

## Alcester Neighbourhood Development Plan

### Regulation 16 Representations: By Contributor

Name	Policy/Section	Representation
Stratford-on-Avon District Council (SDC)	General comment	Formatting – More space should be made between the individual policies. Some of the policies include subheadings entitled higher level policies, whilst other policies do not include them. This makes the document generally more difficult to navigate and read. It is suggested that the higher level policies could be included in tabulated form within each chapter, providing a more consistent approach. Map 2 should include the Neighbourhood Plan boundary.
SDC	Page 6	Since Reg.14 the following paragraph has been included, stating ‘ Neighbourhood Development Plans were established under the Localism Act 2011 in order to give local people more say in the future of where they live’.
SDC	Page 7	Since Reg.14 consultation, paragraphs 1.2.2-1.2.5 have been inserted to provide a more detailed explanation of why (1) Arrow under Weethley parish, which covers partially covers south of Alcester and (2)Kinwarton, which forms an eastern part of Alcester town and has not been included in the Alcester NDP area. However, the Reg.14 SDC recommendation, stating ‘ Recommend that in the first paragraph, insert the words “a large proportion of” after “includes” as it needs to be acknowledged that a part of the town is actually within the parish of Kinwarton’ have not been carried forward into the Reg.16 version .
SDC	Page 8	Green Belt – The Plan generally does not appear to differentiate between Green Belt and non-Green Belt areas. As there are differences between the types of housing that might be acceptable, this issue really needs to be addressed.

Name	Policy/Section	Representation
SDC	Page 15 Policy HBE - Residential Development within the Built-Up Area Boundary	The policy refers to 'redeveloping existing underused buildings' however no explanation/criteria of what an underused building is. The policy should ensure that it doesn't conflict with policies requiring the retention of business/community use buildings.
SDC	Page 15 Local Need scheme	Potential Local Need scheme – Allimore Lane. The Town Council will be aware that initial discussions have taken place concerning a possible community-led housing scheme on land at Allimore Lane. If such a scheme is to include the provision of serviced plots for custom/self-build homes, as well as homes contributing towards meeting the need for identified in the 2017 Survey (referenced on page 15) then it may be preferable for the Plan to allocate land for such a scheme. Reg.16. version does not make any reference to the site.
SDC	Page 16 Affordable housing need	HBE1 states "Schemes for key worker housing will also be encouraged". On the face of it, this is at odds with the explanatory text to HBE2, which identifies a need for affordable housing but not specifically for key worker accommodation. The term 'key worker' is, in any case, not defined (whether in the Plan itself, the Core Strategy of the NPPF). Furthermore, no need for 'key worker' accommodation is identified in the 2017 Survey (only housing for rent or Shared Ownership sale from a housing association, or owner-occupation). I therefore recommend reference to key worker housing is deleted.
SDC	Page 16 Explanation - para 5.1.7	The submission version has not been amended, following officers' recommendation that the Core Strategy sets an indicative figure, rather than a requirement of about 530 homes. For the avoidance of doubt, it is recommended that the paragraph is amended to read as follows- The Core Strategy (see paragraph 6.2.22) refers to <u>a requirement an indicative target ....</u>
SDC	Page 18 Policy HBE2 - Local Housing Need	Reliability of affordable housing supply from "windfall" sites Because there are no site allocations/reservations proposed, additional housing supply (over and above existing commitments) will, by definition, be sourced from unallocated

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		<p>'windfall' development. Experience suggests that such sites are rarely likely to be large and (in particular) over the current 10-unit threshold for affordable housing provision. The potential contribution of such sites to affordable housing supply and consequently their ability to address the local needs referenced on page 17 is therefore likely to be very limited.</p> <p>Attention is also drawn to the fact that because there are no site allocations proposed, this may reduce the protection afforded by para. 14 of the NPPF (July 2018). However, the Council's draft Site Allocations DPD identifies two reserved housing sites, namely ALC.A South of Allimore Lane (west) and ALC.B South of Allimore (east). It has been estimated that the sites could accommodate 60 dwellings and 120 dwellings respectively. This would trigger the affordable housing requirement.</p>
SDC	Page 18 Policy HBE 2 - Local Housing Need	Ensure the definition of local connection is consistent with that currently used by the LPA
SDC	Page 18 Policy HBE3 - Housing Mix	Whilst it is noted that the reference to 10-unit threshold has been omitted in the Reg.16 version, it is considered that the proposed housing mix remains less flexible than the corresponding parts of Core Strategy Policy CS.19. Some justification needs to be provided for the variance from the Core Strategy approach.
SDC	Policy HBE3 - Housing Mix	It is unclear as to what the trigger is for housing mix, does it apply to developments of 10+ dwellings?
SDC	Page 19 Policy HBE5 - Specialist accommodation	<p>Policy has been amended as follows; Proposals for new specialist provision will be supported, provided the proposals meet other relevant policies, <del>particularly if they take into account local people with special needs of all ages, and not solely the elderly.</del></p> <p>However, whilst the plan notes that a need has been identified by WCC for Extra Care Housing, no reference is made to the former school site, Moorfield Road, which has been the subject of the long-running discussions regarding an Extra Care Housing scheme on this site.</p>

Name	Policy/Section	Representation
SDC	Page 19 Policy HBE4 - Bungalows	<p>This introduces a requirement for housing schemes of 10 or more homes to include at least 10% bungalows. Whilst the intent is laudable, I have the following main concerns:</p> <ul style="list-style-type: none"> <li>a. In practice, for the reasons discussed above, there are likely to be very few sites of 10 or more homes coming forward. So in reality the actual yield from this policy is likely to be very limited.</li> <li>b. There is no indication of prioritisation as between affordable and market housing.</li> <li>c. It could compromise the delivery of an Extra Care Housing scheme at Moorfield Road. There is arguably greater evidence of a need for Extra Care Housing than there is for bungalows.</li> </ul>
SDC	Page 20 Policy HBE 6 – Healthy Living	<p>The plan seeks to improve indoor air quality and overheating in new dwellings, the policy is not in accordance with the Core Strategy and Part R: Air Quality in the Council’s Development Requirements SPD. The requirements of Policy HBE6 are not supported by the local validation list as it stands at the moment. The Local List makes no mention of Indoor Air Quality or Overheating Risk performance at all. It requires air quality reports only from schemes which generate or are particularly sensitive to air quality. It does not particularly describe any assessment which the Council could demand from applicants and use for considering these matters.</p> <p>The policy requires that development should demonstrate how it has satisfied the criteria in the Healthy Placemaking, published by Design Council and Social Change UK. However, this document does not appear to contain any criteria set out criteria against which the Council could assess planning applications.</p> <p>The previous Council recommendation has not been taken forward into the Reg.16 version of the plan.</p>
SDC	Page 20 Policy HBE 6 - Healthy Living	This policy seems very prescriptive and will need to be fully justified.

Name	Policy/Section	Representation
SDC	Policy HBE 6 – Healthy Living	<p>Para.3 of the policy states “Development for 10 or more dwellings, including conversions, extensions....” The reference to extension is unclear, does this mean an extension to an existing building to create 10 or more dwellings?</p> <p>After Policy HBE6 it refers to Higher Level Policies (6.1.29-6.1.36); however these don’t appear to relate to policy HBE6. This text may need moving elsewhere in the document.</p>
SDC	Page 20-21 Higher policies	It is unclear how some of the higher policies outlined in paragraphs 1.42-36 relate to the policy topic.
SDC	Page 21 HBE 7 - Electric car charging points	<p>The policy has been amended to make provision for both residential and non-residential developments.</p> <p>However, Stratford-on-Avon District Council’s Development Requirements SPD (March 2018) sets out what is considered a more practical requirement for 1 electric vehicle charging point per dwelling with a garage or driveway and 1 charging point per 10 spaces of communal parking, and set out guidance about how the infrastructure is implemented. Please note that the Council’s Development Requirements SPD is no longer draft and has been adopted by the Council in July 2019.</p> <p>Furthermore, the Government is currently consulting on changes to the building regulations to ensure that every new residential property with an associated car parking space has an electric vehicle charge point. Existing and new non-residential buildings would also have to have electric vehicle chargepoint infrastructure.</p>
SDC	Page 21 HBE 7 - Electric car charging points	<p>Unlike most made NDPs, this emerging NDP has an explicit EVCP policy, separate to Renewable Energy (below) and this is to be encouraged.</p> <p>The requirement of 1 per dwelling and 1 per 10 spaces of commercial parking is broadly in accordance with ours: the later could perhaps be 10% of spaces rather than 1 in 10, so that medium sized schemes of less than 10 still have to accommodate at least 1.</p>

