

## Southam Neighbourhood Development Plan

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

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

Suggested new text underlined deleted text ~~struckthrough~~

Page number	Section	Comment
General	Housing Allocations	It is noted that with the exception of the site for self-build homes (Figure 3, para. 103) there are no site-specific housing allocations proposed within the Plan. It is acknowledged that there are possible complications arising from the timing of publication of the Plan relative to the District Council's preparation of the Site Allocations Plan (SAP). However, in light of comments provided by the Housing Team on Policy 06 below, it is suggested that consideration be given to the allocation of one or more sites for a small-scale Local Need scheme.
General	New Government Guidance - First Homes	<p>The Government has introduced criteria for 'First Homes', a specific kind of discounted market sale housing that is also classed as affordable housing: <u>First Homes - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</u></p> <p>Local plans and neighbourhood plans submitted for examination before 28 June 2021 (Regulation 15), or that have reached publication stage (Regulation 14) by 28 June 2021 and subsequently submitted for examination (Regulation 15) by 28 December 2021, will not be required to reflect the First Homes policy requirement. However, this may mean that if the Plan is not submitted for examination before the 28 December 2021 the Plan may need to reflect this new guidance, therefore depending on your expected timings for the NDP to reach Examination, it would be advisable to incorporate the First Homes requirement within an NDP policy.</p>
General	Introduction	It is suggested adding a small section setting out what the Neighbourhood Plan is and how it is required to meet the 'Basic Conditions'. Reference to the current work on the South Warwickshire Local Plan could also be included.
General	Introduction	The Plan should also emphasise the need to include all members of the community in Southam life e.g. jobs, housing, transport, open spaces etc. Accessibility to those needs to be improved for those with disabilities. Opportunities for inter-generational activities and interaction should be explored.
General	Introduction/Aspirations	There should be reference to facilities for younger people, e.g. open space/BMX park/sports pitches. There should be an additional crossing of the by-pass e.g. bridge as the underpass often floods.

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Page 7	Paragraph 11	The two points referred to in this paragraph are unrelated.
Page 7	Paragraph 12	Only the western part of the river valley is designated an Area of Restraint. Delete 'the' before Southam.
Page 16	Figure 11, Local Green Space Designations	This figure will need to be amended to take account of any additions or omissions.
Page 17	Figure 12, Valued Landscapes and Viewpoints	Viewpoint 1 is not shown from a public footpath/vantage point. The public footpath is to the south (as shown on the attached photo ref: 152222). The land over which this particular view is taken is allocated in the SAP as a potential Reserve Housing Site (SOU.D). The view back towards Southam from the public footpath would be lost should this site ever need to be released.
Page 17	Figure 12, Valued Landscapes and Viewpoints	It may be worth considering having two separate figures, one to show valued landscapes and one to show viewpoints as they could be considered to be different.
Page 20 & 21	Figures 15 & 16, Flood zones	Could these two figures be combined into one?
Page 22	Paragraph 35, bullet point 1	More definition is required, e.g. what is meant by 'fair'? Responses also included comments regarding the following 'There needs to be a link to ensure that growth is what people in Southam want and that it is in the right place'. Water supply is important and infrastructure needs to be fit for purpose.
Page 22	Paragraph 35, bullet point 2	Need to emphasise disabled access.
Page 22	Para 35, bullet point 3	Should be a reference to parking. It should be noted that CIL money has been allocated by SDC to upgrade both GP surgeries/facilities, that the high school is likely to be full and what are the plans for this and employment land is at a premium due to it being used for housing.
Page 22	Para 35, bullet point 4	How will Southam attract new shops?
Page 23	Para 39	Add ' <u>about</u> ' before '1100'.
Page 24	Policy 01, Local Green Spaces	Delete: <del>Development that would harm the openness or special character of a Local Green Space or its significance and value to the local community will not be supported unless there are very special circumstances which outweigh the harm to the Local Green Space.</del>

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		It is suggested replacing the final paragraph with <u>The management of development within areas of Local Green Space will be consistent with that for development within Green Belts.</u> This will ensure consistency with paragraph 101 of the NPPF.
Page 24	Policy 01, Local Green Spaces	For consistency of approach, the playing field associated with Southam Primary School in the centre of the settlement should also be considered as a LGS? The playing fields for the other schools appear to have been included (see attached photo ref: 125226).
Page 25	Local Green Space 1	Site LGS1: Whilst it is acknowledged that there is an intrinsic beauty argument for the valley floor leading to the Holy Well via the public footpath, it is considered that the 'shape' of the LGS is incorrect. It includes part of an agricultural field beyond the Holy Well to the west which wouldn't meet the LGS criteria and should be removed; the northern boundary doesn't follow the tree line and includes part of a field that wouldn't meet the LGS criteria; the LGS excludes part of a field to the south of the footpath on the southern edge which would form part of the overall 'experience' of the valley floor and could be included. A proposed alternative boundary for the LGS site is shown on the attached photo ref: 125226.
Page 29	Local Green Space 7	Site LGS7 is a lake formed from sand and gravel extraction on a working quarry site. Whilst it may have potential as and when it is re-purposed as a nature reserve some time in the future, there is a concern that it may not meet the NPPF criteria at present and subsequently may need to be removed from the Plan.
Page 34	Local Green Space 13, para 74	Southam Cricket Ground. The footpath has now been diverted and this paragraph should be updated to reflect this.
Page 35	Local Green Space 14	Site LGS14 is currently playing pitches to the south of the settlement. The site is the subject of a current planning application (ref: 20/02365/FUL) for the erection of 84 dwellings. The land in question is also part of allocation SOU.1 in the Core Strategy. Whilst the planning application has yet to be determined it should be acknowledged that there is the possibility of this LGS designation being overtaken by other events.
Page 36	Policy 02, Valued Landscapes and Viewpoints	It is not possible to 'maintain and safeguard' landscapes within certain vistas in perpetuity. The phrase 'maintained and safeguarded' should be replaced by 'respected' (as in Policy DC.4 of the Ilmington NDP which passed Examination).  Delete: <del>maintained and safeguarded</del> Add: <u>respected</u>

