

Ilmington Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

Rep.No.	Name	Policy/Section	Representation
ILM.01	Anonymous	HG.1	I object to yet more house on the Armscote road, this is a very fast road despite being a 30 mile area, there are a number of turning and roads leading off Armscote road and it is only a matter of time before there is an accident. This is also an area that floods on a regular basis after a downpour.
		HG.2	This is a quieter road and rather than putting all the burden of housing at the bottom end of the village this would be an ideal location for development
		HG.3	Support
ILM.02	Stansgate Planning on behalf of Celia, Eve, and Grace Beecham	LGS.1	<p>1. INTRODUCTION</p> <p>A large number (10) of Local Green Spaces are proposed by the Submission Version of the Neighbourhood Plan. One of those is LGS3, a small, former orchard measuring 0.2 hectares accessed from Front Street. It contains 12 fruit trees of varying size, age and quality, a drive and the grass is regularly mown. On the western edge of the proposed LGS3 is a former stone barn in domestic use and further west is the dwelling house and listed building Middle Meadow.</p> <p>Appendix 3 of the draft Ilmington NP describes the site as follows:</p> <p><i>The site sits within the conservation area and AONB and forms the setting of the Grade II listed Middle Meadow. The site represents part of Ilmington's open weave layout with remnant orchard trees in the eastern portion.</i></p> <p><i>The special and unique qualities of the site include its open contribution to the centre of the village and more importantly its historic link to one of the last remaining Burgage plots in the village. A Burgage plot is a medieval land used to describe a house on a long and narrow plot of land. The development or sub-division of Burgage plots to address</i></p>

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			<p><i>population growth over the last century has led to a rapid decline in this historic settlement pattern.</i></p> <p><i>Important views into the site were noted by the Heritage Sub-Group for its natural beauty and local historic character and value.</i></p> <p>NPPF paragraph 100 states: <i>The Local Green Space designation should only be used where the green space is:</i></p> <ul style="list-style-type: none"> <i>a) in reasonably close proximity to the community it serves;</i> <i>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;and</i> <i>c) local in character and is not an extensive tract of land.</i> <p>LGS3 meets NPPF tests A and C. However, it does not meet NPPF test B. In this regard, relevant Planning Practice Guidance is:</p> <p><i>Paragraph: 009 Reference ID: 37-009-20140306. Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.</i></p> <p><i>Paragraph: 017 Reference ID: 37-017-20140306 Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty).</i></p> <p>In this case, LGS3 should not be designated a Local Green Space, for the following reasons:</p>

Rep.No.	Name	Policy/Section	Representation
			<p data-bbox="842 272 1167 300">2. HISTORIC SIGNIFICANCE</p> <p data-bbox="842 344 2018 555">The draft NDP describes the land as “one of the last remaining Burgage plots in the village”. However, there is no systematic analysis by the NDP Core Documents of Burgage plots in Ilmington in general nor this plot of land in particular. Furthermore, the “Ilmington Conservation Area Review 1995” (a Neighbourhood Plan Core Document) does not identify this plot of land as particularly special within the Conservation Area. As allegedly “one of the last remaining”, the draft NP implies there are other Burgage plots in the village, in which case this plot is not unique.</p> <p data-bbox="842 600 2018 810">“Burgage” is medieval terminology and is not, in itself, a heritage asset. There is no national guidance to support the designation of undeveloped Burgage plots as Local Green Spaces. LGS3 is located within a Conservation Area but it does not follow from this designation that the land has a <i>particularly special</i> historic importance. LGS3 is not located within the curtilage of a listed building (such as Middle Meadow). It is not a historic park or garden or Scheduled Monument. Simply because the land is undeveloped is not justification for LGS designation.</p> <p data-bbox="842 855 1061 882">3. RECREATIONAL</p> <p data-bbox="842 927 2018 1098">LGS3 is not a “valuable local amenity”. There is no public access to the land. It provides no recreation. Public view of the land is limited to only one vista, from Front Street. However, the frontage hedgerow largely screens views of the orchard behind. The orchard contains no large stature trees nor trees subject to a Tree Preservation Order. A view of the roadside hedge and a glimpse of the orchard behind is pleasant but is not special enough to warrant LGS designation.</p> <p data-bbox="842 1110 2018 1201">NP Core Document “Character Appraisal” Appendix 9 is a “key views map”, copied below. It identifies 28 key views into, outwards and within the village. None of the identified key views are of LGS3.</p> <p data-bbox="842 1246 2018 1342">Similarly, the Conservation Area Review 1996 does not identify a key view of LGS3. It is not a focal point of the village, such as a village green. It is not land with exceptional beauty or high landscape character.</p>

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			<p>4. WILDLIFE</p> <p>NP Core Document “Local Green Space Site Assessment – April 2017” discusses the ecological significance of the site. However, its stated ecological value of LGS3 is largely limited to boundary hedgerows and the orchard trees. These landscape features are of commonplace, ordinary ecological value.</p> <p>The Assessment goes on <i>“in the village there have been sightings of larger fauna species such as bats, birds of prey (e.g. Kestrels), rabbits and hedgehogs. The site plays an important contributory role in the wider ecological significance of the village.”</i> This anecdotal evidence carries little weight as evidence of <i>“richness of its wildlife”</i> (NPPF para 100) and this comment relates to the village as a whole, not this site in particular. There is no evidence its “contributory role” is demonstrably special in ecological terms or that it contributes significantly more to village wildlife than other green spaces in the village.</p> <p>Of more relevance is the fact that:</p> <ul style="list-style-type: none"> • It is a small, former orchard, with 12 ordinary fruit trees of varying age, size and quality. • There is no Habitat Biodiversity Audit that demonstrates a particularly special level of habitat diversity at LGS3. • The land does not have a national or local ecological or habitat designation. For example, LGS3 is not a Local Nature Reserve or a Local Wildlife Site. <p>In conclusion, LGS3 should be removed as a Local Green Space designation from Ilmington Neighbourhood Plan.</p>
ILM.03	Susan Brock	HG.1	Support
		HG.2	Support

Rep.No.	Name	Policy/Section	Representation
		HG.3	Support – 3.8 The avoidance of Tarmac here contradicts Design Guide 5.1 (Footpaths and Pavements) which promotes granite kerbs with a Tarmac surface.
		HG.4	Support
		HG.5	Support - See INF.2 Foul water drainage requirements should be a requirement of the development of Site 3.
		DC.1	Support
		DC.2	Support
		DC.3	Support
		DC.4	Support
		DC.5	Support
		DC.6	Support
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		INF1.	Support
		INF.2	Support - Note that condition concerning foul water drainage attach to Site 3 (HG.5) and should be an unequivocal requirement for the development of this site

Rep.No.	Name	Policy/Section	Representation
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.5	Support
		NE.6	Support
		ETA.1	Support
		ETA.2	Support
		ETA.3	Support
		ETA.4	Support
		ETA.5	Support - Although ETA.5 seems to apply only to new development, I would like to flag the need for new pavements in the village (e.g. on Front St. from the entrance to Peggy's Lane to Back St and Campden Hill, on Armscote Rd north side, and on the Mickleton Rd. from the corner of Back St. to the Playing Fields) Can this be included in the Plan as a 'Project' using CIL money (Community Infrastructure Levy) from new developments? This has been raised with Highways before by the Parish Council. I understand that under Policy HG.5, there is a 'Project' in the Plan which talks about projects that had been suggested by Parishioners in the community-wide survey, which could be reviewed by the Parish Council when CIL money is available. These payments were suggested in the survey and I would now strongly support that CIL monies should be spent on these pavements as high priority.

