbourhood Development Plan

Formal Consultation – Thursday 10th September to Friday 23rd October 2015

Consolidated Schedule of Regulation 16 Representations:

Rep. No.	Person or organisation	Policy	Representation	Reg 19 request?
WNP01	Historic England	Whole document	<p>Thank you for your consultation and Historic England is gratified to see that several comments from our predecessor, English Heritage, as set out in their consultation response of the 13th January 2015 have been followed up in this iteration of the Plan.</p> <p>We have no further substantive comments to make.</p>	Not Stated
WNP02	Natural England	Whole document	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the Submission Draft Plan and generally approves of its content.</p> <p>We do not consider that this plan poses any likely risk in relation to our statutory purpose, and so do not wish to comment further on this consultation.</p> <p>The lack of detailed comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>	Not stated
WNP03	Warwickshire Wildlife Trust	Policy HE2	<p>The Trust supports the protection of Local Green Spaces and the flora and fauna which inhabit them. In order to strengthen the biodiversity element of this policy the Neighbourhood Plan could:</p> <ul style="list-style-type: none"> • Include information about particular species that use the green spaces and that require particular consideration to conserve. 	Not Stated

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		<p>HE7</p> <p>INF1</p>	<p>Species records for the area can be obtained through Warwickshire Biological Records Centre (WBRC)</p> <ul style="list-style-type: none"> • Include information about particularly rare or interesting habitats in the area. Habitat data is available on the Habitat Biodiversity Audit (HBA) • Consider the priorities for enhancing natural habitats, should the resource be found. This could include creating green corridors to link the green spaces for wildlife. Some help with this may be obtained by looking at Warwickshire Local Biodiversity Action Plans as identified in SDC Planning Framework • The allotment area could play an integrated role. Some sites may be enhanced by an actively encouraged nature conservation/management programme <p>Hedgerow planting would increase biodiversity if a variety of native species planting is encouraged.</p> <p>Dark skies can also be beneficial for foraging animals such as bats.</p>	
WNP04	The Coal Authority	Whole document	Having reviewed your document, I confirm that we have no specific comments to make on it at this stage.	Not stated
WNP05	Warwickshire County Council	<p>Whole document</p> <p>Page 9 'Policy or Project'</p> <p>Infrastructure</p> <p>Page 10: Objective 5</p>	<p>As a general point fully justified text is frowned upon by some bodies as it creates strange gaps in sentences which can be difficult for some people to read. Typically left justified text is preferred.</p> <p>I am surprised that Flooding is included in 2) projects and not in 1) planning policies. Having the correct planning policies in place is the key to improving the flooding situation in Welford in the future?</p> <p>Throughout the report where Infrastructure is referred to, '...and surface' could be inserted between 'waste' and 'water' in the final line of this paragraph. Improvements to the surface water system will have a positive impact on the foul system. This is not covered by the term 'waste water'.</p> <p>Throughout the report where objective 5 is referred to, '...and surface' could be inserted between 'waste' and 'water' in the final line of this paragraph. Improvements to the surface water system will have a positive impact on the foul system. This is not covered by the term</p>	Not stated

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		<p>Page 43: Flood Risk Zones</p> <p>Page 50: Objective 12</p>	<p>'waste water'.</p> <p>The quoted Zones only apply to Fluvial flood risk. Welford also has surface water flood risk, such as Church Lane. This section should either be renamed 'Fluvial Flood Risk Zones' or amended to include 'five' flood zone types and include reference to the Environment Agency's Surface Water Flood maps.</p> <p>Third paragraph: The final two sentences of this paragraph 'The modern part of the bridge is seriously flawed in its design with no attempt to increase the height of arches or the spans to prevent blockage. This is further exacerbated by the lack of river dredging by the Environment Agency' are opinion and factually incorrect.</p> <p>WCC FRM objects to their inclusion and requests that they are removed.</p> <p>Inclusion of this opinion as fact in a document of this standing will add to the confusion relating to these topics and make WCC FRM and Welford FLAGs engagement with the community going forward more difficult.</p> <p>Including factual inaccuracies in a document of this nature undermines the whole document, not to mention the negative effects it could potentially have on future partnership working with Agencies.</p>	
WNP06	Warwickshire and West Mercia Police	Whole document	<p>As per our initial response to the Consultation Draft of this document, as a statutory consultee in respect of planning/highway matters it is perhaps not appropriate for us to offer comment at this stage, as to do so may jeopardise any future formal consultation process if our views are sought in the future by the Planning or Highway Authority.</p> <p>While there is nothing in the document that we would specifically object to, there are no details of any individual planning projects or applications. We would ask that any scheme having an impact on the highway network be referred to Warwickshire County Council in their capacity as highway authority, and they will consult with Warwickshire Police if they feel it necessary to do so. I have brought the document to the attention of our Estate Services for their information.</p>	Not stated

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WNP07	A.S. Planning Ltd on behalf of Residents of Welford Park	HLU1	<p>We support this policy insofar as it allows for residential development outside the built up boundary in specified circumstances. We acknowledge this is subject to compliance with Policy HE5, but emphasise that HE5 includes allowance for brownfield sites. This is a pragmatic approach; particularly so when consideration is given to the three provisos regarding 'demonstrable harm'. Nevertheless, the development of a brownfield site outside the 2012 boundary that the Neighbourhood Plan has adopted would be acceptable in accordance with both HE5 and HLU1. That is an important point of principle.</p> <p>In that context it is relevant to relate the terms of these two policies to the built up area boundary plan on page 34, and the explanatory text on page 33. The Neighbourhood Plan seeks to retain that boundary until decisions are made about the potential location of any additional development. There are two important points to note about that plan that are relevant to the approach the Neighbourhood Plan seeks to adopt in restricting new development.</p> <p>First, the plan identifies 'Broad Locations' for development with blue stars. These are taken directly from the PBA SHLAA Review Final Report of January 2013. We note that one such blue star is located immediately south of the village boundary. There are others to the south east and south west. These are areas of potential for residential development. In addition the plan identified two other sites, WEL 103 and WEL 104, which had been put forward for development in the SHLAA process and been found suitable and available for development. Both those sites now have planning permission. WEL 104 is close to the site for which planning permission has now been granted under reference 13/01918/FUL, on the basis that although it is outside the village boundary it relates to a (partly) brownfield site.</p> <p>Together, these factors illustrate that land south of Welford on Avon is suitable for development, and is acknowledged to be so by the planning authority. We note at this point, and will return to it later, that there is a large brownfield site south of the village, adjacent to the blue star confirming it as a 'broad location' and adjacent to the land for which permission has been granted. That land is Welford Park. On the basis of HE5 and HLU1, together with the village development plan and its</p>	Yes

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		HLU5	<p>context, Welford Park is a strong location for residential use that would not be contrary to either existing or emerging policy.</p> <p>We move on now to consider the context of the Neighbourhood Plan in relation to additional residential development in the village. Housing numbers are discussed on pages 30 – 33 and the view is taken that due to a number of applications approved over the last 3 years (for 109 dwellings) Welford on Avon has already provided for in excess of the 84 dwellings defined for Category 2 Settlements in the Stratford on Avon Local Plan. However, this is considered to be an incorrect interpretation of Stratford on Avon’s housing land supply position. In its latest note on housing land supply (dated 31st March 2015), which would have included the approved applications referred to in the Neighbourhood Plan, Stratford on Avon acknowledges that it currently only has 3.85 years of housing land supply. Therefore the housing allocation of up to 84 dwellings for Welford on Avon is in addition to recent planning permissions.</p> <p>There is therefore no justification for the policy to support only small, windfall developments on infill sites or for a limit of 5 dwellings.</p> <p>That being the case there will be a need to extend the Welford on Avon village boundary in the short term if new development is to be accommodated, such that the neighbourhood plan will be out of date very quickly in that respect. It is considered therefore that the issue should be considered within the context of the Neighbourhood Plan, and that it is not appropriate to leave the matter of additional development in the village until a later date.</p> <p>We do not consider, however, that it need necessarily be the case that completely new development will need to be accommodated if other policies of the plan are amended; instead, we consider that it is possible to achieve the required increase in the number of residential properties in the village without taking fresh land. That can be done by changing the terms of policy HLU9.</p> <p>Generally we support this policy as it seeks to ensure that a range of housing types are delivered in line with paragraph 50 of the NPPF.</p>	

