

**Alcester NDP Examiner's Questions and Response of Alcester Town Council (ATC)
and Stratford-on-Avon District Council (SDC)**

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.

ATC - We agree that the Green Belt should be clearly identified for the benefit of the reader. We would be happy to include an additional map showing the Green Belt and the Area of Landscape Quality

SDC – We confirm that an additional map will be prepared to show the requested additions.

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).

ATC - We agree that the parish boundary is shown incorrectly on Maps 3 and 7. We apologise for this error. We will ask the SDC team who prepared the maps to correct them.

SDC – We confirm that revised maps will be prepared to amend Maps 3 and 7 so that the Parish Boundary is shown correctly.

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.

ATC - We confirm that your understanding is correct.

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 is a 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.

ATC - We have been unable to identify a list of appropriate criteria in the Healthy Placemaking Report. In the circumstances we would be happy to delete the final paragraph of the policy ie:

“Development for 10 or more dwellings including conversions, extensions and changes of use will be required to demonstrate how the development will satisfy the criteria set out in Healthy Placemaking, as published by Design Council and Social Change UK.”

We would propose that the reference to the report and its objectives remains in the Explanation of this policy.

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.

SDC: We can clarify that this specific requirement comes from the SDC Planning Application Local List used for the validation of new planning applications, not the Core Strategy. The Local List states that:

“For applications which involve:

- *Loss of employment uses.*
- *Removal of a planning condition limiting occupation of a dwelling to a rural worker;*
- *Loss of community facilities, such as shops, pubs, medical and leisure;*
- *Or seek to demonstrate the redundancy of a heritage asset (para.133 bullet 2 NPPF).*

The type of marketing required for each proposal will be site specific but a general rule should be a minimum of 6 months advertising at a realistic sale price and/or rental charge, accompanied by details of the nature of the advertising, the results and the reasons given for not proceeding. The exact nature of marketing can be refined through a pre-application consultation. For Pubs the CAMRA guide to Public House viability provides some excellent guidance.”

In addition, Core Strategy Policy CS.22 requires a ‘rigorous assessment’ for proposals to convert or redevelop an existing employment site to a non-employment use, in order to demonstrate that the site is no longer viable or appropriate for business purposes. We (SDC) have accepted 6 months of active marketing as a ‘rigorous assessment’. We would not consider less than 6 months of active marketing to be a ‘rigorous assessment’.

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 policies to explain how they should be interpreted.

ATC: The intention of using the words “will be supported” was to ensure that potential developers understand that the inclusion of for example live/work space, whilst not a requirement, are likely to weigh in their favour in considering whether the development as a whole is acceptable.

We are happy to follow the Inspector’s recommendation of removal of the phrase requiring compliance “with other policies in the Neighbourhood Plan”. This phrase has appeared in some policies over the various drafts of the document and we agree that it is not used consistently.

We agree that introductory words should be included at the beginning of the policies and would suggest:

“The Alcester Neighbourhood Development Plan should be read as a whole.

Proposals will be judged against all relevant policies in the Development Plan which includes the Stratford-on-Avon District Local Plan and the Alcester Neighbourhood Development Plan.”

7. Policy EC 5 refers to SDC’s Convenience Goods Study. Could you please provide me with a link to this document?

ATC: The link is below:

<https://www.stratford.gov.uk/doc/205890/name/ED454%20Convenience%20Goods%20Retail%20Study%20June%202008.pdf>

We note that the recommendations from this Study are referred to in 5.9.10 of the Core Strategy

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?

ATC: We confirm that this policy refers to developments of 10 units or more of residential development.

After consideration, and looking at previous drafts of this policy, the reference to “visual impact” is erroneously in this policy and therefore the words “and any visual

impact should be minimized through screening, landscaping and planting” should be deleted.

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.

ATC: The intention of this policy is to encourage improvements in accessibility to areas of green space which are open to the public.

We would propose a rewording as follows:

“Proposals to improve public access to and recreational usage of green spaces, especially the river corridors, will be supported.”

A definition of “green space” could be included:

“Green space means land that is partly or completely covered with grass, trees, shrubs, or other vegetation”

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.

ATC: We agree the proposed amendment.

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.

ATC: SDC has supplied a map which is attached showing that the whole of LGS2 and LGS 3 are covered by the local nature reserve designation. Locally the sites are known as separately as confirmed on the attached leaflet for the site.

SDC: It is our understanding that the River Arrow LNR designation relates only to LGS2, as shown within our adopted Core Strategy policies map. We have discussed the matter with Warwickshire Wildlife Trust, who have confirmed their understanding to also be that the boundaries of the River Arrow LNR accord with those shown within our Core Strategy. The map referred to by Alcester Town Council shows the area SDC have a land interest in (in orange), not the extent of the Local Nature Reserve.