

Fenny Compton 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 ~~struckthrough~~

Page number	Section	Comment
General	Public Sector Equality Duty	It would be useful for the NDP to include a reference, in general terms, to the regard that has been had to the statutory Public Sector Equality Duty when drafting the NDP.
General	Consolidated policies/proposals map	It would be useful for the NDP to incorporate a single, consolidated policies and proposals map. Currently, there are several important and in some cases duplicated pieces of information spread across several different plans. This frustrates ease of understanding and use of the NDP as a whole. It would be preferable if all policy-related content could be displayed in a single plan (possibly supported by an inset map for Fenny Compton village) to an appropriate scale or scales.
General	Omission policy – reserve housing sites	The Plan appears to conflate site allocations (of which there aren't any proposed in the Fenny Compton NDP) with reserve sites. There is a missed opportunity to identify local needs/requirements in the NDP and it is suggested that contact is made with the Housing Team to discuss this further.
General	Village Design statement	If the Parish Council wishes to refer to a Village Design Statement in their design policies, this document will need to be included as an appendix to the Plan.
Page 3	Contents page	As presented, the contents page is very busy and would benefit from it being split up into sections with sub-headings (Introduction; Policies; List of Maps/Figures; Appendices etc). See Claverdon NDP as a good example of this practice. Claverdon 'made' Neighbourhood Plan (stratford.gov.uk) .
Page 3	Contents page	The list of Maps/Figures is missing from the contents page, altogether. These should be added. This will require each of the Maps/Figures listed within the NDP to be given a reference number, too.
Page 3	Contents page	It is suggested that each policy should be given a unique policy number, as well as a title – it makes it easier to refer to in correspondence/reports etc.

Page number	Section	Comment
Page 4	Executive Summary	Remove ES.1 and ES.11 as they are unnecessary. Remove map of the Parish, as it is also listed at p.13 of the document and isn't required twice. It makes more sense for the Parish map to remain at section 1.3.
Page 4	Executive Summary, para 2	There should be an acknowledgement about the District Council being required to identify reserve housing sites in accordance with Core Strategy Policy CS.15 and that Fenny Compton is covered by this provision.
Page 5	Executive Summary	Paragraph commencing "Fenny Compton Built-up Area Boundary" isn't entirely accurate in that it does not comply with the provisions of Core Strategy Policy AS.10 re: development possible in the countryside.
Page 5	Executive Summary	Delete point 2 of 'The Main Findings' Fenny Compton's strategic vision is underpinned by the views of residents revealed in the Parish's survey carried out in 2018' . This repeats the final paragraph listed prior to The Main Findings; re-number all subsequent points, accordingly.
Page 7	Key Principles	Remove ES.1.2 at the top of the page as it is not necessary. The first paragraph refers to 9 key principles, but 10 are listed in the table.
Page 7	Key Principle 1	Delete ' In harmony and at an appropriate scale to the existing village and the wider landscape' and replace with ' <u>Ensure new development compliments the existing village and the wider landscape'</u> .
Page 7	Key Principle 1, Sensitive Building Design	This refers to a VDS but this has not been included as an Appendix. This should be an Appendix to the NDP if it is being referred to here. Delete paragraph ' Using the existing Village Design Statement paying attention to local styles; setting out points on materials; the location of development sites and the size of buildings and developments' and replace with ' <u>Using the VDS to understand the local vernacular and appropriate building materials; the location and scale of development sites and the size of buildings'</u> .
Page 7	Key Principle 1, Sustainable Housing	Delete ' after the Compton Buildings site is built out' as this is an appropriate 'limiting factor' and barrier to other sustainable, appropriate development. In relation to parking, it is suggested that the NDP aligns with parking standards as set out in Part O of the Development Requirements SPD.