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		HLU9	<p>One point which we do not support is the emphasis that the policy places on the provision of bungalows for older residents; this is considered to be restrictive as there are other forms of dwellings that could be equally suitable for older residents such as Park Homes.</p> <p>It is considered that the existing caravan parks within the village, such as Welford Park, could make a useful contribution to the housing mix that is required to be provided in Welford-on-Avon. There are a number of specific benefits in relation to the use of mobile homes for older residents, although the mobile homes could also be used by other residents. First, as with bungalows mobile homes provide a smaller scale dwelling for existing residents in the settlement looking to downsize and represent a realistic alternative in this respect. Second, living in a mobile home on a caravan park provides residents with a sense of community and a support network that is not so easily achievable in other forms of residential development. As is increasingly stated in national news and advocated by a number of charities the isolation of older residents across the UK is a problem and thus in this respect a group of mobile homes with the potential to provide a support network for older residents is an important contribution to the overall housing mix of Welford-on-Avon. Similarly, the infrastructure and maintenance arrangements at Welford Park are such that ultimate responsibility for maintenance is on the owner and not the residents an aspect which may be attractive to older residents.</p> <p>Overall, then, while we support this policy in principle it should be modified to widen the scope for the type of housing that will be supported.</p> <p>We do not think this policy is justifiable for a number of reasons:-</p> <ol style="list-style-type: none"> 1. The first justification for the policy is the saved policy CTY.8 (Mobile Homes) of the local plan which seeks to resist proposals for residential mobile homes. This is a policy that is not being carried forward into the emerging Core Strategy and thus once the Core Strategy is adopted Stratford on Avon Council will no longer have a policy reason to resist the change of use of holiday 	

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			<p>caravan parks to residential. Due to the advanced stage that the emerging Core Strategy is at it is considered that the saved policies should be given limited weight in line with paragraph 215 of the NPPF and as such it is not considered an appropriate base for any emerging policy documents such as the neighbourhood plan.</p> <p>2. The second justification that has been put forward for the policy is in relation to responses to a community survey. It is stated that 99% of the respondents thought that the quantity of caravan accommodation within the settlement was either about right or too many. This response appears to correlate more to the provision of new caravan accommodation within the settlement (whether holiday or residential) rather than the specific use of the caravans themselves and therefore is not considered to be an appropriate base on which to restrict the use of existing caravan sites.</p> <p>Given that these two 'evidence-based' reasons put forward for Policy HLU9 are of only very limited material weight it has to be considered whether there are any other material planning considerations as to why the use of caravan parks should be restricted to a 'holiday' use.</p> <p>In this regard it is noted that within the supporting text for the policy that concerns have been raised regarding the impact on the existing resources (shops/schools etc.) if caravan parks were allowed to be used for residential use. There are two points to be made here:-</p> <p>1. Some of the 'holiday' caravan sites within Welford-on-Avon are currently occupied by the same occupiers for long periods of time and therefore there all-year round use by these occupiers would not have a material impact on the resources. For example mobile homes at Welford Park currently have permission to be occupied 11 months of the year and it is not considered that the increased use of this site by an additional month would materially impact on the resources of the village. In relation to other material planning considerations such as residential amenity and highway safety we would like to draw your attention to an appeal decision for</p>	

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			<p>Welford Park (refs: APP/J3720/A/88/110667/P5 and S88/0894) in which the Inspector recognised that the increased use of a caravan park from 7 months a year to 12 months of a year would not adversely residential amenity or highway safety.</p> <p>2. Welford on Avon needs to provide up to 84 dwellings in accordance with the provisions of the Stratford on Avon Local Plan. This would undoubtedly have a greater impact on the resources of the village than the residential use of existing caravans in the settlement.</p> <p>Therefore there is an argument to be made that by removing this policy and allow for the change of use of caravan sites to residential (to count towards the housing allocation for Welford) that the impact of new housing on the resources of the settlement could be reduced.</p> <p>Overall it is not considered that the impact of a residential use of existing caravan parks on the resources of Welford on Avon is a material planning reason on which to base the policy. Similarly it is not considered that there is any other material planning reasons on which to restrict the use of caravan parks to holiday usage.</p> <p>In conclusion, therefore, the use of brownfield land outside the village boundary for new residential development is agreed, and HE5 and HLU1 correctly allow for that. Proposed Policy HLU9 is, however, unjustified and, further is detrimental to the future provision of development in the village in an acceptable manner.</p>	
WNP08	Framptons on behalf of The Rosconn Group	HLU1	<p>An objection is submitted to Policy HLU1 – new residential development is being overly restrictive on the scale of new housing that may be permitted within the built up boundary of the village. There is no evidence base to substantiate that up to 5 dwellings is acceptable, but 6 dwellings (or more) is necessarily objectionable. The lack of justification for such a restriction is made more starkly when it is evident that there is no policy restriction on the number of new dwellings that might be accommodated on a brownfield site in the open countryside (Policy HE5). Insofar as Policy HLU1 relates to the built up area of the village, there is considered to be no justification for the imposition of any artificial limit on the number of dwellings that may be provided on a site that is</p>	Yes

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		HLU2	<p>suitable for residential development. Similarly, there is no justification for the restrictive approach that seeks to amalgamate housing numbers with a site that is in close proximity to another site(s).</p> <p>The provision of new housing should not be seen as being some form of anti-social development which should be restricted. There is a continuing need for new housing to meet the needs of the population, including housing needs of the population, including housing needs to meet particular sectors of the society, for example young households and the elderly.</p> <p>The application of normal development control standards will ensure that development is not insensitive or causes unacceptable harm to interests of acknowledged importance.</p> <p>Phasing provisions identified in the Core Strategy have not been subject to Examination. In the context of the Government seeking to significantly boost housing land supply, there is considered to be no justification for the impositions of artificial restraint on housing to particular periods of time.</p>	
WNP09	Gladman Developments	National Planning Policy	<p>Before the Welford-on-Avon Neighbourhood Plan can progress to referendum, the Inspector must conclude that:</p> <p>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Plan.</p> <p>(d) The making of the Neighbourhood Plan contributes to the achievement of sustainable development.</p> <p>(e) The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>(f) The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations.</p> <p>Having reviewed the Welford-on-Avon Neighbourhood Plan, it is clear that there have been major flaws throughout the plan preparation (contrary to basic conditions 8(2)(a), (d), (e) and (f)), and that there are</p>	Yes

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			<p>many components, both policies and the supporting text, that are contrary to the basic conditions (especially basic conditions 8(2)(a), (d), (e)). The plan documentation reveals many gaps in the kind of robust evidence that the PPG expects and which is necessary for a Neighbourhood Plan that intends to endure for 20 years.</p> <p>Whilst much of the comments in this representation deal with technical matters, ultimately Gladman consider that the WNP has missed a real opportunity to constructively engage with local landowners to see what benefits additional growth in the village could bring. Instead, the final version of the WNP merely identifies those sites with existing planning permissions and seeks to heavily restrict any further development. This is not the positive approach which the architects of neighbourhood planning envisaged.</p> <p>Context Gladman Developments (Gladman) have land interests in Welford-on-Avon at Milcote Road (which falls within the Neighbourhood Area Boundary) and are actively working to promote the site for residential development and associated community infrastructure including addressing matters which were raised in respect of a recent appeal decision on the site.</p> <p>Summary The Welford-on-Avon Neighbourhood Plan (WNP) covers the period 2011-2031. The Plan has been prepared during the preparation of the Stratford-on-Avon District Council Core Strategy, which is yet to be adopted. The Stratford-on-Avon Local Plan Review (2006) is the adopted Development Plan for the District, although the plan period for this DPD covered the period 1996-2011, and is now time expired.</p> <p>The submission version of the Stratford-on-Avon Core Strategy (SACS) identifies Welford-on-Avon as a Local Service Village, expected to deliver part of an allocation of 2,000 dwellings for the period 2011-2031. Gladman submit that sustainable sites such as Gladman's site at Milcote Road offer the potential to deliver additional housing to help deliver the district's full Objectively Assessed Need (OAN).</p> <p>In its current form, the WNP is inflexible, ineffective and unable to respond rapidly to changes in the planning context i.e. where the Council</p>	

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		<p data-bbox="629 563 770 627">Affordable Housing</p> <p data-bbox="669 954 730 986">HE1</p> <p data-bbox="669 1441 730 1473">HE4</p>	<p data-bbox="842 240 1827 432">is unable to demonstrate a five year housing land supply, as is currently the case. A number of policies actively seek to constrain the ability of future sustainable growth opportunities being delivered and are contrary to the whole ethos of the NPPF, specifically the need to significantly boost the supply of housing and the presumption in favour of sustainable development.</p> <p data-bbox="842 467 1760 531">Gladman's specific concerns to the suite of restrictive policies are as follows:</p> <p data-bbox="842 563 1827 914">The Plan does not take into account the chronic under supply of affordable housing in the district. Page 8 of the Plan, considering the housing needs in the local area. On a district wide basis, coupled with the under provision of market housing, rates of affordable housing delivery have suffered. There is an identified need for affordable housing in the district, and the Neighbourhood Plan should reflect this, and do more to rectify the affordable housing shortfall. The provision of "not normally more than 5 dwellings" in Policy HU1, will not be able to support the level of affordable housing that needs to be delivered across the Local Service Villages. Or make any meaningful contribution to the District needs and chronic shortfall.</p> <p data-bbox="842 954 1827 1409">Policy HE1 seeks to protect important views around the parish, by resisting development that will be obtrusive by virtue of its shape, size or material. The views outlined within policy HE1 are too broadly defined, and are not clear and precise. Cross references to these views, and other documents should be clearly set out on a plan. Gladman note that one of the views is out towards Weston from Milcote Road, but it is not entirely clear what it is about the view that is important. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Gladman submit that new development can often be located in countryside gaps without any undue adverse impact on landscape or view or leading to the physical and visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character.</p> <p data-bbox="842 1441 1659 1473">Policy HE4 states that development within or adjacent to the</p>	

