

Harbury and Deppers Bridge Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

Rep. No.	Policy/Topic	Representation
HDB1	General	Bishop's Itchington Parish Council has no representation to make in respect of the Harbury NDP.
HDB2	General	<p>Thank you for your consultation on the proposed Harbury and Deppers Bridge Neighbourhood Development Plan.</p> <p>The plan area is not within close proximity to the network and therefore the Canal and River Trust have no comments to make.</p>
HDB3	General	<p>Thank you for consulting The Coal Authority on the above.</p> <p>Having reviewed your document, I confirm that we have no specific comments to make on it.</p> <p>Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.</p>
HDB4	<p>General</p> <p>Flood Risk</p>	<p>Thank you for consulting the Environment Agency on the Harbury and Deppers Bridge Neighborhood Development Plan (NDP).</p> <p>The Environment Agency are the main body providing advice on improving resilience and adaptation to the effects of climate change, with particular regard on flood risk, water resources, water quality and aquatic biodiversity.</p> <p>We strive to make a positive contribution through our Statutory Consultee role and are happy to provide comments at this stage of the plan making process.</p> <p>Flood Risk</p> <p>We have previously commented on the draft version of plan in September 2016 and our comments remain the same. Whilst the majority of the plan area is located within Flood Zone 1, we note that our recommendations have not been included in this version of the NDP. We would strongly recommend that the existing policies are expanded, or new</p>

		<p>policies included, to ensure new development is not at risk of flooding and does not increase flood risk elsewhere, taking into account the impacts of climate change.</p> <p>This should support the strategic development needs and policies as set out in Stratford on Avon District Council's adopted Core Strategy 2011 to 2031. In particular, we consider the following policies should be considered;</p> <ul style="list-style-type: none"> • Policy CS.2 (Climate Change and Sustainable Construction) • Policy CS.4 (Water Environment and Flood Risk) • Policy CS.7 (Green Infrastructure) <p>Our previous comments from September 2016 are included below;</p> <p>Harbury and Deppers Bridge are located in Flood Zone 1 (low risk). However, the existing development in Deppers Bridge hamlet is located within 100m of the Main River Itchen and its floodplain. It's important that the NDP includes a Policy to ensure new development is located outside of the floodplain of the River Itchen.</p> <p>Policy H.04</p> <p>We recommend that this Policy should explicitly state that all new development should be located in Flood Zone 1 and that the River Itchen floodplain must be maintained and, where opportunities arise, restored in order to maximise natural storage of flood water, reduce flooding problems and increase landscape, ecological and conservation value.</p> <p>Evidence – Stratford upon Avon's Local Plan Strategic Objective (6) and Policy CS.4</p> <p>Policy H.14</p> <p>We support this Policy that all new development should use sustainable drainage to manage surface water runoff as close to its source as possible. This should maximise any opportunities to enhance biodiversity, create amenity and contribute towards green infrastructure. Surface water discharge from all developments should be limited to the equivalent Greenfield runoff rate.</p> <p>Policy H.10</p> <p>The requirement to retain mature trees and hedgerows can also contribute towards reducing surface water and soil runoff from agricultural land and should be encouraged wherever possible.</p>
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	Groundwater and Contaminated Land	<p>We recommend that Warwickshire County Council as the Lead Local Flood Authority in the area are consulted on this Plan. The LLFA are responsible for managing flood risk from local sources including ordinary watercourses, groundwater and surface water.</p> <p>Groundwater and Contaminated Land</p> <p>The area covered by the Neighbourhood Development Plan is predominantly located on the bedrock of the Rugby Limestone Member, which is designated a 'Secondary (A) Aquifer' by the Environment Agency. Part of the designated plan area is located on the Secondary Undifferentiated Aquifer of the Charmouth Mudstone Formation. Superficial layers of Glacial Till, designated as a Secondary Undifferentiated Aquifer, are also present in places.</p> <p>Secondary A Aquifers are capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. Secondary Undifferentiated Aquifers may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons.</p> <p>There are no Source Protection Zone identified in the Neighbourhood Plan area. The River Itchen is located to the east of the designated plan area, with several other surface water features designated including Bishops Bowl Lakes.</p> <p>Our records indicate that a historic landfill is located north of Harbury, within the area covered by the Neighbourhood Plan. According to Environment Agency records this landfill was excavated during construction of the adjacent railway and accepted industrial waste and soil. It should be noted that Local Authorities hold the most detailed records of historic landfills and consequently the relevant department of Warwick District Council should be contacted to ascertain if there is any additional information available.</p> <p>We note that this landfill, or any potential issues with regards to land contamination, are not highlighted within the 'Harbury and Deppers Bridge Neighbourhood Development Plan 2017 to 2031' (November 2017). If development is to be carried out in this area, consideration should be given to any residual risk to 'Controlled Waters' receptors and the need for any remedial actions.</p> <p>In planning any development in this neighbourhood plan area, reference should be made to our 'Groundwater Protection: Principles and Practice' (GP3) document. This sets out our position on a wide range of activities and developments, including:</p>
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	Biodiversity	<ul style="list-style-type: none"> • Storage of pollutants and hazardous substances • Solid waste management • Discharge of liquid effluents into the ground (including site drainage) • Management of groundwater resources • Land contamination • Ground source heat pumps • Cemetery developments <p>Government Policy, as detailed in the National Planning Policy Framework (paragraph 120), states that <i>‘where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner’</i>. Consequently should a development site currently or formerly have been subject to land-use(s) which have the potential to have caused contamination of the underlying soils and groundwater then any Planning Application must be supported by a Preliminary Risk Assessment. This should demonstrate that the risks posed to ‘Controlled Waters’ by any contamination are understood by the applicant and can be safely managed.</p> <p>Biodiversity</p> <p>The policies referring to ecological and landscape protection are appropriate, but we would suggest that the presence of the River Itchen as the eastern boundary should be highlighted within the Natural Environment chapter and the importance of rivers as blue/green corridors for ecology and how development should allow space for water and biodiversity.</p> <p>We would also suggest that the status of Bishop's Hill & Bishops Bowl as Local Wildlife Sites should also be highlighted as there is little reference to it.</p> <p>We hope you find the above comments useful and we look forward to being consulted in the next stage of the consultation process.</p>
HDB5	General	<p>Introduction</p> <p>This letter provides the response of Gladman Developments Ltd. (hereafter referred to as “Gladman”). Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.</p>

