

Brailes & Winderton Neighbourhood Development Plan

Pre-Submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General)

Regulations, 2012

Appendix 1 - Comments from Stratford-on-Avon District Council

Section	Reference/NDP page	Comment
Contents Page	Contents list (p.1)	<p>Under Section 2 (Evidence Gathering) sub-headings should be listed and numbered to be consistent with the rest of the document (i.e. 2.1 – Governing Principles; 2.2 – The Process). This principle also relates to Sections 3 and 4.</p> <p>Under Section 4 (Policies), all policies should be listed. In order to do this, each policy in the Plan will need to be given a title. See comments throughout this document for assistance in this regard.</p>
Contents Page	Glossary (p.1)	It is suggested that 'LSV2' refers to 'Local Service Village Category 2' and 'SDC' refers to 'Stratford-on-Avon District Council'.
General	Whole document	It would helpful if separate headings were added to the top of each of the individual sections to make it easier to read the plan. Paragraph numbering should also be added throughout.
Vision	NDP Vision (p.2)	First sentence of fourth paragraph to be amended to read "The character of the settlements and landscape within the designated neighbourhood area is of special quality..."
Introduction	1.2 The Neighbourhood Development Plan (p.4)	Amend second sentence of first paragraph to read "Approval to prepare the Plan was given by SDC in June 2014 through the approval of the application to designate the neighbourhood area which was based on the Parish boundary."
Introduction	1.4 How the Community Influenced the Plan (p.5)	Replace "Spring" with "June" in the final line of the first paragraph.
Section 3 – Brailes Today	3.2 History (p.9)	Should the final word on the first line of the first paragraph on p.9 be "sinking" not "shrinking"?
Section 3 – Brailes Today	3.3 Profile of the Parish (p.9)	The section refers to surveys but does not explain what surveys are being relied upon as evidence.
Section 3 – Brailes Today	People (p.10)	The section refers to surveys but does not explain what surveys are being relied upon as evidence.
Section 3 – Brailes Today	Hamlet of Winderton (p.17)	Replace "...is in..." on the first line of the first paragraph, with "...the majority of the settlement lies within..."

Section	Reference/NDP page	Comment
Section 4 – Objectives and Policies	Objectives and Policies (p.18)	This section informs the reader that each policy will consist of: An objective; A policy statement; an explanation for the policy. However, the policy section is not actually written in this format. Currently, not every policy has an objective, in some instances a number of policies are 'linked' together (for example policies L1-L7) and not each policy has an associated explanation. This requires clarification.
Section 4 – Objectives and Policies	4.1 A valued landscape and setting (p.18)	The two main themes would read better as "The Natural Environment" and "The Built Environment" at the bottom of p.18.
Section 4 – Objectives and Policies	Environment – Natural (p.19)	The section entitled Environment highlights flooding as an area of concern for the Brilles community, and makes reference to the NPPF and Core Strategy Policy CS.2 in setting the context. However, it does not make any reference to the District Council's Core Strategy Policy CS.4 'Water Environment and Flood Risk'. It would be helpful reference to CS.4 was included to strengthen the context. The District Council is committed to protecting and enhancing the District's environment and supportive of measures which help to mitigate and adapt to the impacts of Climate Change. Therefore, the District Council is supportive of a policy which seeks to reduce flood risk and mitigate and adapt to the impacts of climate change in local communities.
Section 4 – Natural Environment	Objective for Policies L1-L7 (p.20)	Inclusion of the word 'exceed' in the third line would seem to be inappropriate. Whilst the objective looks to exceed guidelines, Policy L1 then states that 'new developments must adopt best practice SUDS, which appears to be at odds with the objective to 'exceed'.
Section 4 – Natural Environment	Policy L1 (p.20)	<p>Policy CS.4 of the Council's adopted Core Strategy provides detailed policy principles for the protection of the district's water environment and the reduction of flood risk. Policy CS.4 Part B relates specifically to surface water runoff and sustainable urban drainage systems. It requires that SUDS should be proportionally incorporated into all scales of development, supported by a groundwater risk assessment. Part B of the policy currently exceeds the non-statutory national SUDS standards by requiring that for brownfield development sites, developers are expected to deliver substantial reduction in the existing rate of surface water generated from the development, and where possible, limits the rate of surface water runoff to the equivalent Greenfield rate. It is recommended that the policy is reworded to reflect this.</p> <p>Policy L1 states that new developments must adopt best practice Sustainable Drainage Systems. The policy could be strengthened if it requires that the design of SUDS should support the findings and recommendations of Warwickshire Surface Water Management Plan, the Warwickshire Sustainable Urban Drainage Manual and the District Council's Strategic Flood Risk Assessment, which also requires development to exceed best practice.</p>
Section 4 – Natural Environment	Policy L2 (p.20)	Policy does not appear to directly relate to land-use planning matters and should be deleted.

