

Beaudesert & Henley-in-Arden 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 ~~struck through~~ [where applicable].

Page number	Section	Comment
General comment	Policies Section	The Plan does not present any proposals to rectify the shortages of certain types of open space noted in AS.4 of the Core Strategy. This will act as a constraint to residential development, so needs to be addressed.
Page 11	Section 9 – Core Strategy	The relationship of the Plan to specific policies in the Core Strategy is not clearly explained. Section 9 does not include any substantive content in this respect. This omission may present difficulties in terms of demonstrating statutory 'basic conditions' compliance and, in turn, may cause delay and impact on housing delivery unless this issue is addressed now.
Page 12	Section 10 – Vision Statement	The Vision states "It wishes to utilise its unique landscape, Green Belt, history, leisure and tourism assets to offer a sustainable and thriving rural lifestyle for residents and visitors alike". How does it wish to utilise the Green Belt? Also, describing the Green Belt as "a sum of its parts including Landscape..." doesn't really need mentioning here (or so often throughout the Plan).
Page 12	Section 10 – Vision Statement: Cultural Landscape	Is this heading utilising the correct or most appropriate terminology? There is no mention of the Historic Landscape and more specifically, no mention of Listed Buildings or the Scheduled Monument in the main text.
Page 12	Section 10 – Vision Statement: Traffic and Transport	It is considered that this section should make it clear that these are not policies, since they are aspirations only and will therefore not be assessed during the Independent Examination of the Plan.
Page 12	Section 10 – Vision Statement: Sustainable Residential Development	The text should be changed to make clear that residential development within the defined Built Up Area Boundary (BUAB) will be catering for District-wide needs, not just local needs. The main concern is that the Plan as presently drafted will not be effective in meeting identified local housing need, especially for affordable housing.
Page 13	Section 10 – Vision Statement: Sustainable Economic Development	Paragraph 2: "The NDP should also consider the possibility of promoting a modest scale business park situated on the periphery of the town". This statement appears to be followed through somewhat into policy E2 page 17. Where would this be located? If this would be in the Green Belt, it would be contrary to national Policy [see paragraph 145 of the NPPF 2019]. How does this reconcile with the previous statement on page 12 in relation to sustainable residential development, i.e. "Any such developments should not encroach on the Green Belt, so that future generations can also enjoy the sense of freedom living on the edge of such natural beauty offers"?

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Pages 12 and 13	Vision Statement	<p>Where are the vision statements underpinning the 'Natural Environment' and 'Built Environment' topic areas/policies?</p> <p>How do these objectives align themselves with the 5 chosen topic areas within the Plan? Should they be listed under the topic area headings, to create a better understanding of the relevance of each objective and the continuity of the thoughts and ideas throughout the document?</p>
Page 14	Section 11 - Policies	<p>Have the policies in this section been assessed against the 2019 version of the NPPF? It is not clear, but there are mentions of the original 2012 version throughout the document which will need to be checked and updated as necessary.</p>
Page 14	Housing – General	<p>It is not clear why there is no policy within the Plan for 'rural exception', social or affordable housing, to take account of potential future local need. Other Neighbourhood Plans within the Green Belt have embraced this opportunity.</p> <p>Paragraph 6.4.16 of the Henley-in-Arden Area Strategy within the Core Strategy relating to housing distribution and Reserve Sites has not been addressed in the Plan.</p>
Page 14	Housing – preamble: Green Belt and Rural Setting	<p>Third paragraph – Green Belt policy also affords protection against new employment sites, which should be acknowledged. However, the Plan appears to be supporting employment uses within the Green Belt, but not housing, when both are inappropriate in principle. This appears to show an inconsistency in terms of national policy interpretation and local priorities.</p>
Page 14	Housing – preamble: Scale of Residential Development	<p>First paragraph – fails to inform the reader about national policy restrictions in relation to Green Belt. It is considered this should be made clear, for clarification and consistency of approach.</p>