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		DP.1	Support - I strongly agree with both the principles laid out in the Design principles and the need for their implementation in ALL new developments, large and small.
ILM.04	Canal and River Trust	General	The plan area is not within close proximity to our network and therefore the Canal and River Trust has no comment to make.
ILM.05	Sean Clifford	HG.1	Support - Site 1 is the only site that has the capacity to provide a good mixture of social and other housing types. It has safe access onto the other roads in the village without impacting on existing traffic flow. It is also a location which will immediately be within the community, within easy access of existing amenities and will thereby integrate into the existing village framework very well.
		HG.2	Support - The capacity for expansion is more appropriate than other proposed sites.
		HG.3	Support - Agree with all of the above and very keen to ensure that green nature corridors are maintained throughout the development to ensure that wildlife diversity and population dynamics can be conserved for the future.
		HG.4	Support - This is a good opportunity to provide a new farming business venture in the village that can compete more effectively in the modern agricultural climate. It may provide valuable employment for local people in the future.
		HG.5	Support
		DC.1	Support
		DC.2	Support
		DC.3	Support
		DC.4	Support – see comment supporting Site 1

Rep.No.	Name	Policy/Section	Representation
		DC.5	Support
		DC.6	Support
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		LGS.9	Although the green space is currently a relatively new, it is important to maintain and develop these "greens" to promote the balance and well-being of the community living there.
		INF.1	Support - Particularly important at the northern end of the village where flooding of the road and sewerage overflow are recurring problems.
		INF.2	Support - As commented in the previous section, foul water drainage and sewerage overflow during heavy rainfall events are currently a major issue in the northern end of the village.
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.5	Support
		NE.6	Support

Rep.No.	Name	Policy/Section	Representation
		ETA.1	Support
		ETA.2	Support
		ETA. 3	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Support
ILM.06	Tammy Clifford	HG.1	Support
		HG.2	Support - To be used only if Ilmington has to provide further housing in the future.
		HG.3	Support - This site provides social housing and easy access to amenities.
		HG.4	Support
		HG.5	Support
		DC.1	Support - Keeping open green spaces is vital.
		DC.2	Support
		DC.3	Parking provision is a problem and needs to be carefully thought about in all new developments.
		DC.4	Support - Safe and easy access paths need to be part of any new dwellings.

Rep.No.	Name	Policy/Section	Representation
		DC.5	Support - The village landscape, views within the village and to the village are important and need to be conserved.
		DC.6	Support
		DC.7	Support - Keeping up with technology i.e. electric charging points is vital in new developments, as is adequate parking to try to relive the on-road parking that is already present in the village.
		HA.1	Support - Preserving the village heritage for future generations is important.
		LGS.1	Support - Green spaces within the village bring the countryside into the heart of the community and conserving them is key to maintaining the rural nature of Ilmington. The older part of the village has green spaces; I am very keen that any newer developments e.g. LGS 9 are given the same opportunities to have beautiful open green areas within their immediate communities.
		INF.1	Support
		INF.2	Support
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.5	Support
		NE.6	Support

Rep.No.	Name	Policy/Section	Representation
		ETA.1	Support
		ETA.2	Support
		ETA.3	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Support
ILM.07	The Coal Authority	General comment	Having reviewed your document, I confirm that we have no specific comments to make on it.
ILM.08	Environment Agency	General comment	<p>We are broadly in support of the aims and objectives and wish to make the following comments in regards to fluvial flood risk:</p> <p>The NDP area is located within an area primarily within Flood Zone 1 on the Flood Map for Planning (Rivers and Sea). There is a small section of Flood Zone 2 which runs through the village, following the route of an Ordinary Watercourse, however there does not appear to be any mapped extents for Flood Zone 3.</p> <p>The Ordinary Watercourse running through the village is under the jurisdiction of the Lead Local Flood Authority, who in this area is Warwickshire County Council, and we would advise that they are also consulted on this NDP as they are responsible for managing flood risk from local sources including ordinary watercourses, groundwater and surface water.</p>
		INF.1	<p>The NDP includes Policy INF.1: Flooding which ensures that development will only be supported if they satisfactorily identify and address the risk of flooding and do not increase the risk of flooding. There is also a requirement where the watercourse crosses a proposed development, modelling must be undertaken to identify the risk of flooding. We would support this, however would also like to strongly recommend that inclusion of climate change is incorporated to strengthen the policy.</p>

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			In addition, we note the Water Framework Directive (WFD) and objectives from the Severn River Basin Management Plan have not been included as part of the evidence base within Section 6.5 (Infrastructure) and 6.6 (Natural Environment). Sustainable drainage measures, as outlined in Policy INF.1, should always be considered for the improvement of water quality, even if it is necessary for surface water attenuation.
ILM.09	David Gresham	HG.1	Support
		HG.2	Support
		HG.3	Support
		HG.4	Support
		HG.5	Support
		DC.1	Support - DC.1.6 Due care given to avoid gated communities, invasive use of CCTV, security bars, spikes etc. that may conflict with other guidance in DC 1
		DC.2	Support
		DC.3	I would like to see policy encourage more buildings and dwellings of exceptional quality or innovative nature of design
		DC.4	Support
		DC.5	Support
		DC.6	Support
		DC.7	Support

Rep.No.	Name	Policy/Section	Representation
		HA.1	Support
		LGS.1	Support
		INF.1	Support
		INF.2	Support
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.5	Support
		NE.6	Support
		ETA.1	Support
		ETA.2	Support
		ETA.3	Support - I would like to see provision made for protecting the community from an unhealthy balance of holiday/second homes in ETA.3
		ETA.4	Support
		ETA.5	Support

Rep.No.	Name	Policy/Section	Representation
		DP.1	Support
ILM.10	Douglas W. Grieve	HG.1	Object - Emerging evidence of completed or planned house building in the district against targets including category 3 villages indicates there is no need for further housing until after 2031. The NDP would encourage house building when not needed by extending the built up area boundary.
		HG.2	Object - There is no need to include this reserve site as per the previous point about district housing needs i.e. there is no justification to include it. It is outwith the proposed built up area boundary. It has countryside designation in an AONB and should not receive residential housing. Allowing this would encourage further development of other green field sites outwith the brown field site. Anyway, the brown field site would meet the needs of the NDP housing needs assessment - 7 affordable homes.
		HG.3	Support
		HG.4	Object - This is a highly speculative suggestion with almost no detail. The cost will be substantial and could not be justified long term for a holding that was c. 100 acres and would be even smaller if development was allowed. There is a sitting tenant at Mabel's Farm and the fact is that the Mabel's Farm site is not currently available. Therefore the whole basis for selecting this site for development is flawed.
		HG.5	Support
		DC.1	Support
		DC.2	Object - It is not clear if figures 5 & 11 are proposed built up area boundaries or are existing built up area boundaries. This should be made clear in the final version. Reference previous comments, there does not appear to be justification to extend the built up area from the current plan
		DC.3	Support - Subject to previous comments, there does not appear to be justification to extend the built up area from the current plan.