Section	Reference/NDP page	Comment
Section 4 – Natural Environment	Policy L3 (p.20)	Policy does not appear to directly relate to land-use planning matters and should be deleted.
Section 4 – Natural Environment	Policy L4 (p.20)	<p>Policy does not appear to directly relate to land-use planning matters and should be deleted.</p> <p>Separate legislation requires water companies to carry out their statutory duty to ensure that water services infrastructure is provided in a timely manner. It is worth noting that Severn Trent will ensure provision once planning permission has been granted. At a strategic level, the Council Core Strategy has undertaken a number of Water Cycle Studies to evidence that there is sufficient capacity to accommodate the level of planned growth in the district in the plan period.</p> <p>In addition, Policy CS.4 part D 'Water Quality' requires that, in accordance with the Water Framework Directive's objectives, development must not affect the water bodies' ability to reach good or potential status as set out in the Rivers Severn, Humber and Thames River Basin Management Plans (RBMPs).... Development will not be permitted where proposals have a negative impact on water quality, either directly through pollution of surface or ground water, or indirectly through overloading the wastewater treatment works. Prior to any potential development, consultation must be held with either Severn Trent or Thames Water as appropriate to ensure that the required wastewater infrastructure is in place in sufficient time.</p>
Section 4 – Natural Environment	Policy L5 (p.20)	It is unclear what is required to comply with the policy.
Section 4 – Natural Environment	Policy L6 (p.20)	It is unclear what is required to comply with the policy – what are the flood water management proposals to be assessed against?
Section 4 – Natural Environment	Policy L7 (p.20)	<p>Which flood alleviation works are to be taken into account and by whom?</p> <p>Suggest replacing "villages" with "land and properties" if retained, but see comment below on possible re-drafting of the policy.</p>
Section 4 – Natural Environment	Policies L1-L7 (p.20)	<p>It is suggested the remaining policies in this section (after the removal of L2, L3 and L4) could be integrated into one policy titled "Flood Risk". A sample policy is set out below, which could be adapted and incorporated into a revised all-encompassing 'flood risk' policy:</p> <p>"Development should not increase flood risk. Planning applications for development within the Plan area must be accompanied by a site-specific flood risk assessment in line with the requirements of national policy and advice, but may also be required on a site by site basis based on locally available evidence. All proposals must demonstrate that flood risk will not be increased elsewhere and that the proposed development is appropriately flood resilient and resistant.</p>

Section	Reference/NDP page	Comment
		<p>Information accompanying the application should demonstrate how any mitigation measures will be satisfactorily integrated into the design and layout of the development. The use of sustainable urban drainage systems and permeable surfaces will be encouraged where appropriate.</p> <p>Development within Flood Zones 1 and 2 must demonstrate that it will not reduce the capacity and capability of the functional flood plain. Water compatible uses within Flood Zone 3 may be acceptable in certain circumstances but other forms of development will be strictly resisted.</p> <p>All development proposals must incorporate suitable and sustainable means of drainage. Where site conditions are proven to be unsuitable, an alternative drainage solution will need to be agreed by the council and the relevant water authority. The re-use and recycling of water within developments will be encouraged.</p> <p>Proposals which do not satisfactorily demonstrate secure arrangements for the prevention of fluvial and pluvial flooding will not be supported."</p>
Section 4 – Natural Environment	Policy L1-L7: Explanation (p.20)	<p>The explanation should be reworded to be more explicit about the impact of flooding on the Parish. It is recommended that the first paragraph is reworded as follows:</p> <p>"Flooding is a major concern for the Parish as it has a significant impact on the local communities. This is evidenced by the feedback fromJanuary 2016 which shows that it is a high priority consideration for future developments. Reference should also be made to the fact that Brailes is registered on the WCC Surface Water Management Plan (SWMP) as a community at risk of flooding".</p> <p>The explanation would be strengthened if this fact was included with a link to the SWMP. A full description of mitigation works should be included. It is recommended that details of flood alleviation works are provided .e.g. what, where (with a map) and duration.</p> <p>The final sentence of the explanation should be deleted as this does not relate to the explanation of the policy.</p>
Section 4 – Natural Environment	Policy L8 Objective (p.21)	Insert "Local" between "designated" and "green" and Insert capital 'G' for green and capital 'S' for spaces.