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		<p data-bbox="618 467 725 496">HE5</p> <p data-bbox="618 823 725 852">HE6</p> <p data-bbox="618 1182 786 1278">Section D – Housing and Land Use</p>	<p data-bbox="842 240 1816 432">Conservation Area and/or within the setting of a listed building will be supported if the development is in compliance with a number of criteria. Gladman question the need for this policy to be included within the neighbourhood plan, when there are policies on conservation areas and heritage already within the Development Plan, and the NPPF. Gladman submit that this policy should be deleted.</p> <p data-bbox="842 472 1816 791">Policy HE5 seeks to protect open countryside for its intrinsic character and beauty, but will support development in the countryside if it meets the criteria outlined in the policy. The Core planning principles of the NPPF do not state that countryside should be protected, for its intrinsic character and beauty, rather, that it should be recognised. This policy also does not provide flexibility in the future if the OAN for Stratford-on-Avon is found to be higher than what is currently outlined within ERM’s Review of the Objectively Assessed Need, which Gladman submit still does not represent the full objectively assessed market and affordable housing needs for Stratford-on-Avon District.</p> <p data-bbox="842 823 1816 1142">Policy HE6 seeks to protect the gap between Welford and Weston. Gladman do not support this policy. The purpose of the policy is covered within policy HE5. No study appears to have been undertaken to determine that the entirety of the area currently between the settlements is required to be retained to maintain the separate identities of the settlements. By pro porting to create an absolute prohibition on development within this area, the neighbourhood plan is seeking to impose a level of restraint even greater than green belt or Local Green Space. This policy is therefore not in conformity with the NPPF and it should be deleted.</p> <p data-bbox="842 1182 1816 1374">Pages 29 and 30 of the WNP discuss the implications of the adopted Stratford-on-Avon Local Plan Review (2006). The policies contained in this document are significantly time expired, and do not provide for the District’s full, objectively assessed housing needs. The housing context that the plan refers to is no longer relevant, and the evidence base has been updated for the emerging Core Strategy.</p> <p data-bbox="842 1414 1816 1469">The information about the Core Strategy provided on pages 30 and 31 do not take into account the potential for the OAN to increase. These</p>	

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		<p data-bbox="663 890 734 914">HLU1</p> <p data-bbox="663 1315 734 1339">HLU2</p>	<p data-bbox="842 240 1816 427">policies and allocations across local service villages are subject to change, as a result of the upcoming examination process. However, it is noted on page 31 that the preparation of the Site Allocations document may result in housing allocations within Local Service Villages. This is increasingly likely, if the OAN for the district is found to be higher than that outlined within the ERM review of the OAN for Stratford.</p> <p data-bbox="842 469 1800 560">Again, the reference to the "target" of approximately 84 units, on page 33, is wrong. This is not a fixed target at this time, and is subject to change as a result of the ongoing examination process.</p> <p data-bbox="842 596 1816 624">Gladman support the Parish Council's statement on page 34 of the Plan:</p> <p data-bbox="842 660 1783 751">"Once the Core Strategy has been adopted, and housing requirement finally identified, it may be that SDC will identify sites in a Site Allocations DPD and review the built-up area boundary of the village."</p> <p data-bbox="842 794 1767 852">This statement recognises that the numbers being proposed in the emerging Core Strategy are not finalised, and are subject to change.</p> <p data-bbox="842 890 1809 981">Policy HLU1 seeks to outline the circumstances in which new residential development, not normally more than five dwellings, can come forward. Gladman object to the second paragraph of policy HLU1, which states:</p> <p data-bbox="842 1023 1809 1114">"New Residential Development in the Neighbourhood Plan Area over the Plan Period must have due regard to the Approximate Upper Limit defined for Category 2 Local Service Villages."</p> <p data-bbox="842 1155 1816 1273">The "Approximate Upper Limit", is not finalised and not an adopted number. The Core Strategy is not yet an adopted plan, and the figure of 2000 dwellings across the Local Service Villages is subject to change. There is no justification or reasoning for the definition of small scale.</p> <p data-bbox="842 1315 1816 1471">Policy HLU2 stipulates that "Residential development will be supported if it is phased in line with the emerging Core Strategy." Gladman do not support this. There is nothing within the NPPF which supports phasing of development. If anything, the Framework seeks to "boost significantly the supply of housing" signalling that early delivery is beneficial, as</p>	

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		<p>Position of emerging SDC Core Strategy</p>	<p>outlined within paragraph 47.</p> <p>The WNP has missed a real opportunity to constructively engage with local landowners to see what benefits additional growth in the village could bring. Instead, the final version of the WNP merely identifies those sites with existing planning permissions and seeks to heavily restrict any further development. This is not the positive approach which the architects of neighbourhood planning envisaged.</p> <p>The current Development Plan for the District consists of the Stratford-on-Avon Local Plan Review (2006) which covered the period up to 2011. The plan period has now surpassed and this document is significantly out of date and time expired against the requirements of the Framework.</p> <p>The Council are now progressing with its emerging Local Plan, part of which is the Stratford-on-Avon Core Strategy (SACS). The Plan will set out the spatial strategy and key planning policies for the district up to 2031. The SACS was submitted to the Secretary of State for Examination on 30th September 2014, the Examination in Public (EiP) hearing sessions took place between 6th January – 30th January 2015. Gladman have been involved throughout the plan preparation process having submitted detailed representations to all relevant consultation stages in the plan's production and actively participated at the EiP.</p> <p>Throughout the examination numerous participants, including Gladman, argued that the Council's Objectively Assessed Need (OAN) for housing is not consistent with the requirements of the Framework or the PPG. Indeed, this was supported by the Inspector who published his interim findings on 19th March 2015. The Inspector's findings concluded that 'further work is required in order to demonstrate a robust and objective assessment of housing needs and ensure that the SA process is carried out in full accordance with the statutory requirements and relevant guidance...I consider that the CS is not sound as it stands. In these circumstances it would not be appropriate to let the CS progress to adoption at this time.'</p> <p>SADC have recently published the additional evidence required by the Inspector. This includes an updated OAN which identifies a total need of</p>	

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			<p>14,480 dwellings over the plan period, equating to an annual housing requirement of 724 dwellings.</p> <p>It is important to note that SADC's new evidence has yet to be tested and accepted by the Inspector at Examination. Gladman are still of the belief that the housing needs for the district are significantly higher than that proposed in the Council's revised OAN. Gladman commissioned specialist consultants, Regeneris, to prepare an OAN which fully reflects the requirements set out in the Framework and the PPG, this assessment demonstrates the full OAN to be 25,010 dwellings i.e. 1,245 per year. Whilst these figures are in the process of being updated to take account of the 2012 Household Projections, we believe that these figures will continue to point to a significantly higher level of housing need than the Council's revised OAN.</p> <p>It is also important to consider Stratford-on-Avon's relationship within the wider Housing Market Area (HMA). At present it is believed that the shortfall arising from Birmingham City Council is expected to be at least 37,900 dwellings, this figure may be significantly higher and is dependent on the outcome of Birmingham's Local Plan EiP. Therefore, sustainable settlements within the district, such as Welford-on-Avon, will likely be required to fulfil any unmet need within the Greater Birmingham HMA to ensure the Council's Duty-to-Cooperate is met. In its current form the Neighbourhood Plan does not allow sufficient flexibility to allow this to happen.</p> <p>The Neighbourhood Plan seeks to assert policy judgements that have yet to be accepted by the Inspector examining the SACS. Furthermore, the Welford-on-Avon Neighbourhood Plan as proposed is inflexible and has been based upon a restrictive approach to growth in the neighbourhood area, and is contrary to the whole ethos of the National Planning Policy Framework (the Framework) and the presumption in favour of sustainable development.</p> <p>Both the Framework, paragraph 16 and 184 and the PPG, Neighbourhood Planning 070, require that the WNP must be in conformity with the strategic policies in the development plan for the local authority area. Gladman maintain that the correct construction of those paragraphs</p>	