	Legal Compliance	<p>Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic growth.</p> <p>Gladman has been involved in contributing to the plan preparation process across England through the submission of written representations and participation at local plan and neighbourhood plan public examination.</p> <p>Structure of representations</p> <p>These representations are structured to follow the consultation document and will cover the following key topic areas:</p> <ul style="list-style-type: none"> - Legal compliance - Consistency with the Stratford-on-Avon Core Strategy - Neighbourhood Plan polices <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the Harbury and Deppers Bridge Neighbourhood Plan (HDBNP) must meet are as follows:</p> <ul style="list-style-type: none"> (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order. (b) The making of the order contributes to the achievement of sustainable development. (c) 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). (d) The making of the order does not breach, and is otherwise compatible with, EU obligations. <p>National Planning Policy Framework and Planning Practice Guidance</p> <p>The National Planning Policy Framework (the Framework) sets out the Government’s planning polices for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.</p>
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At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to

	General	<p>this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded.</p> <p>Relationship to Local Plans</p> <p>To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted Development Plan relevant to the preparation of the HDBNP is the Stratford-on-Avon Core Strategy, adopted on 11th July 2016.</p> <p>However, it is important to note that the Council is progressing a Site Allocations Plan (SAP) which will identify additional sites for development to supplement the strategic sites identified by the Core Strategy. The Council is currently consulting on its Initial Issues and Options consultation which ends on 9th March 2018. In light of this, it is clear that the SAP is in its infancy, as such, it is important that the HDBNP allows for flexibility and adaptability so it can positively respond to changes in circumstance which may arise over the duration of the plan period. This degree of flexibility is required to ensure that the HDBNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:</p> <p>‘if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).’</p> <p><u>Harbury and Deppers Bridge Neighbourhood Plan</u></p> <p>These representations are made to the current consultation on the submission version of the HDBNP, under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.</p> <p>This section highlights the key issues that Gladman would like to raise with regards to the contents of the HDBNP as currently proposed and its consistency with the requirements of national policy and guidance. To address these inconsistencies Gladman has sought to recommend a series of alternative options to be considered so that the Plan fully reflects the requirements of national policy and guidance.</p>
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	Objectives	<p>Neighbourhood Plan Objectives</p> <p><u>Objective 1</u></p> <p>Gladman is concerned that the HDBNP only seeks to provide small infill housing developments with ‘lifetime housing’ design. Such an approach limits sustainable growth opportunities and does not take account the positive approach to new growth required by the Framework which seeks to boost significantly the supply of housing. Further, objective 1 does not take account of development viability if all dwellings are required to met ‘lifetime housing’ standards. In addition, whilst the provision of new affordable housing is supportive in principle, the objective fails to recognise how an increase in market housing dwelling schemes can assist in the HDBNP in delivering affordable housing units.</p> <p><u>Objective 2</u></p> <p>The above objective seeks to ‘preserve and protect all green spaces within the village and retain countryside views out across a natural landscape’. This objective is considered onerous and would likely result in any sustainable development opportunities being rendered unsustainable for development solely due to its location as a result of the protectionalist stance the neighbourhood plan takes in seeking to protect all green spaces and countryside views across the natural landscape. This does not accord with the requirements of the Framework. Gladman recommend that this objective is modified so that it requires development proposals recognise existing landscape areas and views and that existing features which are considered to be important based on up-to-date evidence are incorporated within a development proposal where possible.</p> <p><u>Objective 9</u></p> <p>The above objective seeks to protect all historic and heritage sites in the parish. This does not take account of the separate balancing exercises required by the Framework in relation to both designated and non-designated heritage assets and should be reflected within the HDBNP.</p>
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<p>H.01 and H.02</p>	<p>Neighbourhood Plan Policies</p> <p><u>Policy H.01 - New Housing Development in Harbury Village and Policy H.02 — New Housing Development in Deppers Bridge and the Open Countryside</u></p> <p>Policy H.01 seeks to define the settlement boundary around Harbury village and only seeks to allow for small scale development within the settlement boundary. Development proposals beyond the settlement boundary as defined by policy H.02 will only be supported where they provide replacement dwellings, redevelopment of redundant or disused development bring back into use a heritage asset or dwellings essential for agricultural workers.</p> <p>Gladman object to policies H1 and H2 in their current form as these will act to preclude the delivery of otherwise sustainable development opportunities from coming forward. The Framework is clear that development that is sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development.</p> <p>The use of a settlement boundary will likely act to arbitrarily restrict growth opportunities from coming forward and therefore does not accord with the positive approach to growth required by the Framework.</p> <p>Indeed, the PPG is clear that all settlements can play a role in delivering sustainable development, so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence’, Accordingly, Gladman recommend that a more flexible stance to development that is well related to Harbury is taken and the following wording is put forward for consideration:</p> <p>“When considering development proposals, the Harbury and Deppers Bridge Neighbourhood Plan will take a positive approach to new development that reflects the presumption In favour of sustainable development contained In the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Harbury and Deppers Bridge Neighbourhood Plan will be supported particularly where:</p> <ul style="list-style-type: none"> - Provision of new homes including market and affordable housing; or - Opportunities for new business facilities through new or expanded premises; or - Infrastructure to ensure the continued vitality and viability of the neighbourhood area.
<p>H.04</p>	<p>Development adjacent to the existing settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”</p>

Policy H.04 — Local Needs Schemes

In principle, Gladman support the above policy but question how a ‘professional Parish Housing Needs Survey’ will be undertaken. It would be more appropriate if the above policy referred to the latest and most up-to-date assessment of housing needs such as a Strategic Housing Market Assessment which is more likely to be updated on a more frequent basis by the local planning authority.

Furthermore, it is noted that the above policy recognises that should such a need be identified then development will be allowed where it adjoins the village settlement boundary and is within reasonable walking distance of public transport and local community facilities. This is a positive approach to future growth and should be reflected in policy H.02 and the provision of market and affordable housing schemes.