Section	Reference/NDP page	Comment
<p>Section 4 – Natural Environment</p>	<p>Policy L8 (p.21)</p>	<p>Re-number as 'Policy L2' and provide title "Local Green Space".</p> <p>The policy as written includes the word "permitted". With regard to the issue of decision making the Framework states "the planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise". The material considerations at the time of determination of a future planning application are unknown and therefore cannot be dismissed through a policy that states development "will only be permitted in the following circumstances". Policies should use the term "supported" or "not be supported" in recognition that the basis of decision making is the development plan unless material considerations indicate otherwise. As such, "permitted" should be replaced by "supported".</p> <p>The second paragraph of the 'Explanation' text (including 2 no. bullet points) should be incorporated into the policy itself.</p> <p>The exact individual boundaries for each of the proposed Local Green Spaces are difficult to pick out on the policies map. It would be appropriate to include separate individual 'inset' maps for each site at an appropriate scale, for clarity.</p>

Section	Reference/NDP page	Comment
Section 4 – Natural Environment	Policy L9 (p.21)	<p>Re-number as 'Policy L3' and provide title "Promoting High Quality Design", or similar.</p> <p>The policy does not read particularly well as drafted. Some suggested wording for a re-drafted policy is set out below:</p> <p>"All development proposals must demonstrate how local character has been taken into account during the conception and evolution of a design. Proposals that do not positively contribute to local character will not be supported.</p> <p>All development proposals will be expected to demonstrate how the design has been influenced by the need to plan positively to reduce crime and the fear of crime and how this will be achieved.</p> <p>The density of development must enhance the character and quality of the local area whilst preserving the amenity of neighbouring residential homes, being commensurate with a viable scheme and infrastructure capacity".</p> <p>The final sentence relating to the maintaining or enhancing of the ecological status of a development site is a separate policy issue and should be a distinct policy in its own right. It is suggested introducing a new policy L4 titled "Nature Conservation" or something similar. Some suggested wording for the policy is set out below:</p> <p>Development should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible. Existing ecological networks should be retained and new ecological habitats and networks are particularly encouraged. Measures to improve landscape quality, scenic beauty and tranquillity are encouraged."</p>
Section 4 – Natural Environment	Policy L10 (p.22)	<p>Re-number as 'Policy L5' and provide title "Renewable and Low Carbon Energy", or similar.</p> <p>Some suggested wording for a re-drafted policy is set out below:</p> <p>"Development proposals relating to the production of renewable and low carbon energy will be supported providing they can be satisfactorily integrated into the character and appearance of the village and its environs. Proposals which have an adverse impact on the character of the area will not be supported.</p> <p>Where appropriate, other development should demonstrate how energy efficiency measures have been maximised through the provision of high energy efficient buildings".</p>

Section	Reference/NDP page	Comment
Section 4 – Natural Environment	Policy L11 (p.22)	<p>The policy as drafted does not directly relate to land-use planning matters since it refers specifically to street lighting. Street lighting is not a matter that can be influenced through planning applications since it is a statutory function of the County Council through other legislation. As drafted, the policy should therefore be deleted. However, the explanatory text indicates the policy is based on the requirement for the maintenance of a 'dark sky' environment in the neighbourhood area. An alternative stance on a 'dark sky' policy is set out below for consideration:</p> <p>"Development should aim to minimise light pollution by avoiding obtrusive external property and street lighting. In considering applications, parties will be encouraged to assess whether the proposed development could take place without external lighting.</p> <p>All applications for new development must demonstrate how the dark skies environment will be protected through the submission of appropriate supporting documentation, to demonstrate that they accord with current professional guidance to achieve an appropriate lighting environment for the area."</p> <p>Re-number as 'Policy L6' and provide title "Dark Skies", or similar.</p>
Section 4 – Built Environment	Objective for Policy L12 (p.23)	It seems unnecessary to refer to "dwellings" in the first line; suggest it reads "Ensure all new buildings..."
Section 4 – Built Environment	Policy L12 (p.23)	Re-number as 'Policy L7' and provide title "Responding to Local Character", or similar.
Section 4 – Built Environment	Policy L13 (p.23)	<p>The following comments in respect of this policy should be read alongside comments in respect of the housing policies, particularly regarding the delivery of affordable housing. As this policy relates to housing, it may be more appropriate to give it a 'H' prefix.</p> <p>For the avoidance of doubt, it is suggested that the policy is reworded as follows with the heading of either "<i>Windfall Development</i>" or "<i>Development within the Built-up Area</i>":</p> <p><i>"Developments on unallocated (windfall) sites within the built up area boundary will be supported where they do not exceed 6 dwellings".</i></p> <p>The policy should also include additional text and framed in a more generalised manner and acknowledge that larger schemes may be appropriate depending on nature and location of site.</p> <p>The accompanying explanation should more accurately reflect the fact that the change to the</p>

