

## **Salford Priors Neighbourhood Development Plan**

### **Salford Priors Parish Pre-Submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General) Regulations, 2012)**

#### **Appendix 1 - comments from Stratford-on-Avon District Council**

This analysis contains a number of initial general comments about the Neighbourhood Plan, followed by a schedule of more detailed policy related points.

##### **General Comments:**

The plan is well presented and written with clarity and purpose. The policies are generally written 'positively' which is welcomed. However, some of the text in chapter 6 should be placed before the relevant policies rather than after them. This enables them to provide a useful context explanation for the policies that follow under each objective. Similarly, any tables and maps should sit alongside the relevant policy.

Policies SP5 and SP19 in the Salford Seven NDP are welcomed. The National Planning Policy Framework (NPPF) clearly states that addressing climate change is one of the core land use planning principles and is expected to underpin plan making and decision making. It emphasises that responding to climate change is central to the achievement of the economic, social and environment dimensions of sustainable development. The inclusion of the policies will help to demonstrate one of the basic conditions for NDPs, such that they will contribute towards the achievement of sustainable development.

More detailed comments on the policies are included in the table, below:

**Policy related comments:**

Section	Reference/page	Comment
<b>National &amp; Local Planning Policy Context</b>	Paragraph 3.12, p.12	Version of Policy CS.15 referred to does not include proposed modification at beginning of Local Needs Schemes section. Reference to Policy CS.16 is consistent with the proposed modified approach to LSVs. Salford Priors is a category 2 LSV for which the policy now states that no more than around 12% of an overall figure of 700 dwellings should be provided in an individual settlement, i.e. no more than around 84 dwellings.
<b>Objectives</b>	Objectives 2 and 5	Objective 2 'To ensure all new development is of suitable, high quality, sustainable design' and Objective 5 'To promote sustainable design and reduced energy use and consumption' appear to be repetitive. Would it be more appropriate for them to be combined?
<b>Vision and Objectives</b>	Paragraph 5.1, p.15	Suggest in the Vision that 'population' is replaced with 'homes' as some of the adjectives that follow are not applicable to people in this context.
<b>3.0 National and Local Planning Policy Context</b>	Paragraph 3.12, p.12-13	SDC agreed further amendments to Policies CS.15 and CS.16 on 20th July 2015. Although the NDP was published prior to publication of these amendments, it needs to take them into account as appropriate. In particular, the proposed changes to the indicative amount of housing required in each of the Local Service Villages in Policy CS.16 may affect the content of the NDP.
<b>Section 6 – Objective 1</b>	Policies SP1 and SP2, p.16-17	There is some degree of overlap, e.g. the first part of each policy uses pretty much the same wording.
<b>Section 6 – Objective 1</b>	Policy SP1, p.16-17	<p>Criterion (a) - It would be helpful for those particular elements or features that contribute to "distinctive character" to be identified. Otherwise, this Policy would appear to contribute little in the way of "added value" to emerging Core Strategy policies.</p> <p>Criterion (a) looks to maintain the character of the settlements of the Parish, including their settings, spaces and built form. How would the allocation of 66 new dwellings as set out in Policy SP9 achieve this?</p> <p>Criterion (d) The provision of roads and footpaths are covered by other legislation for provision by statutory undertakers and cannot be controlled through a NDP. Much domestic hardstanding is covered by permitted development rights. This requires re-wording or deleting.</p> <p>Criterion (f) looks to control signage but many signs are 'deemed consent' and cannot be controlled via policy in a NDP. This requires re-wording or deleting.</p> <p>Criterion (g) asks for the design and placement of signs to be restrained. Many signs are 'deemed consent'. For those that require planning permission, what does 'restrained' mean? What measurement can officers use to ascertain whether a scheme meets the policy?</p>

