

Bishops Itchington Neighbourhood Development Plan

Pre-submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General) Regulations, 2012)

Appendix 1 – Significant comments from Stratford-on-Avon District Council

Suggested new text underlined deleted text ~~struckthrough~~

Page number	Section	Comment
Policies map	Allotments	Consideration could be given to the existing allotments as shown on the map and whether they need to be marginally expanded as not all allotments have been taken.
Page 13	Paragraph 4.6	Work has commenced on a joint South Warwickshire Local Plan. This should be updated and reference made to the 'South Warwickshire Local Plan' rather than Core Strategy. An up to date link should also be included which is: The South Warwickshire Local Plan Stratford-on-Avon District Council
Page 15	Policy BINDP1	This policy is very long and complicated. Firstly, it would appear to be two policies combined. The first three paragraphs deal with the principle of new development and the remainder of the policy deals with design matters. The design element should be a separate stand-alone policy within the 'Built Environment' section of the Plan. However, the design elements are too extensive for a workable policy. It includes a range of different topic areas which in themselves could be separate policies (i.e. design principles; environment/biodiversity; natural environment; green and built infrastructure, carbon emissions etc...). The policy should be split into appropriate components and the design principle policy re-drafted. Criterion (a) refers to 'existing good quality examples of street layouts. It would be useful to explain where these have come from, what the existing examples are and what the evidence base is that is being referred to. It is too vague in its current form. Reference is also made to the 'historic core' of the village, however Bishops Itchington does not have a Conservation Area. It would be useful to explain where the historic core is, confirm whether it has been mapped and provide an explanation of how the parameters have been assessed/created clarifying the evidence base for this.

		Criterion (s) may not be applicable in the majority of cases and there is a concern over how this can be insisted upon.
Page 15	Policy BINDP1, criteria (q)	Reference is made to space for off road/pavement storage of refuse and recycling bins". This would not be supported as bin storage space on pavements is an unsafe obstruction being caused to pedestrians/users of the footway. Bin storage should be in designated areas, generally within the curtilage of the plot. It is suggested that the word "pavement" is removed. Delete 'pavement'.
Page 17	Policy BINDP1, Figure 4, map of the Built up Area Boundary	This map is not the most up-to-date. The 2020 version has removed the hardstanding associated with the recreation ground from the BUAB.
Page 18	Policy BINDP1, Justification/background	In order to make it clear it would be appropriate to explain the situation with reserve housing sites that are being identified in the SAP, particularly as there are two sites on the edge of the village outside the BUAB in the SAP Preferred Options.
Page 19	Policy BINDP1, Para 5.7	It is noted that the community survey identified a preference for development sites under 11 dwellings. There are unlikely to be many (if any) 'windfall' sites greater than this size within the BUAB. Smaller sites are unlikely to trigger an affordable housing requirement and therefore is an identified need for affordable housing is to be met, this will more than likely mean that these homes would more than likely need to be met on a site outside of the BUAB.
Pages 19-20	Policy BINDP1, Table 2, Recent Development and Planning Approvals	The figures for the old cement works site in Table 2, page 20 are incorrect. It is understood that the correct figures are as follows: 13/03177/OUT, 16/03142/REM 16/03781/VARY - 200 homes of which 38 affordable, and 15/04532/OUT 17/03216/REM - 80 homes of which 28 affordable, giving a total of 280 homes of which 66 affordable across the whole site.
Page 21	Policy BINDP2	The BINDP local connection criteria. It would be preferable for the local connection criteria to align with SDC's standard criteria as per Part 5 of the Development Requirements SPD. The criterion 'someone who can otherwise demonstrate a local connection to the Parish' is too ambiguous and open-ended and is likely to cause confusion and disputes at allocation.
Page 21	Policy BINDP2	Policy BINDP2 states community-led housing schemes must be supported by an up to date Housing Need Survey, or other comparable evidence of that need. Para. 5.14 goes on to state that a Housing

		<p>Needs Survey was conducted in the summer of 2016, the outcome of which concluded that there was a need for 14 new homes in the Parish for households with a local connection. However, there is no explanation as to why no specific site allocation for the outstanding housing need is identified.</p> <p>There is also a concern that the Housing Needs Survey is referenced but noted that it is 'now nearing the end of its usefulness and applicants seeking approval or local needs housing under Policy BINDP2 may have to provide more up to date evidence of local need'. Whilst this may be considered to be the case, the Plan needs to make this clear and commit the Parish Council to commissioning a new survey. If it is felt to be out of date, the detailed findings of the survey should not be referenced and instead commit to a new survey, which if carried out in a timely manner could be part of the submission version. It would be preferable for the Plan to identify a preferred site for a scheme, the site would only be released in the event a need is identified via a fresh survey commissioned by the Parish Council.</p>
Page 22	Policy BINDP3	<p>The policy does not take into account that generally homeworking does not require planning consent due to it being classed as an ancillary use of the dwelling. Therefore, it is unclear as to how the policy can control homeworking in new development any more than it could in an existing building. A good example of a homeworking policy is LE.3 of the Ettington & Fulready NDP:</p> <p>Ettington and Fulready NDP: Made Version - July 2018 (stratford.gov.uk) .</p> <p>It may be worth considering a policy similar to this.</p>
Page 22	Policy BINDP3, first para	It might be useful to make reference to Core Strategy Policy CS.22 as well as AS.10.
Page 24	Policy BINDP4	<p>As per the comments in relation to Policy BINDP1, this policy considers several different issues which should be separate policies. The first paragraph together with the criteria a) – e) relates to landscape character. The remaining text relates to the protection of specific views from the village which should be a separate policy. In terms of the individual criteria within the policies, reference is made to the 'historic core' (see comments on BINDP1) as they apply here. It would be useful to know whether the historic boundaries and features have been listed and mapped and if so where. In terms of the designated and non-designated heritage assets, again clarity is sought as to whether these have been mapped and confirmation of the archaeological sites referred to and clarity on whether these have been mapped.</p>