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		The wording of "permanently wired" could perhaps be re-jigged to be more flexible. There is also repetition of the word "dwelling" twice in the same sentence. Also needs to be consideration or a note in the explanation that a more flexible approach should also be sought for EVCPS on or in proximity of heritage assets, such as listed buildings on High Street.
SDC	Page 21 HBE8 - Renewable Energy	It would be helpful if the explanation includes a reference to the legislative drivers for renewable and low carbon energy technologies, such as the Climate Change Act 2008 and the UK Government's Clean Growth Strategy (2018).
SDC	Page 21 HBE8 - Renewable Energy	Rather than applying just to "development proposals relating to the production of renewable energy", this policy should instead be applied to all development proposals that should then seek to incorporate renewable elements (ground and air heat pumps, solar panels etc).
SDC	Page 22 Policy HBE 9 – Development Design	Policy has been amended to include the following wording which replicates the NPPF 'Changes to approved details in a permitted scheme such as a change in materials, will only be permitted if the overall quality of the development is not materially diminished'. It is recommended that the sentence is deleted as it does not represent added value.
SDC	Page 22 Policy HBE 9 – Development Design	First sentence is too broad and is poorly worded and could be improved grammatically. Wording closer to SDC's Core Strategy Policy CS.9 should be incorporated.
SDC	Page 22 Policy HBE10 - Responding to Local Character	This policy is too closely linked with the previous policy: the two should be merged. The values and bullet points for this policy are to be supported, but should all be merged with a re-worded HBE 9.
SDC	Page 22 Policy HBE10 - Responding to Local Character	The explanation might refer to SDC's new design guidance in Development Requirements SPD as para 6.1.47 does in Policy HBE 9.
SDC	Page 24 Policy HBE 11- Public Realm	Again, there are elements of this policy that could also be merged into one over-arching policy with the previous two.

Name	Policy/Section	Representation
SDC	Page 24 Policy HBE12 – Heritage Assets	Concerns remained that the policy conflicts with the Policy CS.20 which sets out a number of tests for the reuse of buildings in residential use. These include the need to demonstrate that residential use is the most suitable viable use for the building itself and the policy should reflect this.
SDC	Page 24 Policy HBE12 – Heritage Assets	<p>The wording of the first sentence needs tweaking, with repetition of “heritage asset” on 3 occasions: perhaps change the first one to “listed building”.</p> <p>The wording needs refining so that the definitions etc. are in accordance with national policy. For instance, there needs to be reference to whether matters of public benefit can outweigh any perceived “less than substantial harm” etc.</p> <p>The 3rd paragraph needs revising. To enshrine in policy development proposals that bring heritage assets back into use will be “strongly supported” is unbalanced and would threaten to overrun the actual design merits of a scheme, in addition to the other material planning considerations.</p> <p>There is a misspelling of “the” in the 4th paragraph.</p> <p>There should also be stronger emphasis on the need to include a heritage statement with any proposal impacting on a heritage assets and the importance of seeking pre-application advice prior to submission to preserve and protect.</p>
SDC	Page 28 Policy EC1 - Development in the Town Centre	<p>Paragraph 4 requires 12 months marketing- The Core Strategy asks for 6, so 12 months seems excessive.</p> <p>Paragraph 4 sentence doesn’t make sense here: ‘unsuccessful marketing for a range of possible uses.</p> <p>Paragraph 5- confusing wording by saying ‘above ground level’; might be better/clearer to say, at first floor and above.</p> <p>Paragraph 5- Should require marketing to show the upper floors are not viable in current use.</p>

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SDC	Page 28 Policy EC1 - Development in the Town Centre	Policy EC 1, 3rd para – it is unclear why it is necessary to demonstrate how a proposed change of use to an alternative form of business will enhance or support the vitality of the town centre and how this would be assessed. The NPPF stresses the need to be flexible about the types of commercial uses that are provided in town centres so that they can adapt and diversify.
SDC	Page 31 Policy EC3 - Supporting Business Start Up.	Since Reg.14 consultation, the policy wording has been expanded to include the following text; 'development proposals for new build or conversions providing live/work space will be supported where the amenity of the neighbouring properties is fully addressed'. It remains ambiguous whether the provision of home office space is intended to be a requirement or one of support. The explanation does not provide any supporting text to clarify this issue.
SDC	Page 31 Policy EC 3 – Supporting Business Start Up.	As worded the policy would support new build live-work units in open countryside, including in the Green Belt. This is contrary to Policy CS.22 (8th para) and also to the NPPF and Policy CS.10 regarding inappropriate development in the Green Belt.
SDC	Page 31 EC4 – Employment land change of use	3 <sup>rd</sup> para – this is also inconsistent with the Core Strategy in relation to new-build schemes outside the Built-Up Area Boundary. It should only be applicable to the conversion of an existing building – see Policy AS.10(e
SDC	Page 31 EC4 – Employment land change of use	Paragraph 2- again requires 12 months marketing Paragraph 3 not particularly clear
SDC	Page 31 EC4 – Employment land change of use	Paragraph 3- might want to add caveat of 'provided that they comply with other policies in the plan'
SDC	Page 39 Policy CLW 1 – Community and Leisure facilities development	The second policy principle in Policy CLW1 does not make sense and should be amended. It is unclear what is meant by 'sustainable' in this context.

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SDC	Page 42 Policy NE1 – Trees, hedges and landscape features	The policy refers to ‘significant or sensitive proposals’ but it is not clear what types of development are classified as ‘significant or sensitive’ for the interpretation of the policy.
SDC	Page 43 Policy NE2 – Biodiversity	The policy states that ‘existing ecological networks should be retained and enhanced’ this part of the policy does not make reference to mitigation or offsetting when development may have a negative impact on existing ecological networks.
SDC	Page 43 - Policy NE3 Local Green Spaces	<p>Since Reg.14 consultation, and following officers recommendation, no. 1 Local Green Spaces (Site 6- Oversley Wood) has removed from the list of LGS. LGS site 7- Crooks Lane Play Area has been subsequently added between Reg. 14 and Reg.16 stages, although this appears to be a renaming of Hopkins Precinct Play Area included in the Reg.14 version. The comments made during the Reg. 14. consultation are reiterated, ‘that whilst the District Council supports the need for an improved play space in this general area, a long term need has been identified to improve the area around Hopkins Precinct and the land to the rear. The District Council is committed to maintaining a play space within the vicinity, but due to the likely need to renovate and improve the wider area, it is recommended that the Local Green Space designation is removed from this specific location. This will provide flexibility in the location of a play area as part of any redevelopment as there is currently no guarantee that the site is capable of enduring during or beyond the end of the plan period.’</p> <p>The following 6 sites lie just outside of the Built-Up Area Boundary for Alcester and within designated green belt land. As such it is recommended that as a Local Green Space Designation essentially provides the same level of protection as green belt designation it is considered unnecessary to designate these sites as Local Green Space. Development proposals within the green belt are assessed against Core Strategy Policy CS.10:</p> <ul style="list-style-type: none"> <li>• Site 7: St Mary’s Park, Kinwarton</li> <li>• Site 9: Bleachfield Street Play Area</li> <li>• Site 12: Gas House Lane Recreation Ground (Centenary Field)</li> <li>• Site 14: Whitehall Farm Green Space</li> <li>• Site 15: Bleachfield Street North Allotments</li> </ul>