Page 14	Policy H1 –Housing Growth	<p>The basis on which the Built-up Area Boundary [BUAB] has been defined requires clarification. Associated Figure 2 on p.16 of the Plan appears to be the Inset Map from the Core Strategy, which indicates [amongst other things] the BUAB of the settlement.</p> <p>There appears to be disconnect between the preamble relating to 'Social and Affordable Housing' and Policy H1.</p> <p>The level of local housing need (as evidenced by the most recent housing waiting list data – 102 households) appears to have grown significantly since the 2014 Housing Needs Survey. No doubt, in part at least, a reflection of the fact that no new affordable housing schemes have been developed in the town since the date of that Survey.</p> <p>The Policy refers throughout to the 'Town Boundary' whereas associated Figure 2 refers to a 'Development Boundary' and the Core Strategy refers to the 'Built-up Area Boundary'. There needs to be some consistency of terminology. Would 'settlement boundary' be more appropriate, if 'built-up area boundary' is not deemed acceptable? The terms 'Town boundary' and 'Development boundary' may mean different things to different parties/organisations.</p>

Page number	Section	Comment
		<p>Second paragraph: The wording of this paragraph in relation to appropriate development in the Green Belt should be brought in line with wording in the 2019 NPPF and Core Strategy.</p> <p>The second paragraph states that development to the west of the railway line should be resisted, however a small section of the BUAB includes a parcel of land to the west of the railway line. Is there a conflict here?</p> <p>The sentence "In particular, residents are keen to preserve the railway line as the natural boundary..." is not policy wording and should be removed and included within the explanatory text, instead.</p> <p>Third paragraph: 'New housing developments in general should be restricted to no more than ten dwellings per new development site unless there are very special circumstances which are endorsed by the JPC'. Shouldn't this be dictated by the site size and efficient use of land? This appears to be a very restrictive policy. Would this mean that any new apartments or conversion to apartments over 10 would be resisted?</p> <p>It is unclear whether or not the third paragraph of the Policy applies only inside the BUAB/settlement boundary or throughout the Plan area. If only within the settlement, there does not appear to be reasoned justification for an arbitrary limit of 10 dwellings unless 'very special circumstances' exist. This will, in practice, place an artificial limitation on affordable housing supply. Where is the evidence to support this figure?</p> <p>Fourth paragraph: 'New housing developments should be prioritised in infill sites within the existing town boundary and only in exceptional circumstances'. The term used should be 'very special circumstances'. 'Exceptional circumstances' refers to changing Green Belt boundaries via a Local Plan Review so has a different meaning entirely.</p> <p>The reference in the fourth paragraph to development on land south of the A4189 Warwick Road seems particularly inappropriate as all the land immediately to the south of Warwick Road within the Neighbourhood Area is located within Flood Zones 2 or 3 (the vast majority being within Flood Zone 3), wherein residential development would normally be unacceptable.</p> <p>Fourth paragraph, last phrase – it is presumed it means land outside the BUAB and within the Green Belt. That being the case, there is no provision in the Core Strategy to revise Green Belt boundaries to accommodate market-led housing schemes, and housing to meet a local need is already provided for in Core Strategy Policy CS.10 so exceptional circumstances wouldn't need to be applied. Clarification is critical as this is a significant issue.</p>

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Page 14	Explanation [text within box]	<p>Paragraph 2: "The Core Strategy identifies Henley as a one of eight Main Rural Centres where up to 85 new homes will be expected to be provided between 2011 and 2031 in order to assist the dispersed approach to housing provision across the district" – this is not correct. Paragraph 6.4.16 in Core Strategy states that "about 90 dwellings are to be provided in the town over the plan period". The wording in the policy explanation should be consistent with the Core Strategy.</p> <p>It is appreciated that the town is surrounded by Green Belt and sensitive countryside, and that its strategic housing requirement <i>may</i> already have been met (although this point is not clear). Nevertheless, and notwithstanding references in the section headed 'Social and Affordable Housing', it is not at all clear that the Plan "supports the creation of appropriate numbers of social and affordable housing".