		Criteria d) and e) are separate issues to that of 'landscape character' in that they refer to impacts on specific habitat designations which could be a separate policy.
Page 28	Figure 5, Historic Environment Housing Assessment Sensitivity	The source quotes 'Stratford on Avon District Council', however it should be clear which document this figure has come from.
Page 29	Policy BINDP5	The current wording based on protection cannot be guaranteed, therefore it is suggested amending the text as follows: Delete: The community facilities listed below and shown on the Policies Map will be protected Add: <u>The retention of the following community facilities will be supported</u>
Page 29	Policy BINDP5	Do the sites 2, 3, 8, 9 and 10 comply with the criteria set out in Policy CS.25 Healthy Communities? Given the revised legislation on Use Class Orders and permitted change of use without the requirement for prior planning consent, will the policy be able to protect shops?
Page 31	Policy BINDP6	This doesn't read as a policy and should be re-written. Please see policies CSL.2 of the Claverdon NDP or policy LA.3 of the Ettington & Fulready NDP as examples of policies that have passed examination regarding sports facilities.
Page 32	Policy BINDP7, Local Green Space 4	It is unclear as to how this meets the tests as set out in the NPPF. There should be clear evidence as to how it meets these tests otherwise it should be removed.
Page 37	Policy BINDP8, Other Open Spaces	This policy as currently written is not precise enough and it is unlikely to meet the basic conditions. The term 'open space' is vague and it would be useful to know what land this term includes, for example is it public realm, private land or both? How can equivalent or 'better' space be provided elsewhere in the village?
Page 39	Policy BINDP10	On street charging points are not practical due to cables acting as trip hazards. This infrastructure would create street clutter due to its design and as such would automatically fail to meet the provisions of the policy. There is also an additional issue of this infrastructure needing to be sited on highway land, which is the responsibility of Warwickshire County Council and would not be on land in the

		ownership of an individual applicant. Therefore, it is unclear how this policy would meet the provisions of the basic conditions.
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Schedule of minor comments from Stratford-on-Avon District Council

Suggested new text underlined deleted text ~~struckthrough~~

Page number	Section	Comment
General	Policies Map	It is not clear why this is a separate document and it is suggested that this is incorporated into the Plan for ease of reference.
General	Policies Map	The reference numbers are difficult to read and the boundaries of a couple of the smaller sites are unclear. NB. The map may need updating subject to other comments regarding the proposed policies.
General	Policies Map	The Policies map is missing a BUAB even though this is shown in Figure 4 and mentioned at para. 5.5.
General	Policies Map	It is not clear why this is a separate document and it is suggested that this is incorporated into the Plan for ease of reference.
Page 7	Figure 3, NDP Process	6th box. Add ' <u>District</u> ' after the word 'Avon'.
Page 7	Figure 3, NDP Process	There is a spelling mistake in the following text 'Submit to Stratford-on-Avon District'. Delete ' Strateford ' and replace with ' <u>Stratford</u> '. Add 'Council' at the end of the sentence.
Page 9	Paragraph 2.5, penultimate sentence	Delete 'the' after 'of'.
Page 11	Paragraph 3.7, second sentence	There appears to be some text and it is unclear what it relates to as the table is referenced 'Table 1' below. Delete text ' Table 10 '.)
Page 13	Paragraph 4.5	This should be updated to read 'consultation took place on Preferred Options in Autumn 2020'.
Page 13	Paragraph 4.1, 5th sentence	Delete ' maps ' and replace with ' <u>map</u> '.
Page 19	Paragraph 5.5., third sentence	Delete ' Area ' and replace with ' <u>Areas</u> '.
Page 21	Paragraph 5.14, third sentence	Replace the full stop with a comma in the number '1,000'.
Page 23	Paragraph 5.20, bullet point 6	Add a full stop at the end of the sentence for consistency.
Page 23	Paragraph 5.23, Parish Council Supporting Action 2	Replace ' other ' with ' <u>others</u> '.

Page 24	Policy BINDP4, criteria (d)	There is a bracket missing at the end of criteria (d).
Page 36	Ridge & Furrow, second sentence	Delete ' manged ' and replace with ' <u>managed</u> '.