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		<p data-bbox="618 432 779 459">Conclusions</p> <p data-bbox="584 1118 813 1209">NPPF/PPG and Basic Conditions</p>	<p data-bbox="842 240 1832 400">within the Framework and PPG is that those local plan policies referred to therein must be extant and up-to-date, following successful examination of an NPPF-era Local Plan. If the WNP is progressed to Examination prior to the adoption of the SACS it will be contrary to basic conditions 8(2) (a) and (e).</p> <p data-bbox="842 432 1816 719">The WNP seeks to resist future development without any regard to the district's full OAN, which is contrary to Central Governments' national policy imperative to 'significantly boost the supply of housing.' Gladman contend that as a result, the WNP proposes an approach which does not comply with either the Framework or PPG. It cannot be appropriate to 'make' the plan without having regard to national planning policy and guidance, furthermore it will not contribute to sustainable development and will not be in conformity with strategic policies in the development plan as these are not yet determined.</p> <p data-bbox="842 759 1809 1078">The WNP is not sufficiently growth orientated nor is it able to respond rapidly to changes in the market. Gladman reiterate that the proposals contained throughout the WNP will effectively act to restrict all future growth outside its settlement boundary. Faced with similar circumstances, other neighbourhood plans have proposed safeguarded sites to allow future flexibility. Gladman contend that an approach such as that adopted in the WNP directly contradicts the entire ethos of the Framework. For these reasons the WNP gives rise to legal flaws and is liable to be subject to judicial review proceedings as it contrary to basic conditions (a), (d), (e) and (f).</p> <p data-bbox="842 1118 1816 1469">The National Planning Policy Framework (NPPF/the Framework) sets out the Government's planning policies for England and how these are expected to be applied in respect of plan-making and decision-taking: NPPF paragraphs 1, 6 and 13. In doing so it sets out the requirements for the preparation of neighbourhood plans and the role they must play in meeting the development needs of the local area. The requirements set out in the Framework have now been supplemented by the Neighbourhood Plan section of Planning Practice Guidance (PPG) and allied sections on Viability, Housing Land Availability Assessment and Strategic Environmental Assessment. The provisions of the Framework and the PPG are mandatory material considerations for the purposes of</p>	

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			<p>basic condition 8(2)(a).</p> <p>Before a Neighbourhood Plan can proceed to referendum it must be tested against a set of Neighbourhood Plan Basic Conditions, set out in paragraph 8 (2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). This is also underpinned in PPG at paragraph 065 of the Neighbourhood Planning Chapter, the basic conditions are as follows:</p> <p>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order. (d) The making of the order contributes to the achievement of sustainable development. (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). (f) The making of the order does not breach, and is otherwise compatible with, EU obligations, and</p> <p>It is clear from the Framework and PPG that Neighbourhood Plans must conform with national policies (basic condition (a): “appropriateness”) and up-to-date strategic policy requirements (basic condition (e)) set out in an adopted Local Plans. Neighbourhood Plans must take a positive approach to facilitate new development, these should not be used as a constraint to restrict growth going forward in the plans strategy. In relation to this Gladman refer to the requirements set out in paragraphs 16 and 184 of the Framework.</p> <p>Gladman consider that the Welford-on-Avon Neighbourhood Plan in its current form fails to comply with various key paragraphs of the Framework and PPG as well as failing to meet basic conditions (a), (d), (e) and (f) which will be addressed throughout this representation. If the Parish Council fails to heed this advice and attempts to progress to examination, the Welford-on-Avon Neighbourhood Plan should be found to have failed the basic conditions and the Plan cannot proceed to referendum. It is Gladman’s view that the Welford-on-Avon Neighbourhood Plan is fundamentally flawed and requires substantial amendment and redrafting or removal of the policies before progressing any further.</p>	

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		<p>Assessment against NPPF</p> <p>Paragraph 14</p> <p>Response to Paragraph 14</p> <p>Paragraph 16</p>	<p>This section of the representation is structured around key paragraphs from the Framework and highlights how the Welford-on-Avon Neighbourhood Plan, as proposed, does not conform with the Framework and consequently that it would not be appropriate to make the plan having regard to the Framework. Please note that our emphasis has been added to these quotes.</p> <p><u>"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.</u></p> <p><u>For plan-making this means that:</u></p> <ul style="list-style-type: none"> • <u>Local planning authorities should positively seek opportunities to meet the development needs of their area;</u> • <u>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</u> <ol style="list-style-type: none"> 1. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or 2. Specific policies in this Framework indicate development should be restricted..." <p>Policy HLU1 New Residential Development sets out that new residential development within the built-up boundary will be supported providing it is on an infill site and is small scale, normally not more than five dwellings. Gladman submit that Policy HU1 does not reflect the presumption in favour of sustainable development; in particular, there is no flexibility within the policy to provide for situations of undersupply of market housing in the District (perhaps resulting from the likely non-delivery of the District's large strategic sites).</p> <p><u>"The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:</u></p> <ul style="list-style-type: none"> • <u>Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;</u> 	

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		Response to paragraph 16	<ul style="list-style-type: none"> • <u>Plan positively to support local development</u>, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and • Identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with the neighbourhood plan to proceed.” <p>The Framework sets a requirement for Neighbourhood Plans to plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan. The Welford-on-Avon Neighbourhood Plan in its current form does not seek to make any additional land allocations for housing development, above that already permitted in the village.</p> <p>The neighbourhood plan seeks to make policy judgements that have yet to be determined through the Local Plan. Furthermore the Welford-on-Avon Neighbourhood Plan as proposed is inflexible and has been based upon a restrictive approach to growth. This is contrary to the whole ethos of the Framework and the presumption in favour of sustainable development.</p> <p>The artificial restriction proposed in Policy CS.16 does not support the Core Strategy’s needs. The OAN for the district, although reviewed for the purposes of restarting the Core Strategy, is still subject to change and is subject to considerable objection.</p> <p>The Parish Council in the WNP argue that Welford has already received 84 dwellings, and there is therefore no need to provide any further housing. The Plan provides no flexibility in the event that the District OAN is found to be higher or they cannot demonstrate a deliverable five year housing land supply. In the event that the Council cannot demonstrate a five year housing land supply, the housing supply related policies of the Neighbourhood Plan would not be up to date, and therefore afforded limited weight.</p> <p>Both the Framework, paragraph 16 and 184 and the PPG ID 41-070, require that the Welford-on-Avon Neighbourhood Plan must be in conformity with the strategic policies in the development plan for the</p>	

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		Paragraph 47	<p>local authority area. Gladman maintain that the correct construction of those paragraphs within the Framework and PPG is that those local plan policies referred to therein must be extant and up-to-date, following successful examination of an NPPF-era local plan.</p> <p>“To boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> • <u>Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area</u>, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; • <u>Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land</u>. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land; • Identify a supply of specific developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;” 	
		Response to paragraph 47	<p>The vision and objectives of the WNP should be aspirational and growth orientated in line with the key objectives of national policy, especially the requirement under paragraph 47 of the Framework which seeks to significantly boost the supply of housing. Where, as here, a plan is constructed solely around policies which seek to constrain the total supply of housing within the neighbourhood plan area. Paragraphs 14, 16, 47, 49 and 184 are principal policy considerations for the purpose of the assessment of basic condition 8(2) (a).</p>	
		Paragraph 49	<p>“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for</p>	

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		<p data-bbox="607 368 790 432">Response to paragraph 49</p> <p data-bbox="600 858 797 890">Paragraph 157</p> <p data-bbox="600 1150 797 1214">Response to paragraph 157</p>	<p data-bbox="844 240 1809 331">the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites.”</p> <p data-bbox="844 368 1827 691">The Council is currently unable to demonstrate a five year housing land supply in accordance with paragraph 49 of the Framework. The recent Woodcock High Court judgement has made clear that paragraph 49 of the Framework in regard to five year housing land supply and the weight to be given to extant housing land supply policies applies equally to both emerging and ‘made’ Neighbourhood Plans as other Development Plan Documents otherwise adopted and/or emerging by the local planning authority. It is clear that there is nothing in policy or stature that elevates Neighbourhood Planning to a level above the wider Development Plan that enables special protection.</p> <p data-bbox="844 727 1823 818">If the WNP is progressed at this time then the housing policies contained in the Plan will be found out of date before it is even adopted, and the presumption in favour of sustainable development will apply.</p> <p data-bbox="844 855 1245 887">“Crucially, Local Plans should:</p> <ul data-bbox="891 890 1827 1114" style="list-style-type: none"> <li data-bbox="891 890 1827 981">• <u>Plan positively for the development</u> and infrastructure required in the area to meet the objectives, principles and policies of this Framework;... <li data-bbox="891 984 1827 1114">• <u>Allocate sites to promote development and flexible use of land,</u> bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;...” <p data-bbox="844 1150 1827 1437">The housing trajectory set out in the emerging Core Strategy demonstrates a heavy reliance on the delivery of the District’s large strategic sites to provide a significant portion of the total housing requirement. It is likely that the expected delivery rates as presented in the Council’s latest housing trajectory will fall significantly short of providing the necessary annual housing requirement. Critically Gladman submit that there is a need to allocate additional deliverable and developable housing sites which can address any shortfall that is likely to occur.</p>	

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		Paragraph 159	<p>Recognised sustainable settlements, such as Welford-on-Avon, provide an important opportunity for the District to maintain a supply of deliverable housing sites throughout the plan period. Gladman have made detailed representations to the Core Strategy examination and previous consultation periods setting out these arguments in greater detail.</p> <p><u>“Local planning authorities should have a clear understanding of housing needs in their area.</u> They should:</p> <ul style="list-style-type: none"> • Prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries... • Prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet identified need for housing over the plan period.” 	
		Response to paragraph 159	<p>Although SADC have recently published its revised OAN and spatial strategy, there is uncertainty as to whether this will be the most effective approach for the district. Gladman contend that as a result the WNP currently fails to meet basic condition 2 (a) and (e).</p>	
		Paragraph 184	<p><u>“Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies. ”</u></p>	
		Response to paragraph 184	<p>There is a requirement to ensure that the Neighbourhood Plan is in general conformity with the strategic policies of the Local Plan (or in this</p>	