</p> <p>Indeed, it appears that there is no realistic prospect of new affordable housing being secured on sites within the settlement boundary, especially if (a) schemes of more than 10 dwellings or (b) conversion of business premises to residential in the Conservation Area are ruled out. Attention is drawn to the site size thresholds in Policy CS.18 of the Core Strategy.</p> <p>The above situation is set in the context of 102 households on the Council's housing waiting list with a Henley-in-Arden address (as at November 2018). The 2014 Housing Needs Survey identified 16 households with a housing need. Whilst there are certain caveats that must be attached to the housing waiting list data, it seems reasonable to assume there must be a correlation between the high number of households on the waiting list and the fact that new affordable housing schemes have been completed in the town since the 2014 Survey.</p> <p>A more positive approach would be to highlight the scope for 'Local Needs' schemes within the scope of Core Strategy Policy CS.15(G). Provided all the relevant criteria are met, there is scope for delivery of such schemes outside the settlement, within the Green Belt.</p>
Page 16	Figure 2	<p>A key should be provided as the map shows various features. If the purpose of the map is just to show the settlement/town/built-up area/development boundary [which ever it ends up being labelled] then it might be more appropriate to replace it with a simplified map merely showing the boundary line and no other constraints at all.</p>
Page 16	Policy H2	<p>"All new housing developments must demonstrate, through the submission of appropriate evidence, that existing infrastructure would not be adversely affected". This assumes that capacity cannot be increased and will remain constant, suggest adding "or that additional capacity will be provided where necessary".</p> <p>The policy states that <i>all</i> new housing development should meet certain criteria – this seems onerous. Does this only apply to new build or does it include conversions, too? Would the criteria be appropriate for conversions?</p>

Page number	Section	Comment
		<p>First bullet point – the submission of a hydrological survey or SDS seems too onerous for <i>all</i> development proposals, particularly since any development within the settlement is likely to be small-scale.</p> <p>Fourth bullet point (residential energy efficiency): There is concern that the criteria are too vague to enable their effective application.</p> <p>Fifth bullet point: Conversion of business premises in the Conservation Area into residential dwellings could be Permitted Development [i.e. does not require prior planning consent] in certain circumstances. Additionally, the point doesn't fit in with the thrust of the policy and should be removed. Finally, this point appears to conflict with Policy E1 relating to the Protection of Existing Employment Sites.</p> <p>Sixth bullet point (parking): It would be preferable for parking standards to align with those in emerging Part O of the District Council's emerging Development Requirements SPD.</p>
Page 16	Policy H2 – Explanation	The explanatory text refers to flood risk specifically, not infrastructure, generally.
Page 17	Economy – Strategic Objective	Is the intention to limit SME's to tourism only? If so the subsequent policy wording does not support this.
Page 17	Policy E1	<p>Criterion a) may need some clarification as to whether the sufficient supply of sites referred to is within Henley or District wide. The Development Management Considerations to Core Strategy Policy CS.22 state "employment land in the locality".</p> <p>Criterion b) – A 12 month marketing period seems excessive. It would be appropriate to check with Development Management officers at SDC to ascertain what the Local Planning Authority expect to see in such circumstances, for consistency of approach.</p> <p>Criterion d) – Suggest rewording to: "Proposals should, wherever possible, alleviate current unacceptable environmental problems".</p>
Page 17	Policy E2	<p>It would be helpful if the policy referred to provisions of Policy CS.10 in Core Strategy regarding provision of employment uses to meet an identified local need. Such development would not be inappropriate development in the Green Belt if fully justified.</p> <p>Criterion d) – This is unnecessary, since it would naturally apply to this and all other NDP policies.</p>
Page 18	Policy E4	This policy goes beyond requirements of Core Strategy Policy CS.26 in that <i>all</i> new residential and commercial developments would be <i>expected</i> to include infrastructure for fibre optic connection whereas CS.26 only requires this of major infrastructure development. This policy also repeats the fourth bullet point in Policy H2.