Section	Reference/NDP page	Comment
		affordable housing site size thresholds was initiated by Government and SDC amended its approach in order to ensure compliance with the new national small sites threshold.
Section 4.2 – Meeting Housing Requirements	Context for comments on Housing Policies	<p>In order to understand the District Council’s concerns and objections, it is important to appreciate more fully the context within which the Plan is being prepared.</p> <p>The Plan covers the whole of the parish of Brailes, which includes:</p> <ul style="list-style-type: none"> • the village of Brailes (which has the status of a Category 2 Local Service Village (LSV) for the purposes of the Core Strategy); and • the hamlet of Winderton (which has no defined status for the purposes of the Core Strategy). <p>The period covered by the Plan is not clearly stated, although we assume its housing policies relate to the same period covered by the Core Strategy, i.e. 2011–2031.</p> <p>Both settlements are ‘washed over’ by the Cotswolds AONB. It is acknowledged that the ability of the Plan to allocate or reserve housing sites will therefore be constrained within the terms of Core Strategy Policy CS.11.</p> <p>Brailes village, by virtue of its status as a LSV, forms part of the strategic housing allocation of approximately 2,000 homes in Core Strategy Policy CS.16. For Category 2 LSVs, such as Brailes, an aggregate housing requirement of approximately 700 homes in total is identified, of which no more than around 12% (i.e. 84 homes) should be provided in any individual settlement. Part D of Core Strategy Policy CS.15 indicates that this development will take place:</p> <ul style="list-style-type: none"> • 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>The District Council’s monitoring of housing supply (as at 31 March 2016) across all categories of LSV indicates that a total of 2,000 homes have already been built or ‘committed’ between 1 April 2011 and 31 March 2016. This actual supply figure may reasonably be expected to increase in the future. Of this supply, some 42 homes are in the village of Brailes. This monitoring further suggests that, although supply from Brailes is currently nowhere near approaching the figure of ‘around 84 homes’, there is, equally, no urgent imperative for the</p>

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		<p>Plan to identify additional sites for release to contribute towards meeting the strategic housing allocation for LSVs contained in Core Strategy Policy CS.16. However, this situation will need to be regularly monitored, and for this reason it may still be prudent for the Plan to allocate sites to meet strategic requirements.</p> <p>Other policies of the Core Strategy relevant to consideration of the Plan's approach to housing supply include CS.18 (affordable housing) and CS.19 (housing mix and type).</p> <p>The concerns and objections in respect of NDP policies primarily relate to uncertainty about their <i>purpose</i> and whether the relevant policies would actually work. It is recommended that a clearer explanation of the strategic policy context be provided in the introductory paragraphs including clarity over where individual policies apply.</p>
Section 4.2 – Meeting Housing Requirements	Key Drivers (p.24)	<p>The section refers to 'the 2015 Survey', to which Survey does it refer?</p> <p>References under 'Key Drivers' should also include reference to satisfaction of the statutory 'basic conditions'.</p>
Section 4.2 – Meeting Housing Requirements	Site Allocation (p.25)	<p>With reference to the second sentence "The sites allocated will have 6 dwellings ...", should this read "have a maximum of 6 dwellings each"? What if the sites can't actually accommodate 6 dwellings? Additionally, the plot list is missing "1" after "Sutton Lane Plot".</p> <p>It is suggested the sites identified in bullet points are referred to as 'sites' rather than 'plots'.</p> <p>It is unclear what is meant by 'Site B – under discussion'. This needs to be clarified.</p> <p>By definition, allocated sites cannot also be windfall sites. The word 'windfall' should be deleted.</p>
Section 4.2 – Meeting Housing Requirements	Objective for Policy H1 (p.27)	<p>Should "... affordable housing as required by the latest..." read "... affordable housing as identified by the latest Brailles ..."?</p>