		<p>Criterion (h) - This criterion is too specific. In any case, the placing of benches and flower boxes are not deemed 'permanent structures' and do not require planning consent. As such, this cannot be controlled via the NDP and should be deleted.</p> <p>Criterion (i) - Do not disagree with the objective of creating new footpaths, cycleways and bridleways, but is this aspect of this criterion relevant to this policy? Could it be better placed elsewhere in the NDP?</p> <p>Criterion (j) - Would query the use of the word "increased". Would the following be more appropriate and achieve the same aim: "<i>Existing verges, hedgerows and trees should be preserved and maintained and new verges, hedgerows and trees provided, so as to encourage wildflowers and wildlife, helping to maintain the rural setting</i>".</p> <p>General – There is no justification or explanation for the Policy.</p>
<p><b>Section 6 – Objective 1</b></p>	<p>Policy SP2, p.17</p>	<p>Does this policy add anything further than national or District policy? Could it be better incorporated into Policy SP1 either as introductory text or the second paragraph as a new criterion?</p> <p>Similar comments to Policy SP1 (criterion a) above in respect of Policy SP2 (criterion a). Indeed, there appears to be considerable overlap between SP1, SP2 and SP4.</p> <p>General – There is no justification or explanation for the Policy. Would it be beneficial for paragraphs 6.6 to 6.9 to be inserted here?</p>

<p><b>Section 6 – Objective 1</b></p>	<p>Policy SP3 and Table 1, p.17-19</p>	<p>Are the Buildings of Local Importance identified/officially recognised as being such? If not, the basis of this policy is questionable.</p> <p>This policy provides a useful local perspective that can be used to shape development proposals. However, you may want to satisfy yourselves that the criteria listed are fully in conformity with the NPPF.</p> <p>It would be helpful to show these sites on a map to avoid any potential confusion as to which sites/buildings are being referred to. Whilst the justification may not need to be included in the NDP itself, you will need to ensure that the buildings have been identified through a consistent and robust methodology in a supporting document. Reasons should be given as to why each particular building has been included – why is it locally important?</p> <p>It may be helpful to include a definition of 'locally important' at the beginning of this policy to provide some context for the subsequent list. This could include local historic connection, fine examples of local vernacular/use of local material, important contribution to character/setting etc.</p> <p>What is meant by 'inappropriate development'? This needs to be expanded and explained.</p> <p>General – There is no justification or explanation for the Policy.</p>
<p><b>Section 6 – Objective 1</b></p>	<p>Policy SP4, p.19</p>	<p>What is meant by "in a manner that is appropriate"? How can this be measured or assessed? Consider re-wording:  "The rural character of the Parish will be preserved by ensuring all new development minimises and where appropriate, mitigates its impact"</p> <p>Criterion c) looks to restore the landscape. Development cannot be used to restore other parcels of land not associated with the proposal and the very nature of developing a site could not itself be classified as 'restoration' given its physical impact on the land. Consider re-wording:  "Include suitable features to protect and where possible enhance the landscape character of the parish"</p> <p>Criterion e) delete the word 'should'</p> <p>Criterion f) delete the words 'proposals should'</p>
<p><b>Section 6 – Objective 1</b></p>	<p>Paragraph 6.5, p.20</p>	<p>This paragraph refers to buildings of local importance, which are listed at Table 1 at Policy SP3. Would it be more appropriate for this paragraph to be part of the justification/explanatory text to accompany SP3?</p>

<b>Section 6 – Objective 1</b>	Paragraph 6.9, p.22	The final part relating to development in Conservation Areas reads like a policy and should perhaps be included in Policy SP2.
<b>Section 6 – Objective 2</b>	Policy SP5, p.25	<p>The requirement to exceed national standards may be contrary to national planning policy and the imposition of national standards. There is also some duplication with Policy SP19 – could the two policies be merged? (See also comments in respect of the Objectives).</p> <p>The Policy repeats policies in the Core Strategy relating to climate change and does not add a local perspective.</p> <p>Criterion (a) includes a reference to 'suitable measures' to reduce and adapt to the impacts of climate change. A definition of suitable measure is needed, either in the policy or in its explanation. This will enable the applicant to understand how to comply with the policy.</p> <p>Criterion c) How would a proposal demonstrate how it has been designed to cope with 'extreme' temperatures? What criteria/standards are they being assessed against? Why is this necessary/appropriate?</p> <p>Criterion (d) seeks to include measures to reduce energy consumption or provide energy from renewable or low carbon sources. Following the Government's Housing Standards Review, these issues will not be covered by planning, but will be dealt with by Building Regulations. In March this year, the Government announced new housing standards which will deal with energy, water and access. This is in order to streamline the approach to housing sustainability standards, by replacing the numerous voluntary imposed by LPA across the country. As a result, it has phased out sustainability standards for housing such as the Code for Sustainable Homes and Life time Homes. This also includes Merton Rule style policies, which required a percentage of energy to be generated on-site. Energy and water efficiency measures and access will be covered by Building Regulations, in line with the Government's Zero Homes approach. From 2016, all new homes will have to be built to zero carbon standards. To achieve this requirement, homes will have to be built using higher energy efficiency standards and renewable energy technologies on site, such as solar PV and ground source heat pump. Where it is not possible to achieve all the carbon emissions savings on-site, for development of 10 homes or more, the remaining carbon emission savings may be offset through the Government's allowable solutions. Building Control Part L ' Conservation of Fuel and Power in new dwellings relates to regulated carbon emissions only, i.e. heating and lighting; not unregulated which includes white goods. The policy should be amended to reflect this change.</p> <p>General – There is no justification or explanation for the Policy.</p>