Rep. No.	Person or organisation	Policy	Representation	Reg 19 request?
		<p>Assessment against PPG</p> <p>Paragraph: 004 Reference ID 41-004-20140306</p> <p>Response to Paragraph 004</p> <p>Paragraph: 009 Reference ID 41-009-2010306</p>	<p>case, the emerging Core Strategy). The SACS is not yet adopted and is currently suspended from examination. As it is possible that further evidence base work will be required, the strategic policies of the plan including the housing requirement may be altered. The Neighbourhood Plan is coming forward at a point in time of uncertainty of the Local Plan. At present, there is no up-to-date adopted Development Plan to which the WNP can be based and tested against. The WNP cannot therefore be considered able to meet basic conditions (a), (d) and (e).</p> <p>This section of this submission is structured around the requirements set out in various sections of the Planning Practice Guidance (PPG) and highlights how the Welford-on-Avon Neighbourhood Plan has not met these requirements or the Basic Conditions. Please note that our emphasis has been added to these PPG references.</p> <p>"A Neighbourhood Plan <u>should support the strategic development needs set out in the Local Plan and plan positively to support local development as outlined in paragraph 16 of the National Planning Policy Framework...</u>"</p> <p>Gladman do not believe the vision or policies as currently drafted will achieve a positive planning framework as required by paragraph 004 of the PPG. On the contrary, they are designed with a negative vision to impose a constraint without ascertaining need.</p> <p>"Can a Neighbourhood Plan come forward before an up to date Local Plan is in place? <u>Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area.</u> They can be developed before or at the same time as the local planning authority is producing its Local Plan.</p> <p><u>A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition.</u> A draft Neighbourhood Plan or Order is not tested against policies in an emerging Local Plan although <u>the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan</u></p>	

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		<p data-bbox="600 727 797 791">Response to paragraph 009</p> <p data-bbox="584 1150 813 1246">Paragraph: 040 Reference ID 41-040-20140306</p>	<p data-bbox="842 240 969 264"><u>is tested.</u></p> <p data-bbox="842 272 1771 360">Where a neighbourhood plan is brought forward before an up to date Local Plan is in place the <u>qualifying body and local planning authority should discuss and aim to agree the relationship between policies in:</u></p> <ul data-bbox="1003 368 1514 464" style="list-style-type: none"> <li data-bbox="1003 368 1514 392">• <u>The emerging neighbourhood plan</u> <li data-bbox="1003 400 1384 424">• <u>The emerging Local Plan</u> <li data-bbox="1003 432 1469 456">• <u>The adopted development plan</u> <p data-bbox="842 496 1615 520">With appropriate regard to national policy and guidance...</p> <p data-bbox="842 560 1816 687"><u>The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflict between policies in the neighbourhood plan and those on the emerging Local Plan..."</u></p> <p data-bbox="842 727 1827 847">As previously discussed in respect of paragraph 184 of the Framework, it is not yet known what the additional evidence work carried out by the Council will mean for the strategic priorities of the district until it has been tested and accepted by the Inspector at Examination.</p> <p data-bbox="842 887 1827 1110">The WNP is not supported by any robust evidence base. The Inspector in his interim findings found key elements of the Core Strategy could not be found sound and therefore additional evidence was required, this evidence has yet to be tested at examination. At this moment in time there is no adopted up to date development plan that the WNP can align itself with or tested against. The correct route for the Town Council is to progress the WNP only when the SACS has been adopted.</p> <p data-bbox="842 1150 1827 1406">"What evidence is needed to support a neighbourhood plan or order? While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in the Order..."</p>	

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		Response to paragraph 040	The WNP does not provide a robust and credible evidence base on which to plan for the development needs of the town over the plan period. An updated OAN has recently been published by the Council which identifies a total need of 14,480 dwellings over the plan period. A local planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body. The Regeneris OAN prepared on behalf of Gladman identifies a level of housing need that is significantly higher than the Council's revised OAN by a factor of 10,530 dwellings. Whilst these figures are currently being updated to take account of the 2012 Household Projections, we maintain that the Council's full OAN will continue to point to a significantly higher level of need than the Council's revised OAN. Until a robust evidence base has been established and the Local Plan has been subsequently adopted, Gladman considers it is not the correct time for the WNP to be progressed.	
		Paragraph: 041 Reference ID 41-041-20140306	"How should policies in a neighbourhood plan be drafted? <u>A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.</u>	
		Response to paragraph 041	A number of policies are counter to national planning policy and are therefore cannot be consistently applied when determining planning applications. As a result the WNP is inconsistent with basic conditions 2(a), (d) and (e).	
		Paragraph: 044 Reference ID 41-044-20140306	"Can a neighbourhood plan allocate additional or alternative sites to those in a Local Plan? <u>A neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan.</u> A neighbourhood plan can propose allocating alternative sites to those in a Local Plan, but a qualifying body should discuss with the local planning	

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		<p>Response to paragraph 044</p>	<p>authority why it considers the Local Plan allocations no longer appropriate.</p> <p>The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it <u>should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies</u> (see paragraph 16 and paragraph 184 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the Local Plan.</p> <p>Should there be a conflict between a policy in a neighbourhood plan and a policy in a Local Plan, section 38 5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.”</p> <p>The emerging Core Strategy seeks to distribute 2000 dwellings across 4 categories of Local Service Villages and aims to limit the growth each village will be expected to accommodate. Whilst the Council have adopted this policy ‘on an interim basis’, it remains subject to objections and is yet to be found sound.</p> <p>Stratford-on-Avon District commissioned ERM to conduct a review of the Objectively Assessed Need (OAN) for the district. The review concluded the OAN to be 14,480 dwellings for the period 2011-2031. Whilst Gladman welcome the increase to the overall housing provision figure they do not consider this to be based on sound evidence or truly represent the full OAN.</p> <p>Gladman remain of the view that the OAN is insufficient and the proposed scale of housing will not meet the full needs of the District. It should be noted that the Examination into the soundness of the Core Strategy is not complete at this stage and the OAN has and can continue to change. The OAN has not been set at a district level and this could have a significant impact on the amount of development to Local Service Villages.</p>	

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		<p>Paragraph: 069 Reference ID 41-069-20140306</p> <p>Response to paragraph 069</p>	<p>Gladman submit that the Neighbourhood Plan should make some provision for development, on top of the provision outlined in Policy HU1, in the form of an allocated site. Welford-on-Avon is a sustainable location for growth, and the site at Milcote Road represents a suitable and sustainable location for development, which can be developed to a high quality design.</p> <p>“What does having regard to national policy mean? <u>A neighbourhood plan or Order must not constrain the delivery of important national policy objectives.</u> The National Planning Policy Framework is the main document setting out the Government’s planning policies for England and how these are expected to be applied.”</p> <p>Gladman refer the Parish Council to our submissions in respect of paragraph 184 of the Framework found above. If the WNP is progressed and submitted for examination prior to the adoption of the SACS, then it cannot be seen to support the strategic requirements for the wider area as it has no regard to the Council’s housing needs.</p> <p>If the WNP is progressed in its current form it will likely be found contrary to basic conditions (a) and (d).</p>	
		<p>Paragraph: 070 Reference ID 41-070-20140306</p>	<p>“Which national polices are relevant to a neighbourhood plan or Order? <u>Paragraph 16 of the National Planning Policy Framework is clear that those producing neighbourhood plans or Orders should support the strategic development needs set out in Local Plans, including policies for housing and economic development.</u> Qualifying bodies should plan positively to support local development, shaping and directing development in their area that is <u>outside the strategic elements of the Local Plan.</u> More specifically paragraph 184 of the National Planning Policy Framework states that neighbourhood plans and Orders should not promote less development than set out in the Local Plan or undermine its strategic policies.</p> <p>The content of a draft neighbourhood plan or Order will dictate which additional national policy is or is not a relevant consideration to take into account. The basic condition allows qualifying bodies, the independent</p>	

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		<p data-bbox="600 564 797 628">Response to paragraph 070</p> <p data-bbox="584 959 813 1050">Paragraph: 074 Reference ID 41-074-20140306</p>	<p data-bbox="844 240 1767 300">examiner and local planning authority to reach a view in those cases where different parts of national policy need to be balanced.</p> <p data-bbox="844 336 1827 528"><u>A qualifying body is advised to set out in its basic conditions statement how they have had regard to national policy and considered whether a particular policy is or is not relevant.</u> A qualifying body is encouraged to set out <u>the particular national policies that it has considered</u>, and how the policies in a draft neighbourhood plan or the development proposals in an Order take account of national policy and advice.”</p> <p data-bbox="844 564 1827 916">The WNP seeks to accommodate future growth within a tightly drawn settlement boundary without any regard to the Council’s revised OAN and the strategic development needs for the wider area. The Neighbourhood Plan is based on the clear ambition to actively constrain the physical growth of Welford-on-Avon and seeks to preclude those sites located outside the settlement area in all but a limited set of specific circumstances contrary to the explicit requirements of the Framework. The WNP in its current form is in conflict with paragraphs 16, 47 and 49 of the Framework and paragraph 070 of the PPG and requires substantial revision before it is progressed under regulation 16 consultation.</p> <p data-bbox="844 952 1827 1442">“What is meant by ‘general conformity’? <u>When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority should consider the following:</u></p> <ul data-bbox="891 1086 1805 1442" style="list-style-type: none"> • Whether the neighbourhood plan policy or development proposal <u>supports and upholds the general principle that the strategic policy is concerned with</u> • <u>The degree, if any, of conflict</u> between the draft neighbourhood plan policy development proposal and the strategic policy • Whether the draft neighbourhood plan policy or development proposal <u>provides and additional level of detail and/or distinct local approach to that set out in the strategic policy without undermining that policy</u> • <u>The rationale for the approach taken in the draft neighbourhood plan</u> or Order and the evidence to justify that approach.” 	