Section	Reference/NDP page	Comment
<p>Section 4.2 – Meeting Housing Requirements</p>	<p>Policy H2 (p.27)</p>	<p>There is a lack of evidence to justify departure from national and local thresholds for the provision of affordable housing. Whilst the Policies all imply a requirement for on-site affordable housing provision, as per the Core Strategy, the Parish Council will be aware from previous informal advice that the maximum size thresholds proposed for schemes fall below those above which on site affordable housing provision is required by CS Policy CS.18 (briefly, on-site provision is only required on sites of 11 or more dwellings), with an off-site commuted sum for sites of between 6 and 10 dwellings. This approach is consistent with the national thresholds.</p> <p>Evidence is therefore essential that due regard has been had to national guidance and Policy CS.18 and that specific local circumstances are such as to warrant the application of lower minimum size thresholds. This is closely linked to the issue of deliverability (see below). Without this evidence, there is a strong likelihood that the Policy could be adjudged to not meeting the 'basic conditions'. If such evidence cannot be produced prior to submission stage, then we recommend the Plan revert to applying the existing thresholds in CS Policy CS.18.</p> <p>There is also lack of evidence that the Policies will work in practical terms. Irrespective of the position concerning compliance with the 'basic conditions', the District Council is concerned that the Policies will not work, in the sense that it they would fail to deliver the housing sought. This also has wider adverse reputational implications. This observation is not in any way intended as a criticism of the Plan's underlying objectives – which are laudable and welcome – but are necessary to highlight the considered opinion of the District Council based on its recent experiences elsewhere that the policies in question will not work under current circumstances.</p> <p>Consequently, and in the absence of any evidence to the contrary, if the submission version of the Plan were to include policies which are likely to be undeliverable in practical terms, then the District Council might be forced to conclude that the Plan itself is constructively not in general conformity with strategic policies for the purpose of assessing compliance with the 'basic conditions'. In any case, there is no point in including policies that will not work.</p> <p>The District Council recognises and welcomes the considerable background work that has been undertaken in preparing the Plan. In particular, it welcomes the fact that meetings have taken place with representatives of some of the Council's partner housing associations to discuss the</p>

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		<p>Plan's proposed approach to delivery of affordable housing. However, their involvement only represents part of a longer supply chain and is conditional upon certain criteria being met. When considering the likelihood of successful delivery, it is necessary to consider all key links in the supply chain.</p> <p>In the above respect, recent experience elsewhere within the District suggests it is highly unlikely that affordable housing (or consequently any housing) will be delivered because the individual sites proposed to be allocated are too small to be viable to develop for mixed tenure schemes.</p> <p>The fact that all the proposed allocated sites are 'sub threshold' (as discussed above) is a strong indicator – a warning sign as it were – that it may be difficult or impossible to achieve the necessary economies of scale necessary to make the provision of affordable housing viable. At the very least, experience suggests that proceeds from the sale of market dwellings would be required to cross-subsidise the cost of developing the affordable homes. This may need to be reflected in reduced purchase prices for the plots of land in question.</p> <p>Under current conditions, and based on the District Council's ongoing dialogue with its partners, it is considered that housing associations are very unlikely to be able to develop very small-scale schemes (of just one or two affordable homes) such as proposed here, even though they remain willing to work with the local community to deliver affordable housing. It is, of course, possible that conditions could change during the Plan period, but it would be wrong to base policies on speculation about what might happen in the future.</p> <p>Similarly, and again taking into account the 'sub threshold' nature of the proposed allocations/reserve sites, the District Council has not seen any evidence to suggest that private house-builders consider that such sites would be likely to be viable to develop for mixed tenure schemes. Developers are unlikely to want to take the risk of promoting and developing market-led schemes without a strong likelihood of housing association involvement.</p> <p>There have been recent cases, including at Fenny Compton, Long Marston and Welford-on-Avon, where private house-builders on smaller 'market-led' housing sites that already had/have the benefit of planning permission have been unable to identify housing associations willing to partner the development of the required affordable housing. It should be noted that the sites concerned are significantly larger than the sites proposed to be allocated in the Plan:</p>