<p><b>Section 6 – Objective 2</b></p>	<p>Policy SP6, p.25</p>	<p>Policy pretty much repeats Policy CS.9 in the Core Strategy – it would be helpful to incorporate a local perspective.</p> <p>Criterion (b) May be inappropriate for a NDP to require use of traditional or reclaimed materials on all sites as opposed to sites affecting a heritage asset. May be more appropriate for this criterion to seek to <i>“encourage the use of...”</i>. Need to be vary of unintended misinterpretation – suggest rewording: <i>“use traditional and/or reclaimed materials such as tiles, slates, bricks and stone that are appropriate to the local context”</i>.</p> <p>Criterion c) as written is potentially preventing innovative design, which may be appropriate in the right location...</p> <p>Criterion i) What is meant by the need to ensure that proposals include ‘a good standard of space’? What is a ‘good standard’? What would be an appropriate definition? Are there regulations to refer to? To what does it refer (i.e. garden land)? If so, there are existing space standards. What would be the justification to insist on higher standards? The Policy as written is too ambiguous and requires further consideration and re-drafting, if it is to be retained.</p> <p>General – There is no justification or explanation for the Policy.</p>
<p><b>Section 6 – Objective 3</b></p>	<p>Policy SP7, p.26</p>	<p>Core Strategy approach does not provide for dwellings in Rushford/Pitchill and Abbots Salford other than to meet a local need. A NDP can propose development in other locations to that specified by a Local Plan/Core Strategy but there should be clear justification for doing so based on local circumstances.</p> <p>With 60 dwellings already committed in Salford Priors, it is uncertain why a further large site on School Road for 66 units is being promoted in the NP as this would exceed significantly the scale of housing expected in the LSV according to Policy CS.16 as proposed to be modified, ie. no more than around 84 dwellings. Having said that, it is a matter of local choice if the community seeks to plan for a scale of development above that given in the Core Strategy.</p> <p>There is no reference to a settlement boundary for Salford Priors. Should this be defined and indicated on a map? Outside such a boundary, there will only be scope for “rural exception housing” (i.e. local needs schemes) falling within Part 6 of Core Strategy Policy CS.15.</p> <p>Replace the word ‘permitted’ with ‘supported’.</p> <p>Each allocated site quotes a number of dwellings. Should each state ‘up to...’ or ‘approximately...’ since the sites may be able to accommodate more than the quoted figure.</p>

		General – There is no justification or explanation for the Policy. Is there evidence to show that the quoted sites are deliverable?
<b>Section 6 – Objective 3</b>	Policy SP8, p.27-28	<p>Replace 'permitted' with 'supported'.</p> <p>Criterion a) What is the 'Jack Thompson Croft' style site layout referred to? Does this need to be quoted?</p> <p>Criterion b) A minimum of 40% affordable housing is not consistent with the Core Strategy Policy CS.17 which states 35%.</p> <p>Criterion d) What is the reasoning/justification for providing parking for some existing dwellings?</p> <p>General – There is no justification or explanation for the Policy.</p>
<b>Section 6 – Objective 3</b>	Policy SP9, p.28-29	<p>Replace 'permitted' with 'supported'.</p> <p>Criterion a) Not sure what is meant by 'single properties and terraces' in this context. Requires re-drafting or explanation.</p> <p>Criterion b) A minimum of 40% affordable housing is not consistent with Core Strategy. The phasing plan is very prescriptive although it is reasonable to expect development of the site and off-site works to take place concurrently. It is unclear whether points 3 and 5 of Phase One of the Phasing Plan can be achieved within public highway or on land controlled by site owner.</p> <p>Criterion e) 5 hectares is a large area for a village green. Is this correct? What is the justification for such a large tract of land to be put to this use? What land does it refer to (i.e. is there a preferred site in/adjacent to the village)? Does it need to be mapped?</p> <p>Criterion f) is very prescriptive. Is it really required?</p> <p>Suggest the final paragraph of the Policy is amended as follows:  "Development will only be supported <del>permitted</del> when a planning application is submitted with a master-plan for the whole site <u>together with a delivery statement</u> <del>and when legal and funding agreements are in place</del> to ensure <del>both</del> open space and housing elements of the scheme <del>are can be</del> delivered in tandem over an appropriate timescale".</p>