H.09

Policy H.09 - Protecting Significant Views

The above policy seeks to protect significant views out of the village. Whilst acknowledging that these views maybe valued by the local community, this policy should be supported by robust evidence and allow a decision maker to come to a view as to whether particular a particular location contains physical attributes that would ‘take it out of the ordinary.’ It does not appear that any up-to-date evidence has been prepared to support the proposed views other than the Village Design Statement (1998) and this brings into question the adequacy of the evidence supporting this policy. As such, the policy is not supported by proportionate and robust evidence as required by the PPG’ and Gladman recommend that this policy is deleted.

Local residents may have particular concerns with development being located on the edge of Harbury which at present forms an area of countryside that is currently accessible. However, an area’s pleasant sense of openness and the presence of views across an area to open countryside cannot, on their own, amount to a landscape which should be protected.

Gladman submit that new development can often be located on the edge of settlements without impacting on key vistas and views. Quite often the delivery of sustainable development proposals can enhance an existing landscape setting and provide new vistas and views to the surrounding area to the benefit of both existing and future residents.

	General	<p><u>Conclusions</u></p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. Whilst we support many of the policies aims and objectives in principle, we feel that the Plan would benefit from additional modifications to policies contained within, to ensure that It allows for flexibility going forward and guarantees that the Plan is capable of reacting positively to changes that may occur over the plan period.</p> <p>If the Examiner decides that it is necessary to hold a public hearing to discuss the issues raised then Gladman respectfully request that we are afforded the opportunity to participate at the hearing session(s).</p>
HDB6	General	<p>Thank you for giving the Highways England the opportunity to comment on the above referenced documentation.</p> <p>Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England, which includes all motorways and major trunk roads. The SRN in the vicinity of Harbury and Deppers Bridge consists of the M40 motorway and the A46 Trunk Road.</p> <p>We have reviewed your documents and feel that the policies contained therein are an appropriate approach to ensuring the necessary planned development growth within the Parish. In view of this Highways England is content with your policies in so far as they might affect the operation of the SRN and in particular the M40 motorway and A46 Trunk Road.</p>
HDB7	General	<p>Thank you for the invitation to comment on the Regulation 16 Neighbourhood Plan. Our previous substantive Regulation 14 comments remain entirely relevant, that is:</p> <p><i>“Historic England is supportive of both the content of the document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness and the protection of locally significant buildings and landscape character including important views is to be applauded. We also highly commend the approaches taken in the Plan to ensuring that the design of new development contributes to the conservation and enhancement of the historic environment”.</i></p>
HDB8		<p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p>

		<p>About National Grid</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK’s gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution’s Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following high-pressure gas pipeline as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • FM23 - Churchover to Newbold Pacey <p>From the consultation information provided, the above overheads powerline does not interact with any of the proposed development sites.</p> <p><u><i>Gas Distribution – Low/Medium Pressure</i></u></p> <p>Whilst there is no implications for National Grid Gas Distribution’s Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com</p>
HDB9		<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 is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England has no further comment to make on this plan at this stage; however, should significant changes have been made since the Regulation 14 submission, please consult us again if you consider that you require a more detailed response.</p>
HDB10	General	<p>1. INTRODUCTION</p> <p>1.1 This representation is made by Pegasus Group, on behalf of Rainier Developments, to respond to the Harbury and Deppers Bridge Neighbourhood Development Plan document (hereafter referred to as 'the NDP'). This representation is made in relation to Land North of Mill Street, Harbury (see Site Location Plan at Appendix 1).</p> <p>1.2 Rainier Developments is grateful for the opportunity to make representations in respect of the NDP, which is currently at Submission (Regulation 16) stage, and is supportive of the proactive approach the Harbury NDP Steering Group has taken in engaging in the planning process in a manner which seeks to identify and deliver the aspirations of the local community.</p> <p>1.3 The representations are framed in the context of the basic conditions relevant to the preparation of a Neighbourhood Development Plan, as defined by Paragraph 8 (2) of Schedule 45 of the Town and Country Planning Act 1990 (as amended):</p> <ul style="list-style-type: none"> ➤ Having regard to national policies and advice contained in guidance issued by the Secretary of State It is appropriate to make the neighbourhood plan; ➤ The 'making' of the neighbourhood plan contributes to the achievement of sustainable development; ➤ 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); ➤ The 'making of a neighbourhood plan does not breach, and is otherwise compatible with EU obligations; and ➤ Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