Name	Policy/Section	Representation
		<ul style="list-style-type: none"> <li data-bbox="927 261 1615 293">Site 16: Bleachfield Street South Allotments</li> </ul> <p data-bbox="824 325 2024 395">On the basis of the above 8 sites being removed as LGS designations then the remaining sites would need to be renumbered accordingly.</p>
SDC	Map 7 – Local Green Spaces	The LGS Site 9 – Collins Way Play Area has not been annotated on the Map 7. In light of the comments above, Map 7 may require renumbering as well.
SDC	Map 8	This doesn't show valued landscapes but does show viewpoints; the contents need to be clarified in the title or in a key.
SDC	Appendix 4: Flood Map	Ideally this should cover the entire NDP area. Also Flood Zone 3: areas benefitting from flood defences, and Flood storage area are both referred to in the key but aren't shown on the map.
Environment Agency	General Comment	<p data-bbox="824 683 2024 1040">The Neighbourhood Development Plan (NDP) should propose local policies to safeguard land at risk from fluvial flooding and the provision of sustainable management of surface water from both allocated and future windfall sites. The local policies should seek to enhance the policies in Stratford-on-Avon District Council's Core Strategy 2011 to 2031, in particular Policy CS.4 Water Environment and Flood Risk and Policy AS.2 Alcester. The plan area includes a number of watercourses including the River Arrow, which runs through the Town and River Alne which form part of the southern boundary. Both of these watercourses are designated as Main Rivers and have significant areas of floodplain associated with them, most of which is Flood Zone 3 (high probability). There are also smaller ordinary watercourses and any proposals that are considered during the Neighbourhood Plan process should take account of this.</p> <p data-bbox="824 1072 2024 1295">All proposals for new development must demonstrate that existing flood risk will not be increased elsewhere (downstream), ideally by managing surface water on site and limiting runoff to the greenfield rate or better. The use of sustainable drainage systems and permeable surfaces will be encouraged where appropriate. Consideration should also be given to the impact of new development on both existing and future flood risk. Where appropriate, development should include measures that mitigate and adapt to climate change.</p> <p data-bbox="824 1327 2024 1391">In line with National Planning Policy we would wish to see all new development, directed away from those areas at highest flood risk, i.e. towards Flood Zone 1. In addition all</p>

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		<p>new development, including infill development and small scale development, should incorporate sustainable drainage systems (SuDS) to reduce flood risk and manage surface water and to ensure that runoff does not increase the risk of flooding elsewhere. Planning applications for development within the NDP area must be accompanied by site-specific flood risk assessments in line with the requirements of national policy and advice. These should take account of the latest climate change allowances.</p> <p>In addition to the comments above, 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 6.4 (Community, Leisure and Well-being) and Section 6.5 (Natural Environment).</p> <p>The River Avon and River Alne within the NDP boundary is classified as having 'Moderate Ecological Status or Potential' and under the WFD there is a requirement for all waterbodies to meet 'Good Ecological Status or Potential' by 2027. The NDP should support the WFD to secure water quality improvements where possible and align with Stratford-on-Avon District Council's Core Strategy 2011 to 2031, in particular Policy CS.4 Water Environment and Flood Risk.</p>
Environment Agency	Para 4.1	<p>We strongly advise the following recommendations are included in the NDP: Para 4.1 could be strengthened to acknowledge the potential that new development may have to reduce existing flood risk.</p> <p>Para 4.1 could be strengthened to acknowledge the potential that new development may have to reduce existing flood risk.</p>
Environment Agency	Policy CLW2	<p><b>Policy CLW 2 – Enhancing access to and utilisation of open green spaces</b> – We support the policy to improve access to the River Arrow and River Alne corridors. Blue and green infrastructure could be referred to as this is key in managing and reducing flood risk</p>

Name	Policy/Section	Representation
Environment Agency	Policy CLW5	<b>Policy CLW 5 – Protecting against air, noise, water and light pollution</b> – this could be strengthened to include 'Development proposals should have regard to and support the actions and objectives of the Severn River Basin Management Plan (RBMP)'. Sustainable drainage measures should always be considered for the improvement of water quality, even if it is necessary for surface water attenuation.
Environment Agency	Paragraph 6.5.4	– The town is at risk of flooding from the Rivers Arrow and Alne, and whilst work has taken place since the flooding in 2007, there are also existing flood defences which were built around the 1960's which provide a standard of protection to the community. Reference to the existing flood defence should be made within the NDP and ideally referenced on a location map for clarity.
Environment Agency	Objective A	- this could be strengthened by including a requirement to retain and enhance river habitats and taking opportunities to improve connectivity through blue and green infrastructure, whilst also ensuring flood risk is not increased and where possible, reduced. Where possible opportunities should be taken to open up any existing culverts to reduce the associated flood risk and danger of collapse as well as enhancing biodiversity and green infrastructure.
Environment Agency	Objective B	Improve and maintain flood resilience - we would recommend expanding this objective to 'Reduce flood risk and improve and maintain flood resilience'
Environment Agency	Policy NE 6	<b>Policy NE 6 - Mitigating and preventing increased flood risk</b> Consideration should be given to the following measures to protect and enhance the river corridors of the River Arrow and River Alne and Ordinary Watercourses located in the NDP area. The existing flood risk management policy, Policy NE 6 could be strengthened and should consider the inclusion of the following mitigation measures; <input type="checkbox"/> Ensuring all new development is in Flood Zone 1. Only if there is no viable/available land in Flood Zone 1 should other areas be considered using the Sequential Test approach. Please note that any watercourse which does not have any flood extents associated with them, will require further work or modelling as part of detailed planning applications to ensure the development will be safe and not increase flood risk.

Name	Policy/Section	Representation
		<ul style="list-style-type: none"> <li><input type="checkbox"/> All developments should create space for water by restoring floodplains and contributing towards Blue and Green Infrastructure.</li> <li><input type="checkbox"/> Allocated sites should be highlighted and the flood risk associated with them identified.</li> <li><input type="checkbox"/> Opportunities to reduce flood risk elsewhere by allocating flood storage areas.</li> <li><input type="checkbox"/> Setting back development 8m from the watercourses to allow access for maintenance and restoring the natural floodplain. This includes existing culverted watercourses and flood defences.</li> <li><input type="checkbox"/> Ensure all SuDs features are located outside of the 1 in 100 year plus climate change flood extent.</li> <li><input type="checkbox"/> Open up culverted watercourses and remove unnecessary obstructions.</li> </ul> <p>All developments should seek to control and discharge all surface water runoff generated on site during the 1 in 100 year plus climate change rainfall event. For Greenfield development sites, the surface water runoff generated as a result of the development should not exceed the Greenfield runoff rate. For Brownfield development sites, developers are expected to deliver a substantial reduction in the existing runoff rate, and where possible, reduce the runoff to the equivalent Greenfield rate. We recommend that the wording for the second paragraph of Policy NE 6 is amended. Surface water discharge should not exceed the Greenfield runoff rate (as described above) and this does not usually require detailed hydraulic modelling to be carried out to determine the effects of this. We recommend that the third paragraph within 'Policy NE 6 – Mitigating and preventing increased flood risk' should be expanded to include 'must demonstrate that flood risk will not be increased elsewhere and where possible, reduces flood risk and ensures the development is appropriately flood resistant and resilient.' This policy should also be strengthened to include reference to the existing flood defences within the town and the requirement to ensure these are effectively maintained to ensure flood risk is managed appropriately.</p>
Environment Agency	Project 6	New footbridge over the River Arrow – this should include a bullet point to ensure the working group considers flood risk and how flood risk could be reduced and managed effectively as part of this project. The Environment Agency are also carrying out a Flood Risk Management scheme to improve the standard of protection of the existing flood defences within the town and this should be mentioned within the NDP. Further details are included below;