<b>Section 6 – Objective 3</b>	Policy SP10, p.29	<p>There could be difficulties in identifying certain sites in hamlets that are not restricted to meeting a local need (see comment on Policy SP7 above) but restricting all other sites in this way. There needs to be clear evidence put forward to justify this approach.</p> <p>Whilst welcoming the possibility of rural 'exception' schemes, over and above whatever site-specific allocations may be included in this Plan, There is a need identified in the 2008 Housing Needs Survey commissioned by the Parish Council which remains unmet. In order to gain the confidence of Registered Providers, there will need to be an express commitment to support specific schemes on named sites. Is a more up-to-date Housing Needs Survey required to underpin evidence for such proposals?</p> <p>General – There is no justification or explanation for the Policy.</p>
<b>Section 6 – Objective 3</b>	Policy SP11, p.30	<p>Setting a maximum of 20 dwellings per hectare (dph) is a very low density and does not necessarily reflect rural character. There needs to be clear evidence put forward to justify this approach.</p> <p>This Policy should clarify whether this is a gross or net figure. Accompanying text may be required to justify why 20 dph is the appropriate figure. Is it intended that this policy would apply to replacement or single dwellings? Is the figure appropriate in such circumstances?</p>
<b>Section 6 – Objective 3</b>	Policy SP12, p.31	<p>Policy SP12 seeks 40% affordable housing which is a higher requirement than set by the Core Strategy at 35%. NDP may need to justify this figure, particularly in viability terms to demonstrate that it is achievable and does not unduly affect the viability of schemes – including the allocated sites – coming forward for development.</p> <p>The threshold of 11 homes is also different from that proposed in the Core Strategy. It is unclear as to whether a NDP can depart from strategic policy in this regard.</p> <p>It is assumed this Policy will only apply in the case of market-led schemes mixed tenure promoted under Policy SP6 and thus will, by definition, only apply to Salford Priors village. For the avoidance of doubt, this Policy should clearly state whether it requires on-site provision. The reference to "exceptional circumstances" is unhelpful, but could be easily rectified by deleting the words "unless exceptional circumstances can be demonstrated" from the second line.</p>

<b>Section 6 – Objective 3</b>	Policy SP13, p.31	<p>The level of detail provided in this policy would seem to be extremely detailed.</p> <p>Is Policy SP13 unduly strict and would it have the unintended consequence of seeing applications for demolition and rebuild as opposed to conversion? As such, if Policy SP13 remains in its current form, does the NDP need to include a policy against the demolition of existing buildings?</p> <p>Paragraphs 6.25 &amp; 6.26 appear to set policy requirements. As such, they may need to be included within Policy SP13 itself.</p>
<b>Section 6 – Objective 4</b>	Policy SP14, p.34	<p>The wording of this policy may need to be clarified or strengthened to prevent circumstances where a tree/hedgerow was substantially cut down but left in situ, which would comply with the letter of this policy but not its overriding objective.</p> <p>Is it reasonable to require replacement if there are genuine safety reasons for removal? There is no obligation to replace trees/hedgerows unless they are protected.</p> <p>Can this policy legally be implemented? How will suitable alternative locations be found, particularly if the trees cannot be replaced elsewhere onsite, and additional land is in third party ownership? How would this policy be enforced to ensure replacement trees/hedgerows were planted?</p> <p>Is Table 5 necessary if Policy SP14 applies to all trees? What additional protection does a locally important identification bring? Perhaps Policy SP14 could encourage the protection of all trees/hedgerows where appropriate and actively prevent loss of those locally important trees listed in Table 5.</p>
<b>Section 6 – Objective 4</b>	Policy SP14, Table 5 p.35	<p>These trees need to be shown on a map to avoid any potential confusion as to which trees are being referred to. It may also be necessary to provide some context as to why these particular trees have been identified (e.g. local character, rare species locally etc) and to ensure that a consistent methodology has been applied to their identification.</p>
<b>Section 6 – Objective 4</b>	Policy SP15, p.36	<p>National policy is not framed in this way (see para. 112 in NPPF). Is there a detailed assessment of agricultural land quality for the NP area in any case?</p> <p>It would be helpful to map this classification. Is Grade 3a data available? Notwithstanding this, the implication of this policy is that development on Grade 3b, 4 and 5 land would be acceptable in principle. Would this result in development in locations that may otherwise be unsustainable? Would more appropriate wording be:  <i>"the loss of Grade 1, 2 and 3a agricultural land will be resisted, as appropriate, to ensure that the best and most versatile land is retained for agricultural uses"</i>?</p>