	<p>Vision and Objectives</p>	<p>2. NEIGHBOURHOOD DEVELOPMENT PLAN</p> <p>Vision and Objectives</p> <p>2.1 The NDP opens by defining the following vision for the Parish: “Our vision is of a socially cohesive and mutually supporting rural parish. A low carbon parish with adequate infrastructure, that respects the value of the surrounding farmland and natural landscape and offers essential services, recreation, employment and housing opportunities for people of all ages and income levels.”</p> <p>2.2 Rainier Developments supports the vision set out above, as it is considered to contribute towards the achievement of sustainable development in line with national guidelines.</p> <p>2.3 The NDP goes on to define the 9 objectives, which relate to various aspects of the NDP such as housing, environment, and infrastructure. These objectives are generally supported; however, it is considered that several policies contained within the NDP require amendments in order to ensure the delivery of these objectives. The Individual policies are considered throughout this representation.</p> <p>Plan Period</p> <p>2.4 The NDP is confirmed to cover the period from 2011-2031, in order to align with the Stratford-on-Avon Council Core Strategy which covers the same period.</p> <p>2.5 Rainier Developments supports this as it reinforces the need for the NDP to be in general conformity with the strategic policies contained in the development plan, of which the Plan period is an Integral part.</p> <p>2.6 However, a degree of uncertainty exists regarding the future of the development plan for Stratford-on-Avon District, on account of the forthcoming revisions to the National Planning Policy Framework (NPPF), expected Spring 2018, and the confirmed housing shortfall pressures arising within the Greater Birmingham Housing Market Area in which part of Stratford on Avon District lies.</p> <p>2.7 The revised NPPF, or indeed further evidence in respect of the housing shortfall within the Coventry and Warwickshire Housing Market Area (I-1 MA), may trigger the need for Stratford-on-Avon District Council to undertake a review of their development plan, resulting in a shift in the over-arching Plan period. Such a shift would result in the Neighbourhood Development Plan and the Local Plan becoming misaligned.</p>
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	H.01	<p>Housing Policies</p> <p><u>Policy H.01 — New Housing Development within Harbury Village</u></p> <p>2.8 Policy CS.16 of the adopted Stratford-on-Avon Core Strategy requires the delivery of at least 14,600 additional homes between the period 2011 to 2031. This is to be distributed in accordance with Policy CS.15, which sets out the settlement hierarchy for the District.</p> <p>2.9 Policy CS.15 identifies Harbury as falling within the fourth highest order settlement tier within the settlement hierarchy, known as ‘Local Service Villages’ (LSVs), along with 63 other settlements within the District.</p> <p>2.10 The Policy goes on to state that, within LSVs, development will take place on sites identified in a Neighbourhood Plan and through small-scale schemes on unidentified but suitable sites within their Built-Up Area Boundaries (where defined) or otherwise within their physical confines.</p> <p>2.11 Core Strategy Policy CS.16 then confirms that approximately 2,000 dwellings will be delivered at LSV5 across the Plan period.</p> <p>2.12 Appendix 1 to the Core Strategy sets out the methodology for defining which villages fall under the LSV designation. This methodology includes a scoring system for a number of criteria, including amongst others; size of the settlement (number of dwellings), size and opening hours of local general store, size of local primary school and public transport availability. Of the 64 LSVs identified, Harbury scored the highest against the identified criteria, achieving a 100% score. Harbury is therefore identified as the most sustainable LSV and is labelled a ‘Category 1’ LSV, along with 4 other settlements.</p> <p>2.13 Category 1 LSVs are afforded approximately 450 homes in total (out of the 2,000-home requirement defined by Policy CS.16), of which no more than around 25% should be provided in an individual settlement. As such, no more than approximately 113 homes should be provided at Harbury across the Local Plan period (2011 to 2031).</p> <p>2.14 The Neighbourhood Development Plan identifies 4no. sites which either have planning permission or have been completed within the Local Plan Period, amounting to some 114 dwellings. In conjunction with several other smaller sites, 128 commitments have been made within Harbury since the start of the Plan Period. Harbury has accordingly delivered the housing requirement as defined by the Core Strategy.</p>
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2.15 As a result, Policy H.O1 of the Neighbourhood Development Plan does not seek to allocate any sites for residential development. Instead, the Policy indicates that windfall developments may be acceptable within the defined settlement boundary for Harbury, subject to a number of criteria.

2.16 However, Stratford-on-Avon District Council is in the process of preparing a Site Allocations Plan, which is currently undergoing a Revised Scoping and Initial Options Consultation. This document sets out an intention to identify reserve sites for housing throughout the District, in accordance with the requirement set out within Core Strategy Policy CS.16.

2.17 Policy CS.16 sets out how it is the intention that these sites would be released selectively for development under a number of circumstances, including under the context of a shortfall in the five-year housing land supply across the District, to contribute meeting any additional need for housing in relation to a net growth in jobs at Jaguar Land Rover (Gaydon Lighthorne Heath), meeting any shortfall arising from the Coventry and Warwickshire HMA and also any shortfall arising outside the HMA from settlements such as Birmingham.

2.18 The location of any reserve sites will need to take account the settlement pattern and the overall balance of distribution of development, and other criteria, as set out in Policy CS.15. These criteria are considered below in respect of Land North of Mill Street:

1) in relation to residential development, the number of homes proposed is consistent with the overall scale of development identified for the settlement in Policy CS. 16 Housing Development;

Policy CS.16 stipulates that approximately 2,000 homes are apportioned to Local Service Villages (approximately 13.7% of the overall housing requirement), of which approximately 450 are attributed to the five Category 1 LSVs (22.5% of the LSV requirement).

Policy CS.16 also stipulates that, collectively, reserve sites will have the capacity to delivery up to 20% of the total housing requirement to 2031 (14,600 dwellings). Reserve sites should, therefore, collectively total 2,920 dwellings.

Following the same pattern of distribution, approximately 13.7% of this requirement should fall to LSVs (approximately 400 dwellings), of which 22.5% (approximately 90 dwellings) should fall to the five Category 1 LSVs (approximately 18 dwellings per settlement).

However, given that Harbury is identified within the Core Strategy as the most sustainable of the Category 1 LSVs, it is more appropriate for Harbury to identify a reserve site capable of accommodating more than this figure.

2) the scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement;

The Concept Masterplan included at Appendix 2 to this representation indicates how the layout and density of the proposed development is in keeping with its immediate context. Furthermore, the scale of the development (38 dwellings) is not disproportionate with regard to Harbury village as a whole and would represent a 3.62% increase to the existing housing stock.

3) the design of the development is well-related to, and can be readily integrated with, the existing form of the settlement;

The Concept Masterplan demonstrates how the site can come forward in a way which is well-related to and integrated with the existing form of Harbury.

4) the location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement;

The Concept Masterplan demonstrates how the site can come forward for development whilst integrating landscape considerations into the design. A full landscape and visual impact assessment would accompany an application for planning permission.

5) the location and extent of the development would not result in the identity and/or integrity of the settlement being undermined as a result of the reduction in the gap with an adjacent settlement; and

The nearest settlement north of Harbury is Ufton, some 2km away. The development of this site would not erode that distance.

6) the scheme incorporates or provides for appropriate improvements to the infrastructure and services of the community.

The Concept Masterplan includes areas of amenity green space as well as an equipped area of play to support the community. Furthermore, the Masterplan includes the retention and improvement of the element of the public right of way which runs through the site.

2.19 Accordingly, given the sustainability credentials of Harbury, as recognised within the Core Strategy, the emerging Neighbourhood Development should allocate one or more reserve sites to maintain accordance with the Development Plan for the District.

2.20 It is submitted that Land North of Mill Street is a logical location for future housing growth, having regard to the policy context, to ensure housing delivery to meet the District's own needs and to meet future unmet needs arising with the HMA and beyond. Land North of Mill Street should accordingly be allocated as a reserve site within the emerging Neighbourhood Development Plan and Site Allocations Plan.