Name	Policy/Section	Representation
Environment Agency	Alcester Flood Risk Management Scheme	<p>The Environment Agency are developing a flood risk management scheme to reduce the risk of flooding to properties from the River Arrow and River Alne, which are both classified as Main Rivers, running through Alcester. The scheme is looking to improve the existing flood defences through the town, with a view to developing a consistent level of protection to the Town Centre. Any land which is required, or likely to be required, for a current or future Flood Risk Management Scheme should be safeguarded from future development as stated in paragraph 157 of the NPPF. Any new development which is behind the flood defences and therefore receiving a level of protection from flooding, will be required to provide a commuted sum towards the on-going maintenance of these flood defences. In addition, developers may be required to contribute towards the cost of the planned Flood Risk Management Scheme through S106 contributions or Community Infrastructure Levy charging schedules. Any new development upstream should also reduce surface water run off to less than the Greenfield run off rate. With this in mind, we recommend that the NDP considers including this within Policy NE 6 or add an additional policy to reflect this. The Environment Agency would welcome early conversations with any developments coming forward in this area and the promotion of this scheme within the NDP would be welcomed. We recommend that Warwickshire County Council as the Lead Local Flood Authority (LLFA) are consulted on this Plan. The LLFA are responsible for managing flood risk from local sources including ordinary watercourses, groundwater and surface water.</p>
Stansgate on behalf of Linfoot Country Homes Ltd	Objective A	<p>Object -</p> <p>Objective A seeks the provision of a range of housing types to meet the aspirations and needs of the whole community whilst protecting the town's character. This reflects the guidance in the Framework, particularly paragraph 61. However the policies of the NDP are too restrictive and do not allow these needs to be met.</p> <p>For example the NDP identifies a need for bungalows (paragraphs 6.1.17-6.1.20) and supports the provision of community led housing schemes, serviced plots for those wishing to build or commission their own housing and key worker housing (Policy HBE 1). The 2017 Housing Needs Survey also identified a need for local market housing to meet the needs of people with a local connection. Notwithstanding this the tight settlement boundary, landscape, Green Belt and heritage constraints restrict capacity within the settlement for new housing and no allocations are made. This means there is no opportunity for the needs of the whole community to be met.</p>

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		<p><b><i>The Plan must be amended to ensure the provision of housing to meet the needs of the whole community and to ensure that Objective A can be met. To do this it must:</i></b></p> <ul style="list-style-type: none"> <li><b><i>• Allocate land for development to meet local needs;</i></b></li> <li><b><i>• Allow the development of land both within and adjacent to the BUAB to meet local needs.</i></b></li> </ul>
Stansgate on behalf of Linfoot Country Homes Ltd	Policy HBE 2	<p>For Objective A to be met Policy HBE 2 must identify different forms of Local Needs Housing and then enable that provision. It must also be in general conformity with Policy AS.10 of the Core Strategy to meet the Basic Conditions. At present it fails to do either. Policy AS.10 of the Core Strategy supports small scale housing adjacent to a BUAB to meet identified local needs. The Development Management Considerations confirm that these schemes can comprise mixed tenure or solely affordable (social) units, according to the nature of the need identified.</p> <p>The Alcester Housing Needs Survey 2017 identifies a need for both local market and affordable housing, with a particular need for bungalows (25 bungalows in total). Policy HBE 2 only permits the development of affordable housing to meet local needs. It does not allow other forms of local housing need to be met and therefore fails to provide an adequate framework to meet Objective A and is in direct conflict with Policy AS.10 of the Core Strategy. The policy must be amended to ensure all local housing needs can be met.</p> <p><b><i>The policy should provide a clear definition for Local Needs Housing. This should include affordable housing (using the definition provided in the Framework) and local market housing (housing available at market prices where occupiers comply with a local connection test). Such housing should then be permitted within and adjacent to the BUAB.</i></b></p> <p><b><i>The following wording is suggested:</i></b>  <b><i>Policy HBE 2- Local Needs Housing</i></b>  <i>Local needs housing is defined as housing which meets the identified needs of a community. It includes both local market and affordable housing.</i>  <i>The development of Local Needs Housing will be supported on small sites beyond, but adjacent to, the Built-Up-Area Boundary where the following is demonstrated:</i></p>

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		<ul style="list-style-type: none"> <li>• <i>There is a proven and as yet unmet local need, having regard to the latest Housing Needs Survey or other similar assessment; and</i></li> <li>• <i>Secure arrangements exist to ensure the housing will remain available to meet the continuing needs of local people and in the case of affordable housing that it will remain affordable.</i></li> </ul> <p><i>Where viability for 100% local needs housing provision cannot be achieved, an element of general market housing may be included in schemes to provide sufficient cross-subsidy to facilitate the delivery of local needs homes. In such cases, promoters will be required to provide additional supporting evidence in the form of an open book development appraisal for the proposal containing inputs assessed and verified by a chartered surveyor.</i></p> <p><i>For the purpose of local needs housing, a local connection is defined as the following: (no change proposed)</i></p> <p>This matter was raised by Stansgate Planning during the Regulation 14 consultation exercise and the Alcester NDP Steering Group concluded a change was required. Some minor changes were made to the policy but they do not appear to reflect the Steering Group's intentions. This matter has been raised with the Town Council who, it is understood, may be looking again at the wording of the policy with a view to making its own response.</p>
Stansgate on behalf of Linfoot Country Homes Ltd	Policy HBE4-	<p>Policy HBE- Bungalows</p> <p>The 2017 Housing Needs Survey identifies a significant need for both affordable and market bungalows in Alcester and thus to achieve Objective A of the NDP a policy supporting their provision is necessary. Policy HBE 4 will not achieve the objective as there is no land available to meet the need the identified need:</p> <ul style="list-style-type: none"> <li>• <i>Two sites are shown as allocations in the Plan, both already benefiting from full planning permission. Those permissions provide for only two bungalows and therefore do not meet the identified need;</i></li> <li>• <i>No other sites are allocated and, as explained by Stratford District Council in their response to the Regulation 14 consultation, windfall sites providing more than 10 dwellings are unlikely.</i></li> </ul> <p>The policy requires bungalow provision only on sites providing 10 or more dwellings so it is unlikely any market bungalows will be achieved.</p>

Name	Policy/Section	Representation
		<p><b><i>The policy should be amended to support the provision of market bungalows to meet local needs on sites within and adjacent to the BUAB.</i></b></p>
<p>Stansgate on behalf of Linfoot Country Homes Ltd</p>	<p>General comment</p>	<p><b>Allocate Land for Development</b></p> <p>It is clear from the preceding assessment that it is not possible for all identified local housing needs to be met within the BUAB for Alcester.</p> <p>The Regulation 14 consultation draft of the Alcester NDP identified under Policy HBE1 that there are small parcels of land on either side of Allimore Lane which might lend themselves to future development. These are the only parcels of land on the edge of Alcester already excluded from the Green Belt.</p> <p>Stratford on Avon District Council responded to the Regulation 14 consultation on the matter of allocating land off Allimore Lane indicating that if a scheme were to include "... homes contributing towards meeting the need identified in the 2017 survey ... then it may be preferable for the Plan to allocate land for such a scheme." á</p> <p>This reflects the guidance in the Framework (paragraph 69) which requires neighbourhood planning groups to consider opportunities to allocate small and medium sites to meet housing needs of an area.</p> <p>Notwithstanding this, the comments put forward by Stansgate during the Regulation 14 consultation, and the recognition by the Town Council's Planning Consultant (noted in the Steering Group's response to Stansgate's comments) that the merits of the site being promoted off Allimore Lane should be considered by the Steering Group and the Town Council, the Steering Group concluded it would not allocate land for development in the Neighbourhood Plan. There is no justification provided for this conclusion</p> <p>The aims of Objective A can only realistically be met through the allocation of land and without that need being met the plan will fail to meet the housing needs of the community and thus fail the Basic Conditions. <b><i>The plan should be amended to allocate land for development.</i></b></p>

Name	Policy/Section	Representation
Stansgate on behalf of Linfoot Country Homes Ltd	Glossary	<p><b>Affordable Housing</b> – The definition of affordable housing in the Glossary does not reflect the latest definition in the Framework and should be amended accordingly (noting that the definition in the Core Strategy predates the current Framework and is thus out of date).</p> <p>This matter was raised by Stansgate Planning during the Regulation 14 consultation exercise and the Alcester NDP Steering Group concluded a change was required. Unfortunately that change was not made. Stansgate has since been in discussions with the Clerk to Alcester Town Council who has confirmed the error was accidental and has recommended a new definition. It is understood that the NDP Steering Group is submitting their own response to the consultation to identify this error which will propose new wording in line with the Framework. The draft seen by Stansgate on 25 June and attached herewith would be acceptable.</p> <p>Local Needs Housing – A definition of Local Needs Housing should be included in the Glossary to provide clarification to the Plan. The definition should be 'Housing which meets the identified needs of a community and where arrangements are in place to ensure it will be available to meet the continuing needs of local people. Local Needs Housing can be market or affordable'.</p>
Stansgate on behalf of Linfoot Country Homes Ltd	Allocate Land off Allimore Lane for Development	<p>In order to meet the development needs of Alcester additional land should be allocated for development. Linfoot Country Homes Ltd has an interest in the land outlined in red on the attached site location plan reference LCH-AL-01 and seeks the allocation of that land to meet local needs market and affordable housing, to include a significant proportion of bungalows. Attached is information relating to the site and assessing its suitability for allocation.</p> <p>Stratford on Avon District Council has commenced work on a Site Allocations Plan (SAP) and on 15 July 2019 is taking to Cabinet and then Full Council a draft Submission version with a view to formal consultation commencing in mid-August and submission to the Secretary of State before Christmas 2019. Three sites are proposed for allocation on the edges of Alcester.</p> <p>The emerging SAP proposes the allocation of the land in question for self-build or custom build purposes. This provides independent confirmation of the suitability of the site for development.</p>

