

Ilmington Neighbourhood Development Plan

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

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

Policy related comments:

Section	Reference/ page	Comment
Contents	p.3 section 6.1	Replace 'Development' with 'Growth' to match the main text of the Plan.
Contents -Policy HG.1	p.3 section 6.1	Replace policy title with 'Housing Allocations' to match the main text of the Plan.
Contents – Policies HG.2 and HG.6	p.3	Policies HG.2 and HG.6 have exactly the same title, which is confusing. Each policy should have a unique title.
Contents – Policy DC.3	p.3 – section 6.2	Replace 'Development' with 'Infill' to match the main text of the Plan.
Contents – Policy DC.4	p.3 –section 6.2	Add 'to Amenities' to be consistent with the main text of the Plan.
Contents- Policy HA1	p.3 -section 6.3	Change page number to '41'
Contents – Policy HA.1	p.3 – section 6.3	Replace ':' with '.' between letters and number in policy number and add ':' after policy number; change page number to '41'
Contents	p.4- section 6.4	Change page number to '44'
Contents – Policy LGS.1	p.4 – section 6.4	Change page number to '44'
Contents	p.4 – section 6.5	Change page number to '46'
Contents– Policy INF.1	p.4 – section 6.5	Replace policy title with 'Flooding' to match the main text of the Plan; change page number to '46'
Contents– Policy INF.2	p.4 – section 6.5	Change page number to '47'
Appendices	p.4 – Appendix 4	The Ilmington Character Appraisal quoted here is missing from the document itself.
List of Figures	p.5 – Figure 14	Change page number to '42'
List of Figures	p.5 – Figure 15	Change page number to '43'
List of Figures	p.5– Figure 16	Change page number to '45'
List of Figures	p.5 – Figure 17	Change page number to '48'
List of Figures	p.5 – Figure 18	Change page number to '49'
Section 2	p.8– para 2.5	Add 'within the Core Strategy' after 'Villages' on 2nd line. Note: It would be helpful to state what around 13% equates to (i.e. approximately 58 dwellings) to provide some context.
	p.9 – para 2.12 – second bullet point	Is the CAONB Management Plan national policy?; is the number '4' after 'Core Strategy' meant to indicate a footnote reference?

Section	Reference/ page	Comment
	p.12 – para 3.2.2 and Figure 2	Should this site be included on a map and added as an additional Figure in the NDP for context?
	Page 14, 3.2.11, 2nd line	2nd line – should read ‘Cotswolds’
	p.16 – Section 4 – para 4.3	Should this refer to Figure 14, not Figure 2?
	p.17 – para 4.8	Refers to a ‘settlement boundary’ but one did not exist in the timeframe discussed in this paragraph. As such, the wording needs to be amended, accordingly.
Strategic Objective	P. 20	It should be made clear that in the case of housing development this cannot be restricted to meeting local demand if by that it means Ilmington Parish only.
Policy HG.2	P. 20	Last sentence -insert ‘Farm’ after ‘Mabel’s’
Site Assessment Criteria	p.22 – Figure 6	Item 1 indicates a preference for PDL, but the sites being promoted through the NDP are not classified as PDL in accordance with the definition in the NPPF - is there is a conflict here?
	p.22 – Figure 6	‘Not cause harm to the setting of listed buildings...’ is too broad. Anything visible in the same view as a listed building could be argued to cause harm to its setting. ‘Available for development and without known impediment to development.’ Impediments that can be overcome or are acceptable if outweighed by other material considerations should be acknowledged.
	p.23 – Figure 7	Could this map be produced at a larger scale in order to make it easier to read/interpret?
	paragraph 6.1.6.4 (f).page 26	There are currently 3,750 households on the District Council’s Housing Waiting List; 13 of these households live in Ilmington. Additional affordable housing needs will arise in the future. The demand for affordable housing is high (because of the lack of affordability of other tenures) and vacancies within the existing affordable stock will not meet this demand. In light of this information we would ask the NDP group to review paragraph 6.1.6.4 (f).
Policy HG.3; Mabel’s Farm Development		Only the Mabel’s Farm site attracts a requirement for on-site affordable housing provision – seven affordable homes. It is important to establish whether any housing association will develop / take-on 7 affordable homes. If this is not feasible, an association may be willing to consider developing the whole scheme i.e. both the market and affordable homes.
Policy HG.6	P. 27	Insert ‘Farm’ after ‘Mabel’s’.