Section	Reference/NDP page	Comment
		<p>each of the sites in question having typically been granted planning permission for up to 15 homes, of which 5 or thereabouts have been secured as affordable. It has only been possible to prevent delivery of those sites from stalling through the substitution of a Fixed Equity Sale tenure product. But the use of that tenure product in the case of Brailes may not necessarily be effective in meeting identified local need. There may be a more pressing need for housing for rent.</p> <p>It is understood all the proposed allocations comprise sites in separate, private ownerships. In considering the overall likelihood of delivery, it is accordingly necessary to consider whether the owners of the sites in question would be willing to accept the likelihood of significantly reduced land values such as would be necessary to enable the development of each site to be economically viable.</p> <p>A suggested alternative approach could be the allocation of certain sites for market housing and other sites purely for the provision of affordable housing.</p>
Section 4.2 – Meeting Housing Requirements	Policy H1 (p.27)	<p>The Policy will require a suitably worded title.</p> <p>Unclear what a 'gradual approach' is and how this would work in practice.</p>
Section 4.2 – Meeting Housing Requirements	Policy H2 (p.27)	<p>Unclear what is meant by 'an appropriate time' and how this would work in practice.</p> <p>The wording is different to a previous description in the Plan, plus "...of which at least 2 must be affordable housing" or is it "...of which two will be affordable..."? If retained, the policy will require a suitable title e.g. "Promoting Affordable Housing".</p>
Section 4.2 – Meeting Housing Requirements	Policy H3 (p.27)	<p>The policy should refer to the 'Policies Map', not the Proposals Map.</p> <p>Second sentence "... of which 2 must be affordable housing." or should this read "... of which at least 2 must be affordable housing."?</p> <p>Policy H3 is not strictly a "safeguarding" policy but a 'reserve sites' policy.</p> <p>Part D of Core Strategy Policy CS.16 includes provision for a Site Allocations Plan (SAP) to identify Reserve Housing Sites for the purposes explained in that Policy. The SAP is to be prepared by the District Council. Although there is no <i>requirement</i> for a Neighbourhood Plan to identify reserve sites, there is no reason why it should not do so and the District Council considers NDPs to be an ideal opportunity to assist in that provision, although such reserve sites would come forward to meet District, as opposed to local needs.</p>

Section	Reference/NDP page	Comment
Section 4.2 – Meeting Housing Requirements	Objective for Policy H4 (p.28)	Second sentence: "These sites are small sites used solely for affordable housing on land ...". Preferably this should read "These sites are small sites used solely for housing, as identified through a housing needs survey, on land...". As this currently reads it appears that only housing association rent or shared ownership housing would be allowed on these sites though such proposals are often reliant on local market homes to cross-subsidise a "local needs scheme". This could, in effect, be a way of preventing development. Policy H4 would also need a slight re-wording so it doesn't read "... will be affordable houses only."
Section 4.2 – Meeting Housing Requirements	Policy H4 (p.28)	<p>It is difficult to identify what "added value" this Policy creates, over and above existing Core Strategy policies in respect of 'Local Need' schemes. More importantly, for similar reasons discussed in respect of Policy H2, it is difficult to see sites of no more than about six dwellings being financially viable for development if exclusively for affordable homes. Whilst the Parish Council are entitled to restrict any housing provided to use exclusively as affordable housing, it should give careful consideration to the likelihood of delivery.</p> <p>As with other Policies, the underlying objective is laudable and welcomed. However it lacks clarity and further consideration should be given to delivery. For example, is it intended that the sites on which such properties would be developed will come forward under the auspices of Policies H2 and H3?</p> <p>The District Council therefore recommends:</p> <ul style="list-style-type: none"> • That the continued inclusion of the stipulation, in Policy H4, that any sites released "will be of around six houses" be reviewed in the light of the considerations around delivery discussed above. <p>Provide a suitable policy title, "Rural Exception Housing", or similar.</p> <p>Unclear what is meant by 'an appropriate time' and how this would work in practice.</p> <p>Replace "will be provided by a correctly administered Housing Needs Survey" with "will be provided by a Housing Needs Survey endorsed by the Council".</p>
Section 4.2 – Meeting Housing Requirements	Policy H4: Explanation (p.28)	In third line, refer to PC's in full for clarity.