Name	Policy/Section	Representation
		<p>Having undertaken further research it is however concluded that the site is not suitable for self-built or custom build purposes due to the high costs of infrastructure and archaeology. These costs would not prevent the development of the site by a single developer to meet the local needs identified in the 2017 Housing Needs Assessment and addressed above. See attached plan and associated documents.</p>
<p>Framptons on behalf of L&amp;Q Estates (formerly Gallagher Estates Ltd)</p>	<p>Policy HBE1</p>	<p>1. This submission is made on behalf of L&amp;Q Estates (formerly Gallagher Estates Ltd) in the context of the Alcester Neighbourhood Development Plan 2019 – submission Version (NP), and relates to land north and south of Allimore Lane, Alcester. A plan identifying the land to the north and south of Allimore Lane is attached at APPENDIX 1. It should be noted that the area of land located to southern extent of land south of Allimore Lane (SHLAA Site ALC15) is located within the Parish of Arrow and Weethley and therefore not included within the designated Neighbourhood Plan Area.</p> <p><b>2. Policy HBE 1 'Residential Development within the Built-up Area Boundary'</b> states that <i>"All areas outside of the Built-up-Area Boundary are classed as countryside. New housing in the countryside will only be supported in accordance with the criteria in paragraph 79 of the NPPF and Policies AS.10 and CS.10 of the Core Strategy"</i></p> <p>3. This policy does not allow for Reserve Housing Sites to come forward in accordance with Core Strategy Policies CS.15 and CS.16. The NP has failed to properly acknowledge the Site Allocations Plan which is currently in preparation to identify the Reserve Housing Sites.</p> <p>4. It is therefore recommended that an additional sentence is included within Policy HBE 1 to allow for the coming forward of Reserve Housing Sites, in the knowledge that these will be located outside of the Built-up Area Boundary but within the Neighbourhood Plan Area.</p> <p>5. The parcels of land on either side of Allimore Lane have been considered within the Strategic Housing Land Availability Assessment (SHLAA) 2019 and can be identified at site references: ALC12, ALC13, ALC15. L&amp;Q Estates submitted representations to the SHLAA consultation in September 2018 and confirmed that these three parcels of land should be considered as a whole and that they are suitable, available and deliverable within the plan period.</p>

Name	Policy/Section	Representation
		<p>See plan attached.</p> <p>6. The SHLAA 2019 concludes the following:  ALC12: Likely to be deliverable  ALC13: Likely to be deliverable  ALC15: Not Deliverable</p> <p>7. ALC15 is considered not deliverable because:   <i>"Scope to provide vehicular access through Parcels 12/13 and development north of Allimore Lane or off Evesham Street to south has not been resolved. Development would need to avoid flood risk area on northern part of site."</i></p> <p>8. The Stratford on Avon Site Allocations Plan (SAP) Proposed Submission Consultation Version has now been uploaded to the Council's website. The report is due to be reported to the Council's cabinet meeting on the 15th July.</p> <p>9. Policy SAP.1 states; <i>"Approximately 3,000 homes have been identified on the reserve housing sites listed in Annex 1"</i>. Annex 1 identifies sites ALC.12 and ALC.13 as reserve sites in the SAP Proposed Submission Consultation Version.</p> <p>10. L&amp;Q Estates are promoting ALC12, ALC13 and ALC15 as one site, therefore any ownership restraints can be overcome. With regards to access, access would be taken via ALC12 and ALC13 to the north and then to ALC15 as part of a later phase of development, therefore any access restraints can be overcome. L&amp;Q Estates confirm that there are no legal issues which would restrict the availability of land.</p> <p>11. ALC12, ALC13 and ALC15 should be considered in the context of the permissions to north of Allimore Lane. Development here provides the opportunity to strengthen and enhance the settlement edge by rounding off the settlement inside the A435. The extent of development at land south of Allimore Lane, Alcester would not result in the identity and or/integrity of the settlement being undermined as a result of the reduction in the gap with the adjacent settlement. The site is bound to the west by A435 which would act</p>

Name	Policy/Section	Representation
		<p>as an appropriate development boundary, as is already proven to the north of Allimore Lane.</p> <p>12. The Reserved Matters application for the land north of Allimore Lane (southern site) (17/01084/REM) is subject to a resolution to grant following the 13th March 2019 committee. This Reserved Matters submission makes provision for an access to Allimore Lane which in turn will facilitate access to the southern sites.</p> <p>13. The sites to the north of Allimore Lane have been permitted in the context of the Landscape Sensitivity Study, which shared the same conclusions for ALC12, ALC13 and ALC15.</p>
Framptons on behalf of L&Q Estates (formerly Gallagher Estates Ltd)	Policy HBE3	Policy HBE 3 'Housing Mix' is now in accordance with Core Strategy policy CS.19. Policy HBE 3 has now been amended to remove the fixed percentage mix and provide maximum percentages which align with Core Strategy policy CS.19.
Framptons on behalf of L&Q Estates (formerly Gallagher Estates Ltd)	Policy HBE4	<p>Policy HBE 4 'Bungalows' places a policy requirement on Developments of 10 or more units stating that they should include at least 10% bungalows. There is no evidence base for such a requirement on all developments of 10 or more dwellings.</p> <p>If bungalows are required for the elderly or for down-sizing then such a requirement could be incorporated as ground floor flats – this is an approach currently accepted by Officers at Stratford-on-Avon District Council and other housing and planning authorities around the country. The provision of ground floor flats rather than bungalows is also a much more efficient use of land. Bungalows by their nature require larger plots which then has a knock-on effect to the number of dwellings that can be delivered on each site. The 2015 SHMA does identify a need for bungalows within Stratford District, however the document makes a comment on the differing rental levels of a 2-bed flat and a 2-bed detached bungalow stating "Affordable Rented housing can therefore be considered to be similar to social rented housing but at a potentially higher rent. The 80% (maximum) rent is to be based on the open market rental value of the individual property and so it is not possible to say what this will actually mean in terms of cost (for example the rent for a two-bedroom flat is likely to be significantly different to a two-bedroom detached bungalow)". In these terms it appears that a detached bungalow may be more expensive</p>

Name	Policy/Section	Representation
		to rent than a 2-bed flat. Therefore, any ambiguous reference to 'bungalows' should be replaced by single storey ground floor dwellings.
Framptons on behalf of L&Q Estates (formerly Gallagher Estates Ltd)	Policy TI1	<p><b>Policy TI 1 'New Development and Connectivity'</b> includes requirements for developments of 10 or more units to provide direct connections to the existing network of public footpaths, cycleways and bridleways and rights of way with clear signposting and full accessibility for all users except where it can be clearly demonstrated to be physically impossible. There is also a requirement for developments to improve accessibility to existing routes, and any visual impact should be minimised through screening landscaping and planting. Further requirements also include that developments should seek to encourage a modal shift to reduce car journeys by integrating into existing footpaths, cycleways and bus routes which may require developers liaising with local public transport providers. Such development should also provide bike storage.</p> <p>It is considered that the requirements of Policy TI 1 are not in accordance with Core Strategy Policy CS.7 'Green Infrastructure' and Core Strategy Policy CS.26 'Transport and Communication'. The Submission Neighbourhood Plan does not include any reference to the adopted Core Strategy policies CS.7 and CS.26 within the supporting text.</p>
Framptons on behalf of L&Q Estates (formerly Gallagher Estates Ltd)	Policy NE.5	<p><b>Policy NE 5 'Protecting Valued Landscapes and Important Views'</b> states that <i>"Development proposals must demonstrate how they are appropriate to, and integrate with, the character of the landscape setting whilst conserving, and where appropriate, enhancing the character of the landscape including important landscape features"</i>.</p> <p>21) The Valued Landscape identified at VL4 (as shown on map 8), located along Allimore Lane is limited to and restricted to the eastern <i>"The view from the old railway bridge on Allimore Lane looking south east towards Oversley Wood"</i> (page 60) and therefore does not impact upon the allocated site to the north of Allimore Lane nor any potential forthcoming Site Allocation Plan sites to the north and south of Allimore Lane.</p>
Coal Authority	General Comment	No specific comments.
Gladman Development Limited	General Comments	Legal Requirements -Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in §8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic

Name	Policy/Section	Representation
		<p>conditions that the ANP must meet are as follows:</p> <p>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</p> <p>(d) The making of the order contributes to the achievement of sustainable development.</p> <p>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</p> <p>(g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.</p> <p>Revised National Planning Policy Framework</p> <p>On the 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy. §214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Submission of the ANP ultimately occurred after this date, and the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018 and corrected in February 2019.</p> <p><b>National Planning Policy Framework and Planning Practice Guidance</b></p> <p>On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF2018 consultation. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.</p> <p>The Revised Framework sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of neighbourhood plans within which locally-prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirm</p>

Name	Policy/Section	Representation
		<p>the Government’s commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that:</p> <p><b>“The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”</b></p> <p>Paragraph 14 further states that:</p> <p><b>“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:</b></p> <ul style="list-style-type: none"> <li><b>a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;</b></li> <li><b>b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement;</b></li> <li><b>c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five year supply requirement, including the appropriate buffer as set out in paragraph 73); and</b></li> <li><b>d. The local planning authority’s housing delivery was at least 45% of that required over the previous three years.”</b> <p>The Revised Framework also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed following the adoption of a Local Plan, then the neighbourhood planning</p> </li></ul>

Name	Policy/Section	Representation
		<p>body should request an indicative figure to plan taking into account the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.</p> <p>In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that they are compliant with the basic conditions and other legal requirements before they can come into force. If the Examiner identifies that the neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.</p> <p><b>Planning Practice Guidance</b></p> <p>Following the publication of the NPPF2018, the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans. Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and give consideration to the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan<sup>1</sup>. This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.</p> <p>It is important the neighbourhood plan sets out a positive approach to development in their area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement as a minimum. Furthermore, it is important that policies contained in</p>

Name	Policy/Section	Representation
		<p>the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward. Indeed, the PPG emphasises that;  “... All settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”</p> <p>Relationship to Local Plan  To meet the requirements of the Framework and Neighbourhood Plan Basic Conditions, neighbourhood plans should conform to the strategic policy requirements set out in the adopted Development Plan. That relevant to the preparation of the ANP is the Stratford-on-Avon District Core Strategy which, for now, consists of the Core Strategy DPD only. The Core Strategy determined that Stratford would be required to deliver 14,600 homes between 2011 and 2031.</p> <p>To meet the requirements of the Framework the Council is preparing the Site Allocations Plan and has recently consulted on the 2018 Draft SHLAA document. It is therefore important that the ANP provides flexibility to ensure that the policies contained in the ANP are not overridden upon the adoption of any future component of the development plan; as section 38(5) of the Planning and Compulsory Purchase Act 2004 states:  ‘if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).’</p>
Gladman Development Limited	HBE1	<p>This section highlights the key issue that Gladman would like to raise with regards to the content of the ANP as currently proposed. It is considered the requirements of national policy and guidance are not always reflected in the plan. Gladman have sought to recommend a modification to ensure compliance with basic conditions.</p> <p><b>Policy HBE 1: Residential Development within the Built-up Area Boundary</b></p>

Name	Policy/Section	Representation
		<p>Policy HBE.1 identifies a settlement boundary for Alcester and states that land outside of this defined area will be treated as countryside, where development will be carefully controlled. Gladman object to the use of settlement boundaries if these preclude otherwise sustainable development from coming forward. The Framework is clear that sustainable development should proceed. Use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a) and (d).</p> <p>As currently drafted, this is considered to be an overly restrictive approach and provides no flexibility to reflect the circumstances upon which the ANP is being prepared. Greater flexibility is required in this policy and Gladman suggest that additional sites adjacent to the settlement boundary should be considered as appropriate.</p> <p>Gladman recommend that the above policy is modified so that it allows for a degree of flexibility. The following wording is put forward for consideration:</p> <p>“When considering development proposals, the Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they provide:</p> <ul style="list-style-type: none"> <li>- New homes including market and affordable housing; or</li> <li>- Opportunities for new business facilities through new or expanded premises; or</li> <li>- Infrastructure to ensure the continued vitality and viability of the neighbourhood area.</li> </ul> <p>Development adjacent to the existing settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”</p> <p>Indeed, this approach was taken in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner’s Report states:</p> <p><b>Policy GMC1 should be modified to state that “Development ...shall be focused within or adjoining the settlement boundary as identified in the plan.” It should be made clear that any new development should be either infill or of a minor or</b></p>

Name	Policy/Section	Representation
		<p><b>moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan."</b></p>
Gladman Development Limited	Policy HBE 12	<p>Policy HBE 12- Heritage Assets</p> <p>As written, Policy HBE 12 takes the line that development "affecting a heritage asset or within the setting of a heritage asset", will only be supported if it conserves or enhances the Conservation Area or heritage asset. Policy HBE 12 does not contain reference to the heritage balancing exercise as required by the NPPF 2019 at Paragraph 193. Regard should also be had to NPPF paragraph 197, which states:</p> <p>"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."</p> <p>Policy HBE 12 states that the policy "will be applied to applications affecting both designated and non-designated heritage assets and their settings", where development will be subject to more onerous conditions. Clearly, for non-designated heritage assets, there are separate balancing exercises to be undertaken in terms of their significance. It should be noted that the list of heritage assets are not all listed buildings, nor are all recorded ostensible assets within a conservation area.</p> <p>The setting of heritage assets is discussed at NPPF paragraphs 189 and 190, whilst definitions are provided in the NPPF Glossary. Here, the NPPF states that the Setting of a Heritage Asset "is not fixed and may change as the asset and its surroundings evolve". Clearly, the approach in the ANP does not have regard to national policies as outlined above and is therefore in conflict with basic condition (a).</p>

Name	Policy/Section	Representation
Gladman Development Limited	Policy NE5	<p>Policy NE 5 – Protecting Valued Landscapes and Important Views</p> <p>This policy identifies 4 valued landscapes which the plan makers consider are important for the setting and character of Alcester. The policy goes onto state that development proposals must ensure that the vistas and skylines therein are maintained and safeguarded.</p> <p>Identified views must be supported by evidence and ensure that they demonstrate a physical attribute elevating a view’s importance beyond simply being a nice view of open countryside. The evidence base to support the policy does little to indicate why these vistas are important and why they should be protected, other than providing a view of the surrounding fields and woodland. It therefore lacks the proportionate and robust evidence required by the PPG.</p> <p>The NPPF (2019) makes clear at Paragraph 170 that only <i>valued</i> landscapes should be ‘protected and enhanced’:</p> <p><b>“170. Planning policies and decisions should contribute to and enhance the natural and local environment by:</b></p> <p><b>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);”</b></p> <p>Countryside should not simply be protected for its own sake. We consider that for a landscape to be identified for protection there should be a demonstrable physical attribute that elevates its importance out of the ordinary, whereas simply seeking to protect views of open countryside is not justified. Gladman therefore suggests this element of the policy is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to paragraph 16(d) of the Framework.</p> <p><b>Conclusions</b></p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the ANP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.</p> <p>Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>

Name	Policy/Section	Representation
		<p>Paul Emms Gladman Developments Ltd</p>
Highways England	General Comment	<p>Support -Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. The SRN within the Alcester Neighbourhood Plan area comprises the A46 Trunk Road which passes through the south section of the Plan area.</p> <p>We recognise that the ANDP considers the need to conform to the policies set out within the adopted Stratford-on-Avon Local Plan Core Strategy, and that the ANDP therefore considers key development allocations including housing and employment. We support the continued commitment to sustainable development contained within the ANDP, noting that Stratford-on-Avon's Core Strategy requires Alcester to accommodate 350 new homes as well as 11 hectares of key employment developments; with a potential to generate traffic levels that will have implications for the A46.</p> <p>In 2014, planning permission was approved on appeal for Core Strategy Proposals ALC.1 and ALC.2 (North of Allimore Lane) - forming two halves to the same residential development equating to 350 dwellings - which is listed as part of the ANDP. These</p>