2.21 Further information pertaining to the site is included at Chapter 3 of this representation.

H.02

Policy H.02 — New Housing Development within Deppers Bridge and the Open Countryside

2.22 Rainer Developments has no comment to make in respect of Policy H.02.

H.03

Policy H.03 - Securing a Suitable Mix of Housing Types Tenures and Sizes in New Development

2.23 Rainer Developments has no comment to make in respect of Policy H.03.

H.04

Policy H.04 — Local Needs Schemes

2.24 Rainer Developments has no comment to make in respect of Policy H.04.

H.05

Policy H.05 - Housing Development and Design Principles

2.25 Rainer Developments has no comment to make in respect of Policy H.05.

Other Neighbourhood Plan Policies

H.06

Policy H.06 — Green Infrastructure

2.26 Rainer Developments has no comment to make in respect of Policy H.06.

H.07

Policy H.07 - Protecting and enhancing Local Green Spaces

2.27 Rainer Developments has no comment to make In respect of Policy H.07.

H.08

Policy H.08 - Protecting Small. Incidental Open Spaces

2.28 Rainer Developments has no comment to make in respect of Policy H.08.

H.09

Policy H.09 - Protecting Significant Views

2.29 Policy H.09 defines a number of ‘significant views’ out of the village, which will be given ‘special considerations’ when assessing planning applications. The policy goes on to state that ‘*special attention should be paid to preserving such views*’. *The policy concludes by stating ‘development proposals that would have a significant adverse impact on these views will not be supported.’*

2.30 Five significant views covered by Policy H.09 are identified by way of view-point cones on Map 1 within the NDP.

2.31 Rainier Developments acknowledges the role of the planning system in protecting and enhancing valued landscapes, as well as minimising the landscape and visual impacts of development.

2.32 However, Policy H.09 is insufficiently evidenced or defined, including what constitutes a ‘significant view’ and the necessary characteristics a view must have in order to be considered ‘significant’. Furthermore, the view-point cones used on Map 1 to identify significant views are crude and suggest that all five of the identified views are of the same length and breadth. In reality, some of these views are likely to be narrow ‘glimpsed’ views, whilst others are likely to be broader, panoramic views. It is also likely that these views vary in the extent to which they are un/interrupted, as some of the identified views appear to be heavily vegetated.

	<p>H.10</p> <p>H.11</p> <p>H.12</p> <p>H.13</p> <p>H.14</p> <p>H.15</p>	<p>2.33 Rainier Developments would also question the consistency of the approach applied to identifying ‘significant views’, as a number of potential views to the south of the village appear to have been overlooked, including from Bush Heath Road, Pineham Avenue and Bush Heath Lane.</p> <p>2.34 It is recommended that professional landscape evidence is prepared in order to justify the importance of these views, as well as helping to define their extent.</p> <p>2.35 The inclusion of this Policy is therefore not supported by Rainier Developments at this time.</p> <p><u>Policy H.10 - Landscape Design Principles</u></p> <p>2.36 Rainier Developments has no comment to make in respect of Policy H.10.</p> <p><u>Policy H.11 - Ensuring New Development Provides Appropriate Infrastructure</u></p> <p>2.37 Rainier Developments has no comment to make in respect of Policy H.11.</p> <p><u>Policy H.12 - Protecting Existing Community Facilities</u></p> <p>2.38 Rainier Developments has no comment to make in respect of Policy H.12.</p> <p><u>Policy H.13 - Development of New Community Facilities</u></p> <p>2.39 Rainier Developments has no comment to make in respect of Policy H.13.</p> <p><u>Policy H.14 - Sustainable Design and Energy Efficiency</u></p> <p>2.40 Rainier Developments has no comment to make in respect of Policy H.14.</p> <p><u>Policy H.15 - Highways and Transport</u></p> <p>2.41 Rainier Developments has no comment to make in respect of Policy H.15.</p>
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	<p>H.16</p> <p>H.17</p> <p>H.18</p> <p>H.19</p> <p>Promotion of specific site</p>	<p><u>Policy H.16 - Business and Employment Development in the Centre of Harbury Village</u></p> <p>2.42 Rainer Developments has no comment to make in respect of Policy H.16.</p> <p><u>Policy H.17 - Protecting Existing Employment Premises</u></p> <p>2.43 Rainer Developments has no comment to make in respect of Policy H.17.</p> <p><u>Policy H.18 - Protecting and Enhancing Local Shops and Businesses</u></p> <p>2.44 Rainer Developments has no comment to make in respect of Policy H.18.</p> <p><u>Policy H.19 - Protecting Local Heritage</u></p> <p>3. LAND NORTH OF MILL STREET, HARBURY</p> <p>The Site</p> <p>3.1 The site is located to the north of Harbury village, north of Mill Street, and covers an area of circa 1.89ha. The site comprises two field parcels currently in agricultural use, as well as a former local garage/petrol station adjacent to 36 Mill Street. The site is bounded to the north, west and east by vegetated field boundaries. The site is subdivided by a central hedgerow which separates the two field parcels. The site is accessed via Mill Street to the south. The site is located part-within, part-beyond, the settlement boundary for Harbury, as defined by the emerging NDP. (see the appended Site Location Plan - Appendix 1).</p> <p>3.2 A public right of way runs north-south through the centre of the site, crossing from the western to the eastern parcel of land. The site is located in Flood Zone 1, the area at least risk from flooding. The site is also relatively flat and not constrained topographically.</p> <p>3.3 The site has capacity to accommodate approximately 38 dwellings. Given the site's size, there is the flexibility to allow for a mix of housing types and tenures, as well as allowing for the provision of on-site open space.</p>
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Social Infrastructure and Accessibility

3.4 The site is well located to the centre of the village, within close proximity to the local services and facilities. The Co-operative foodstore is about a 5-minute walk (350m) along Mill Street, whilst a number of other services and facilities are available in the village centre, including; Harbury CofE Primary School, several public houses, an independent convenience store, a chemist, a day-care centre, All Saints Church, the village hall, a unisex hairdressing salon and a florist.

3.5 Harbury also benefits from frequent bus services to Leamington Spa, Bishops Itchington, Long Itchington and Napton on the Hill, with the nearest bus stops located approximately 200m from the site on Mill Street.