Section	Reference/NDP page	Comment
Section 4.2 – Meeting Housing Requirements	Policy H5 (p.28)	<p>The percentage requirement needs to be justified as it departs from the 40-50% ordinarily required for market dwellings by Part B of Core Strategy Policy CS.19.</p> <p>Should the policy read "2 and/or 3 dwellings" otherwise all 66% would either be all 2 or all 3 bed?</p>
Section 4.2 – Meeting Housing Requirements	Policy H6 (p.29)	<p>The statement "Encourage the provision of dwellings for older residents ..." has a very wide description (bungalows? sheltered? larger property so family can move in to care for resident? smaller property?). This requires clarification.</p> <p>Subject to other possible modification based on comments set out elsewhere in this schedule, the policy could be made more positive by deleting the word "Encourage" and add "...will be supported" at the end of the sentence.</p> <p>Add clarity to explanation as to how this policy will be implemented e.g. through the use of planning obligations and/or planning conditions that restrict the occupation of such units.</p>
Section 4.2 – Meeting Housing Requirements	Policy H7 (p.29)	<p>This Policy could of considerable significance to all potential housing delivery partners. However its application could prove highly problematic. There are significant practical issues around interpretation. In addition, it is difficult to see what "added value" this Policy creates over and above relevant national and Core Strategy policies on design quality (see, for example, Policy CS.9).</p> <p>The District Council therefore recommends:</p> <ul style="list-style-type: none"> • That the continued inclusion of this Policy be reviewed in the light of the existence of other relevant policies. <p>Should the policy be retained in any form, the policy will need to be given a suitable title.</p>
Section 4.2 – Meeting Housing Requirements	Housing – General comment	<p>It is noted there is no policy included in respect of the village boundary and its function in determining where housing development will be supported, in principle. Suggested revisions to Policy L13 may resolve this.</p>

Section	Reference/NDP page	Comment
Policies Map	Policies Map (p.30)	<p>Site 5 – There is an area of ‘white land’ to the rear (east) of this site that is not an allocated site through the NDP but is included within the built-up-area boundary (BUAB). Is this an error, or is it part of the allocation? Since it is agricultural (greenfield) land, it is suggested the BUAB should run along the eastern boundary of site 5 if the ‘white land’ does not form part of the allocated site.</p> <p>Southwest part of proposed BUAB – There is an agricultural field to the eastern side of Henbrook Lane that has been included within the BUAB but has not been put forward as an allocated site in the NDP. Is this an error? It is considered that if this land is not an allocation, it should be removed from the proposed BUAB.</p>
Section 4.3 – A Strong Local Economy	Policy E1 (p.32)	<p>In the first line of the policy, it is suggested that ‘should’ is replaced with ‘will’ and ‘must’ is replaced with ‘should’. “All” should be deleted, since it is far too onerous for every application to do what the policy is asking. A suitable alternative measurement of appropriateness in terms of scale of development will need to be considered and inserted into the policy. The policy will require a suitable title.</p>
Section 4.3 – A Strong Local Economy	Policy E2 (p.32)	<p>Whilst supported in principle, the policy is not as clear as it could be and does not appear to support new employment sites or take account of the potential loss of existing employment sites, which seems to be omissions, given that one of the three objectives of the NDP is to support a strong local economy. An alternative, all-inclusive policy could be considered, along the following lines:</p> <p>“In the interests of developing a sustainable community, proposals for expanding or improving existing employment sites or creating new employment sites which support the growth of local employment will be encouraged. Proposals for the change of use or redevelopment of land or premises identified for or currently in employment use will not be permitted unless:</p> <ul style="list-style-type: none"> a) There is a sufficient supply of sites for a range of employment uses to meet both immediate and longer term requirements over the Plan period; or b) The applicant can demonstrate that the site/premises is no longer capable of meeting employment needs or where there is no reasonable prospect of the site being used for employment uses; or c) Development of the site for other appropriate uses will facilitate the relocation of an existing business to a more suitable site; or d) Unacceptable environmental problems are associated with the current use of the site and the proposal will remove them; or e) The site is located in the village centre and the proposed use will contribute to the vitality and viability of the centre or forms part of a regeneration project