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Page 36	Policy 02, Valued Landscapes and Viewpoints	There's no specific reference to viewpoints in the actual policy despite the heading.
Page 39	Policy 03, Brownfield Land	The policy should also deal with brownfield land outside the BUAB. Parts of the justification relate to greenfield land so aren't directly relevant to this policy.
Page 40	Policy 04, Conservation Area	It is unclear as to what is meant by 'utility'. Consideration could be given to using 'uses' or 'activities'.
Page 40	Policy 04, Conservation Area	The NPPF requires public benefits to outweigh any identified harm to heritage assets. The wording of the policy here requires "special circumstances" It may be better to use the NPPF compliant term of 'public benefits' instead. Delete: <del>special circumstances</del> . Add: <u>public benefits</u> .
Page 41	Policy 05, Designing Out Crime	It is unclear as to where the justification is for reference to 'larger than 10 dwellings' within the policy. It would be useful to know how this threshold was agreed. Similarly, there is no explanation as to the choice of SBD Silver Level certification (as opposed to any other) and the mechanism for implementation is unclear.
Page 42	Para 97	This paragraph is a selective representation of what the Core Strategy actually says in para 6.7.20 on page 170. The wording should be clear so that everyone understands why the District Council is identifying reserve housing sites in the SAP, particularly as the NDP isn't intending to do so.
Page 42	Para 97	<p>Policy CS.16 states in regards to Main Rural Centres that "<i>Stratford-on-Avon District will meet its objectively assessed housing needs for the period 2011 to 2031. Provision will be made for at least 14,600 additional homes, distributed as follows based on the sustainable locations identified in CS.15:</i></p> <p><i>Main Rural Centres: approximately 3,800 homes</i>"</p> <p>Southam is identified as a sustainable location within Policy CS.15. Policy CS.16 is not as definitive in housing requirements as Paragraph 4.4.1 (97) suggests and therefore the paragraph should be amended to reflect this.</p>
Page 42	Para 98	The text will need to be amended as a self-build site isn't a Rural Exception or a Reserve Site.
Page 43	Policy 06, Local Need Housing	As written, this policy appears to be overly restrictive in that only schemes including bungalows and located close to the post office will be supported. There is concern that this would not meet the Basic Conditions test.
Page 43	Policy 06, Local Need Housing	<p>In summary, it is recommended that this policy is re-written.</p> <p>It appears to conflate two distinct issues: meeting local housing need and the need for single storey dwellings. Whilst it is true that Southam has seen extensive housing development in recent years, this</p>

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		<p>is broadly in line with the strategic approach established in the Core Strategy and, more specifically, is to address District-wide housing need.</p> <p>The 2017 Southam Housing Needs Survey identified a need for 36 additional homes for households with a local connection to Southam, comprising a mix of housing association homes for rent and Shared Ownership sale and homes for owner-occupation. It should be highlighted that 10 of the 36 homes (28%) were required in the form of bungalows.</p> <p>The Policy as currently drafted is not likely to be effective in meeting the above need (or any need that might be identified in any subsequent survey). It would benefit from being re-written to clarify its purpose and, possibly, allocating one or more sites specifically for a small-scale Local Need scheme.</p> <p>It is suggested that a further discussion regarding this policy takes place with John Gordon in the Housing Team at Stratford District Council.</p>
Page 44	Policy 07, Self-Build Provision	<p>The policy should refer to self-build and custom housebuilding. The title should be changed to cover both elements. Consider amending the first para to read: “Proposals that involve schemes for self-build housing and custom-build housing will be supported <del>provided the site is sustainable through new or existing infrastructure</del> <u>subject to the provision of appropriate infrastructure</u>”. The local connection criteria are more stringent than Policy SAP.6, which states that all plots will be offered in the first instance to individuals or households that have a local connection through living and/or working in Stratford-on-Avon District or by having close family living in the District... The criteria in the NDP policy should be re-defined, or removed.</p>
Page 44	Para 102	<p>Amend sentence as follows: The District Council’s Self-Build and Custom Housebuilding Register, updated as at 1st April 2019 lists approximately 42 <del>41</del> expressions of interest identifying Southam as a preferred site or one of the preferred sites.</p>
Page 45	Policy 08, Housing Mix	<p>The principle of the policy is supported, however it is unlikely to work in its current form due to the lack of housing allocations in the NDP and the lack of in-fill opportunities within the settlement. Therefore, it is suggested that the policy is re-written.</p>