Rep.No.	Name	Policy/Section	Representation
		DC.4	Support
		DC.5	Support
		DC.6	Support
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		INF.1	Support
		INF.2	Support
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Object - Orchard trees are a commercial crop and trees can be removed and planted by choice. Those who want to plant orchards can do so if they wish.
		NE.5	Support
		NE.6	Support
		ETA.1	Support

Rep.No.	Name	Policy/Section	Representation
		ETA.2	Support
		ETA.3	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Support
ILM.11	Michele Hall	HG.1	Support
		HG.2	Support
		HG.3	Support
		HG.4	Support
		HG.5	Support
		DC.1	Support
		DC.2	Support
		DC.3	Support
		DC.4	Support
		DC.5	Support
		DC.6	Support

Rep.No.	Name	Policy/Section	Representation
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		INF.1	Support
		INF.2	Support
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.5	Support
		NE.6	Support
		ETA.1	Support
		ETA.2	Support
		ETA.2	Support
		ETA.4	Support
		ETA.5	Support

Rep.No.	Name	Policy/Section	Representation
		DP.1	Support
ILM.12	Trevor Hall	HG.1	Support
		HG.2	Support
		HG.3	Support
		HG.4	Support
		HG.5	Support
		DC.1	Support
		DC.2	Support
		DC.3	Support
		DC.4	Support
		DC.5	Support
		DC.6	Support
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		INF.1	Support

Rep.No.	Name	Policy/Section	Representation
		INF.2	Support
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.5	Support
		NE.6	Support
		ETA.1	Support
		ETA.2	Support
		ETA.2	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Support
ILM.13	Alan Hessel	HG.1	Support
		HG.2	Support
		HG.3	Support

Rep.No.	Name	Policy/Section	Representation
		HG.4	Support
		DC.1	Support
		DC.2	Support
		DC.3	Support
		DC.4	Support
		DC.5	Support
		DC.6	Support
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		INF.1	Support
		INF.2	Support
		NE.1	Support
		NE.2	Support
		NE.3	Support

Rep.No.	Name	Policy/Section	Representation
		NE.4	Support - ancient trees should be allowed to rot and fall and the remains left for insects wherever safe to do so
		NE.5	Support
		NE.6	Support
		ETA.1	Support
		ETA.2	Support
		ETA.3	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Support - no overly modern designs for the sake of design. no huge glass expanses
ILM.14	Jean Hessel	HG.1	Support
		HG.2	Support
		HG.3	Support
		HG.4	Support
		HG.5	Support
		DC.1	Support

Rep.No.	Name	Policy/Section	Representation
		DC.2	Support
		DC.3	Support
		DC.4	Support
		DC.5	Support
		DC.6	Support
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		INF.1	Support
		INF.2	Support
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.5	Support
		NE.6	Support

Rep.No.	Name	Policy/Section	Representation
		ETA.1	Support
		ETA.2	Support
		ETA.3	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Support
ILM.15	Highways England	General comment	I can confirm that Highways England have no comments to make on this consultation as the area in question is quite some distance from the SRN.
ILM.16	Historic England	General	<p>Historic England is supportive of both the content of the document and the vision and objectives set out in it. We are very pleased to note that the Plan evidence base is well informed by reference to the Warwickshire Historic Environment Record including historic landscape sensitivity analysis. Our earlier Regulation 14 comments remain entirely relevant. That is:</p> <p><i>“The emphasis on the conservation of local distinctiveness through good design and the protection of heritage assets, archaeological remains and landscape character including green spaces and important views is to be applauded. The Village Design Principles in section 7 will no doubt prove invaluable as a context for the production of sensitive development proposals”.</i></p> <p>In conclusion, the plan reads overall as a well written, well-considered document which is eminently fit for purpose. We consider that an exemplary approach is taken to the historic environment of the Parish and that the Plan constitutes a very good example of community led planning.</p>
ILM.17	Sarah Hobson	HG.1	Support - No comment

Rep.No.	Name	Policy/Section	Representation
		HG.2	Support
		HG.3	Support
		HG.4	Support
		HG.5	Support
		DC.1	Support
		DC.2	Support
		DC.3	Support
		DC.4	Support
		DC.5	Support
		DC.6	Support
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		INF.1	Support
		INF.2	Support
		NE.1	Support

Rep.No.	Name	Policy/Section	Representation
		NE.2	Support
		NE.3	Support
		NE.4	Support - Orchard trees are a commercial crop and trees can be removed and planted by choice. Those who want to plant orchards can do so if they wish
		NE.5	Support
		NE.6	Support
		ETA.1	Support
		ETA.2	Support
		ETA.3	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Support
ILM.18	David Howitt	HG.1	Object - I have concerns about the extent of the proposals for the redevelopment of Mabel's Farm and believe that the scope of the development is potentially too large.
		HG.2	Object - For the reasons given later, I am concerned about the size of the development proposed for Mabel's Fatm.HG.3 Support - Traffic on Back Street is a real concern and consideration should be given to enabling access from Mickleton Toad rather than from Back Street.
		HG.4	Object

Rep.No.	Name	Policy/Section	Representation
ILM.19	Inland Waterways (Warwickshire Branch)	HG.1	Support
		HG.2	Support
		HG.3	Support
		HG.4	Support
		HG.5	Support
		DC.1	Support
		DC.2	Support
		DC.3	Support
		DC.4	Support
		DC.5	Support
		DC.6	Support
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		INF.1	Support
INF.2	Support		

Rep.No.	Name	Policy/Section	Representation
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.6	Support
		ETA.1	Support
		ETA.2	Support
		ETA.3	Support - Whilst the Ilmington area contains no canals or navigable rivers, which are our chief area of concern, we are happy to support this NDP in order to help protect the neighbourhood from poor or unwarranted development.
		ETA.4	Support
		ETA.5	Support
		ETA.6	Support
ILM.20	John Kinning	HG.1	Object - These sites were allocated because, at the time it was decided that a Neighbourhood Plan was needed, these appeared to be the appropriate number of homes required to meet the needs of Stratford DC. The situation is now very different in that at 31st March 2018, Stratford DC had a total of 15,651 homes either built or committed between 2011 and 2031. This was against a requirement of 14,600. The Category 3 Local Service Villages, into which Ilmington falls had 442 built or committed compared to a total requirement of 450. It would appear that there was no necessity for Ilmington to plan for the developments contained in the NP. The NP should have been brought up-to-date to

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			reflect this.
		HG.2	Object - My comments regarding Policy HG.1 are equally appropriate here. In March 2018 Stratford DC had a 6.5 year supply of housing land. I believe that if the supply fell below 5 years a NP could be ignored.
		HG.3	Object - Were it necessary to develop Site 1 the detail in HG.3 is appropriate. However as stated in HG.1 there is no need for this development.
		HG.4	Object - It is not necessary to relocate Mabel's Farm.
		HG.5	Object - My comments regarding HG.1 are relevant. However an appropriate small development could be acceptable.
		DC.1	Support - I agree with Policy DC.1. However a large project such as Site 1 would be very negative for the village. It could also prove difficult to control the actual development within the allocated site.
		DC.2	Object - As I said in DC.1 I do not agree with Site 1 being included within the village boundary as it is not required to meet the needs of Stratford DC. It appears that Figure 11 purports to be the current official Boundary Plan as drawn up in 2017, which it is not
		DC.3	Support - The boundary should be that drawn up by Stratford DC in 2017.
		DC.4	Support
		DC.5	Support
		DC.6	Support
		DC.7	Support