Page number	Section	Comment
Page 7	Key Principle 1, Sustainable Housing	It should be acknowledged that any reserve housing sites identified in the Site Allocations Plan will be outside of the BUAB.
Page 7	Key Principle 2, Traffic Management Measures	Delete ' reduce vehicular impact through speed measures '. This cannot be controlled through 'land-use' planning policy.
Page 7	Key Principle 3, Protection of Village Community Assets	Delete ' new facilities to be provided if an existing one is compromised by an acceptable development '. Replace with <u>equivalent replacement facilities to be provided if an existing facility is lost to new development.</u>
Page 8	Key Principle 4, Policies box	Reconsider the wording as follows: "Protecting Village Recreational Assets: use of income from new developments (S106 agreements) invested in community facilities; not supporting <u>support</u> the loss or partial loss retention of existing recreational spaces and facilities unless replaced; supporting <u>support</u> proposals that enhance and improve existing facilities including: village hall, bowls club, sports pavilion and field, allotments.
Page 8	Key Principle 4	This doesn't refer to Policy 'Development of New Recreational Facilities'?
Page 8	Key Principle 5, Flood Prevention	Add ' <u>Where necessary</u> ' to the end of the final sentence in the 'Policy' box to recognise that such a proposal may not be appropriate in all cases.
Page 8	Key Principle 6, Environmental Sustainability	The following sentence is setting a very high bar "new developments and building conversions designed to be self-sufficient in power production from renewable sources". It is suggested referring to the recently adopted Climate Change SPD. Development Requirements SPD Stratford-on-Avon District Council . However, this could be included in an 'Aspirations' section which could be attached as an annexe to the NDP but it should be made clear that this specific section would not become part of the Statutory Development Plan.
Page 8	Key Principle 8, Promoting Connectivity	In the Policy box (first title), delete ' homes ' and replace with ' <u>broadband</u> '. Delete the second policy as it is not appropriate to insist upon this given it includes highway land outside the influence of the individual landowners.

Page number	Section	Comment
		Delete : 'Connected infrastructure: all new dwellings and commercial premises should provide high speed connectivity from building to road side' .
Page 9	Key Principle 9, Natural Environment	Remove mention of the school sports field for LGS designation as it is suggested adding additional sites for LGS designation in the NDP.
Page 9	Key Principle 9, Natural Environment	Replace fourth policy title ' Wildlife ' with ' <u>Conserving the Natural Environment</u> '; amend third point to read 'wildlife habitats and landscape features <u>are maintained</u> '; remove the point relating to Parish owned trees, since this cannot be controlled through policy as trees can be felled without consent unless TPO'd delete ' existing Parish owned trees preserved and managed '. The final point to make is to delete ' through regular glazing ' as this is not a planning policy matter.
Page 9	Key Principle 10, Caring for Heritage Assets	Second point – delete ' any heritage asset ' and replace with ' <u>the significance of any heritage asset or its setting</u> '.
Page 10	Development Outcomes, Fourth paragraph	Fourth paragraph. This is not drafted as per the Core Strategy (see para 1.2.5 of the CS for more appropriate wording. The housing figures are not targets for LSV's, as suggested in the NDP.
Page 10	Development Outcomes, Fifth paragraph	Delete : ' Subsequent to the Core Strategy, Stratford-on-Avon District Council has proposed additional 'reserved sites' for development. While these are not covered by this Neighbourhood Plan, the Parish Council has represented the views of the local community by formally objecting to all proposed reserved sites within Fenny Compton Parish '. It is not appropriate to include statements referring to the community objecting to potential reserve housing sites in the <i>Development Plan</i> .
Page 11	Section 1.2, para 1.2.2	Amend to read 'After two <u>formal</u> stages of <u>public</u> consultation, the adoption process requires some validation by through an independent examiner Examination of the NDP and a Parish-referendum in the Neighbourhood Plan Area. Remove the word ' live ' on the fourth line and add inverted commas around 'made'.
Page 12	Section 1.2, para 1.2.8	The first sentence states that the NDP has been developed to accommodate a substantial increase in housing. However, the Plan does not allocate any housing sites or reserve housing sites and on p.10 of