Suitability

3.6 The site is located partly beyond the settlement boundary of Harbury, as the garden associated with 36 Mill Street forms part of the site and is included within the Settlement Boundary. The site boundary follows existing field parcels and the existing hedgerows would be retained as part of the development.

3.7 The extent of built form extending to the north beyond Mill Street is varied, but the site would not extend beyond the farm buildings located to the east of the site. The site would therefore make a logical extension to the village.

3.8 There are no statutory designations covering the site. Any localised ecological considerations could provide a green infrastructure framework that would contribute towards achieving environmental sustainability, whilst at the same time working within the natural features of the site.

3.9 The site is located entirely within Flood Zone 1, the area at least risk from flooding. Any development proposal would seek to utilise Sustainable Drainage Systems (SuDS) in developing the most appropriate strategy for drainage of the site.

3.10 With regards to access, the development would be accessed from Mill Street via a new priority junction which has been designed to accommodate visibility splays for surveyed vehicle speeds. The level of traffic generated by a development of this scale will not materially impact upon the operation of the local highway network. Pedestrians would be able to access the site either from the vehicular access to be created, or via the public right of way which crosses the site and connects to Mill Street. The pedestrian linkages offer the opportunity for residents to walk to Harbury village centre and the variety of facilities that it offers within a reasonable walking distance from the site.

3.11 It is considered that there are no infrastructure constraints or requirements to bring forward this site for residential development. The village is well served by all utilities and broadband.

3.12 There are no known ground contamination issues on this site.

3.13 If the site were to come forward for residential development this would not impact upon the amenity of neighbouring properties. The predominant land use around the site is residential and agricultural. There are no other uses in the immediate vicinity that may be compromised if residential were to come forward on this site.

Landscape Impact

3.14 The site comprises two agricultural field parcels immediately adjacent to the built edge of the village.

3.15 Policy H.09 of the emerging Neighbourhood Plan identifies a 'significant view' out of village originating from Mill Street and crossing the western field parcel which forms part of the site.

3.16 Concerns have been raised elsewhere within this representation regarding the views identified by Policy H.09, particularly regarding their extent and their lack of definition/justification.

3.17 However, regarding the view across the site, it is considered that the importance of this view is significantly over-estimated by the Policy.

3.18 Firstly, as illustrated by Figure 3.1 overleaf, the view from Mill Street immediately crosses a private residential garden, which is surrounded by hedgerow on all sides. It is beyond the control of the planning system to regulate how the resident of this property utilises their garden, save for the construction of structures that require planning permission. The resident of this property could feasibly undertake the following actions without the need for planning permission, which would severely obstruct the identified view:

- No longer routinely maintain the hedgerows and tree shown in Figure 3.1. Any significant vegetation growth would severely obstruct the view, particularly as the hedgerows are already upwards of 1.5m tall;
- Erect a shed in their garden. Garden sheds do not require planning permission provided that they meet certain criteria. Sheds that do not require planning permission include sheds up to 4m in height;
- Extensions or alterations to the existing property undertaken under the Town and Country Planning (General Permitted Development) (England) Order 2015.

3.19 Furthermore, as can be seen on Figure 3.2 overleaf, the landform rises with an increased gradient moving northwards away from the village. As such, development located within the identified site area would not obstruct views of the land beyond the site boundary from Mill Street, due to this topographical difference.

3.20 A view out of the villages would therefore be retained in this location.

3.21 Lastly, the Illustrative Site Layout Plan included at **Appendix 2** indicates how development can come forward on the site which supports the retention of the identified view.

3.22 It is Important to note that draft Policy H.09 does not automatically preclude development of land considered to fall within any of the views identified. Development may still come forward on such sites provided that they do not result in a 'significant adverse impact' upon an identified view.

3.23 The Illustrative Site Layout Plan shows how development has been located towards the southern end of the site, with the northern end identified as public open space and SUDs attenuation. This layout is informed by the topography of the site as Identified above and would serve to retain a view out of the village from Mill Street.

3.24 The layout retains a view out of the village through the centre of the site, as depicted by way of two red arrows. Users of the existing public right of way would continue to experience this view when walking northwards from Mill Street.

Achievability

3.25 The site is capable of coming forward for residential development in the next five years if required. The site is within two ownerships and is being promoted by Rainier Developments. Residential development on this site is viable and therefore the site is considered achievable.

Availability

3.26 The site is being promoted by Rainier Developments on behalf of the landowners. There are no ownership issues that would prevent development coming forward on this site.

Economic Benefits

3.27 In terms of economic sustainability, jobs would be created during the construction phase of the development (including indirect employment through the construction supply chain). The new residents of the development would also serve to support the existing local facilities and services within the village, through additional household spend.

Proposed Illustrative Masterplan

3.28 Rainier Developments has prepared a Proposed Illustrative Masterplan included at Appendix 2 to demonstrate how the site might come forward for residential development.

3.29 The Proposed Illustrative Masterplan Illustrates a possible development that could be delivered on this site. The development includes approximately 38 dwellings, of which 13 would be affordable (35%), 0.7ha of public open space and associated infrastructure.

3.30 The development parcels would be contained to the southern end of the site adjacent and akin to the existing built form of Harbury. The northern half of the site would include an area of open space with possible play equipment and attenuation area. The existing north-south hedgerow through the spine of the site would be retained and is surrounded by a strip of open space leading up to the boundary with Mill Street. The existing public right of way would be retained leading to the open space to the north of the built development.

3.31 As mentioned, the Harbury Neighbourhood Plan identifies this site has having a key view out of the village (to the north). This key view would be retained by the positioning of the open space through the centre of the site and to the north. This would enable those walking north along the public right of way to still appreciate the key view out of the village of the wider landscape.

3.32 The existing trees and hedgerows both surrounding and within the site would be retained as much as possible. The concept masterplan also identifies the opportunity to provide new trees as part of the proposed development. The main vehicular access point would be off Mill Street.