<p><b>Section 6 – Objective 4</b></p>	<p>Policy SP16, p.36</p>	<p>The protection of large tracts of agricultural land in this way is not considered to be lawful. The areas are too far from the communities they serve, they are not demonstrably special or local in character (in accordance with NPPF para 77 – Local Green Space designation).</p> <p>The term ‘open space’ usually refers to land actively used for leisure and recreation e.g. parks and playing fields. It appears that this policy is seeking to designate land better termed ‘areas of restraint’ in order to protect the character of each individual settlement. As such, it may be more appropriate to move this policy under Objective 1.</p> <p>This policy may require justification to ensure that the land has been identified through a consistent and robust methodology in a supporting document. Reasons should be given as to why each particular site has been included – why is it important that this particular land is protected from development?</p>
<p><b>Section 6 – Objective 4</b></p>	<p>Policy SP17, p.39</p>	<p>This policy would be stronger if it used the wording of, and complied with, paragraphs 76 and 77 of the NPPF regarding Local Green Space. The evidence supporting the claims about local wildlife provided in Appendix 3 should be referenced (has this come from WCC records?).</p> <p>The Pool by Worcester Meadows Special Area of Protection (SAoP) lies within a Protected Open Space in Policy SP16 (Area A) so has duplicative protection. Also, part of pasture land (Area B) in Gerrard Close Pond SAoP has planning permission for residential development (see 14/01126/OUT).</p> <p>Again, this policy may require justification to ensure that the land has been identified through a consistent and robust methodology in a supporting document.</p>
<p><b>Section 6 – Objective 5</b></p>	<p>Policy SP19, p.41-42</p>	<p>There appears to be some duplication of Policy SP19 with SP5. Perhaps they could be combined or would it be more appropriate to move some criteria listed under Policy SP19 to Policy SP5? (see also comments in respect of the Objectives).</p> <p>The NPPF recommends that development plans are positively framed. Development plans are to include positive strategy for low carbon and renewable energy schemes. Paragraph 97 of the NPPF states that policies should be designed to maximise renewable and low carbon energy development, whilst ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.</p> <p>Policy Criterion (h) – The Town and Country Planning (General Permitted Development) (England) Order 2015, Part 14 makes provision for permitted rights to erect small scale renewable energy schemes on dwelling houses. Under certain circumstances, this includes homes within Conservation Areas. For example, under Part 14, A.1(c) of the Town and Country Planning (General Permitted Development) (England) Order 2015, a solar PV or solar thermal</p>

panel may be installed on a dwelling house in a Conservation Area, provided it is not installed on a wall that fronts the highway. It is recommended that the policy criterion is amended to reflect the permitted development rights.

Policy Criterion (i) states '*Larger scale renewable energy installations, such as full -sized wind and solar farms should not be supported...*'. It is unclear what is meant by full sized or larger. The size of commercial scale wind and solar energy schemes may vary in size. Recommend that the term is deleted and the text is amended to read '*Large scale commercial renewable energy installations, such as wind and solar farms....*'

Bullet point (i) This could be strengthened further by amending text to include reference to landscape i.e. '*The visual impact is minimal and does not adversely affect the rural and historic character and landscape of the parish*'.

There are a number of other issues such as cumulative impact, residential amenity, shadow flicker, direct and reflected light relation to commercial scale wind and solar energy schemes that could be helpfully included in the policy. These are set out in Section 3 'District Resources' Policy CS .3 ,part B and D of the Proposed Core Strategy. Furthermore, the policy could be strengthened by including reference to the Stratford District Renewable Energy Landscape Sensitivity Study (July 2014). The study was produced to assist decision makers in determining applications for the commercial wind and solar energy in our district.