Page number	Section	Comment
		the Plan confirms the community's wish to object to potential housing sites in the SAP. As such, this sentence is inaccurate and should be deleted.
Page 14	Section 1.3, para 1.3.5	Clarification on what is 'large-scale' industrial development is required. There is an industrial estate/business park off Wharf Road to the north of the railway line but it is not listed, however it is not clear why (as it is mentioned at para 1.5.6 on p 16)? The sentence beginning 'Views towards the hills of' is a separate point to industry and should have its own separate paragraph.
Page 14	Section 1.5, para 1.5.2	Delete ' services ' and replace with ' <u>amenities</u> ' or ' <u>facilities</u> '. For point 9, add ' <u>and recreation ground</u> ' for completeness.
Page 16	Section 1.5 'Fenny Compton Today'.	This section is on page 14 and not page 16. However, subject to possible changes to the NDP following the Reg.14 consultation, a number of other page numbers may need amending.
Page 16	Section 1.6, para 1.6.1	This is not an accurate description of a BUAB. Please see para 4.1.4 of the Preferred Option version of the SAP for a more accurate description.
Page 16	Section 1.6, para 1.6.2	Delete ' The map below outlines the built-up area boundary (BUAB) of the village in Fenny Compton published by SDC. ' Replace with <u>'The map at Figure ? outlines the built-up area boundary of the village of Fenny Compton'.</u>
Page 16	Section 1.6, para 1.6.2	Para 1.6.2 indicates the BUAB map outlines the BUAB published by SDC but this is not the case. There are several differences between the NDP version and the Preferred Option SAP version maps. If the Parish Council wish to reflect the SDC version, this maps needs replacing with the latest SAP version map.
Page 16	Section 1.6, para 1.6.3	Delete ' The BUAB is defined by SDC to incorporate the existing settlement and the development of the Compton Buildings Site. ' Replace with: <u>The BUAB has been defined to incorporate the existing settlement and the Compton Buildings site to the North East of the village</u>

Page number	Section	Comment
Page 17	Section 1.7	Delete references to the Countryside Commission/WCC and Ecology Report below para 1.7.3 since they are already listed as footnotes on this page.
Page 18	BUAB map	The BUAB map should only have the BUAB displayed. The map on p.18 is trying to indicate three subjects, namely: Heritage Assets; Local Green Spaces; the BUAB. It is suggested that there is a separate map for each of these subject matters. It makes it much easier to view and interpret the individual subjects/assets, particularly when there are over-lapping lines for different subjects/assets.
Page 24	Section 2.2, Key Principles	This duplicates the section at p7-9. Is this necessary? Suggest that this section is deleted.
Page 25	Section 2.3, para 2.3.2	How would development be assessed to be appropriate to the history and rural environment? Should this reference the VDS (if it is a document to be utilised for assessing the suitability of planning applications)?
Page 26	Policy : Sensitive building design	Delete 3.1 and remove paragraph numbers and paragraph sub-headings in the Policy itself, as they are all unnecessary. This relates to every policy in the NDP. The Policies should still be numbered but as AD.1 for example. See Claverdon NDP as a good example. Claverdon 'made' Neighbourhood Plan (stratford.gov.uk) .
Page 26	Policy: Sensitive building design	First paragraph. There is a concern that the wording is too vague and doesn't actually refer to buildings. It also fails to refer to, or take account of, building work that could be carried out under permitted development rights. It is also looking to tackle two separate issues. The matter relating to 'key vistas' should be a separate policy altogether in a different section of the NDP. The policy does not identify any locations where development is considered acceptable or unacceptable.
Page 26	Policy: Sensitive Building Design	See Policy BE.1 in the 'made' Ettington NDP for an example of a good policy relating to 'responding to local character' to improve wording and focus of the policy.
Page 27	Policy: Sustainable Housing	The three separate paragraphs are actually three separate policies. The policies relating to parking and sustainability should be removed and added elsewhere in the NDP, where appropriate. In relation to parking, it is suggested that the NDP aligns with parking standards as set out in Part O of the Development Requirements SPD.
Page 27	Policy: Sustainable Housing	The first paragraph can remain. However, in terms of development that can take place within the countryside, the list in the policy is not accurate. The exceptions should be in accordance with Core Strategy Policy AS.10.