	General	<p>4. CONCLUSIONS</p> <p>4.1 Overall, Rainier Developments are supportive of the intention of the Harbury and Deppers Bridge Neighbourhood Development Plan. However, it is not considered that the Plan is in general conformity with the strategic policies contained in the development plan at this time.</p> <p>4.2 Both the Core Strategy and the emerging Allocations Plan are clear in their Intention to identify reserve sites for housing development. At present, the Neighbourhood Plan fails to identify and allocate such sites, despite the recognised sustainability credentials of Harbury.</p> <p>4.3 Rainier Developments also submit that Policy H.09 of the Neighbourhood Plan is insufficiently defined and requires suitably qualified landscape input in order to define and justify the inclusion of any views.</p> <p>4.4 This representation is prepared in support of the site North of Mill Street to be a reserve site for future housing development in Harbury. The site has been demonstrated to be suitable for residential development, whilst it has also been demonstrated that the site is capable of coming forward in a manner that preserves views out of the village.</p> <p>4.5 Rainier Developments consider that the site to the North of Mill Street represents the most logical and sustainable growth option for Harbury and therefore should be identified it as a preferred reserve housing site for future housing development in the village.</p> <p>4.6 This representation has set out how the site North of Mill Street, is suitable, achievable and available for development. The site is therefore deliverable, in the context of paragraph 47 of the NPPF.</p> <p>4.7 Rainier Developments intend to continue the promotion of the site through the process of the Stratford-on-Avon District Site Allocations Plan.</p> <p>4.6 Rainer Developments welcomes the opportunity to comment on the Harbury and Deppers Bridge Neighbourhood Plan Document and will endeavour to facilitate an on-going dialogue with the Parish Council and local community In the promotion of land North of Mill Street.</p>
HDB11	Figure 3 (p.10) Para 2.2 (p.13)	's' is missing from 'Depper' in final box the list of actions could be completed by adding:

<p>Para 3.16 (p.18)</p>	<ul style="list-style-type: none"> • Consideration of second Reg.14 representations (plus dates) • Revision of Plan plus preparation of Basic Conditions Statement and Consultation Statement (plus dates) • Submission of NDP to SDC for Reg.16 consultation (plus date)
<p>Objective 3 (p.26)</p>	<p>change 'has been' to 'was' and 'for to 'in' in the first line and change 'is' to 'was' in the second line to take account of passing time.</p>
<p>Map on page 28</p>	<p>change 'all' to 'important'? The associated policy H.07 does not look to protect all green spaces, since this would not be feasible or practicable.</p>
<p>Para 5.5 (p.31)</p>	<p>doesn't have a number, title or key</p>
<p>Para 5.7 (p.32)</p>	<p>paragraph below 4 bullet points – Change 2 no. instances of 'HNDP1' to 'H.01'.</p>
<p>Policy H.02 (p.33-34)</p>	<p>has out of date housing figures. The latest published figures (as of March 2017) are: 63 dwellings built; 71 dwellings committed; total of 134 houses.</p>
<p>Policy H.03 (p.34-35)</p>	<p>In order to reflect the justification at para 5.11 and ensure continuity with Policy H.04, should an additional criterion e) be added to Policy H.02 as follows: "small-scale community-led schemes as defined through an up-to-date Housing Needs Survey or equivalent evidence base document"?</p>
<p>Policy H.04 (p.36-37)</p>	<p>If housing in the Parish is to meet requirement identified in the Core Strategy, it would seem inappropriate to expect developers to agree the mix of dwellings with Parish Council. Also, schemes cannot be expected to meet the needs of older and younger residents – dwellings may be suitable but occupancy of market dwellings cannot be controlled. Core Strategy does not stipulate that development should provide self-build so wording of this policy may be too prescriptive. The threshold of 6 or more dwellings is too onerous in relation to the provision for self-build.</p>
<p>Policy H.04 (p.36-37)</p>	<p>The Policy does not read well as drafted. Consider amending as follows:</p>
<p>Policy H.04 (p.36-37)</p>	<p>"When a proven local housing need is properly identified, through a professional <u>an up-to-date</u> Parish Housing Needs Survey, and that need which cannot be met by affordable housing provision through a market-led scheme under Policy H.03, local needs schemes will be supported in areas where housing will <u>would</u> not normally be considered suitable unless it meets <u>but only in</u> the following circumstances:</p>
<p>Policy H.04 (p.36-37)</p>	<p>a) In Harbury it <u>any site</u> should adjoin the village settlement boundary, and in Deppers Bridge it <u>any site</u> should be immediately adjoining existing built development in the hamlet; " [to end].</p>
<p>Paragraph 5.14</p>	<p>The housing needs survey quoted at 5.14 is out-of-date. There is no mention about the need to keep housing needs data up-to-date.</p>
<p>Policy H.05</p>	<p>should apply to all forms of development not just housing. Point g. should also cover development proposals within the Conservation Area or other heritage assets as there isn't a separate policy about such sites.</p>

	<p>Objective 3 (p.39) Policy H.07 (p.39-40) Section 5 – policies and proposals, para 5.13</p> <p>Para 5.19 (p.43) Policy H.12 Policy H.14 Policy H.17</p> <p>General -Housing</p> <p>General</p>	<p>Change ‘all’ to ‘important’ change ‘protected’ to ‘designated’. Final paragraph – change ‘for non-open land uses’ to ‘on these sites’. “Local people expressed strong views about the type of housing needed in the future, Figure 4.” However, Fig.4 is titled “Preferred future housing provision”, and not housing need. Figure 4 is an odd mix of tenure and house type. Should affordable bungalows and affordable flats have been included alongside affordable housing (or more correctly affordable houses?) or is affordable housing referring to tenure, like owner-occupier or shared ownership and, if so, why aren’t other tenures included? This question should probably have listed housing association rent, shared ownership, owner and self-build as well as house, bungalow, flat/apartment. the photo does not show one of the proposed Local Green Spaces alluded to in the Policy DM would usually stipulate a minimum marketing period of six months. should c. also refer to upstream, ie. flood water can back-up. in a. ‘extended period’ should be defined. Suggest it is consistent with Policy H.12.</p> <p>the Plan makes no specific housing land allocations, it’s mostly reliant on infill development from windfall sites to augment housing supply – such sites are, by their very nature, likely to be small-scale and most likely sub-threshold for affordable housing purposes It is surprising that the Plan appears silent on the subject of specialised housing Chapter 6 will need to be removed from the Plan following Examination.</p>
HDB12	General	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Planning Policy Statement: ‘A Sporting Future for the Playing Fields of England’. http://www.sportengland.org/playingfieldspolicy</p>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

