

Alcester Neighbourhood Development Plan

Pre-submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General) Regulations, 2012)

Appendix 1 – Significant comments from Stratford-on-Avon District Council

Suggested new text underlined deleted text ~~struckthrough~~

Page number	Section	Comment
Page 5	Introduction – Section 1.2 (The Neighbourhood Plan Area)	<p>It is noted that the Neighbourhood Area excludes those parts of the built-up area of the town falling within (1) Arrow with Weethley parish and (2) Kinwarton parish. It would have been preferable to include those areas within the designated Neighbourhood Area, although it is recognised that this is an issue that will need to be pursued outside the scope of the current Plan. It is considered that this section does not adequately explain why a joint NDP has not gone ahead with Kinwarton parish, particularly given the obvious links.</p> <p>Recommend that in the first paragraph, insert the words “a large proportion of” after “includes” as it needs to be acknowledged that a part of the town is actually within the parish of Kinwarton.</p>
Page 13	Policy HBE 1 (Residential development within the Built-up Area Boundary)	<p>It is noted that the Built-up Area Boundary replicates that in the Core Strategy, although it excludes those parts of the town falling within (1) Arrow with Weethley parish and (2) Kinwarton parish. It is questionable therefore whether this policy really creates any ‘added value’ especially given different policies could potentially apply within the same Built-up Area Boundary. As a minimum it is recommended that the part of the Built-up Area Boundary that falls within Arrow and Weethley parish should be clearly shown as excluded from the Neighbourhood Area.</p> <p>The Policy states that ‘schemes for key worker housing will also be encouraged.’ This appears to be at odds with the explanatory text to HBE 2 (Local Needs Housing) which identified a need for affordable housing but not specifically for key worker accommodation. The term ‘key worker’ is, in any case, not defined (whether in the Plan itself, the Core Strategy or the NPPF). Furthermore, no need for ‘key worker’ accommodation is identified in the 2017 Survey (only housing for rent or shared ownership sale from a housing association, or owner-occupation). It is therefore recommended that reference to key worker housing is deleted.</p>
Page 14	Policy HBE 1 Explanation	<p>Because there are no site allocations / reservations proposed, additional housing supply (over and above existing commitments) will, by definition, be sourced from unallocated ‘windfall’ development. Experience suggests that such sites are rarely likely to be large and (in particular) over the current 10-unit threshold for affordable housing provision. The potential contribution of such sites to affordable housing supply and consequently their ability to address the local needs referenced on page 17 is therefore likely to be very limited.</p> <p>The final two paragraphs appear to conflate two distinct issues: namely housing supply within ‘Alcester’ as defined for the purposes of the Core Strategy on the one hand and the designated Neighbourhood Area on the other. The two areas are not identical and it is important that the Plan</p>

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		<p>should provide clarification on this point. The Core Strategy figure of 530 homes includes a site of 119 dwellings on the edge of Alcester but in Kinwarton Parish. This needs to be clarified because as presented it suggests that a further 95 homes need to be provided in Alcester to meet the Core Strategy target which is not the case. In addition the Core Strategy does not refer to the 530 homes figure as a "requirement" more an "indicative target".</p> <p>The southern edge of allocation ALC1 is commensurate with the settlement boundary and as such, any land outside ALC1 / south of Allimore Lane is going to be outside of the Built-up Area Boundary and therefore not relevant to this policy. As such it is suggested that the third paragraph is deleted.</p>
Page 15-16	Policy HBE 2 (Local Needs Housing): Potential Local Need Scheme – Allimore Lane	<p>The Town Council will be aware that initial discussions have taken place concerning a possible community-led housing scheme on land at Allimore Lane. If such a scheme is to include the provision of serviced plots for custom/self-build homes, as well as homes contributing towards meeting the need identified in the 2017 survey (referenced on page 13) then it may be preferable for the Plan to allocate land for such a scheme.</p>
	Policy HBE 2 (Local Needs Housing): Definition of 'local connection' for local needs housing	<p>The 'local connection' criteria defined in the policy differs from the standard criteria in use by Stratford District Council (which could create practical issues) and only appear to apply in the case of 'Local Need' schemes. It would be preferable if the same 'local connection' criteria were to apply across all new affordable housing schemes. Unlike for schemes within the Built-up Area boundary, there is no scope for 'serviced plots for those wishing to build or commission their own housing'.</p> <p>It is inferred from the above that the District Council's standard Priority Nominations arrangements will continue to apply in respect of all non Local Needs schemes: although in practice – for the reasons noted above – the scope for delivering such schemes is likely to be very limited in any case.</p>
	Policy HBE 2 (Local Needs Housing): Former School Site, Moorfield Road	<p>The Town Council will be aware of the long-running discussions regarding an Extra Care Housing scheme on this site. The site is owned by Warwickshire County Council, who have been actively exploring its potential for hosting an Extra Care housing scheme. This is an ongoing project, with design solutions to flood risk and other issues still to be resolved. Nevertheless, two important considerations are evident:</p> <ol style="list-style-type: none"> 1. This is a large brownfield site requiring redevelopment; its significance is enhanced by its size and prominent townscape setting, as well as the potential contribution it could make to housing supply. 2. This is almost certainly the only site of sufficient size close to the town centre likely to be able to support delivery of an Extra Care Housing Scheme. <p>It is considered to be disappointing that the Plan does not include any site-specific proposals for this site. It is recommended that further consideration be given to the future redevelopment of the site and to the inclusion of a site-specific allocation for an Extra Care Housing scheme.</p>
Page 16	Policy HBE 3 (Housing Mix): Market Housing Mix	<p>It is considered unclear where the market housing threshold for this policy has originated from. Given that there are no site allocations promoted within the NDP and the issue that the town is</p>