Page number	Section	Comment
Page 27	Policy: Sustainable Housing	The first paragraph makes reference to 'Rural Exception Sites'. However, it is unclear whether this is intended as a reference to community-led 'Local Need' schemes. Clarification would be helpful.
Page 27	Policy: Sustainable Housing	Second paragraph. Suggest moving this text to the Design/Infrastructure section of the NDP. Look at Policy IN.1 in the 'made' Ettington NDP for alternative wording to consider for this policy.
Page 27	Policy: Sustainable Housing	Third paragraph. Move to Design/Infrastructure section of the NDP. See Policy IN.2 in the 'made' Ettington NDP for alternative wording to consider for this policy re: 'building for life' standards.
Page 27	Explanation	Paragraph 3.3.3. It is unclear how this objective is to be realised. There should be an acknowledgement that the District Council is having to identify reserve housing sites in its Site Allocations Plan in accordance with Core Strategy Policy CS.15 and that Fenny Compton is affected by this.
Page 28	BUAB map	This is a duplication of the map on page 18. Depending upon how the maps for the different topics/assets/policies are going to be distributed throughout the NDP, this map will need to be either deleted (if a duplication for the BUAB) or replaced with a map relating to a different subject matter.
Page 29	Policy: Appropriate Traffic Management Measures	First paragraph. It is not clear how this can be implemented or measured.
Page 29	Policy: Appropriate Traffic Management Measures	Delete second paragraph. 4.1.2 Where necessary, development would be supported with appropriate traffic management measures that improve road safety, for example, by reducing the impact of vehicular traffic through speed management. It is not appropriate to include traffic management measures in land-use policies. Such matters are the responsibility of either the County Highways Authority, or the Police, outside the remit of the planning regime. However, this could be included in an 'Aspirations' section which could be attached as an annexe to the NDP but it should be made clear that this specific section would not become part of the Statutory Development Plan.
Page 30	Congestion	There is a large gap after the heading 'congestion' and it would be useful to clarify whether any text is missing from this section.
Page 31	Policy: Protection of Village Community Assets	The list of community facilities at paragraph 3 is different to the list set out in para 1.5.2 on p.14 of the Plan and it is not clear why.
Page 32	Map	Should this list 9 facilities, rather than 6? The map should have a heading and figure number.
Page 34	Policy: Development of New Community Facilities	It is suggested that the first sentence ends with " <u>occupiers of neighbouring properties</u> " to make it clear who is being protected.
Page 34	Explanation, para 5.3.6	It is assumed that this relates to both S106 and CIL income streams. This paragraph may benefit from redrafting to improve clarity.

Page number	Section	Comment
Page 35	Policy: Protecting Village Recreational Assets	It is suggested adding ' <u>in a suitable location</u> ' to the end of the first paragraph to ensure any replacement facility or asset would meet the community's requirements and is situated in an appropriate location.
Page 35	Policy: Protecting Village Recreational Assets	<p>Second paragraph. Delete text after first sentence as follows: 'These recreational spaces and facilities listed below and shown on the map are to be protected:</p> <ol style="list-style-type: none"> 1. Children's play area 2. Bowls Club 3. Sports Pavillion and playing field 4. Allotments <p>It is considered that the 4 recreational spaces listed could be suitable candidates for Local Green Space designation as well as the school playing field. These 4 sites should then be added to the policy/map relating to LGS designation. There would be no need to duplicate the protection of these assets in different parts of the Plan.</p>
Page 35	Policy: Protecting Village Recreational Assets	It is not clear from google maps where the children's play area is (listed adjacent to the fire station as 'site 1' on the map on p.36 of the NDP).
Page 36	Map of Recreational Assets	Delete if agree with the above point regarding the potential additional Local Green Space designations, as they will be added to the LGS map.
Page 38	Policy: Development of New Recreational Activities	It is suggested adding ' <u>occupiers of neighbouring properties</u> ' to the end of the first sentence, to make it clear who is being protected.
Page 40	Flood Risk Map	This should have a proper heading and a Figure Number. The map isn't of particularly good quality and it is not possible to pick out the detail on the legend at all. The map should be replaced with one of much sharper quality, with a legend that can be read and interpreted (i.e. include explanatory text for the figures against each of the coloured tiles so people understand what they are looking at).
Page 41	Policy: Domestic Energy Production	Re-draft the beginning of the first sentence to read: ' New Developments <u>Development proposals and building conversions</u> will be designed to be'
Page 41	Policy: Domestic Energy Production	See Policy NE.6 of the 'made' Snitterfield NDP or policy CLW.9 of the 'made' Stratford Town NDP for alternative wording for such a policy.