		<p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England’s Active Design Guidance: https://www.sportengland.org/activedesign</p>
HDB13	General	<p>Response of Warwickshire County Councils to the Harbury and Deppers Bridge Neighbourhood Plan – Regulation 16 consultation</p> <p>I refer to the above consultation on the formal submission of the Plan to the District Council and the policies will be used to decide planning applications.</p> <p>The County Council welcomes communities proposing neighbourhood Plans that shape and direct future development. The main responsibilities of the County Council are highways and public transport, education, social services, libraries and museums, recycling/ waste sites and environment. The County Council’s role is to deliver the services and facilities efficiently.</p> <p>The Neighbourhood Plan accords with the focuses on enhancing and maintaining sustainable modes of transport in the area and that any new developments will be encouraged to provide these in their proposals.</p> <p>We also recommend that projects such as car share schemes or car clubs be considered for further investigation in order</p>

	<p>H.01</p> <p>H.10</p> <p>H.11</p> <p>H.15</p>	<p>to reduce car usage in the area covered by the Neighbourhood Plan.</p> <p>Our specific comments on the Plan are as follows:</p> <p>Policy H.01 New Housing Development in Harbury Village (e)</p> <ul style="list-style-type: none"> We support the principle of new developments providing adequate amounts of parking subject to the criteria set out in the Local Transport Plan (2011-2026) and the parking standards as set by Stratford-on-Avon District Council's Supplementary Planning Document: Vehicle Parking Standards. Planning applications will be subject to detail comments and site requirements. <p>Policy H.10 Landscape Design Principles (c)</p> <ul style="list-style-type: none"> We would require further information on the enhancements to public rights of way before commenting further. <p>Policy H.11 Ensuring New Development Provides Appropriate Infrastructure</p> <ul style="list-style-type: none"> We support this policy in principle and would comment on individual developments as and when they emerge. Any new developments are subject to planning approval by the local authority, in this case Stratford-on-Avon District Council and Warwickshire is a statutory consultee on the approval process. This would include commenting on any schemes which impact the existing road networks or introducing new or increasing existing public and community transport. We note the ambition to improve the availability and accessibility of the local bus service and is pleased that there is emphasis placed on supporting accessibility and the use of public transport. We support this objective in principle subject to further detail being provided. We note that there is a goal of expanding Harbury parish in a sustainable way and we support this aspiration, but the County Council will respond to each individual development on a case by case basis. <p>Policy H.15 Highways and Transport</p> <ul style="list-style-type: none"> As stated above, all new developments which have an impact to the local network are subject to approval. This includes any impact to existing road networks or the addition of any new routes or accesses. <p>The County Council welcomes developments introducing enhancements the sustainable modes of travel in the area, but would require further detail on the individual develop</p>
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		Please see attached detail comments from Flood Risk Management on those matters.
HDB14	Introduction	In the introduction we would suggest that you mention that the River Itchen runs through parts of Deppers Bridge, which does present a risk of river flooding; as well as some risk of surface water flooding in parts of the parish. It might be worth checking the parishes flood risk online at https://flood-warninginformation.service.gov.uk/long-term-flood-risk/map for your own benefit.
	Para 3.12 (p.17)	<p>Good point that makes reference to the community working to mitigate against climate change impacts, especially in relation to efficient energy.</p> <p>The National Planning Policy Framework suggests a neighbourhood plan should consider the issues from climate change and flooding, you could include a sentence about the changes in flood risk from climate change, and refer to the key planning policy.</p>
	Para 3.23 (p.19)	Good section that makes it clear which green spaces are enjoyed by the community, and therefore should be protected from development.
	Objective 6 (p.26)	<p>Following on from this objective with a new one, or inclusive of Obj 6; there is no mention to the use of SuDs within any new developments, something the LLFA are keen to see when they assess planning applications.</p> <p>The objective could include further details on what type of SUDS features the community would prefer and find most beneficial. We would suggest mentioning the multiple benefits of SUDS, including greater biodiversity, amenity value and improved water quality, with a strong preference to above ground SuDs.</p>
	Para 5.10 (p.33)	<p>For all new developments, the LLFA requires the use of above ground SUDS designed in accordance with CIRIA 753 SUDS manual, providing attenuation to greenfield runoff rates. The requirements set out in the following documents should also be adhered to in all cases:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework • Paragraphs 030 - 032 of the Planning Practice Guidance (PPG) • Defra's Non-statutory technical standards for sustainable drainage systems • WCC Flood Risk and Drainage Planning Advice <p>All developers should refer to these when constructing a Flood Risk Assessment and or Drainage Strategy as part of a</p>

	<p>Policy H.05</p> <p>Policy H.06</p> <p>Policy H.14</p>	<p>planning application. Currently there is no specific detail referring to greenfield Qbar rates, and we would suggest that restricting flows to less than 5 l/s is viable – something like this could be added.</p> <p>Point B - You could also include a point that encourages new developments to open up any existing culverts on a site providing more open space/green infrastructure, and the creation of new culverts should be kept to a minimum.</p> <p>Same as above, emphasise the benefits from keeping watercourses open and SUDS amenity values.</p> <p>Point C – this is the first time where SUDS are mentioned in the plan currently, if the comments above are adhered to, and then this point can be developed into a new policy specific to SUDS. The policy could include:</p> <p>Referring to the SUDS discharge hierarchy would be of benefit, with the preferred choice of infiltration or water discharged into an existing watercourse being the first options, before connecting to a sewer. Any new developments should be designed and built with separate systems up to the point of where they connect to the combined sewer, in line with building regulations. Detailing a requirement for all new developments to utilise SUDS to achieve the multi-functional benefits of good SUDS design. This policy should include a requirement for all sites to attenuate to greenfield rates and include that 5 l/s is NOT the minimum possible discharge rate achievable.</p> <p>Any new planning applications which incorporate SUDS features into their site will have to provide a maintenance schedule as part of the planning permission process as well.</p>
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