Section	Reference/NDP page	Comment
		<p>Where there is no reasonable prospect of a site being used for the allocated employment use, planning applications for alternative uses will be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p> <p>The policy should be titled “Employment Sites” or something similar.</p>
<p>Section 4.3 – A Strong Local Economy</p>	<p>Policy E3 (p.32)</p>	<p>Does this policy intend to cover <i>all</i> redundant farm buildings, or ones of ‘traditional’ building materials (i.e. brick/stone barns) etc? The second sentence indicates “The AONB states...” which cannot be correct; it must be a quote from a publication referring to the AONB. Regardless, quotes should not be within the policy; however, they could be included in the Explanation. The policy does not provide guidance as to the situations when which a change of use could be appropriate. Set out below is an example of a similar policy that could be used/adapted, should it be deemed appropriate:</p> <p>“The conversion of redundant agricultural buildings built of traditional materials and of architectural merit to housing, permanent business space or residential tourist accommodation will be accepted provided the development:</p> <ul style="list-style-type: none"> a) Does not have an unacceptable impact on the visual and landscape amenity of the area, particularly conservation areas and listed buildings; b) Does not have an unacceptable impact on neighbours’ amenity; c) Does not cause harm to nature conservation interests; d) Benefits from a safe and convenient access to the site or a satisfactory access can be created; e) The building is genuinely capable of being converted without significant modification, rebuilding (including foundations and walls) or extension; and f) Ancillary and/or proposed outbuildings and boundary treatments are in keeping with the character and setting of the original building. <p>Such applications will be expected to demonstrate compliance with the above criteria through the submission of supporting documentation such as ecological surveys and structural engineer’s surveys.”</p> <p>The policy should be titled “Re-use of Buildings” or something similar.</p> <p>Consideration needs to be given to the consistency/conformity of this policy with national permitted development rights and Core Strategy Policy AS.10.</p>

Section	Reference/NDP page	Comment
<p>Section 4.3 – A Strong Local Economy</p>	<p>Policy E4 (p.32)</p>	<p>It will need to be clarified as to whether last sentence of the policy applies to sites in open countryside. It would seem inappropriate so suggest wording which refers to sites within/edge of Built Up Area Boundary.</p> <p>The policy as written does not provide criteria by which a planning application could be assessed in terms of acceptability.</p> <p>There is no need to quote the NPPF in the policy itself. However, the NPPF definition excludes buildings in agricultural and forestry use. The policy should clarify that for the purposes of the NDP, the definition of brownfield land includes buildings in agricultural or forestry use or at the very least, that such buildings will be considered akin to brownfield land.</p> <p>If the policy is to support the use of land specifically for housing, should the policy be located in the Housing section of the Plan or the built environment section as opposed to the economy section?</p> <p>Set out below is an example of a similar policy that could be used/adapted, should it be deemed appropriate:</p> <p>“Any proposals for the redevelopment of brownfield land to create new homes will be supported subject to the following criteria:</p> <ul style="list-style-type: none"> a) The new use would be compatible with the surrounding uses; b) Any remedial works to remove contaminants are satisfactorily dealt with; and c) The proposal would lead to an enhancement in the character and appearance of the site and would not result in the loss of any land of high environmental value.” <p>The policy should be titled “Use of Brownfield Land” or something similar.</p>

Section	Reference/NDP page	Comment
<p>Section 4.3 – A Strong Local Economy</p>	<p>Policy E5 (p.33)</p>	<p>The Policy refers to the improvement of "...the current infrastructure" but does not explain what that relates to. The Explanation to the policy only talks about internet connectivity. Should the policy refer specifically to high-speed broadband? Set out below is an example of a policy that could be used/adapted, should it be deemed appropriate:</p> <p>"All new residential and commercial development within the Neighbourhood Area will be expected to include the necessary infrastructure to allow future connectivity to high speed broadband."</p> <p>The policy should be given an appropriate title, depending upon its eventual scope.</p>
<p>Section 4.3 – A Strong Local Economy</p>	<p>Policy E6 (p.33)</p>	<p>Below is a re-worded policy for consideration:</p> <p>"All new dwellings are encouraged to provide space to support home-working, with flexible space adaptable to a home office, and where appropriate incorporate cabling to support broadband in accordance with Policy E5."</p> <p>The policy should be titled "Homeworking" or something similar.</p>