Page number	Section	Comment
Page 43	Policy: Minor Commercial Developments	1,000m2 is quite big and is almost the size of an Aldi store and so it is suggested that the definition of 'minor' is reconsidered.
Page 43	Policy: Minor Commercial Developments	<p>It is suggested splitting this into two policies for</p> <p>a) Protecting and supporting existing employment sites, and b) promoting appropriate new employment sites.</p> <p>See policies LE.1 and LE.2 of the 'made' Ettington NDP for appropriate titles and wording for both policies. Add policy no's. 'BE.1' and 'BE.2' to the new policies.</p>
Page 49	Policy: High Speed Broadband	It is suggested looking at the policy wording of policy E.4 of the 'made' Claverdon NDP for appropriate wording for such a policy. Claverdon 'made' Neighbourhood Plan (stratford.gov.uk) .
Page 49	Policy: Connected Infrastructure	Delete this policy. New dwelling and commercial units in the neighbourhood should provide high speed connectivity (e.g. fibre optic cabling) from the property to the roadside. This would be across highway land and would be the responsibility of WCC as County Highways Authority.
Page 50	Policy: Protection of Valued Landscapes	Re-word first paragraph. Development proposals should demonstrate how they <u>have regard are</u> appropriate to, and integrate with the character of the <u>surrounding landscape and protect the key views identified in Figures ? and ? on pages 52 and 53 of the Plan setting while conserving, and where appropriate, enhancing the character of the landscape.</u>
Page 50	Policy: Protection of Valued Landscapes	Delete second paragraph as it relates to more than just landscape character, is too vague as drafted, and is unnecessary. Delete: Development proposals should ensure that all valued landscapes are maintained and safeguarded, particularly where they relate to heritage assets, rising land, village approaches and settlement boundaries.
Page 53	Map	This map requires a Figure number. What are the different colours denoting for the different views? The views need to be numbered and listed in the associated policy. Could the maps on p.52 and p.53 be integrated?
Page 53	Policy: Local Green Spaces	Amend first paragraph to read: 'This Plan designates the school playing fields as a following areas of Local Green Space (LGS) as defined on Figure ?, where development will not be supported, other than in very special

Page number	Section	Comment
		circumstances where public benefit would outweigh the harm to the LGS'. This is shaded green and denoted LGS 1 on the map below.
Page 53	Policy: Local Green Spaces	List the following locations as proposed LGS: <ol style="list-style-type: none"> 1. <u>School playing field</u> 2. <u>Bowls Club</u> 3. <u>Village recreation ground</u> 4. <u>Allotments</u> 5. <u>Children's Play Area</u> (subject to confirmation of its existence/correct location – see comment on map on p.36 of the NDP.
Page 53	Policy: Local Green Spaces	The re-worded first paragraph is sufficient. Delete second paragraph as follows: Development that would harm the openness or special character of a LGS or its significance and value to the local community will not be supported unless there are very special circumstances that outweigh the harm to the LGS.
Page 55	Map	If this is to be the LGS map, it will need to be amended to remove the BUAB, Conservation Area and Listed Buildings. It will need to have an appropriate Title and Figure Number. The other areas of Local Green Space (listed above) will need to be added to the map.
Page 57	Policy: Verges and Hedges	Amend title to read ' <u>Verges Trees</u> and Hedges' as verges are part of the Highway and under the jurisdiction of WCC and it is not appropriate to include verges in a policy. Add policy no, i.e. NE.3.
Page 57	Policy: Verges and Hedges	Delete as drafted and replace with wording as per policy NE.3 of the 'made' Stratford Town NDP which is appropriate for such protection.
Page 58	Policy: Wildlife	Delete paragraphs three and four as they are not planning matters that can be covered through land-use policies. Delete: The existing stock of Parish Council – owned trees should be preserved and managed wherever possible, and the planting of additional trees in the village should be encouraged. The diversity of unimproved and semi-improved grassland on steep hillsides should be conserved through regular grazing.