Page 19	Policy E5	This policy may not be enforceable/relevant to certain types of telecommunications equipment if it is Permitted Development.
Page 19	Policy E5 – Explanation	There is no explanatory text for this policy. There was some appropriate text in the December 2017 draft version NDP, but this has been removed. It's not clear why.

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Page 19	Policy E6	It is unclear where this is intended to apply. Just within the settlement boundary or also in the Green Belt? If Green Belt locations are countenanced, then this may conflict with the criteria in Core Strategy Policy CS.10.
Page 19	Policy E7	<p>Policy E7 should be presented separately from Policy E6.</p> <p>Criterion d) refers to the units being in "reasonably accessible locations to service facilities by means other than private vehicle" which suggests they would be in reasonable proximity to settlements. However, the explanation implies that such schemes would be supported in rural locations. These units could therefore be located outside the BUAB but there is no real detail on how much commercial space would have to be provided to qualify for this and this could potentially be abused. This stance does not comply with the provisions of Core Strategy Policy CS.22 which indicates the incorporation of workspace in a dwelling will not make that dwelling acceptable in locations contrary to housing policies in the Core Strategy [i.e. not acceptable in rural locations]. Any such deviation from the Core Strategy would need to be fully justified and this local justification is lacking.</p> <p>Alternative wording for criterion d) which has been included in a number of 'made' neighbourhood plans could be: "They are in locations where housing development would be acceptable".</p> <p>Other 'made' Plans which have incorporated a policy on live-work units have also included an additional criterion "They shall not adversely impact on neighbouring amenity". It is suggested this is included, as it is essential to ensure the potential work use would be acceptable to neighbouring dwellings/uses.</p>
Page 20	Policy C1	<p>Refers to "Protecting and enhancing existing community assets/facilities". However, there is no explanation of what these assets and facilities are.</p> <p>The policy itself seems to have a lighter touch than the Core Strategy, with less robust wording. The NDP says the loss of existing community facilities will be resisted unless it can be demonstrated that the facility is no longer viable or in active use and has no prospect of being bought back into use. Compared to Core Strategy Policy CS.25 which requires active marketing to show the use is not viable, with no realistic prospect of the use continuing. In addition the Core Strategy also allows the discontinuance of use where there are overriding environmental benefits – the NDP doesn't include this provision, so would the NDP override the CS if a proposal sought to remove a community asset on grounds of negative environmental impact? The NDP wouldn't support it, but the Core Strategy would.</p> <p>Consider inserting further policy that supports facilities being provided targeted at the 10-16 year old age group, to tie in more with the explanation or remove the wording from the explanation?</p>
Page 21	Policy C2	Proposed Local Green Spaces need to be thoroughly justified in accordance with NPPF/PPG. The sites have not been mapped to show their extent, which is a critical requirement for the assessment of their acceptability in accordance with the criteria set out in paragraph 100 of the NPPF 2019. Site 7, for example, seems to suggest an extensive area of open countryside which is already protected by Green

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		<p>Belt so is probably inappropriate for designation of LGS in any case. Since the extent of the designations are not shown on a policies/proposals map, this Policy is, in practice, unworkable. The exact boundaries of each designated area need to be shown on a policies/proposals map. This is a critical omission and will require the Plan to go through a further 6 week Regulation 14 consultation on this issue.</p> <p>The two paragraphs directly below the list of 7 sites are not policy and should be removed and added to any justification/explanatory text.</p> <p>The paragraph commencing "Development that would harm the openness or special character of a Local Green Space..." delete the word 'openness' as not relevant criteria in Local Green Space designations.</p> <p>Each proposed site needs to be fully justified against the criteria set out in paragraph 100 of the NPPF 2019. There is no justification in the Plan. This work is crucial evidence for the assessment of suitability and also needs to be included within the Plan prior to the re-run of the Regulation 14 consultation.</p>