Rep.No.	Name	Policy/Section	Representation
		HA,1	Support
		LGS.1	Support
		INF.1	Support
		INF.2	Support
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Trees should be allowed to rot and fall and the remains left for insects wherever safe to do so.
		NE.5	Support
		NE.6	Support
		ETA.1	Support
		ETA.2	Support
		ETA.3	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Support

Rep.No.	Name	Policy/Section	Representation
ILM.21	Wood, on behalf of National Grid	General comment	<p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area</p> <p>Electricity Distribution</p> <p>The electricity distribution operator in Stratford-on-Avon District Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p>
ILM.22	Natural England	General comment	<p>Site allocation within Cotswolds AONB</p> <p>We note that the plan proposes site allocations, particularly the allocation at ‘Mabel’s Farm’, which has the potential to impact on the Cotswolds Area of Outstanding Natural Beauty (AONB). Natural England recommends that the views of the Cotswolds AONB Board are sought regarding the acceptability of development at this site and suggests that any specific requirements for mitigation and Landscape and Visual Impact Assessment (LVIA) etc. should be included in the submission draft.</p> <p>Best and Most Versatile (BMV) land</p> <p>We have not checked the agricultural land classification of the proposed allocations, but we advise you ensure that any allocations on best and most versatile land are justified in line with para 112 of the National Planning Policy Framework.</p> <p>Additional information</p> <p>The attached annex may be of use to you; it sets out sources of environmental information and some natural environment issues you may wish to consider as you develop your neighbourhood plan or order.</p>

Rep.No.	Name	Policy/Section	Representation
			<p>Strategic Environmental Assessment Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance at: http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans</p> <p>Habitats Regulations Assessment Where a neighbourhood plan could potentially affect a European protected site, it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2010), as amended (the 'Habitats Regulations'). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive, which is transposed into the Habitats Regulations.</p> <p>In accordance with Schedule 2 of The Neighbourhood Planning (General) Regulations 2012, a neighbourhood plan cannot be made if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out. Therefore, measures may need to be incorporated into the neighbourhood plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the plan on European protected sites. This will be particularly important if a neighbourhood plan is to progress before a local plan has been adopted and/or the neighbourhood plan proposes development which has not be assessed and/or included in the Habitats Regulations Assessment for the local plan.</p>
ILM.23	Network Rail	General comment	Network Rail has no comments.
ILM.24	Lydia Robinson	HG.1	Object - The land allocated for "20" houses at Mabel's Farm is excessive. Typical housing density in a Category 4 villages in Stratford District is 34-35 houses per hectare. The site is 1.25ha which

Rep.No.	Name	Policy/Section	Representation
			would support over double that number. With the addition of the reserve site, we could see a developer pushing for 60 houses on the site. This is three times the stated requirement for the village. In addition, this policy relies on the relocation of Mabel's farm which the current tenant has shown no appetite for. If the current tenant won't vacate the land then this plan is fundamentally flawed.
		HG.2	Object - The same comment as HG.1. The land allocated for "20" houses at Mabel's Farm is excessive. Typical housing density in a rural setting is 35 houses per hectare we estimate the site is 1.25ha which would support double the amount of houses. With the addition of the reserves site, we could see up to 60 houses built. This is three times the stated requirement.
		HG.3	<p>Object - HG.3.1 - The proposed dwellings in the DRAFT plan all appear to be 4/5 bed detached houses with detached garages. The development is inward looking with the Back Gardens facing back Street, the character of this development will be suburban and therefore "estate-like" We would prefer to see a ribbon style development, as was mentioned in a previous consultation report, with terraces of smaller houses facing Back Street buffered by green space. The size of the houses will inevitably attract commuters and families, there has been no 'housing needs survey' done in the village so it difficult to understand what the motivation is for the scale, type and style of the proposals other than to maximise profit for the developer. Therefore, we would rather see this policy be more specific and refer to the type of housing e.g. "terraces of small houses or clusters of agricultural buildings". There are typically no clusters of large houses in the village as this by definition would be a housing estate.</p> <p>HG.3.2 - The Mabel's farm land has historically been associated with both Mabel's Farmhouse and the Dower house as it was the productive farmland for the Dower house. These are both Grade II listed buildings. Development here will affect the setting of both of these heritage assets as well as Folly Farm and Sansome house. Mabel's farm is one of the few working farms in the village and the connection with this agricultural landscape contributes to the significance of Mabel's Farmhouse as a former dairy farmhouse. In addition, the development will impact the conservation area as it will be visible from key views down Back Street. Finally, the development will affect key views of Mabel's farmhouse from the public right of way that crosses the land. Historical photographs</p>

Rep.No.	Name	Policy/Section	Representation
			<p>available on images of Ilmington demonstrate that this view has remained unchanged since the house was built. https://www.ilmingtonimages.co.uk/viewswithinthevillage. This policy seems to be also worded to encourage pastiche and historical replication. We would rather see a high quality, higher density contemporary scheme that references the agricultural character of the area than a suburban pastiche of a village house.</p> <p>HG.3.3 - The majority of the driveways along Back Street do not fully comply with current highways regulations regarding access and visibility. Pulling out onto Back Street is difficult therefore a new entrance onto a 20-60 house estate will dramatically increase traffic movements. This will have a negative impact on the highway safety of Back Street.</p> <p>HG.3.4 - Ilmington currently has poor access to public transport and residents are highly dependent on car-use. The provision of parking in the new developments is actively encouraging reliance on cars and therefore is not sustainable and not in line with the principals of the NPPF. Therefore we strongly oppose this policy.</p> <p>HG.3.5 - For this policy to be effective the size and type of “Green Space” should be specified otherwise a developer could interpret this requirement in many ways – is it referring to a green space that is the size of the main green on front street or the one in front of the howard on front street? These are fundamentally different in terms of size and amenity.</p> <p>HG.3.6 - The hedgerows and mature trees that are currently located on the site provide important habitat for nesting birds, barn owls, mice, bats and hedgehogs. Several of these are protected species therefore adding the phrase “wherever possible” provides a developer the ammunition to make a case for their removal. This needs to be more absolute.</p> <p>HG.3.7 - Providing additional footpaths is welcomed but this policy is a strategy to mitigate the loss of the exiting footpath.</p>