Bullet Point (iii) does not comply with Paragraph 98 of the NPPF paragraph, which states that '*when determining planning applications, Local Planning Authorities should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy*'. It does not require the need for renewable energy schemes to be justified.

Bullet Point (iv) is equally onerous and unreasonable. There is nothing in the NPPF that precludes the development of energy generation for the applicant and not the UK Grid; in the same way that an applicant is not restricted to erect a dwelling for their own purposes and not to meet the needs of the UK housing requirements.

It is therefore recommended that policy criteria iii) and iv) are omitted.

Bullet Point (vii) – It would be helpful to specify what special area is referred to. If it relates to Policy SP17 'Special Area of Protection', there should be a clear reference.

<b>Section 6 – Objective 6</b>	Policy SP20, p.43	The second sentence needs more consideration as accessibility for all users will not always be appropriate. Suggested amended wording: "Where proposals include new routes these should provide direct, legible connections to the existing network of routes, with clear signposting when necessary, and full appropriate levels of accessibility for all users".
<b>Section 6 – Objective 6</b>	Policy SP21, p.44	This Policy requires discussion with WCC Highways to ensure it is appropriate and deliverable.  Criterion (a) – This may not be appropriate as the speed limit could be changed to accommodate the new development.
<b>Section 6 – Objective 6</b>	Policy SP22, p.45	The car parking standards specified within the Policy are too prescriptive and are unlikely to be enforceable. Any policy on car parking should be consistent with Core Strategy policy CS.25C.
<b>Section 6 – Objective 6</b>	Policy SP23, p.46	The policy itself does not say anything specific to the area. Some points made in the explanation could usefully be included in the policy itself (i.e. point 6.54).
<b>Section 6 – Objective 7</b>	Policy SP24, p.47	A 12 month marketing period to demonstrate a site is no longer viable as an employment site may be unreasonably long in some circumstances. This might be overcome by replacing 'and' with 'unless' in that sentence.  Typically, the term 'employment' refers to Class B Uses in the Use Classes Order. However, retailing and leisure uses, for example, also generate employment. For clarity and the avoidance of doubt, it may be useful to clarify which employment uses this policy applies to.  Second paragraph – amend to read "Small-scale proposals for new employment opportunities...". Consideration should be given to what is meant by 'small-scale' in terms of assessing appropriateness of overall scale of development. This definition should be included within the Policy.  General – There is no justification or explanation for the Policy.
<b>Section 6 – Objective 7</b>	Policy SP26, p.48	This policy doesn't add much to Policy CS.21 in the Core Strategy. Also, there is a policy distinction between sites within a Local Service Village and other locations, in that new build dwellings are acceptable in the former so there isn't a policy preference towards conversion of existing buildings.  There is a difference between live/work units and homeworking, in that live/work units will invariably require planning permission for either conversion or new build, whereas homeworking can be operating a business out of a room in an existing dwelling, not necessarily triggering the need for 'change of use'. Does homeworking need to be mentioned?

<b>Section 6 – Objective 7</b>	Policy SP27, p.48	<p>The approach of this policy is similar to that taken in the Vale of Evesham Control Zone in Policy COM.11A in District Local Plan and Policy CS.14 in emerging Core Strategy. Only land south of A46 in the Neighbourhood Plan area lies within the Control Zone and there is no justification for applying this approach over the rest of NP area, particularly as various A and B class roads run through it.</p> <p>Criterion b) An existing business should not have to demonstrate that they have looked at the possibility of wholly relocating before having the opportunity to expand on their existing site.</p>
<b>Section 6 – Objective 7</b>	Policy SP28, p.49	<p>Criterion c) encourages formal recreation proposals that would not require new buildings. However, new investment/facilities may require a small/discrete building (such as a pavilion) that may be deemed acceptable in the right location and constructed from appropriate materials. Is this policy too restrictive as drafted? Should consideration be given to the possibility of new infrastructure in appropriate circumstances?</p>
<b>Section 6 – Objective 8</b>	Policy SP30, p.50	<p>The aim of Policy SP30 is acknowledged although it is queried how the second half of this policy would work in practice. In a physical sense, allocated site SP7/8 will unite the two halves of the village and resolve this policy objective. How could other sites, unless they too were located in the same vicinity achieve this objective? Would deleting “to unite the two halves of the village” be more appropriate?</p> <p>As written, this is not a ‘land use’ based policy and is more aspirational in nature. Therefore, it will need to be put in a separate section of the Plan, since non-land use based policies are not examined against the Basic Conditions.</p>
<b>Section 6 – Objective 8</b>	Policy SP31, p.51	<p>Slight contradiction in criterion (a), suggest inserting “level of” between “current” and “facilities”.</p> <p>The policy heading is ‘new and improved community buildings’ but the policy itself refers to possible replacement facilities or the renovation/improvement of existing facilities only. Should the policy be expanded to include potential provision of new (i.e. additional) facilities?</p>