Section	Reference/ page	Comment
		<p>The reserve site (Site 1a) is immediately adjacent to the Mabel's Farm allocation (Site 1) but comprises only part of a larger field. The site area and indicative housing yield therefore appear somewhat arbitrary and were this site to be developed separately, it would not currently attract a requirement for on-site affordable housing provision.</p> <p>There is potential merit in terms of both urban design considerations and an improved ability to meet local housing need if the whole of the field the subject of the HG.2 reservation were to be either included in the HG.1.1 allocation or an expanded HG.2 reservation. If the latter option is pursued, there may also be merit in increasing flexibility by making provision for the earlier release of the site if a decision is made to pursue a Local Need scheme.</p> <p>Also consideration should be given to the need (if any) to relocate the existing farmhouse and farm buildings at Mabel's Farm. It will be important for any potential partner housing association to broadly understand the likely implications in terms of cost and timing. In this respect there is concern that in Policy HG.4 (i) neither the Policy itself or the explanatory text give any indication as to whether such relocation is actually necessary and (ii) there is no indication as to any preferred broad location (or at least area of search) for such re-provision.</p> <p>The site has reasonably level routes to the village centre and playing field and therefore, if there is a need, it may be well-suited to occupation by some households with mobility-related disabilities. With this in mind, a cross-reference should be made to Part D of Core Strategy Policy CS.19. Having regard to the Public Sector Equality Duty, it is strongly recommended that the Plan is revised to specifically address this issue.</p>
Supporting Documents	p.28 – Policy DC.1	Should Core Strategy policies CS.8, CS.9 and CS.11 be added?
Policy DC1.4	P. 28	While the analysis on page 29 is appreciated, it may be too prescriptive to apply 'up to 16 dwellings per hectare' to every site.
Density	p.29 – para 6.2.1.3	Suggests an overall density of 10 to 16 dwellings per Ha. This is very low, even for a rural settlement. Taking into account the data in Figure 9 (excluding Conservation Area and BUAB statistics, for the reasons set out in the next point) it suggests the average density has been 17 dwellings per Ha. Therefore, suggest the range should be changed to 16 to 20 dwellings per Ha in the Plan.

Section	Reference/ page	Comment
Density Analysis	p.29 – Figure 9	Including data on the Conservation Area and BUAB within the overall analysis of density may be misleading, in that it includes all land [i.e. paddocks, orchards, allotments, ponds and other land that is clearly non-domestic and including it will inevitably reduce the overall figure significantly and 'skew' the results. This is unlikely to lead to the most sustainable use of the land...
Policy DC2	p.30	The final 7 words appear to relax the requirements of the NPPF on outstanding or innovative dwellings in the open countryside – was that their intention?
BUAB	p.31 – Figure 10	<p>There are 3 differences between the BUAB in the NDP and the draft BUAB promoted through the SAP:</p> <ul style="list-style-type: none"> • NDP includes Mabel's Farm [to allow for re-development] • NDP includes a greenfield site to northern edge of the village [to allow for re-development] • NDP excludes an area of garden/amenity land to the north of Rowney's Farm. <p>In general terms, the proposed BUAB agrees with SDC analysis with these 3 exceptions, 2 of which are parcels of land being promoted for development though the Plan, which was outside the scope of the SAP analysis. The proposed BUAB being promoted through the NDP seems sensible and defensible.</p>
Policy DC3	p.32	What is meant by sufficient off-road parking- this needs to be quantified. Does this involve on plot parking or would any off-road location be acceptable?
	p.33 – Figure 11	Map appears to have been produced 'upside down'. It is confusing having this plan orientated south-north.
Policy DC.5 – Supporting Documents	p.34	Should Core Strategy policy CS.5 be added?
	p.35 – para 6.2.11	Should this be Figure 12, not 11?
Policy DC.6 Environmental Sustainability		<p>Query what the policy is trying to achieve. In many cases renewable energy technologies such as heat pumps and solar panels may be installed without the need for planning permission, under permitted development rights. In conservation areas and AONBs these rights are limited. Recommend that the policy principle is redrafted to take account of this factor.</p> <p>Third policy principle does not add any value as it is replicating the NPPF. The policy could state that it encourages development to go beyond the Building Regulation and achieve 'BREEAM Excellent' standard.</p>