Rep.No.	Name	Policy/Section	Representation
			<p>HG.3.8 - This policy is acceptable in principle however if the development was sustainable in principle then hard surfacing wouldn't be such a key issue. This policy is also trying to mitigate the effect of the development on the surface water run-off on Back Street.</p> <p>HG.3.9 - It is unlikely that a developer will actually implement this policy. We would be happy for 100% affordable housing if it was high quality, sustainable and made available for local people.</p> <p>HG.3.10 - The overhead cables in the farmer's fields are not particularly unsightly. This policy is just way of facilitating the development.</p>
		HG.4	<p>Object - The farmer seems to be happy in his current location and has shown no indication that he would like to move. In addition, we have no objection to the farm in its current location, we feel it is important that smaller rural businesses are still part of the fabric of Ilmington. By moving the farm to an edge of village location rural businesses are being marginalised in favour of suburban housing. Ilmington is currently unspoilt and retains a rural outlook, unlike other neighbouring villages such as Mickleton, this type of development will dilute the quality and character of the village.</p>
		HG.5	<p>Object - These sites are quite different in Character from site 1 therefore more tailored policies should apply. The context of these sites is more suburban in character and therefore should have more tailored and appropriate policies.</p>
		DC.1	<p>Support</p>
		DC.2	<p>Object - We strongly object to the adjustment of the housing development boundary to include the greenfield sites surrounding Mabel's farm. The farmyard and existing farmhouse forms part of the existing boundary and is previously developed land. A developer will prioritise building on the greenfield site above the previously developed land which defeats the whole ambition of the plan which seems to be to clean up the farm site. In addition, the boundary seems very wilfully drawn with site 1a being allocated by dividing up half a field with no adherence to existing boundaries or the grain of the area. The western boundary of Site 1 fails to respect the line of the mature</p>

Rep.No.	Name	Policy/Section	Representation
			hedgerow and encroaches into the adjacent field. The field patterns in this area are significant and have remained unchanged since enclosure in 1781, their loss alters the fabric and grain of the area. By creating hard boundaries in the middle of a field the plan seems to be actively encouraging the rest of the field to be developed in the future through a further extension of the boundary. By building on the most sensitive frontage area first (i.e. the area that faces the conservation areas, back street and the listed buildings) the area to the rear of the site will be more easily developed in the future as further development here will be seen as uncontentious.
		DC.3	DC3. Support
		DC.4	Object
		DC.5	Object - The landscape assessment and site selection process seems to have been inherently flawed with sites outside of the AONB given equal scores to those within. The view analysis is also limited with no mention of key views from well-used footpaths in the village such as the one crossing the Mabel's farmland.
		DC.6	Whilst the policies here are commendable, I do not think there is an example of a 20, let alone, 40 unit housing development in Stratford District that has implemented this level of sustainability. A housing development of this scale will attract a major developer whom will be able challenge these policies to ensure the development only meets the minimum requirements defined in Stratford Council policy.
		DC.7	Ilmington currently has poor access to public transport and residents are highly dependent on car-use. The provision of parking in the new developments is actively encouraging reliance on cars and therefore is not sustainable and not in line with the principals of the NPPF. Therefore we strongly oppose this policy.
		HA.1	Object - The proposed changes to the housing boundary and the allocation of sites 1 & 1a will force development to occur on the boundary of the conservation area, within the AONB and directly adjacent to a number of listed buildings. In addition, the last historical working dairy farm in the

Rep.No.	Name	Policy/Section	Representation
			village will be relocated which will remove it from the central area of the village. The loss of a rural outlook on to farm land from several grade II listed farmhouses will fundamentally alter and harm their setting as they will be disconnected from the land which contributes to their significance. Mabel's farmhouse in particular has high significance for its original character and is the only farmhouse in the village still associated with farmland. This gives it high evidential and social value as a heritage asset.
		LGS.1	Support
		INF.1	Support
		INF.2	Support
		NE.1	Object - The development of sites 1 and 1a involves removal of hedgerow and boundary material as well as open green spaces so it conflicts with both of these policies. The language of these policies seems too soft describing "should" rather than "must" as the descriptor.
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.5	Support
		NE.6	Support
		ETA.1	Support
		ETA.2	Support

Rep.No.	Name	Policy/Section	Representation
		ETA.3	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Support
ILM.25	Severn Trent Water	HG.1	<p>Support - Policy HG.1 and HG.2 – The proposed developments within policy HG.1 and HG.2 are all located in close proximity to watercourses therefore surface water should be discharged to these outfalls in accordance with the Drainage Hierarchy (Paragraph 80 of Planning Practice Guidance):</p> <ul style="list-style-type: none"> • Site 1 and 1a is located near to a watercourse on the southern edge of Mickleton Road, there may also be a culverted watercourse within the area of back street that may be suitable. • Site 2 there is a watercourse located on the Northern side of ‘The Old Wainwights’, there may also be a culverted watercourse that may be suitable. • Site 3 is contains a watercourse along the southern boundary, therefore no issues of connection of surface water to the watercourse should arise. <p>Severn Trent are aware of capacity limitations within the Ilmington combined sewerage network and that any development is likely to have an impact. It is therefore strongly recommended that developers contact Severn Trent in advance of any planning application to enable appropriate assessments to be undertaken and where required any associated network improvements to be scheduled.</p>
		DC.1	Support
		DC.6	Support - Severn Trent are Supportive of DC.6.1 that developments should include SuDs, recycling of grey water and captured rainwater harvesting. These designs would be expected to help mitigate an increase in the risk of sewer flooding as a result of the new development through reducing flows entering the combined sewerage system. This approach will be most effective where SuDS are utilised to manage flows to sustainable outfalls such as infiltration or watercourse.

Rep.No.	Name	Policy/Section	Representation
		INF.1	<p>We would also recommend that existing properties in the catchment are encouraged to use water butts such as those as available on the Severn Trent website - https://www.stwater.co.uk/wonderful-on-tap/save-water/free-ways-to-save/. Water butts can be a good method of collecting rainwater during a storm that would otherwise enter the combined sewer and have additional water resource benefits. In addition we would also strongly recommend that local planning authorities incorporate the voluntary building standard of 110 l/p/d into their planning policies so that new development is designed in line with this approach. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <ul style="list-style-type: none"> • Single flush siphon toilet cistern and those with a flush volume of 4 litres. • Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. • Hand wash basin taps with low flow rates of 4 litres or less. • Water butts for external use in properties with gardens. To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/ <p>Support - We are supportive of policies INF.1.1 INF.1.3, INF.1.4 INF.1.5 and INF.1.6 as methods to reduce the potential risk of sewer flooding due to heavy rainfall through reducing the volume of surface water entering the combined sewerage system. SuDS where appropriate may also help to providing wider amenity and biodiversity benefits to the communities where they are installed.</p> <p>INF.1.2 - It is advised that 5l/s is the practical minimum of surface water discharge, any proposals to reduce flows below 5l/s should consider the impact on blockage risk and ensure that flow controls contain sufficient blockage protection.</p>

Rep.No.	Name	Policy/Section	Representation
		INF.2	<p>INF.1.7 - We would also note that whilst we have no objection to the use of cut-off ditches to protect development from flood risk, these features would be classified as land drainage systems and cannot be connected to the sewerage system.</p> <p>Object - Policy INF.2 – We are supportive of INF.2.1, INF2.3, INF2.4 and INF2.5 and recommend that developers contact Severn Trent at the earliest opportunity to confirm sufficient capacity exists through completing hydraulic modelling. If hydraulic analysis returns showing insufficient capacity to accommodate growth it will be the responsibility of Severn Trent to provide capacity in line with our risk prioritisation protocol.</p> <p>INF.2.2 - Whilst we understand the reasoning for the proposed policy INF.2.2 this is not a statement that Severn Trent would be able to support due to the developer's rights to connect under Section 94 of the Water Industry Act (1991). We therefore object based on this sub-section only.</p>
ILM.26	Mrs M Smith	HG.1	<p>I wish to confirm that I consider HG.1.1 Site 1 Mable's Farm to be the ideal area for residential development. My opinion is it is better to widen the village rather than lengthen it. An ideal safe place for families to live. I also feel very strongly that properties should not be built on raised ground which I feel would spoil views of the village as people approach the area.</p> <p>I do not object to HG.1.2.</p> <p>I strongly object to HG.1.3. It is a dangerous road despite speed limits.</p>
		HG.2	Support - I do not object
		HG.3	Support - I have no objection to any of those policies
		HG.4	Support - Agree that would be a good idea .It would be a way of continuing with farming and all that is supplied locally
		HG.5	Object