<p><b>Section 6 – Objective 8</b></p>	<p>Policy SP32, p.53</p>	<p>The community should seek protection of these buildings under the Assets of Community Value Regulations 2012, as set out in part 5 of the Localism Act 2011.</p> <p>This policy may wish to include the ability for the loss of an existing community asset site provided the asset can be relocated elsewhere on an appropriately located site and provided that the replacement provision is of the same or better quantity or quality (akin to Policy SP35(a)).</p> <p>It would also be helpful to map these assets.</p> <p>Suggest adding 'community' between the words 'alternative' and 'use' for clarity and avoidance of doubt.</p>
<p><b>Section 6 – Objective 8</b></p>	<p>Policy SP33, p.53</p>	<p>Is Policy SP33 necessary given criterion (h) in Policy SP6? If it is necessary, it may need to define what community safety measures are. Notwithstanding the above, the requirement that a development, where possible, improve the safety of the whole parish may be unduly onerous and unable to be implemented and enforced.</p> <p>There is no explanatory text. However, paragraphs 6.75 and 6.76 listed under Policy SP34 appear to refer to community safety issues.</p>
<p><b>Section 6 – Objective 8</b></p>	<p>Policy SP34, p.54</p>	<p>It is assumed this policy refers to the collection of CIL receipts? Does the policy need to be more prescriptive, with mention of the CIL regime and the possible local infrastructure schemes the receipts could help fund?</p> <p>The explanatory paragraphs 6.75 and 6.76 do not appear to relate to the Policy. As such, there is no explanatory text to justify Policy SP34.</p>
<p><b>Appendix 2</b></p>	<p>p.67-70</p>	<p>The list of design principles are prescriptive and numerous. As such, these guidelines may be too onerous if the building in question is not a listed building.</p> <p>Criterion e) requires previous alterations to the building deemed 'unacceptable' (by whom?) to be removed and replaced through the current proposal. It is not reasonable to insist upon this.</p> <p>Criterion r) states that any sub-division of a large internal space will not be appropriate. However, there may be circumstances where this is appropriate (i.e. in order to create bedrooms at first floor level in a barn). It would be worth talking this through with a Conservation Officer to ascertain whether this criterion is acceptable.</p> <p>Criterion s) assumes there were original rainwater goods, but does not consider the scenario where there were none originally.</p>

		<p>Criterion z) indicates that there is a presumption against the erection of new ancillary structures within the curtilage of a converted agricultural building and criterion aa) states that garaging must be met within the original building. This is onerous and impractical. By looking to comply with all other design criterion (relating to use of existing openings for example) there may not be opportunity to include a garage within the original structure. Attempting to 'shoehorn' a garage into a traditional barn may appear incongruous and destroy the character and appearance of the building, thus failing to uphold many of the other design criterion listed. The most appropriate solution may be the construction of a 'cart shed' style garage/storage building within the designated curtilage, which would complement the building. As such, these two criteria require re-thinking.</p> <p>General – the lettering system for the criteria appears unnecessarily complicated. Could they be bullet points or numbered?</p>
<p><b>Appendix 3</b></p>	<p>p.71-74</p>	<p>The maps included are poor. They are difficult to interpret due to lack of detail/helpful features in order to confirm where they are (i.e. no buildings shown). There are many areas of different coloured shading on each map with no key to explain their significance.</p> <p>There is no explanation as to why these particular sites are of importance and are included within the Plan. Have they been chosen from a shortlist? If so, what is the list and who has provided it? What were the criteria for choosing these sites? Have WCC Ecology been contacted to provide advice/justification for including them? This section needs to be considered in more detail and provide both evidence/justification and better maps.</p>