Page number	Section	Comment
		In terms of the policy see policy NE.5 of the 'made' Claverdon NDP for a suitable alternative. Claverdon 'made' Neighbourhood Plan (stratford.gov.uk) .
Page 58	Policy: Wildlife	The fifth paragraph of the 'Wildlife' policy relates to a separate issue and should be a stand alone policy. Remove this paragraph from Policy NE.4. Delete: Future development proposals should avoid adverse impacts on Local Wildlife Sites and potential Local Wildlife sites highlighted in the map on page 20.
Page 59	Policy: Local Wildlife Sites	Create a new policy titled ' <u>Local Wildlife Sites</u> ' with policy wording as follows: <u>Proposals which would adversely affect the environmental quality of Local Wildlife Sites and Potential Wildlife Sites within the designated Neighbourhood Area as highlighted at Figure ? of this Plan, will not be supported'.</u>
Page 59	Policy: Conserving or Enhancing the Historic Environment	See policy BE.2 of the 'made' Claverdon NDP for appropriate alternative wording for such a policy. Claverdon 'made' Neighbourhood Plan (stratford.gov.uk) .

Schedule of minor comments from Stratford-on-Avon District Council

Suggested new text underlined deleted text ~~struckthrough~~

Page number	Section	Comment
Front cover	Front page	The Plan should state the Plan Period as per all other NDP's (i.e. 2011-2031) on the front page.
General	Explanatory text	Where reference is made to surveys it may be helpful to cross reference them to the 'supporting documents' text by way of footnote.
General	Explanatory text	Check the font size as some of the headings are different sizes.

General	Explanatory text	The explanatory text should directly follow each policy and the photos and maps could follow the explanatory text.
Page 4	Executive Summary	The wording of policy 3.2.1 (Future housing) should also be reflected in the Executive Summary for consistency.
Page 8	Key Principle 4, Policies box	The 'Policy Box' is a different colour to all the other policy boxes (i.e. the writing is white, not black etc).
Page 9	Key Principle 9	Delete 'verges' and replace with 'Trees' in third policy title.
Page 10	Development Outcomes	Remove ES.1.3 as it is unnecessary.
Page 10	Development Outcomes, Third paragraph	Third paragraph. Add 'already approved' after 'build 100 homes'.
Page 12	Para 1.2.9	Delete the word 'advice' as it is not required.
Page 18	BUAB map	The BUAB will need to be given a Figure number.
Page 18	BUAB map	The BUAB should fill the entire page to make it as clear as possible.
Page 19	Para 1.7.10	Should state 'as shown on Figure?' so the map and text tie in.
Page 19	Para 1.7.10	Insert line space between para's 1.7.10 and 1.7.11.
Page 20	Map of Wildlife Sites	This should be given a Figure number.
Page 21	Habitats Map	This should be given a Figure number.
Page 27	Policy: Sustainable Housing	Add Policy number, i.e. AD2.
Page 29	Policy: Appropriate Traffic Management Measures	Add policy number i.e. RS.1.
Page 31	Policy: Protection of Village Community Assets	Add Policy number: i.e. PA.1.
Page 34	Policy: Development of New Community Facilities	Add Policy number: i.e. PA.2.
Page 35	Policy: Protecting Village Recreational Assets	Add Policy number: i.e. RA.1.
Page 38	Policy: Development of New Recreational Activities	Add Policy number: i.e. RA.2.
Page 39	Policy: Ensuring Development Manages Flood Risk	Add Policy number: i.e. FP.1.
Page 39	Policy: Ensuring Development Manages Flood Risk	Remove sub-heading (as well as removing number 7.1.1) as they are not necessary.

Page 41	Policy: Domestic Energy Production	Add policy number, i.e. ES.1.
Page 42	Policy: Electric Vehicle Charging	Add policy number, i.e. ES.2.
Page 43	Key Principle	Amend title to read: 'Promoting Business and Employment' to match contents page listing.
Page 46	Policy: Home working	Add policy number, i.e. BE.3.
Page 49	Policy: High Speed Broadband	Add policy number, i.e. PC.1. Amend policy title to read 'High-Speed Broadband'.
Page 50	Policy: Protection of Valued Landscapes	Add policy number, i.e. NE.1.
Page 52	Map	This map requires a Figure number. The viewpoints need to be numbered and listed in the associated policy.
Page 53	Policy: Local Green Spaces	Add policy number, i.e. NE.2.
Page 58	Policy: Wildlife	Amend title to read 'Wildlife' Conserving the Natural Environment'. Add policy number, i.e. NE.4.
Page 59	Policy: Conserving or Enhancing the Historic Environment	Add policy number, i.e. HE.1.