Rep.No.	Name	Policy/Section	Representation
		DC.1	Support - It is very important to protect valued landscapes. In my opinion it would be land owners not being considerate to village dwellers
		DC.2	Object
		DC.3	Support
		DC.4	Support
		DC.5	Support - This I consider to be very important not to spoil the look of Ilmington as approached from all directions.
		DC.6	Support
		DC.7	Support
		HA.1	Support
		LGS.1	Support
		INF.1	Support
		NE.1	Support
		NE.2	Support
		NE.3	Support
		NE.4	Support
		NE.5	Support

Rep.No.	Name	Policy/Section	Representation
		NE.6	Support
		ETA.1	Support
		ETA.2	Support
		ETA.3	Support
		ETA.4	Support
		ETA.5	Support
		DP.1	Very important to observe all of these proposals never to back track on any of them
ILM.27	Sport England	General comment	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>http://www.sportengland.org/playingfieldspolicy</p>

Rep.No.	Name	Policy/Section	Representation
			<p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should</p>

Rep.No.	Name	Policy/Section	Representation
			<p>look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p>
ILM.28	Stratford Branch of Ramblers	DC.1 DC.2 DC.3	<p>Support - DC 1.5 f should include reference to footpaths.</p> <p>Support - Any application for planning permission should be required to identify any rights of way on the site, with detailed proposal if any change/diversion is contemplated.</p> <p>Support</p>

Rep.No.	Name	Policy/Section	Representation
		DC.4	Support - Should mention footpath network as well.
		DC.5	Support - Should include reference to footpaths as well.
		LGS.1	Support
		NE.1	Support
		NE.5	Support
		NE.6	Support
		ETA.5	Support
		DP.1	Support - The suggestion of the use of wooden kissing gates is not essential. More important is the lifetime of the gate, meaning metal would probably be better. I understand there is a stock of these gates available, if there is the manpower to install them.
ILM.29	Warwickshire County Council	General	<p>The County Council welcomes communities proposing neighbourhood Plans that shape and direct future development. The main responsibilities of the County Council are highways and public transport, education, social services, libraries and museums, recycling/ waste sites and environment. The County Council's role is to deliver the services and facilities efficiently.</p> <p>Financial implications of Parish Plans:</p> <p>We would like to state at the outset that the County Council cannot commit to any financial implications from any proposals emanating from Neighbourhood Plans. Therefore, Neighbourhood Plans should not identify capital or revenue schemes that rely of funding from the Council. However, we will assist communities in delivering infrastructure providing they receive any funding that may arise from S106 agreements, Community Infrastructure Levy or any other sources.</p>

Rep.No.	Name	Policy/Section	Representation
			<p>We have the following comments to make as a guide any amendments prior to formal submission of the Plan.</p> <p>Transport matters:</p> <p>The Council supports proposals for cycling and walking to be included in new developments. The County Council also suggests that projects such as car share schemes or car clubs be considered for further investigation in order to reduce car usage in the area.</p> <p>Our specific comments on the Plan are as follows:</p>
		DC.4	<p>Policy DC.4: Pedestrian Access to Amenities:</p> <p>We welcome that design considerations of connecting new housing with the existing footpath network.</p> <p>Any new developments will be subject to further consultation with Warwickshire County Council's to assess any impact to existing networks.</p>
		DC.7	<p>Policy DC.7: Local Parking Standards and Traffic Management:</p> <p>We welcome that cycle storage facilities would also be incorporated alongside parking provision in any new proposals.</p> <p>New developments will be required to meet parking standard contained in the Stratford-on-Avon District Council's Supplementary Planning Document: Vehicle Parking Standards and in Warwickshire County Council's Local Transport Plan (2011-2026).</p>
		ETA.5	<p>Policy ETA 5: Safe Walking and Cycling:</p> <p>The Council supports the ambition to create for safe walking and cycling for the parish area.</p>

Rep.No.	Name	Policy/Section	Representation
			<p>Public Health matters:</p> <p>Public Health Warwickshire are content that matters relating to health life styles have been incorporated into the proposed Neighbourhood Plan.</p> <p>More evidence and suggestions can be found in the Public Health Development Planning for Health. This document is attached.</p> <p>Flood Risk Matters:</p> <p>We have some minor suggestions and these are contained in appendix A [set out below].</p> <p>Community Infrastructure Levy monies (CIL):</p> <p>The Parish Council may receive CIL monies from the District Council. Should the Parish Council wish to spend any of the monies on highways or other environmental matters please contact us. Any works to or within Highway land will require further consents from the County Council. Further, should you wish the County Council to undertake any works please contact Mrs. Philippa Young in the first instance on E mail philippayoung@warwickshire.gov.uk</p> <p>Appendix A:</p> <p>DP.1 <i>Design Principles</i> - If this policy referred to Policy INF.1 Flooding within it, then that would remove the need for the individual references to be made to INF.1 in all of the policies mentioned below, as they already state that compliance with DP.1 is mandatory.</p> <p>HG.3 <i>Site 1</i> – Make reference to Policy INF.1 Flooding</p> <p>HG.5 <i>Site 2 and 3</i> – Make reference to Policy INF.1 Flooding</p>

Rep.No.	Name	Policy/Section	Representation
		DC.1	<i>Development within the Neighbourhood Area</i> – Make reference to Policy INF.1 Flooding.
		DC.3	<i>Infill within the Built-up Area Boundary</i> – Make reference to Policy INF.1 Flooding
		INF.1	<p><i>Flooding</i> – Currently the last sentence suggests that new development sites should discharge to less than 5 l/s, which might not be the case for all sites (depending on their size). Please amend the last sentence in INF1.2 to say that ‘Discharge rates lower than 5 litres per second can be achieved; 5 l/s is not the minimum possible rate’.</p> <p>A well written policy, which has taken our previous comments on board, a strong example for other NDPs.</p>
ILM.30	Richard John Shurey	HG.1	Support – I have lived in Ilmington for about 40 years. As a lover of the English and (of course) Ilmington countryside, I realise that the countryside cannot be fossilised and any new buildings should ‘blend in’ with the present houses.
		HG.2	Support – See answer to Policy HG.1.
		HG.3	Support – Point HG.3.4 – Parents taking children to school do cause bad congestion in Back Street (and danger).
		HG.4	Support – It would be good to see the continuation of a farming principle – good to see cows!!!
		HG.5	Support.
		DC.1	Support.
		DC.2	Support.
		DC.3	Support.