Section	Reference/ page	Comment
Policy DC.7	p.39	<ul style="list-style-type: none"> • the first bullet point does not comply with the new parking standards set out in the Development Requirements SPD; • bullet point 2 should not include the word 'maximum'; • bullet point 3 seems onerous, with no real basis for inclusion; • does bullet point 4 mean that parking to the front of a dwelling would be unacceptable? This appears punitive and unreasonable; • Unclear what bullet point 5 means or how it could be implemented in practice. If a 2-bed house provided 2 spaces, how would it provide a further 0.2 of a space for visitors, and how could this be practical? • If new housing is to be frontage only as envisaged in HG3 and HG5 I can't see how visitor parking can be provided on site.
Policy DC.7 – Supporting Documents	p.39	Refers to Dev Req SPD but does not comply with it. The first and second points are confusing and internally contradictory, as they would have the effect of imposing two sets of slightly different standards. Further consideration is needed, as the Policy as it stands may be unworkable.
Policy HA1		Omit first 6 words they are harmful to the objectives of the policy.
Policy LGS.1	p.44	<p>Agree with all LGS designations, except for LGS9 (Land at Wilkins Way). This relates to land on a modern development on the edge of the village and the designation is made up of 3 small parcels: 2 'informal' green spaces adjacent to the access road/parking areas and an area of scrubland including a balancing pond.</p> <p>Insufficient evidence to conclude that these small parcels of land are 'demonstrably special' to the community based on the para 76/77 criteria in the NPPF and as such should be removed from the Policy.</p>
Policy LGS.1	p.44	Final paragraph refers to harm to the 'openness' of LGS. This is a Green Belt consideration, but it is not listed as a consideration under the NPPF.
Section 6.4	Page 44	should be a cross-referenced to Appendix 3, which itself should have a title
Figure 16	p.45	Remove LGS9 from map.
Policy INF.1	p.46 bullet point a)	<p>First policy principle – Query how the applicant will demonstrate how they have satisfactorily address the risk of fluvial and pluvial? Is it intended that this policy requirement will be applied to all types of development?</p> <p>Must have criteria to identify when the risk of flooding has been satisfactorily addressed/STWA has no objection, or LLFA has no objection, or suitably qualified expert has evaluated, or....</p>