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		<p>Response to paragraph 074</p> <p>Paragraph: 078 Reference ID 41-078-20140306</p>	<p>The WNP cannot be found to be in general conformity with the strategic requirements of the wider area given that the WNP has no regard to the additional evidence base work that has been prepared by the Council, specifically the OAN. It is important to consider that this additional evidence has yet to be tested and accepted by the Inspector examining the SACS. The Inspector may find that the OAN requires further adjustment and Stratford-upon-Avon as one of the most sustainable settlements will need to accommodate further growth, if the WNP is progressed in its current form it will not allow this to happen.</p> <p>“What are the relevant EU obligations? A neighbourhood plan or Order must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. There are four directives that may be of particular relevance to neighbourhood planning:</p> <ul style="list-style-type: none"> • <i>Directive 2001/42/EC</i> on the assessment of the effects of certain plans and programmes on the environment (often referred to as <u>the Strategic Environmental Assessment (SEA) Directive</u>). <u>This seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing plans and programmes. It may be of relevance to neighbourhood plans.</u> • <i>Directive 2011/92/EU</i> on the assessment of the effects of certain public and private projects in the environment (often referred to as the Environmental Impact Assessment (EiA) Directive). Environmental Impact Assessment is a procedure to be followed for certain types of proposed development. This is to ensure that decisions are made in full knowledge of any likely significant effects on the environment and that the public are given early and effective opportunities to participate in the decision making procedures. It may be of relevance to Neighbourhood Development Orders • <i>Directive 92/43/EEC</i> on the conservation of natural habitats and of wild fauna and flora and <i>Directive 2009/147/EC</i> on the conservation of wild birds (often referred to as the Habitats and Wild Birds Directives respectively). These aim to protect and improve Europe’s most important habitats and species. They may be of relevance for both neighbourhood plans or Orders. <p>Other European directives such as the Waste Framework Directive (2008/98/EC), Air Quality Directive (2008/50/EC) or the Water</p>	

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		<p>Response to paragraph 078</p>	<p>Framework Directive (2006/60/EC) may apply to particular circumstances of a draft neighbourhood plan or Order.”</p> <p>The Welford-on-Avon NP was subject to a screening report which determined that the Plan does not need to be subject to a SEA Report. However, the Screening Report did outline that:</p> <p><i>"This screening report has explored the potential effects of the proposed WANDP with a view to determining the likely requirement for an environmental assessment under the SEA directive. Results of the screening process indicate that there is uncertainty associated with the size, nature and location of likely proposals in the NDP."</i></p> <p>It is, however, noted that given the Core Strategy is yet to be found sound, there is the potential that a party aggrieved with the outcome of the neighbourhood plan could seek to challenge the outcome on this basis.</p> <p>It is in the interests of all stakeholders that the WNP is based on a robust and deliverable strategy, and once 'made' is not open to challenge. Given there remains uncertainties regarding the emerging Stratford-on-Avon Core Strategy, there may be some merit in an SA/SEA of the WNP being undertaken, to ensure that the plan is able to demonstrate its ability to deliver sustainable development.</p>	
		<p>Paragraph: 007 Reference ID 37-007-20140306</p>	<p>"How does Local Green Space designation relate to development? Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, <u>plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.</u>"</p>	
		<p>Response to paragraph 007</p>	<p>Gladman contend that the designation of Local Green Space should be consistent with the requirements set out by paragraph 76 and 77 of the Framework and the above guidance. Gladman refer to the examiner's report to the Outwoods Neighbourhood Plan which found that unless the proposal satisfies each of the three bulleted criteria under paragraph 77 of the Framework, it does not meet the requirements for this</p>	

Rep. No.	Person or organisation	Policy	Representation	Reg 19 request?
		<p data-bbox="595 660 801 783">Paragraph: 046 Reference ID: 11-046- 20150209</p> <p data-bbox="595 1281 801 1342">Response to paragraph 046</p>	<p data-bbox="842 240 1010 268">designation.</p> <p data-bbox="842 304 1832 624">Gladman note that policy HE2: Important Green Spaces identifies 7 areas which are being proposed as Local Green Spaces. It is not appropriate at this time to designate land as Local Green Space, until there is greater clarity on the level of housing that may be required in Stratford-upon-Avon and the wider area. This can only be determined following the successful outcome of the SACS at Examination. The use of this policy tool without the appropriate evidence to demonstrate that the proposed areas meet all of the requirements set out in the Framework. Progression of the WNP at this time will result in a strategy that restricts the supply of housing and therefore impact SADC's ability to meet its full OAN.</p> <p data-bbox="842 660 1816 887">"What do you do if a neighbourhood plan is likely to have a significant environmental effect? <u>Where a neighbourhood plan is likely to have a significant effect on the environment a strategic environmental assessment must be carried out and an environmental report prepared in accordance with paragraphs 2) and 3) of regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004.</u></p> <p data-bbox="842 924 1816 1046">Whether a neighbourhood plan proposal requires a strategic environmental assessment, (and if so) the level of detail needed, will depend on what is proposed. <u>A strategic environmental assessment may be required, for example, where:</u></p> <ul data-bbox="891 1051 1816 1243" style="list-style-type: none"> <li data-bbox="891 1051 1659 1078">• <u>A neighbourhood plan allocates sites for development</u> <li data-bbox="891 1086 1771 1147">• The neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan <li data-bbox="891 1155 1816 1243">• The neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan." <p data-bbox="842 1281 1805 1437">Whilst there is no legal requirement for a Neighbourhood Plan to have a supporting sustainability appraisal, PPG suggests that it may provide a useful approach to assess whether a neighbourhood plan will meet all basic conditions required by section 38 of the Planning Compulsory Purchase Act 2004.</p> 	

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		<p>Paragraph: 040 Reference ID 3-040-20140306</p>	<p>The adequacy of a Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA) goes to the core compliance of basic condition (f) which requires strict adherence to the requirements of the Strategic Environmental Assessment Directive and the implementing UK regulations.</p> <p>Gladman note that the SEA Screening Report states that the WNP will be in conformity with the strategic influence of the Stratford-on-Avon Core Strategy, and an SEA is therefore not required and the Council have agreed with this stance. It is, however, noted that given the Core Strategy is yet to be found sound, there is the potential that a party unhappy with the outcome of the neighbourhood plan could seek to challenge the outcome on this basis.</p> <p>It is in the interests of all stakeholders that the WNP is based on a robust and deliverable strategy, and once 'made' is not open to challenge. Given there remains uncertainties regarding the emerging Stratford-on-Avon Core Strategy, there may be some merit in an SA/SEA of the WNP being undertaken, to ensure that the plan is able to demonstrate its ability to deliver sustainable development.</p> <p>"How does the five-year housing supply relate to neighbourhood planning? Local planning authorities need to be able to demonstrate a five-year supply of deliverable sites in order to comply with national policies. The National Planning Policy Framework asks local planning authorities to use their evidence base to ensure that their Local Plan meets the objectively assessed needs for market and affordable housing, identifies key sites that are critical to the delivery of the housing strategy and identifies and updates annually a supply of specific deliverable sites sufficient to provide a five- year supply.</p> <p><u>Neighbourhood plans set out policies that relate to the development and use of land and can be used to allocate sites for development but the plans must be in general conformity with the strategic policies of the Local Plan.</u> Where a neighbourhood plan comes forward before is in place, the local planning authority should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress</p>	