Name	Policy/Section	Representation
		<p>allocated sites were noted as being at Reserved Matters stage in March 2019, therefore technical work to measure the transport implications of these sites has already been undertaken. Furthermore, a third site allocation (ALC.3 Land North of Arden Road) which was included within the Stratford Core Strategy for 11-hectare expansion to the existing industrial estate employment was granted outline planning permission in July 2017, and therefore has not been considered as part of the ANDP.</p> <p>As there are no further housing or employment allocations listed within the ANDP, we are content that the Alcester NDP is consistent in its recognition of the Adopted Stratford-upon-Avon Core Strategy policies, and that there are no further potential implications arising from the ANDP for the SRN.</p>
Historic England	Vision and Objectives	<p>Our earlier Regulation 14 comments remain entirely relevant. That is:          “The emphasis on the conservation of local distinctiveness through good design and the protection of heritage assets (designated and undesignated) including through submission for inclusion in Stratford Councils Local List is to be applauded. Policies to conserve landscape character including green spaces and important views are equally supported”.          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 Town and that the Plan constitutes a very good example of community led planning.</p>
National Grid	General Comment	<p>Specific comment –          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.          National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area. Electricity Distribution          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: <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a>          Appendices - National Grid Assets          Please find attached in:          • Appendix 1 provides a map of the National Grid network across the UK.          See attached</p>

Name	Policy/Section	Representation
Warwickshire County Council	General Comment	<p>Specific Comment-</p> <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><b>Financial implications of Parish Plans</b></p> <p>We would like to state at 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. We ask the Public Examiner to note this comment during the Public examination.</p> <p>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> <p>We have the following comments to make as a guide; Flood Risk Matters We have some minor suggestions and these are contained in appendix A.</p> <p>Should you wish to discuss or require any of the above matters please contact me?</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</p>

Name	Policy/Section	Representation
		please contact Mrs. Philippa Young in the first instance on E mail philippayoung@warwickshire.gov.uk
Warwickshire County Council	Policy HBE1	Explanation – page 15 - The two allocated housing sites (ALC1 and ALC2) are both classed as major developments therefore, the LLFA will be consultees on any planning applications that will be submitted, and will require a site specific Flood Risk Assessment to be submitted as part of the application.
Warwickshire County Council	Policy CLW2	Explanation – page 39/40 - We support the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water Above ground SuDS could be utilised in open spaces. You could also encourage new developments to open up any existing culverts, providing more open spaces/green infrastructure for greater amenity, biodiversity and reduced flood risk; and the creation of new culverts should be kept to a minimum.
Warwickshire County Council	Policy NE6 Mitigating and preventing the increase in flood risk	<p><i>"Development proposals involving the discharge of surface water into the River Arrow will not be supported unless it can be demonstrated by means of approved comprehensive digital modelling techniques that the proposal will not increase the risk of flooding to properties in the Neighbourhood Area."</i> – The SuDS hierarchy (as referred to in point 6.5.45) states that the first preference is to connect into a waterbody, such as the River Arrow; therefore this should be supported, rather than a connection into a combined system. The LLFA and the Environment Agency review applications to ensure flood risk is not increased, therefore we would recommend that you consider re-writing this point to reflect this.</p> <p>You could include the following: - Discharge rates should be set to control run off at greenfield rates for a 1 in 100 year event, plus an allowance for climate change. You could suggest a 40% allowance as stated in our Standing Advice document (which can be found online at <a href="https://apps.warwickshire.gov.uk/api/documents/WCCC1039-73">https://apps.warwickshire.gov.uk/api/documents/WCCC1039-73</a>), which was written in line with the Environment Agency's update dated February 2016. - Please be aware that 5 l/s is NOT the minimum possible discharge rate achievable. In relation to this, the requirements set out in the following documents should also be adhered to in all cases:</p> <ul style="list-style-type: none"> <li>• The National Planning Policy Framework</li> <li>• Paragraphs 030 - 032 of the Planning Practice Guidance (PPG)</li> <li>• DEFRA's Non-statutory technical standards for sustainable drainage</li> </ul> <p>- On smaller development sites where the discharge rate is below 5 l/s, these rates are achievable through water reuse, protected orifices, and better design.</p>

Name	Policy/Section	Representation
		<p>- SuDS features should be at the surface and adequate treatment of flows should be provided to ensure that final flows leaving the site do not degrade the quality of accepting water bodies. Flood attenuation areas must be located outside of flood zones and surface water outlines to ensure that the full capacity is retained. You could include a point that the Lead Local Flood Authority requires SuDS to be designed in accordance with CIRIA 753 SUDS Manual. - The adoption and maintenance of all drainage features is a key consideration to ensure the long term operation and efficiency of SuDS. As part of the planning procedure the LLFA will expect to see a maintenance schedule, at detailed design stages. All SuDS features should be monitored and cleaned regularly as a matter of importance.</p>
Warwickshire County Council	Project 3	<p>Additional car parking - The document suggests that new car parks might be developed at some stage. Depending on the size and type of drainage, there is an opportunity to introduce SuDS and adequate treatment for flows, to ensure that discharge/run off flows leaving the car park site do not degrade the quality of accepting water bodies, providing greater amenity.</p>
Natural England	General	<p>No comments - However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. – see attached</p>
Sports England	General	<p>Specific Comment -  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 <b>assessments of need and strategies for indoor and outdoor sports facilities</b>. 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>

Name	Policy/Section	Representation
		<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.  <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If <b>new or improved sports facilities</b> are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.  <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any <b>new housing</b> 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 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 <b>any new development</b>, 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</p>

Name	Policy/Section	Representation
		<p>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: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>
Severn Trent Water	Policy NE.9	<p>Mitigating and preventing increased flood risk- We are supportive of your policy and recognise that one of the potential causes of flooding is from sewers. As sources of flooding have the potential to interact we are supportive of paragraph 6.5.45 relating to the SuDS hierarchy and would emphasise that surface water should be managed sustainably from new developments.</p> <p>With regards to the policy that states '<i>Development proposals involving the discharge of surface water into the River Arrow will not be supported unless it can be demonstrated by means of approved comprehensive digital modelling techniques that the proposal will not increase the risk of flooding to properties in the Neighbourhood Area</i>', we are supportive and recognise the need to work with the LLFA where such matters arise.</p> <p>We would however be cautious of the potential impact such discharge restrictions may have if the only remaining solution is to connect into the foul/combined sewer, which could significantly increase the risk of sewer flooding.</p> <p>We are therefore supportive of the policy wording which states '<i>All developments will be expected to include sustainable drainage systems and permeable surfaces. Where site conditions are proven to be unsuitable an alternative drainage solution will need to be agreed with the local planning authority and water authority.</i>'</p>

Name	Policy/Section	Representation
		<p>We have previously undertaken hydraulic modelling on the site allocations ALC.1 and ALC.2 to understand the impact to the sewerage network. The modelling study returned a low risk score of flooding and pollution as a result of these developments combined.</p>
Severn Trent Water	General Comment	<p>Specific comments For your information we have set out some general guidelines that may be useful to you.</p> <p>Position Statement  As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p> <p>Sewage Strategy  Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.</p> <p>Surface Water and Sewer Flooding  We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.</p>

Name	Policy/Section	Representation
		<p>We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.</p> <p>To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website <a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</a></p> <p><b>Water Quality</b></p> <p>Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p><b>Water Supply</b></p> <p>When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p><b>Water Efficiency</b></p> <p>Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. 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"> <li>• Single flush siphon toilet cistern and those with a flush volume of 4 litres.</li> </ul>