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		<p>The focus on the provision of bungalows is understandable, given the findings of the 2017 survey and the fact that Part B of Core Strategy Policy CS.19 does not contain any specific requirements in respect of the proportion of bungalows within individual schemes (only their inclusion as part of an 'appropriate mix'). However, the reality is that, in the absence of further specific allocations, only small-scale schemes on unidentified "windfall" sites within the Built Up Area Boundary of the town are likely to come forward. The prospects for achieving the prescribed proportions of bungalows on smaller sites are likely to be limited.</p> <p>It is suggested that a further discussion takes place with John Gordon in the Housing Team at Stratford District Council.</p>
Page 47	Policy 09, Environmental Sustainability	The principle of this Policy is supported, however the criteria set out currently is considered to be too generalised to enable the Policy to be workable in practice.
Page 49	Policy 11, Electric Vehicles	<p>The principle of this Policy is supported. However, there are a couple of points for consideration as follows:</p> <p>It is unclear as to how this Policy would be implemented/enforced? For example, via condition? If so, it would be useful to say so. It should be clear as to what is meant by 'near future' as this could be months or it could be years.</p> <p>It is unclear as to how realistic the requirement for a three-phase electricity supply to all new domestic properties would be? This is important given the potential additional costs involved. Has this proposal been discussed with the local electricity distribution network operator?</p>
Page 50	Policy 12, Dark Skies	There should be reference to community safety issues re: streetlights.
Page 51	Policy 13, Safe Walking and Cycling	It is suggested amending the 1 <sup>st</sup> paragraph to read ' <del>We require that developments</del> Developments <u>should</u> provide safe pathways'.
Page 53	Policy 14, Residential Parking	It would appear that this Policy follows the requirements within Part O (Travel and Parking) of the current District Council's Development Requirements SPD, therefore given the comprehensive nature of the SPD, consideration should be given as to whether there is a need for having a separate set of

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		<p>requirements unless there are any Southam specific reasons for doing so. This could be explained in the justification.</p> <p>Should the Policy remain, it is suggested that there should be some text included to state that the standards are a starting point similar to that in the SPD in case there are site specific circumstances to justify a slightly different level of parking provision.</p>
Page 55	Policy 15, Flood Risk Mitigation	There should be more of an emphasis on flood prevention.
Page 57	Policy 17, Retail Area Development	There is a concern that the element of the policy restricting the change of use of retail units to dwellings does not comply with recent changes to permitted development rights through the revised GDPO. It is suggested that the heading and 2 <sup>nd</sup> line are changed from ' <del>retail</del> ' to ' <u>commercial</u> ' given changes to the Use Classes Order which places a wide range of uses into a new Class E. Restricting change of use from retail to residential will not be enforceable because of relaxed national policy
Pages 65 – 66	Aspiration A6 & A7	Should these also cover Market Hill?
Page 68	Aspiration 11	<p>Southam College Relocation. The inclusion of this Aspiration reflects pre-publication engagement. However, it would be helpful for the supporting text to explain that decisions about the re-location of Southam College and any consequential redevelopment of the existing campus are likely to be taken in the context of the emerging South Warwickshire Local Plan. This will take some time to complete the necessary statutory processes leading to adoption. Even then, it is important to recognise that the actual process of securing the necessary funding and physically relocating to a new campus are likely to take many years. With reference to para. 176, there is therefore a distinct possibility that the profile of identified local housing need may have changed in this time. Furthermore, it is implicit within the Aspiration that the <i>only</i> option available for the existing campus would involve the discontinuation of its existing educational use. This may not necessarily be the case. This all points to the fact that it would be desirable to consider the option of bringing forward a Local Need scheme on another site or sites on the edge of Southam.</p>
Page 69	Appendix 1	Definition of "Affordable Housing". With reference to the 'Remarks', It should be noted that this is a partial and incomplete explanation, and therefore potentially misleading. In the interests of

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		completeness and brevity, it would be preferable simply to cross-reference to the corresponding definition in Annex 2 of the NPPF.

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

Suggested new text underlined deleted text struckthrough

Page number	Section	Comment
<b>General</b>	<b>Front cover</b>	The Neighbourhood Plan will need a title for the next stage e.g. 'Regulation 15 – Submission version'.
General	Public Sector Equality Duty.	It is good to see the inclusion of para. 33, which reflects previous pre-publication advice.
Page 6	Para 4	Add <u>of</u> before '6,842'.
Page 22	Para 35	Add <u>'the Plan'</u> after 'organised'.
Page 67	Aspiration A8	There is a spelling mistake in the heading. Replace 'Hight' with <u>'Height'</u> .