Rep.No.	Name	Policy/Section	Representation
		DC.4	Playing field attracts many people (especially children). Ensure a safe footpath route from the main village.
		DC.5	Support.
		DC.6	Support.
		DC.7	Encourage children (and parents) to use cycles for going to school. To ensure safety, pupils should receive good training and plenty of warning given to inform car drivers.
		HA.1	Support.
		LGS.1	Support.
		INF.1	I have little knowledge or experience of flooding.
		INF.2	Support.
		NE.1	Support.
		NE.2	Support.
		NE.3	Support – Keep as many grassy margins as is safe and feasible – they produce many beautiful wild flowers!
		NE.4	Ilmington has a very lengthy tradition of allotments and orchards – the lovely tapestry is so informative and evidence of this is the church one worked by Ilmington ladies.
		NE.5	Fortunately, no main road ‘visits’ Ilmington!
		NE.6	Support.

Rep.No.	Name	Policy/Section	Representation
		ETA.1	Some years ago, Ilmington had an entry in the Caravan Club book. It was so good to see visitor's caravans on the lovely playing field – we shared the beauty that is Ilmington. Sadly this was discontinued due to red tape – licence and insurance required, meaning added costs. All the campers wanted was nice grass and the use of a toilet – simple!!!
		ETA.2	Support.
		ETA.3	Support – see comments for Policy ETA.1.
		ETA.4	Support.
		ETA.4	Support.
		DP.1	Support.
ILM.31	Jane Neate	HG.1, HG.2, HG.3, HG.4, HG.5, DC.1, DC.2, DC.4, DC.5, DC.7, HA.1, LGS.1, INF.1, INF.2, NE.1, NE.3, NE.4, NE.5, NE.6, ETA.1, ETA.2, ETA.3, ETA.4, ETA.5, DP.1	Supports all these policies. No comments submitted to specify why.
ILM.32	Stratford-on-Avon District Council	Page 3, Table of Contents	Policy HG.3 – amend title to read “Site 1 – Land at Mabel’s Farm” for clarity.
		Page 3, Table of Contents	Policy HG.5 – amend title to read “Sites 2 and 3 – Land off Featherbed Lane and Land north of Armscote Road” for clarity.

Rep.No.	Name	Policy/Section	Representation
		Page 9, para 2.12	In the Reg.14 version NDP, there were three bullet points, not four as set out in the Reg.16 version. It appears that in making a minor amendment to (original) bullet point two, the bullet has been separated into two separate bullet points in error. There is no amendment to the text, so recommend bullet points 2 and 3 are joined to create one statement.
		Page 18, photo	At the bottom of the page is a photograph of St. Mary's Church, but the preceding paragraph refers to the former Church of St. Philips which is now used as the community shop. Has the wrong photo been inserted – should this be a photo of the community shop?
		Page 20, Policy HG.2	Since Reg.14, the following wording has been added to the policy: "...and if the development of Site 1 has been completed" in relation to the release of the proposed strategic reserve housing site. It is not clear why this is a requirement and SDC raise concern that this is not in general compliance with Policy CS.16 of the Core Strategy which outlines the specific circumstances in which reserve sites will be released. It appears this requirement conflates the issues of allocated sites and reserve sites and the purposes for each – you can't 'tie-in' a reserve site to the outcome of an allocated site, since they are for different purposes.
		Page 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 a conflict here? Additionally, it states that agricultural buildings are included in the definition of PDL, which they are not as they are classified as greenfield. This needs amending for accuracy and clarity.
		Page 22, Figure 6	Item 7 – "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. Should "unacceptable" be inserted between "cause" and "harm"?
		Page 22, Figure 6	Item 8 – "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.
		Page 22, Figure 6	

Rep.No.	Name	Policy/Section	Representation
		Page 24, Policy HG.3	Item 9 – “Does not cause harm to important views...” is too broad. Any development could cause harm to any of the landscapes listed but this does not mean it is unacceptable, since the test should be whether the harm is unacceptable. Therefore, recommend inserting “unacceptable” between “cause” and “harm” on the first line.
		Page 24, Policy HG.3	Add “Land at Mabel’s Farm” to the policy title, for clarity and consistency of approach.
		Page 27, para 6.1.12.6	Only the Mabel’s Farm site attracts a requirement for on-site affordable housing provision – seven affordable homes. It is not clear whether it has been established by the Parish Council whether any housing association will develop or 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. This point was mentioned by SDC at Reg.14 but does not appear to have been clarified by the PC.
		Page 29, Policy HG.5	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 exiting affordable stock will not meet this demand. In light of this information SDC consider the wording of this paragraph should be reviewed.
		Page 30, Policy DC.1	Add “Land off Featherbed Land and Land north of Armscote Road” to the policy title, for clarity and consistency of approach.
		Page 32, para 6.2.5	DC.1.4 – the proposed housing density is very low, even for a rural location. Would this constitute the best use of land?
			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 10 (excluding Conservation Area and BUAB statistics, for the reasons set out in the next point) it suggests the average density has been 17

Rep.No.	Name	Policy/Section	Representation
		<p data-bbox="600 309 819 373">Page 32, Figure 10</p> <p data-bbox="600 523 819 628">Page 34, Figure 11 – Village built-up area boundary</p>	<p data-bbox="842 272 2002 336">dwellings per Ha. Therefore, suggest the range should be changed to 16 to 20 dwellings per Ha in the Plan, as a minimum.</p> <p data-bbox="842 379 2033 555">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. It is unclear where the data has originated from and whether this is sufficient evidence to support policy DC.1.4.</p> <p data-bbox="842 667 2033 879">At the time of the Reg.16 consultation, the District Council’s Site Allocations Plan (SAP) was in draft form. The SAP included draft built-up area boundaries (BUABs) for all Local Service Villages except for those which had a village boundary designated through a ‘made’ Neighbourhood Plan. The draft SAP included a BUAB for Ilmington since the NDP had not reached Examination and had the potential to change. The BUAB set out at Figure 11 of the Reg.16 NDP was the same as the proposed BUAB at Figure 10 of the Reg.14 version NDP. SDC’s comments at Reg.14 were as follows:</p> <p data-bbox="842 919 2013 983">“There are 3 differences between the BUAB in the NDP and the draft BUAB promoted through the SAP:</p> <ul data-bbox="842 1027 1966 1129" style="list-style-type: none"> <li data-bbox="842 1027 1554 1059">• NDP includes Mabel’s Farm [to allow for re-development] <li data-bbox="842 1062 1966 1094">• NDP includes a greenfield site to northern edge of the village [to allow for re-development] <li data-bbox="842 1098 1789 1129">• NDP excludes an area of garden/amenity land to the north of Rowney’s Farm. <p data-bbox="842 1171 2024 1310">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 through the Plan, which was outside the scope of the SAP analysis. The proposed BUAB being promoted through the NDP seems sensible and defensible”.</p>