Name	Policy/Section	Representation
		<ul style="list-style-type: none"> <li>• Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</li> <li>• Hand wash basin taps with low flow rates of 4 litres or less.</li> <li>• Water butts for external use in properties with gardens.</li> </ul> <p>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 <a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</a></p> <p>We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p>
Canal and Rivers Trust	General	The plan area is not within close proximity to our network and therefore the Canal & River Trust have <b>no comments</b> to make.
Dr Nicholson	Policy HBE1	Support
Dr Nicholson	Policy HBE2	Support
Dr Nicholson	Policy HBE3	Support
Dr Nicholson	Policy HBE4	Support
Dr Nicholson	Policy HBE5	Support
Dr Nicholson	Policy HBE6	Support
Dr Nicholson	Policy HBE7	Support
Dr Nicholson	Policy HBE8	Support
Dr Nicholson	Policy HBE9	Support
Dr Nicholson	Policy HBE10	Support
Dr Nicholson	Policy HBE11	Support
Dr Nicholson	Policy HBE12	Support
Dr Nicholson	Policy EC1	Support
Dr Nicholson	Policy EC2	Support
Dr Nicholson	Policy EC3	Support
Dr Nicholson	Policy EC4	Support
Dr Nicholson	Policy EC5	Support
Dr Nicholson	Policy EC6	Support
Dr Nicholson	Policy EC7	Support

Name	Policy/Section	Representation
Dr Nicholson	Policy EC8	Support
Dr Nicholson	Policy EC8	Whilst the Alcester area does not have any of the canals or navigable rivers which are our main area of interest, we are keen to support robust neighbourhood plans which help to protect the individuality of the area and guard against poor and unwarranted development. The River Arrow and the River Alne are useable by canoes and small (unpowered) craft and some provision for access would be welcomed.
Dr Nicholson	Policy TI1	Support
Dr Nicholson	Policy TI2	Support
Dr Nicholson	Policy TI3	Support
Dr Nicholson	Policy CLW1	Support
Dr Nicholson	Policy CLW2	Support
Dr Nicholson	Policy CLW3	Support
Dr Nicholson	Policy CLW4	Support
Dr Nicholson	Policy CLW5	Support
Dr Nicholson	Policy NE1	Support
Dr Nicholson	Policy NE2	Support
Dr Nicholson	Policy NE3	Support
Dr Nicholson	Policy NE4	Support
Dr Nicholson	Policy NE5	Support
Dr Nicholson	Policy NE6	Support
Stansgate	Policy NE3	Object - With regard to the site constraints in the site assessment for LGS17, these are incorrect as the site does not lie within the built-up area boundary as shown on the Alcester inset plan in the District Council's adopted Core Strategy. Nor does it lie within an Area of Restraint. With regard to the ecological significance, the site does not lie adjacent to the River Arrow. The ecological value claimed is therefore based upon the wrong premise. In any event, there is no objective evidence that the site provides the benefits claimed, which are more generalized comments on the benefits of protecting all flora, fauna, the food chain and ecosystems. There is no dispute regarding the many benefits of allotments and there is no disagreement that well-used allotments should be protected from development that does not meet, in this District, policy CS.25. However, it remains that the "special qualities and local significance" claimed for this site relate to their use as allotments and are thus protected by adopted policy CS.25. In fact, this policy protection is strengthened by the fact that allotments in Alcester are so popular and so well-used. The allotments are barely visible from the footpath running along

Name	Policy/Section	Representation
		<p>Allimore Lane and over the A435 and so it is difficult to see what "strong contribution" these allotments make to "local character and distinctiveness". As a result of their location, these allotments are not of particular significance with regards to "natural beauty". In any event the character of this area will change quite significantly with the major residential development on land to the north of these allotments. National planning policy guidance advises that if land is already protected, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space. This is in paragraph 011 Reference ID:37-011-20140306. Turning to site LGS15, this site lies within the Green Belt, where national planning policy guidance advises that "consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space". This is in paragraph 010 Reference ID: 37-010-20140306. There is no objective evidence that this site itself contributes to ecological significance. Instead there are general comments about the value of orchard trees for the Nobel Chafer and the value of protecting all flora, fauna, the food chain and ecosystems. As with LGS17, it remains that the "special qualities and local significance" claimed for this site relate to their use as allotments and are thus protected by adopted policy CS.25. In fact, this policy protection is strengthened by the fact that allotments in Alcester are so popular and so well-used. The value of this site to the wider undeveloped land on this southern edge of the town is limited by its position tucked in between residential development on three sides. The objection raised in my letters of 16 November and 19 October still stand.</p>
Colleen Chester	Policy HBE1	Object -There is no clear explanation as why 'key worker ' provision is a higher priority to other sector needs. No sites have been identified as potential sites and therefore this policy is too vague.
Colleen Chester	Policy HBE2	Object - The premise that development beyond the built up area of the town is welcomed is not acceptable when there is a large site within the built up area of the Town which remains still remains vacant I.e the former Alcester primary school site at Moorfields. This site should be the first priority for development to meet the towns housing needs rather than permit creeping ad hoc development beyond the built up area.
Colleen Chester	Policy HBE3	Support - Is this policy referring to ALC1?. If it is not then it is unclear where these aspirational housing mix figures are to be achieved as no sites are identified.
Colleen Chester	Policy HBE4	Object - There needs to be more evidence of what 'strongly supported' means and is this of a greater priority for provision than affordable housing? Would such provision be better supplied within a specialist housing scheme?

<b>Name</b>	<b>Policy/Section</b>	<b>Representation</b>
Colleen Chester	Policy HBE5	Object - This policy is too vague. Is there a site identified for this provision?
Colleen Chester	Policy HBE6, 7,8,9, 10, 11	Support
Colleen Chester	Policy HBE12	Support - It is important to ensure that development proposals are sensitive to and bring additionally to heritage sites and buildings.
Colleen Chester	Policy EC1	Support - Support this policy subject to the loss of parking within the town centre. Such parking areas must not be reduced and alternative parking location outside the built up area of the town then being deemed justifiable.
Colleen Chester	Policy EC2	Support
Colleen Chester	Policy EC3	Support - Support this policy so long as it is within the built up area of the town.
Colleen Chester	Policy EC4	Object- the opportunity for such mixed schemes is very limited within the built-up area of the town and therefore unlikely to be achieved. Such schemes outside the built up area must not be permitted.
Colleen Chester	Policy EC5	Object - Retail development other than within the town centre must be resisted in order to ensure the future viability and vibrancy of the centre. Otherwise the High Street will follow those of many market towns- vacant premises that become derelict, a string of charity and discount stores, and the loss of the specialty stores that make Alcester a popular destination for shopping.
Colleen Chester	Policy EC6	Support - Support the premise but this is a very vague policy.
Colleen Chester	Policy EC7	Support
Colleen Chester	Policy EC8	Object - The real opportunity for the development of new visitor attraction space within the built up area of the town is limited and therefore the need to make provision to support this is not required. The reference to Alcester Abbey and Beauchamp Court does not contain any detail as to why these areas are of specific significance and therefore merit support.
Colleen Chester	Policy T1, 2 and 3	Support
Colleen Chester	Policy CLW1	Support - Policy supported on the basis that any development proposal that offers leisure facility provision as a planning gain tool are robustly challenged to ensure that the leisure provision offered is relevant to the towns needs and commensurate to the value of the planning permission sought.
Colleen Chester	Policy CLW2	Support - Support this policy provided that this does not then open up the requirement for parking provision to be made as this would be detrimental to the quality of the green spaces that are being accessed.
Colleen Chester	Policy CLW3	Support

Name	Policy/Section	Representation
		Support - Provided that alternative allotments that are provided are of at least the same quality of land to that lost to development.
Colleen Chester	Policies CLW5, NE 1 & NE2	Support
Colleen Chester	Policy NE3	Support - Though some of these sites are also protected due to their location within the greenbelt, the additional protection this designation will afford these sites is important and should be supported.
Colleen Chester	Policy NE4	Support - The towns' river and water courses are not just important from an aesthetic view but they serve an important role in the natural management of storm water runoff.
Colleen Chester	Policy NE4	Support - The policy to ensure that key approaches to the town are protected to ensure that the heritage and identity of the town is not adversely affected by inappropriate development is strongly supported. The designation of Valued landscapes VL1-4 requires explanation as to why these sites have been selected.
Colleen Chester	Policy NE5	Support - Having lived through two floods in the town both of which affected my property, I naturally endorse this policy. It is vital that such flood assessment studies are rigorously tested prior to any development being given the go ahead. The clear assessment of the impact of development has on other areas in the town is essential.