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		<p>Response to paragraph 040</p> <p>Site submission</p> <p>Assessment against Basic Conditions</p>	<p>and to share evidence to prepare their plan. <u>Neighbourhood Plans should deliver against the objectively assessed evidence of needs.</u></p> <p>The WNP fails to propose policies that will deliver housing in accordance with the full objectively assessed housing needs. The WNP cannot be in conformity with the strategic policies for the wider area when it has progressed ahead of the publication of the Council's new evidence. Furthermore, this evidence is yet to be tested at Examination and may be subject to further changes.</p> <p>Gladman commissioned specialist consultants Regeneris to prepare an OAN which fully reflects the requirements set out in the Framework and the PPG. This assessment of housing need demonstrates the full OAN to be 25,010 i.e. 1,245 dwellings per annum. Whilst these figures are currently being updated to take account of the 2012 Household Projections, we maintain that the Council's full OAN will point to a significantly higher level of need than the Council's revised OAN.</p> <p>The Parish Council are aware that Gladman have land interests at Milcote Road, Welford-on-Avon. Gladman consider the site to be suitable, available and deliverable. The site is capable of accommodating a high quality sustainable residential development, structural planting and landscaping and informal open space. Appendix 1 of our representation provides a site location plan.</p> <p>Gladman submit that the plan should make some provision for development, especially as the OAN is subject to change in the ongoing examination process. Gladman have developed extensive evidence to show that the site is suitably located with good access to existing facilities and services. The proposal will provide new homes which will help sustain the vitality and viability of local services and facilities for future years. Gladman believe the site can bring real benefits to the community and proposals can be brought forward which directly address matters which were raised in the recent appeal decision on the site.</p> <p>Gladman object to the Welford-on-Avon Neighbourhood Plan in its current form, which is distinctly anti-growth attempts to resist future growth through a number of policies which seek to constrain the ability</p>	

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			<p>of new sustainable development proposals coming forward.</p> <p>The Welford-on-Avon Neighbourhood Plan contains a series of flaws not only in its application to local and national policy, but lacks clear robust and up-to-date evidence to support a number of its objectives and policies. Several areas of the Welford-on-Avon Neighbourhood Plan need to be addressed by a fundamental overhaul to the development strategy, failure to do so will undoubtedly lead to the plan being found unable to meet a number of the basic conditions at Independent Examination.</p> <p>The Welford-on-Avon Neighbourhood Plan contains a number of matters which contravene the following basic conditions:</p> <p>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State,</p> <ul style="list-style-type: none"> • Gladman contend that the strategy as proposed by the Welford-on-Avon Neighbourhood Plan’s vision, objectives and a number of policies, including their supporting text, seek to constrain the delivery of sustainable housing development. This is in direct conflict with the National Planning Policy Framework. <p>(d) The making of the order contributes to the achievement of sustainable development</p> <ul style="list-style-type: none"> • The policies contained throughout the WNP actively seek to constrain the ability for sustainable growth opportunities, such as Gladmans’ site at Milcote Road, and would actively seek to constrain the ability for development to come forward through various mechanisms to prevent future sustainable growth. • There is no other development envisaged other than that which is contained within the revised built up boundary, this provides no flexibility or contingency in the event of an undersupply of housing. If the WNP does not seek to deliver the districts’ OAN then it will fail to maintain the town’s vitality and viability and will not provide housing of a scale to meet localised or district wide housing needs. 	

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			<p>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area (or any part of that area)</p> <ul style="list-style-type: none"> • The emerging SACS is subject to an ongoing Examination, the Council have recently published the additional evidence base work required by the Inspector. The WNP seeks to advance ahead of the successful outcome of the SACS. It therefore cannot be considered to be in general conformity with the strategic policies for the wider area when it disregards the additional evidence base work which has been undertaken. At this time there is no sound or up-to-date adopted local development plan against which the WNP can be prepared and tested against. • The WNP is not supported by any robust evidence, relying solely on the evidence of a development plan that was found unsound in the Inspector's interim findings. • The WNP seeks to establish policies that will pre-empt the successful outcome of the SACS's examination. <p>(f) The making of the order does not breach, and is otherwise compatible with EU obligations</p> <ul style="list-style-type: none"> • Whilst the plan has been screened and determined not to require a SEA, Gladman submit that if the OAN is found to be higher than that outlined in the ERM Review, the Parish Council may have to subject to plan to a SEA, as they could be the possibility of having to allocate sites around Welford-on-Avon. <p>Gladman would like to remain involved throughout the preparation of the Welford-on-Avon Neighbourhood Plan and therefore request to be added to the consultation database. Gladman wish to take part in the hearing session(s) of the examination of the Neighbourhood Plan.</p>	
WNP10	Stratford-on-Avon District Council	Whole document	SDC commend all the work that has gone into the writing of the Welford-on-Avon Neighbourhood Plan. The plan is easy to read, well laid out with targeted policies focussing on delivering the community's vision and objectives. In general, the policies of the Plan appear well-justified, and	Yes

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		<p data-bbox="611 336 786 395">General Observations</p> <p data-bbox="667 1086 730 1114">HE1</p> <p data-bbox="667 1182 730 1209">HE2</p> <p data-bbox="667 1374 730 1401">HE3</p>	<p data-bbox="842 240 1794 300">the consideration given to arrangements for its monitoring and review are welcomed.</p> <ul data-bbox="891 336 1832 1050" style="list-style-type: none"> <li data-bbox="891 336 1832 432">• The plan's objectives don't appear to be SMART i.e. specific, measurable, achievable, realistic and timely - realistic targets that measure the accomplishment of a goal of a specified time frame <li data-bbox="891 432 1832 496">• It would be very helpful if evidence documents were referenced throughout the Plan, ideally as footnotes <li data-bbox="891 496 1832 560">• Page 9, final paragraph – for clarity, suggest it starts 'If not required earlier, two years before...' <li data-bbox="891 560 1832 624">• Page 10 – not sure the distinction for delivering objectives is that clear or necessary <li data-bbox="891 624 1832 751">• The Welford Plan Objective No.5 (page 10): There does not appear to be a policy approach within the Plan to help deliver the provision of adequate waste water systems as specified in the objective <li data-bbox="891 751 1832 911">• Concern that all references to Local Plan policies will become redundant once Core Strategy is adopted and those in relation to housing development will become particularly out-of-date and confusing. Table 4 provides a comparison of policies in the LP and NP in any case. <li data-bbox="891 911 1832 1050">• on a point of detail in respect of the definition of "Affordable Housing" in the Glossary, it should be noted that provision of such housing does not always involve "some measure of public funding" <p data-bbox="842 1086 1738 1145">A plan should be included in NDP itself illustrating important views identified in the policy.</p> <p data-bbox="842 1182 1827 1342">It is unclear whether the Local Green Spaces identified have been assessed for their compliance with criteria in paragraphs 76 and 77 of NPPF. Additionally, there is no map included to help pinpoint the locations of the sites listed LGS1 to LGS7. Without this visual aid, people unfamiliar with the village will not know where these sites are located.</p> <p data-bbox="842 1374 1693 1469">Should reference be made to the requirement of Very Special Circumstances in order to justify development on such sites, in accordance with paragraph 76 of NPPF?</p>	

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		HE5	<p>Consider amending the first sentence of the policy to read "Open countryside surrounds the settlement of Welford-on-Avon..."</p> <p>Figure 8 is a screen shot from the 2012 SHLAA, which may well be considered out of date, given the number of permissions and appeals granted for development since that map was produced. There may be a need to re-visit the settlement or built-up-area boundary for the village and include an up-to-date map within the Plan to take account of recent decisions.</p>	
		HE6	<p>Should it be made clear that this is irrespective of exceptions identified in Policy HE5 of the Plan?</p> <p>The 'strategic gap' between the two settlements should be clearly indicated on a map, in order to clearly define the land covered by this policy.</p>	
		HE7	<p>This policy is too restrictive. It would be inappropriate to require natural hedging for rear boundaries, e.g. between gardens, in most cases. Abutting a right of way would be reasonable to do so. It does not take account of existing permitted development rights for boundary treatments.</p>	
		HE8	<p>It is considered that a map of the allotments, clearly defining its outer limits in the overall landscape context would be beneficial to the reader of the Plan.</p>	
		HE9	<p>It is recommended that the second sentence in the policy is amended to read as follows: "Development within these flood zones will be opposed <u>resisted</u> unless:"</p> <p>The policy should reflect the sequential approach sets out in Paragraphs 100-104 of the NPPF. Whilst there is a general presumption against development in Flood 2 and 3, development is permitted where it would satisfy the sequential or exception test, and demonstrate that development will be safe for its lifetime taking account of the vulnerability of its users without increasing flood risk elsewhere, and where possible, reduce flood risk overall.</p>	

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		INF3 Page 32, Table 1	<p>The policy could provide for opportunities to reduce flood risk through the use of sustainable urban drainage and links to green infrastructure. The plan doesn't mention surface water flooding, although it is included in Objective 12.</p> <p>Second paragraph of explanatory text under Policy HE9: The reference to 'commercial' development taken from the PPG is queried in this context.</p> <p>On what basis has 6 mile journey been identified? There does not appear to be any justification or evidence to support this figure/distance.</p> <p>A number of housing approvals identified in Table 1 are not within the settlement/built-up-area boundary of Welford-on-Avon. Only those that are within the settlement count towards Welford's Local Service Village (LSV) housing provision so the table needs to be amended accordingly. As at 30 September 2015, there were 23 completions and 65 commitments with resolution to grant, outline or full planning permission equating to a total of 88 new dwellings within the LSV. The Parish total at the same date was 179 dwellings, this being made up of 44 completions and 135 commitments.</p>	
		Page 32, Table 2 HLU1	<p>Of the 6 cases listed, the current situation is as follows: 14/02810/OUT – Appeal dismissed 15/01604/FUL – Application refused and currently at appeal 14/03173/FUL – Appeal dismissed 15/02101/FUL – Application refused and currently at appeal 15/02391/FUL – Application refused 15/01410/FUL – Application has been withdrawn</p> <p>Page 33, 2nd paragraph – for the above reasons, the percentage figure of approved dwellings for the village needs to be recalculated.</p> <p>Third paragraph of policy – It is not clear what this part of the policy is trying to achieve. Stating that cumulative development should not exceed 'small scale' is too vague. What does small scale actually mean? How can it be measured or monitored?</p> <p>Fourth paragraph of policy – five dwellings is probably too low a</p>	