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		surrounded by the West Midlands Green Belt, it is questioned whether there will be the prospect of achieving any in-fill schemes of this number of houses. The 'mix' figures are not quoted as a 'range' and as such can be extremely difficult to achieve – however, it is acknowledged that the figures quoted are within the parameters of Core Strategy Policy CS.19.
Page 16	Policy HBE 3 (Housing Mix): Affordable Housing Mix	<p>The 'mix' figures are not quoted as a 'range' and as such can be extremely difficult to achieve – however it is acknowledged that the figures quoted are within the parameters of Core Strategy Policy CS.19. However, it is unclear on what basis specific percentages are specified compared to the range identified in Policy CS.19 in the Core Strategy no evidence is provided to suggest the need for a more rigid policy than that currently applied under CS.19. Flexibility is important as it ensures developers can tailor their proposals in accordance with viability and the character of the area.</p> <p>The figures do not hint at the community's aspiration in relation to providing smaller homes. As an example of an alternative approach that might be worth considering is within the Stratford-upon-Avon NDP which has added "at least" before the figure for 1 and 2 bed dwellings, adding "no more than" before the figures for 3 bedroom and 4+ bedroom dwellings.</p> <p>In relation to the 10-unit threshold, it is considered that this would reduce the ability of the Plan to manage the profile of the size and type of new homes developed during the Plan period, compared to counterpart Core Strategy Policy CS.19 which has no minimum size threshold. This could lead to imbalance within the housing stock, which could in turn put pressure on an already limited affordable housing stock.</p>
Page 16	Policy HBE4 (Bungalows)	<p>Whilst the intention of the Policy is laudable, a number of concerns are raised:</p> <ul style="list-style-type: none"> • In practice there are likely to be very few sites of 10+ homes coming forward without specific site allocations within the NDP itself. So in reality the actual yield from this policy is likely to be very limited. • There is no indication of prioritisation as between affordable and market housing. • It could compromise the delivery of an Extra Care Housing scheme at Moorfield Road. There is arguably greater evidence of a need for Extra Care Housing than there is for bungalows. <p>The term "strongly supported" should be clarified or replaced with "supported". Strong support may imply that such considerations outweigh other provisions of the plan and it is not clear that that is justified or what was intended.</p>
Page 17	Policy HBE 5 (Healthy Living)	This policy introduces a requirement for the submission of Air Quality and Overheating Risk performance calculations which is not in accordance with the Core Strategy or the draft Development Requirements SPD and is not supported by the validation requirements of the Council. In addition it is considered that such requests are not reasonably proportionate for minor applications below 10 dwellings.
Page 18	Policy HBE 6 (Specialist Provision)	This Policy could be more specific about which policies in particular should be considered. Is it intended that this should permit developments outside the Built-up Area Boundary? Is there a limit to the number of retirement dwellings supported?