Page 21	Policy C2 – Explanation	<p>First paragraph – amend first sentence to read: "...with paragraphs 76-78 <u>99-101</u> of the <u>2019</u> NPPF..." to take account of current national policy. The paragraph acknowledges that Local Green Space should be 'robustly justified' but the Plan fails to provide any such justification.</p> <p>Fourth and fifth paragraphs: These have nothing to do with Local Green Space designations. It is suggested these are moved to next section [policy C3] where they would be more relevant.</p>
Page 22	Policy C3	<p>The policy itself mentions the sports grounds at Warwickshire college, but the explanatory text indicates the college has closed – this requires clarification and amendment as necessary.</p>
Page 22	Policy C3 – Explanatory text	<p>The sentences about possible swimming facilities set out within the explanatory text hypothesises about the benefits of having a new major hotel development in order to use the hotel swimming pool for the community. Could this be construed as eagerness for a major hotel, and is this the intention? This whole text seems very hypothetical and conversational in nature, rather than justification for a policy.</p>
Page 23	Policy N1	<p>As written, this policy seeks to preserve the rural surroundings [of the settlement?] and also preserve the tranquillity of the countryside and Green Belt. This appears to attempt to achieve two different things, the former being more related to design which suggests it should not be part of this policy or the 'Natural Environment' section of the Plan. The second element of the policy as drafted does not suggest how tranquillity would be achieved or how development would be assessed to comply with the policy. This needs clarifying.</p>
Page 23	Policy N2	<p>Suggest re-wording first paragraph as follows: "Development proposals relating to <u>including the use</u> production of renewable energy <u>technologies</u> will be supported...".</p> <p>Second paragraph: "All proposals must have regard to the Green Belt policy and in particular paragraph 91 of the National Planning Policy Framework...". This should be changed to paragraph 147 of the 2019 NPPF as this currently references the 2012 version of the NPPF.</p>

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		<p>Second paragraph: Suggest re-wording as follows: 'Plans coming forward <u>New development</u> should ensure that adverse impacts are addressed, including cumulative landscape and visual impacts and are not in conflict with any other policies in this Plan.' Additionally, as the entire paragraph is currently drafted, it reads that the NPPF states this - it doesn't- this could be made clearer by inserting a full stop after "paragraph 147 of the National Planning Policy Framework 2019".</p>
Page 23	Policy N3	<p>Whilst not inappropriate, the policy as drafted is lacking in detail and set out below is an alternative policy on the same topic which is from a 'made' neighbourhood plan that has passed Examination, which might be worthy of consideration as an alternative policy:</p> <p>"All new development will be encouraged to protect all trees and hedges where appropriate, as per BS 5837: 2012 Trees in relation to design, demolition and construction or as subsequently revised or replaced. Where this is not appropriate, new trees and hedges should be planted to replace those lost. Most new developments should incorporate appropriate new tree and hedge planting of a suitable size and species in their plans. The new hedge or shrub planting should be implemented as per the recommendations in BS 4428:1989 Code of practice for general landscape operations and any new tree planting should be carried out in accordance with BS 8545:2014 Trees from nursery to independence in the landscape or as subsequently revised or replaced.</p> <p>Relevant new development proposals will be expected to demonstrate that they have, where possible, had regard to appropriate sustainable landscaping, in order to avoid later retrofitting of poor quality or token landscape design".</p>
Page 24	Policy N4	<p>There is an inherent confusion in this policy, as it seems to cover landscape features, landmarks, views, skylines and landscapes. It is suggested deleting referencing to 'skylines' in policy and explanation as the explanation/justification for the policy is based on landscape importance, including views, not 'skylines'.</p> <p>In addition, the list of views to be protected should be set out within the policy itself, not the explanatory text [as policy C2 – LGS]. The valued landscapes and views identified need to be fully justified and shown on a map [as per policy C2] in order to assess whether the protection of the landscapes/views would be appropriate. This work is crucial evidence for the assessment of suitability and also needs to be included within the Plan prior to the re-run of the Regulation 14 consultation.</p>