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			<p>Following the end of the Reg.16 consultation period on the Ilmington NDP, planning permission was granted for a single dwelling on land off Mickleton Road toward the northern end of the village, which SDC needed to take into account when producing the version of the BUAB to be included within the Proposed Submission Consultation version of the SAP which commenced its 6 week public consultation on 8th August this year. Due to the location and extent of the approved curtilage associated with the permission, SDC's version of the BUAB extended along the southern edge of Mickleton Road, thus enclosing a tract of greenfield land to the south of the application site.</p> <p>Following publication of the SAP, Ilmington Parish Council has issued a statement with their preferences moving forward and an alternative BUAB to that put forward through the SAP including the newly approved dwelling site but excluding the tract of land to the south of the application site. This has been achieved by excluding a small tract of land which would be classified as 'non-residential curtilage' which would comply with the methodology set out in the SAP when considering what land should be included or excluded from a village BUAB.</p> <p>Therefore, whilst the Parish Council has drawn up a possible alternative to SDC's interpretation of this recent planning permission, fundamentally, their interpretation complies with the methodology put forward by SDC through the SAP and would maintain a defensible and consistent position. As such, SDC has no concern over the alternative interpretation of the village BUAB suggested by the PC. The PC's statement is included as a separate, but associated document for consideration.</p> <p>Remove the 'apostrophe s' from 'Ilmington' to ensure the language is correct.</p> <p>Map appears to have been produced 'upside down'. It is confusing having this plan orientated south-north.</p> <p>DC.7.1 – The proposed parking ratio does not comply with the parking standards set out in the adopted Development Requirements SPD (part 'O'). Whilst the SPD does suggest that NDPs could</p>
		Page 35, para 6.2.8	
		Page 46, Figure 12	
		Page 42, Policy DC.7	
		Page 42, Policy DC.7	

Rep.No.	Name	Policy/Section	Representation
			set different standards, these would need to be justified. SDC are not convinced the evidence to deviate from the SPD is compelling.
		Page 42, Policy DC.7	DC.7.2 – The parking standards for visitor spaces are not in accordance with those set out in the adopted Development Requirements SPD (part ‘O’). Whilst the SPD does suggest that NDPs could set different standards, these would need to be justified. SDC are not convinced the evidence to deviate from the SPD is compelling.
		Page 42, Policy DC.7	Whilst DC.7.2 covers developments of 5 dwellings or more, it is not clear what standards would apply to developments of 4 or less dwellings. This appears to be a significant omission, given the likelihood is that the majority of development over the Plan period will be smaller scale in nature.
		Page 42, Policy DC.7	Would these be based on part ‘O’ of the SPD or other calculations that we are not aware of? DC.7.3 – does this point mean that parking to the front of a dwelling would be unacceptable? This appears to be punitive and unreasonable.
		Page 42, Policy DC.7	DC.7.4 – Since publication of the Reg.16 version NDP, the District Council’s Development Requirements SPD has been formally adopted. Therefore, to take account of this change in circumstances, suggest amending the second line to read “...in accordance with part ‘O’ of the adopted SDC Development Requirements...”.
		Page 42, Policy DC.7 – Reference Documents	DC.7.5 – Since publication of the Reg.16 version NDP, the District Council’s Development Requirements SPD has been formally adopted. Therefore, to take account of this change in circumstances, suggest amending the first line to read “...in accordance with part ‘R’ of the adopted SDC Development Requirements...”.
		Page 42, Policy DC.7 – Explanation	Third bullet point – amend to read “Parts O and R of SDC’s Development Requirements SPD adopted July 2019”.
		Page 48, Policy LGS.1	

Rep.No.	Name	Policy/Section	Representation
			<p>Para 6.2.18 – Amend beginning of second sentence to read “Part ‘O’ of the adopted SDC Development Requirements SPD...” to take account of the current situation following its adoption in July this year.</p> <p>SDC agree with all proposed LGS designations, except for LGS9 (Land and balancing pond 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. It is considered there is insufficient evidence to conclude that these small parcels of land are ‘demonstrably special’ to the community based on the paragraph 100 of the NPPF and as such LGS9 should be removed from the Policy.</p> <p>The final paragraph of the policy 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 and as such any reference to harm to openness should be removed.</p> <p>Reference to proposed site LGS9 should be removed from the map to comply with the assessment outlined, above.</p> <p>It is considered that the policy 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 etc.</p> <p>INF.1.5 – SDC consider this wording is more appropriately explanatory text, not policy.</p> <p>INF.1.9 – SDC consider this wording is more appropriately explanatory text, not policy.</p> <p>INF.2.5 – SDC are unconvinced the insistence upon separate drainage systems is appropriate, or acceptable as a policy.</p>
		Page 48, Policy LGS.1	
		Page 49, LGS Map	
		Page 51, Policy INF.1	
		Page 51, Policy INF.1	
		Page 51, Policy INF.1	
		Page 52, Policy INF.2	
		Page 54, Figure 19	
		Page 54 – Foul Water Drainage	

Rep.No.	Name	Policy/Section	Representation
		Page 57/58 – Policy NE.1, Explanation	<p>This map is very difficult to read and interpret at this scale. Is there any way it could be reproduced at a better/more appropriate scale, for clarity and ease of reference?</p> <p>Insert line space between paragraphs 6.5.8 and 6.5.9.</p>
		Page 60, Policy NE.2	<p>Several paragraphs of explanatory text refer to areas of semi-improved grassland, some of which are referred to by name. It would be beneficial for these to be supported by a map.</p>
		Page 63, Policy NE.3	<p>Since the Reg.14 version, the phrase “with an emphasis on” has been added in relation to encouraging biodiversity. SDC are concerned that this is an imprecise term for decision making and should be removed.</p>
		Page 65, Policy NE.4	<p>Paragraph NE.3.2 is impractical and cannot be insisted upon. As such, it should be deleted.</p>
		Page 68, Policy NE.5	<p>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. It is considered that the policy should 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.</p>
		Page 70, Policy NE.6	<p>Replace “be resisted” with “not be supported” for consistency of approach/language throughout the Plan.</p>
		Page 70, Policy NE.6	<p>Replace “be resisted” with “not be supported” for consistency of approach/language throughout the Plan.</p>
		Page 71, Figure 25	<p>Paragraph NE.6.1 – add “...appended to this Plan” to ensure readers realise they don’t have to look elsewhere for the Design Guide.</p>

Rep.No.	Name	Policy/Section	Representation
		Page 72, Policy ETA.2	Paragraph NE.6.3 – Remove “and period of illumination” as this is not within the influence of planning in general, or a NDP specifically.
		Page 72, Policy ETA.2	Could this map be produced at a larger scale in order to view the detail more clearly?
		Page 74, Policy ETA.4	Bullet point one – remove ‘d’ from the end of ‘Incorporated’ for consistency of language.
		Page 78, Policy DP.1	Bullet point two – this relates to work in the highway which would be outside the application site and land ownership.
		Page 78, Policy DP.1	Replace “be resisted” with “not be supported” for consistency of approach/language throughout the Plan.
		Page 78, Policy DP.1 – Reference Documents	This is a new policy inserted since Reg.14 consultation. At para DP.1.2.3, it is unclear what is meant by ‘important balance’ between open and built areas, or how this would be assessed.
		Page 82, Design Guide	It is unclear what is meant by ‘open character of the village’ and how any perceived compromise could be assessed. There is no reference to the adopted SDC Development Requirements SPD, which covers all aspects of design – is this an omission?
			Para 2.2.6 – Possibly a tradition of red tiles in the village which are now brown due to algae growth and pollution?