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		<p>It is considered that in itself this policy is unlikely to be effective as it is both ambiguous and fails to identify specific priorities. A better approach might be to identify specific accessibility standards that <u>all</u> new homes should meet. It would also be useful for the Plan to refer to the Public Sector Equality Duty in this respect (see Section 149 of the Equality Act 2010 – the ‘protected characteristics’ most likely to be of relevance in the context of a land use plan are those of ‘age’ and disability’).</p>
Page 19	Policy HBE7 (Electric Car Charging Points)	<p>The intention of this policy is supported however it is unclear whether the aim is to secure one charging point per dwelling or per parking space. For flats, listed buildings, holiday lets and retirement properties there may be a reasoned justification to not provide these facilities. Perhaps introduce ‘where appropriate...’ to the start of the wording.</p> <p>Stratford-on-Avon District Council’s draft Development Requirements SPD (March 2018) sets out what is considered a more practical requirement for 1 electric vehicle charging point per dwelling with a garage or driveway and 1 charging point per 10 spaces of communal parking.</p> <p>It is noted that this policy only applies to residential development, and it is suggested that consideration is also given to non-residential development. The draft Development Requirements SPD sets out a requirement for non-residential development of 1 charging point per 10 spaces of parking.</p>
Page 22	Policy HBE 12 (Heritage Assets)	<p>It is considered that the policy conflicts with the requirements of Core Strategy Policy CS.20 which sets out a number of tests for the re-use of buildings in residential use. These include the need to demonstrate that residential use is the most suitable viable use for the building itself and the policy should be amended to reflect this.</p>
Page 40	Policy NE3 (Local Green Spaces)	<p>Of the 19 proposed Local Green Space sites, it is recommended that the following 8 sites are removed as follows:</p> <ul style="list-style-type: none"> • Site 6 (Oversley Wood) is not in reasonably close proximity to the town of Alcester, being over 1 mile from the historic centre of the town and on the opposite side of the A46 by-pass. Additionally, the site is over 90ha in size, which clearly cannot be classified as ‘local in character’ and is definitely an ‘extensive tract of land’. Therefore it is considered that Site 6 does not meet the assessment criteria set out in the NPPF for Local Green Space designation. In addition the site is designated as ‘Ancient Woodland’ within the Core Strategy which already affords it a high level of protection within the NPPF (paragraph 175(c)). • Site 8 (Hopkins Precinct Play Area) is the play area adjacent to Hopkins Precinct, and whilst the District Council supports the need for an improved play space in this general area a long term need has been identified to improve the area around Hopkins Precinct and the land to the rear. The District Council is committed to maintaining a play space within the vicinity but due to the likely future need to renovate and improve the wider area it is recommended that the Local Green Space designation is removed from this specific

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		<p>location. This will provide flexibility in the location of a play area as part of any redevelopment as there is currently no guarantee that the site is capable of enduring during or beyond the end of the plan period.</p> <ul style="list-style-type: none"> • The following 6 sites lie just outside of the Built-Up Area Boundary for Alcester and within designated green belt land. As such it is recommended that as a Local Green Space Designation essentially provides the same level of protection as green belt designation it is considered unnecessary to designate these sites as Local Green Space. Development proposals within the green belt are assessed against Core Strategy Policy CS.10: <ul style="list-style-type: none"> • Site 7: St Mary's Park, Kinwarton • Site 9: Bleachfield Street Play Area • Site 12: Gas House Lane Recreation Ground (Centenary Field) • Site 14: Whitehall Farm Green Space • Site 15: Bleachfield Street North Allotments • Site 16: Bleachfield Street South Allotments <p>On the basis of the above 8 sites being removed as LGS designations then the remaining sites would need to be renumbered accordingly.</p>
Page 47	Policy NE6 (Mitigating and Preventing increased flood risk)	<p>This policy states that 'all proposals must demonstrate that flood risk will not be increased elsewhere and that the proposed development is appropriately flood resistant and resilient.' It is suggested that this requirement should just be for those areas that require flood risk assessments under national policy requirements.</p> <p>Recommend that a separate map showing the extent of surface water flooding in the town would be helpful – Appendix 6 is considered not fit for purpose as it should cover the entire town as a minimum.</p>