Section	Reference/ page	Comment
Policy INF.1	p.46 – bullet b)	States that all new development should incorporate SuDS. Should be reworded to state SuDS will be proportionately incorporated in all scales of development to accord with Core Strategy policy CS.4.
	p.47– bullet d)	Satisfactory performance may not mean attractive appearance.
Policy INF.2	p.47– bullet c)	Unlikely that disconnecting surface and highway drainage can be insisted upon.
		Reword policy ‘expected to demonstrate that there is adequate capacity or improve capacity – this could include separate grey water storage facilities’?
Policy NE.1 – Explanation	p.52/53	Talks of ‘green fingers’ and areas of semi-improved grassland [some of which are referred to by name]. These should be supported by a map
Policy NE.2		Policy focusses on habitat quality. It does not refer to visual appearance. It could result in visually unattractive habitats of high ecology value.
Policy NE.3	p.57 – para’s 2, 3 and 4	These paragraphs are either impractical or not related to planning matters and should be deleted.
Policy NE.4	p.59	Replace ‘be resisted’ with ‘not be supported’ for consistency of approach/language throughout the Plan. Concern is raised that as drafted, there is a lack of ‘flexibility’ as advocated through the NPPF. Should the policy go on to say ‘...unless it can be clearly demonstrated that...[replacement land could be provided for the same purpose]’? Note: The allotments and orchards are also designated LGS through the NDP providing them with other forms of protection. Loss of such things may bring positive improvements if replaced off site with higher quality or quantity.
remainder of Section 6.6	p.59 to p.64	From para below Policy NE.4 Explanation: all subsequent para’s require re-numbering, starting with 6.6.1 becoming 6.6.15 etc.
Figure 22	p.61	Could this map be produced at a larger scale in order to view the detail more clearly?
Policy NE.5	p.61	Replace ‘be resisted’ with ‘not be supported’ for consistency of approach/language throughout the Plan.
Figure 23	p.64	Could this map be produced at a larger scale in order to view the detail more clearly?
Policy ETA.2	p.65	Bullet point 1 – add ‘d’ to the end of ‘Incorporate’; Bullet point 2 relates to work in the highway, outside land ownership; Bullet point 3 should be a separate paragraph. Reword “encourage the provision of space to support...”

Section	Reference/ page	Comment
Policy ETA.4	p.67	Replace 'be resisted' with 'not be supported' for consistency of approach/language throughout the Plan; insert 'another community' between 'into' and 'use' at end of first paragraph.
Policy ETA.5	p.69	Delete first paragraph of the policy, as this cannot be achieved through the Plan. Paragraph 2 sets out the parameters of the policy perfectly adequately.
Section 7	P. 71ff	Detailed design issues should be covered in a series of specific policies. Suggest restructuring as follows: <ul style="list-style-type: none"> - insert a heading, eg. Design and Layout or Built Environment; - state an objective; - insert a policy, eg. based on text in Design Principle and Guiding Principles; - provide and explanation, including reference to comments expressed by the community; - 7.3.6 could be included in 7.2 New Developments; - 7.6.7 could be included in Section 5 Natural Environment.
	Para 7.3.3 f	Possibly a tradition of red tiles in the village which are now brown due to algae growth and pollution.
	Para 7.3.3 g,	This is very rigid and would apply to any garden shed or porches on Bennet Rd (some of which are flat roofed).
	Para 7.4.1 c	Pastiche is not always the best solution and there is scope for extensions that are not pastiche.
Scale and Design	p.74 (top of page)	Bullet b) does not tie-in with national and local plan policy for householder development outside the Green Belt. How do you interpret/measure 'in proportion to...'?
	p.74 – para 7.5.1	Responsibility of WCC as County Highways, not the NDP.
	p.74 – para 7.5.2	These are not matters that can be influenced by the NDP – they are the responsibility of the statutory provider (i.e. WCC). The Local Highway Authority will not endorse the use of Cotswold Stone chippings and may not support setts on adopted highways.
	p.76	Replace 'ANNEX' with 'APPENDIX'.
	p.81 – Appendix 3	Add 'LOCAL GREEN SPACES' to title.
	p.86 – Appendix 4a	Is there any way a 'dividing line' can be introduced to split the page between 'characteristic' and 'uncharacteristic' to avoid confusion or errors of judgement?
	p.87 – Appendix 4b	Does the word 'characteristic' need to be added?

Section	Reference/ page	Comment
	p.88 – Appendix 4c	Does the word 'characteristic' need to be added?
	p.89 – Appendix 4d	Is there any way a 'dividing line' can be introduced to split the page between 'characteristic' and 'uncharacteristic' to avoid confusion or errors of judgement?
	p.90 – Appendix 4e	Does the word 'characteristic' need to be added?