Page 24	Policy N4 – Explanation	<p>'A Special Landscape Area Study was commissioned by SDC in June 2012'. For the avoidance of doubt its full name and name of consultants should be used here. The correct title is "Landscape Sensitivity Assessment July 2011 by White Consultants" – please replace, accordingly.</p> <p>First paragraph: delete "and pretty villages" as it is not necessary.</p>
Page 25	Policy B1	<p>It is not considered that all the bullet points would fit under the policy heading of 'development criteria'. The policy appears to be made up of a disparate collection of criteria that would be more appropriate for other parts of the Plan, since they refer to issues of heritage, landscape and design.</p> <p>Criterion b) relates to heritage. If it remains, it is suggested adding "and their settings".</p>

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		<p>Criterion d) refers to 'valued landscape views' but the policy does not identify valued views of local importance to be protected. This maybe elsewhere in the document and if so reference should be made to the relevant figure/policy.</p> <p>Criterion f) relates to heritage matters. Is this the correct place in the Plan for such a requirement?</p> <p>Criterion g) with reference to building heights – should there be a requirement to justify a need/why a proposed building may need to be higher than existing building heights as a small increase may not cause harm and some areas may have variation?</p> <p>Criterion h) as drafted reads as being 'judgemental' and suggests buildings earmarked for replacement are already incongruous, which may not be the case. Suggest rewording as: "be designed to complement or enhance the historic character by adhering to high quality design principles as set out in the emerging Development Requirements Supplementary Planning Document being developed by the District Council or its successor document".</p> <p>The policy justification/explanatory text appears to be missing. This needs to be included to understand the basis for the policy's inclusion.</p>
Page 25	Policy B2	<p>Policy title: Suggest amending to "Re-use of Agricultural Buildings".</p> <p>First paragraph: National policy and Core Strategy policies do not require buildings to be redundant in order to be appropriate for reuse – please remove "redundant" in order to be in general conformity with the NPPF and Core Strategy.</p> <p>Some conversions may be classed as Permitted Development so in such circumstances it would be difficult to control in terms of criteria set out.</p> <p>This policy appears to restrict buildings which are not built from traditional materials or of architectural merit from conversion. Policy AS.10 in the Core Strategy is supportive of conversions to residential use within the physical confines of a village. However, it is only in more isolated locations where the conversion is restricted to the type of building. Conversions may also bring about alterations to a building. Core Strategy Policy CS.20 requires alterations to be of an appropriate scale in relation to the existing buildings, should reference be made to any alterations being appropriate and subservient?</p> <p>The policy justification/explanatory text appears to be missing. This needs to be included to understand the basis for the policy's inclusion.</p>

Page number	Section	Comment
Page 26	Policy B3	<p>This policy as drafted appears to cover two issues: Flood Risk and Drainage. These have been separated out in other neighbourhood plans. Additionally, the matters outlined in paragraphs one and three of the policy are the responsibility of statutory undertakers and as such cannot be influenced by the neighbourhood plan. Consider splitting into two policies as set out below:</p> <p>“Reducing Flood Risk</p> <p>New developments for residential or commercial buildings will be expected to provide and incorporate sustainable drainage systems unless it is demonstrated that this would be inappropriate. Other measures such as the reuse and recycling of water, the use of permeable paving and other measures that help with water efficiency and those which enhance ecology will be encouraged in all development schemes. Proposals which do not satisfactorily address fluvial and pluvial flooding considerations will not be supported”.</p> <p>“Drainage</p> <p>All proposals for new residential dwellings or new commercial buildings must demonstrate that there are or will be adequate water supply and water treatment facilities in place to serve the whole development. Proposals that would result in an unacceptable risk to the quality and or quantity of a water body or water bodies will not be supported.</p> <p>Proposals to expedite the improvement and upgrade the existing drainage network in the village will be supported. All developments will be expected to demonstrate that there are suitable and satisfactory arrangements in place to deal with foul water”.</p>