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			threshold to insist on the provision of a Transport Assessment.	
		HLU2	The basis for this policy is questionable in relation to Welford as there are no means of phasing the implementation of planning permissions and small-scale windfall sites.	
		HLU4	Paragraph 1 – Whilst the sentiment is understood, many boundary treatments are permitted development and therefore outside the control of the planning system. Paragraph 3 of policy – It is not considered that the minimum width of footpaths can be insisted on through the NDP. This is dealt with via technical guidance controlled by WCC as highways authority. I do not consider you can override such guidance.	
		HLU5	Suggest delete the word 'Emerging' in first line when referring to the Core Strategy so that it doesn't become overtaken by events. Whilst concurring with the broad objectives, they would be achievable within the framework of policies within the emerging Core Strategy. In that sense they don't appear to bring real "added value" to the plan-making process, other than perhaps to confirm local community priorities. More importantly, the Parish Council may wish to carefully consider some of the issues around its implementation. Given other relevant policies of the Plan, and the absence of any allocated sites, it appears unlikely that any of the preferred scheme typologies will be delivered on any scale within the village: relying as it will on supply principally from small-scale "windfall" schemes. Extra Care Housing, in particular, is more likely to need to be on a larger-scale to be viable - although such a scheme could be pursued via the community led 'Local Need' route.	
		HLU6	Although it is good practice to have positively-worded policies, it would be appropriate to rephrase this one negatively given the types of sites it covers, i.e. 'Development in...will not be supported unless it:...' Also suggest '...and its surroundings' is added to end of final bullet point.	
		HLU7	The final bullet point is more widely applicable and might be better	

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			<p><i>Policy B15 – Provision, Retention and Enhancement of Community Facilities.</i></p> <p>“The Parish Council will permit proposals for new, and improvements to existing, Community Facilities, including the possibility of a new Village building, provided that:</p> <ul style="list-style-type: none"> • adequate provision for parking is provided; • the site is, wherever possible, located in or adjacent to the settlement boundary; • the site is accessible by walking and cycling; • there are opportunities to integrate services; • detrimental impacts on road safety or traffic flow can be satisfactorily mitigated in the interests of both road users and users of the proposed development; and • the proposal would not have an adverse effect on residential amenity. <p>The Joint Parish Council should review the suitability of the present community buildings in relation to the proposed growth of the village and consider the possibilities for facilities that could be incorporated in a new multi-purpose building”.</p> <p><u>Objective 9 – “Traffic will have been managed and through traffic will have been controlled thus ensuring the village roads are safe for all residents. Any development will minimise commuting and traffic movements”</u></p> <p>and;</p> <p><u>Objective 10 – “Public Transport will have been improved, and the extensive network of footpaths and cycle ways further developed and maintained”</u></p> <p>Could traffic management/improvement issues be worked into policies like B11 and B12 of the Barford NDP (below)?</p> <p><i>Policy B11 – Traffic Management.</i></p> <p>“New development will be permitted subject to the following:</p> <ul style="list-style-type: none"> • suitable and safe access is provided to the site; 	

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			<ul style="list-style-type: none"> • all additional traffic generated by the development is identified and any mitigation measures are provided by the developer; • parking is provided in accordance with the policy B13; • there is no detrimental impact on the pedestrian/cycleway network". <p><i>Policy B12 – Transport Improvements.</i></p> <p>"Developer contributions under Section 106 and Community Infrastructure Levy payments will be sought towards the following within the parish:</p> <ul style="list-style-type: none"> • Highway improvement schemes to promote the safety of pedestrians and cycle users; • Traffic calming measures, pedestrian priority schemes and the reduction in traffic speeds on routes through the village centre; • Increasing public and community transport to and from the village. • High speed broadband • Community facilities <p>The parish council will work with and encourage providers of public transport to provide as full a service as is needed to support future development in the village. This will include developing relations with community transport suppliers to provide transport direct to supermarkets etc. to cover the needs of those who need assistance".</p> <p><u>Objective 11 – "Sustainable green and low energy consumption using existing and emerging technologies will have been championed"</u></p> <p>Could this objective be fashioned into a policy in conformity with Section 10 of the NPPF, along the following lines:</p> <p>"The incorporation of renewable and low-carbon energy technologies in all new development will be encouraged and supported"?</p> <p><u>Objective 12 – "River and surface water flooding will have been controlled"</u></p> <p>Could this objective be fashioned into a policy, along the following lines:</p>	

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			"All new development must ensure that surface water flooding in the area will not be exacerbated and development must not overload the foul drainage system within the village"?	
WNP11	Coventry Airport	Whole document	Coventry Airport has no objection to this Neighbourhood Development Plan.	Not stated
WNP12	Inland Waterways Association	HE2	The IWA (Warwickshire branch) is particularly keen to maintain the scenic beauty of the River Avon and stop the proliferation of mobile home parks which ruin the views on some parts of the river.	Not stated
		HE5	The IWA (Warwickshire branch) would like to see improved visitor moorings in the area to allow passing boaters to see the village and use its facilities more easily.	
		HE9	The provision of moorings mentioned earlier could provide a safe haven for unlucky river users in time of flood.	
WNP13	A. Brookes	HLU1	The Neighbourhood plan document, page 33,34 and the map depicted in figure 8, are misleading and do not reflect the actual village "built up area" at the date of the publication of the document, i.e. the 4th August 2015. In view of the fact that SDC have already granted permission for various developments outside of the area outlined in figure 8, by default, the built up area has been extended and should be reflected by a true and accurate, "built up area" plan.	Not stated
WNP14	M. Crump	HE5	Suggest re-wording the second sentence above to read: "Consideration for support of development in the open countryside will be given providing it":- After all simply because a site is brownfield does not mean that support for development should automatically necessarily be forthcoming.	Not stated
		HE7	Sometimes a tasteful stone wall is preferable to an overgrown hedge. Also unkempt hedges adjacent to narrow pavements can create a safety hazard for pedestrians in busy roads. You only have to look at the west side of the northern end of Long Marston Road.	
		INF1	I find the response choices of "Support" or "Object" too broad for the Dark Skies Policy which has several facets. I also have some concerns regarding the consultation process leading to this policy. In my opinion	

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		INF2	<p>the term "Dark Skies" is synonymous with no street lighting for most people and I should like to make the following comments:- The draft Neighbourhood Plan (NP) states that the Dark Skies Policy was supported by over 90% of residents consulted in December 2013 and April 2014.</p> <p>The NP Committee minutes of 10th December state that 59 feedback forms were received from the three sessions held on 1st December so it is reasonable to conclude that c55 people supported the policy. There do not appear to be any equivalent minutes giving feedback from the April 2014 consultation but fewer people were present and many were the same as those who attended in December. However, the December '13 consultation form talked only of a Dark Skies Policy and the minutes of the December 10th Committee meeting confirm ".....the area and scope of [the policy] is yet to be determined".</p> <p>Similarly the feedback form issued in April'14 talked of minimising light pollution without saying how. The NP acknowledges that data from the Welford Parish Plan on the environment was "particularly valuable in informing and setting a baseline". Yet the Parish Plan reported that a small majority of 53% of the 866 respondents (462 people) supported the provision of street lighting at locations where it could be beneficial such as at junctions and street corners. I wonder if more research into public opinion should have taken place?</p> <p>Turning to external lighting on homes and businesses I note that the NP states that "Welford...has very few areas which are permanently lit overnight...hence reducing the likelihood of burglaries". I find this rationale counter intuitive and certainly not in accordance with advice given to me by both the police and our insurance company when we once experienced a burglary. More importantly it contradicts the advice from Warwickshire Police and the Council's Rural Crime Co-ordinator published in the January 2015 edition of our parish magazine which reads "Consider the installation of external lights. The will welcome genuine visitors and deter the criminal who wishes to work undetected". I hope that you can understand why I find it difficult to support this policy.</p> <p>More sewerage capacity is long overdue.</p>	

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			<ul style="list-style-type: none"> • Dwellings appropriate to older residents wishing to down-size, including bungalows • Houses specifically designed for first-time buyers • Extra Care accommodation, as defined by Warwickshire County Council. <p>Proposals for other types of dwellings will only be supported if very special circumstances can be clearly demonstrated. New Residential Development outside the Built-Up Area Boundary will be supported if it is in accordance with policy HE5.' If there is a better way of ensuring that regard is given to Welford's allocation of 84 houses, except in the special identified circumstances of providing housing for the elderly, first time buyers etc, and to the extent that it is appropriate to entrench the allocation of 84 houses in the Village Plan, might that be included in the Plan?</p>	