

Louisa Slator

From:
Sent: 25 November 2019 14:56
To: Louisa Slator
Cc: Vanessa Lowe
Subject: Alcester Neighbourhood Plan

Dear Louisa

The following are a list of issues and questions on the Alcester Neighbourhood Plan

1. While there are several references to the town being surrounded by Green Belt, none of the maps in the Plan shows the Green Belt and I will recommend that either an additional map is included to show it and the Area of Landscape Quality or that these notations are shown on Map 1, which would need to be retitled.
2. The Parish Boundary is shown in a different place on Maps 3 and 7 than on Maps 2 and 5 (which appear to be correct).
3. The intentions of Policy HBE2 are not entirely clear. Could you confirm that my understanding is correct in that:
 - a) in the second bullet point the intention is that priority in the allocation of houses provided on exception sites are allocated to those with a local connection (i.e. if there are no people meeting these criteria the houses would be allocated to those on the housing waiting list rather than left empty) and
 - b) to demonstrate a local connection it is necessary to meet any one of the criteria listed and that there is no order of priority within these criteria.
4. Policy HBE 6 is admirable in its ambition, but goes beyond the scope of land use planning policy, particularly in terms of the internal environment, which falls generally within the area of Building Regulations. I have looked at the Healthy Placemaking report but for the most part it I report of research undertaken to capture the experience and opinions of professionals engaged in place-making. It is an interesting and stimulating report, but it is lengthy and I have not been able to identify within it a clear set of criteria which could be readily addressed applied by a professional designing a development or a decision maker dealing with a planning application. While there is reference within the report to the criteria listed in paragraph 6.1.26, there is no clear checklist for professionals to work with. If I missed this I should be grateful if I could be referred to it. It would be helpful to have an explanation of how the principles of the report could be applied in practice.
5. SDC comment on policy NE1 that the Core Strategy asks for 6 months rather than 12 months marketing, but does not give the reference for this and I could not quickly locate it.
6. There is a general issue around the use of the words “will be supported” and the requirement for compliance “with other policies in the Neighbourhood Plan”. The reference to certain types of development being “supported” can raise the question of what happens to forms of development which don’t have these qualities. One example of this is the reference to live/work space in Policy EC 3. It is clear to me that the support for live/work space does not mean it is a requirement and I have taken this interpretation of this form of words throughout the Plan. Where there is a requirement for certain things the policy needs to be phrased differently. In many policies there is a reference to compliance “with other policies in the Neighbourhood Plan”, but in many others there isn’t. It is a general convention that the Development Plan should be read as a whole and the application of one policy does not preclude the application of others. The use of this form of words in some cases and not others is therefore potentially confusing. For example in Policy EC 2 the support for employment uses on brownfield sites without any reference to other policies should

not mean that other policies, such as for example those relating to design or the effect of heritage assets should not be applied any more than it does in Policy EC 3 where there is a reference to other policies. However, the omission of this form of words in some cases and not others could give that impression. I will therefore suggest that references to other policies in the Plan should be deleted and that there should be new paragraph at the beginning of the polices to explain how they should be interpreted.

7. Policy EC 5 refers to SDC's Convenience Goods Study. Could you please provide me with a link to this document?
8. There are two ambiguities in Policy T1 1. Can you confirm that "Developments of 10 units or more" refers to residential developments and that the "visual impact" referred to in the second section refers to the visual impact of the engineering works which may be required by the policy rather than the visual impact of the development as a whole which would be covered by policies HBE 9-11?
9. In Policy CLW 2 the term "open green spaces" is not defined in any way and could apply to any undeveloped area in the parish. There should ideally be a map or at least a clear verbal definition to make it clear where the policy applies.
10. In Policy CLW 4 there is no indication of what "suitable and appropriate" means. I am minded to recommend an amendment to suggest that this relates to the accessibility of the site to the community it will serve and to the suitability of the ground conditions for cultivation.
11. Could you please clarify for me the extent of the River Arrow Local Nature reserve in relation to the proposed Local Green Spaces. The Core Strategy policies map appears to just cover LGS2, but the description on p53 states that it also includes LGS3.

Kind Regards

Richard

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