Page 26	Policy B4	<p>It is unclear why this isn’t applicable to all forms and locations of development, particularly given the settlement is surrounded by Green Belt and the development of greenfield sites is highly unlikely.</p> <p>Paragraph 2: ‘Evidence of compliance with the BREEAM and Lifetime Homes Standard as set out in this policy must be submitted as part of any application and its implementation secured through an appropriately worded condition’. The relationship to/compliance with Core Strategy Policy CS.9 is unclear and should be explained.</p> <p>The Policy is understood to relate to design quality rather than rather than accessibility and versatility of the housing stock: the Lifetime Homes Standard is concerned with the latter rather than the former. In any case, compliance with the Standard is not explicitly mandated by Part D of Core Strategy Policy CS.19. For this reason it is recommended that reference to that Standard is removed from this Policy and consideration given to inclusion of a separate, free-standing, policy on accessibility.</p> <p>Paragraph 2 requests a condition to be in accordance with BREEAM and Lifetime homes standards. Is this reasonable? Are elements covered by building control? Core Strategy Policy CS.2 refers to BREEAM but only for non-residential development.</p>

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		'Red' scores [referred to in paragraph 3] should be avoided through re-design, thus reference to such scores being "justified" is inappropriate. Could policies B1 and B4 be amalgamated?
Page 27	Policy B5	Paragraph 2: Suggest amending wording to read – "All proposals must preserve <u>conserve</u> the important physical fabric and settings of listed buildings, and Scheduled Monuments <u>and Conservation Areas</u> " to comply with NPPF wording and for completeness. Paragraph 3: "Where necessary, applications will be accompanied by an appropriate archaeological survey to ascertain the implications of development on below ground heritage assets". This is already mentioned in Policy B1 and is therefore duplication?
Page 27	Policy B5 – Explanation	First paragraph: amend to "...Conservation Area status <u>and a Scheduled Monument</u> (see Figure 3 below) and Scheduled Monuments (see Figure 4 on p.28) . To take account of deletion of Figure 3 which is unnecessary [see comment below].
Page 27	Figure 3	Delete map as it is not necessary, since Figure 4 on p.28 is more appropriate, in that it shows all heritage assets listed in the Explanatory text associated with associated Policy B5.
Page 28	Figure 4	Include key/legend in order to list the heritage assets shown. Additionally, re-number as 'Figure 3'.
Page 30	Chapter 12 – Community Aspirations	The heading 'Strategic Objective' is misleading, in that there is more than one objective listed. Suggest amending the title to '...Objectives' and numbering the objectives listed.
Page 30	Chapter 12	Chapter 12 should include an introductory paragraph to clearly indicate that the community aspirations/projects listed in this section of the Plan will not be Examined as part of the Independent Examination of the NDP and will not have 'weight' in the decision making process in the same way that policies will.
Page 31	Project 1 – Car Parking: Justification	Build new car parks on unused land – criterion a) would be classified as inappropriate development in the Green Belt and it is unsure how this would be justified.
Page 32	Project 2 – Road Safety	The proposed measures listed are the responsibility of Warwickshire County Council as County Highways Authority. These aspirations will not happen unless WCC has agreed to the proposals.
Page 34	Project 4 – The Mount	Paragraph 1 refers to "pathways...turning into an inaccessible wilderness...". Are there public rights of way over/through this site? This should be checked with Warwickshire County Council. Paragraph 2 – amend first sentence to remove "have" in order that it refers to past tense given it relates to something that happened in 2014.
Page 34	Project 4 – The Mount: Justification	The first paragraph refers to a 'perimeter pathway'. Is this a public right of way [see comment above]? If so, this should be made clear and perhaps the project would benefit from including a map showing the alignment of the public rights of way across/around the site and also including the plan prepared by the owners in 2014 to illustrate the potential improvements to the site.