

Long Marston Neighbourhood Development Plan

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

Appendix 1 - Comments from Stratford-on-Avon District Council

Policy related comments:

Section	Reference/ page	Comment
Paragraph 2.8, 1 st line	Page 8	Suggest replacing 'allocated' with 'provided' as the former word suggests specific sites being identified in the Plan.
Paragraph 3.1.28	Page 15	It should be pointed out that the Parish population is going to be very different to the Neighbourhood Area population due to the Meon Vale and Long Marston Airfield developments. The 2019 population forecast likely includes an element of the former because the increase since 2011 can't be entirely down to the recent small developments on the edge of the village identified in paragraphs 3.1.24-3.1.27.
Paragraph 4.1	Page 17	The Vision of the NDP should not refer to Long Marston Parish because the NDP does not cover the whole Parish.
Policy L&E1	Page 19	<p>Concern is raised that this policy does not distinguish between the different types of environmental designations e.g. SSSIs, Local Wildlife Sites, etc. and the proportionate level of protection afforded to these, as per Policy CS.6 of the Core Strategy.</p> <p>In addition, the criteria do not flow well from the introductory paragraph of the policy.</p> <p>Criterion a) cannot be controlled through planning policy and should be removed. Criterion b) would need to be mapped to make sense of the aim of the policy. Delete text from "...which connect with..." as it is not required. Criterion c) is in effect a duplication of criterion a) and should be removed. Criterion d) – it is assumed this is meant to only apply to external lighting. It should be noted that here are limited circumstances where external lighting would be controllable through the planning process. Street lighting would normally be controlled by the Local Highways Authority whilst domestic security lighting would normally be permitted development. Criterion f) suggest re-drafting second sentence to read "Proposals should look to preserve existing aquatic habitats and development that has an adverse impact on such habitats will not be supported". Remove</p>

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		reference to Fig.14 as it is not necessary. Delete final sentence as the examples listed are not mapped and will not be the full list of such sites. Criterion g) Delete “Environmentally sustainability by” and add “through” between “demand” and “using”
Para 5.1.2	Page 19	The contents of this paragraph are largely unrelated to the contents of Policy L&E1, which concerns the natural rather than built environment.
Policy L&E2	Page 25	This policy is more akin to a ‘settlement gap’ policy that a green infrastructure policy and should therefore be re-titled and re-drafted as such. Is there a reason why this approach has been chosen rather than identifying the land as a potential Local Green Space ?
Figure 18	Page 27	This Figure should be amended to reflect the latest version in the 2022 SAP Preferred Options . This includes an amendment on the eastern edge of the village to take account of the correct built form of a recent development.
Policy L&E3	Page 28	The policy is conflating different issues/assessments (landscapes, vistas and skylines). It seems to relate more to protecting important views and it should be redrafted to explain how these views should be protected. The views seem to be mapped at Fig. 19, not Fig.21 as suggested in the policy.
Figure 19	Page 29	Are the views from public vantage points? It isn’t clear from the map. Assessments and local evidence is needed to justify why each of these views are particularly important to the local community and thus meriting specific protection.
Policy L&E4	Page 32	There seems to be a lot of repetition within the policy and it could be re-drafted in a more streamlined and focussed manner. Should criterion a) start with the second sentence and go on to say that in such an event, the PROW should be diverted? Criterion b) is unlikely to happen since this would relate to land outside the application site.
Policy L&E5	Page 36	Criterion a) – it is unclear how this would work in practice. Criterion b) – “New homes will be expected to demonstrate improvements to water efficiency.” – improvement compared to what? The second sentence of criterion c) is a separate point Criterion d) would, in effect, support wind farms and solar farms as well as solar roof panels – is this the intention? Criterion f) – this criterion does not relate specifically to the climate emergency – it should be moved to a design policy.

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		Criteria g), h), and i) are all in fact part of one criterion and should be combined accordingly. How would criterion i) work in practice? Where would these charging points be located? How would this be controlled? Criterion j) – remove this as you can't set out in a policy that the policy will be modified in different circumstances.
Policy Com 1	Page 38	Criteria a) and d) cover the same topic. It would be useful if a Map could be provided to show the community facilities or assets covered by the Policy. Figure 27 shows two registered community assets but Paragraph 6.1.2 states that there are four community assets in the village. Paragraph 6.1.8 states that new development should improve recreational facilities, but this requirement does not form part of the Policy wording itself? Paragraph 6.1.9 states that the Policy looks to add additional recreational areas, but this is not referenced anywhere in the Policy wording.
Policy Com 2	Page 38	This policy does not appear to add anything above criterion c) of Policy Com 1 and it is suggested it is deleted.
Policy Inf 1	Page 41	Criteria a) and b) seem to be saying the same thing. Criterion d) – why 'Where applicable'? Criteria e), f) and g) should be indented bullet points underneath criterion d). How would criterion f) be assessed? The wording isn't sufficiently precise. Criterion g) relates to construction of structures and use of land for storage, which are two separate issues.
Policy Inf 5	Page 45	Given the subject matter of the criteria, it is unclear why this is titled 'Community Safety'? It is unclear how criterion a) could be implemented as it is outside the application site and it is unlikely any development would be of the scale appropriate to warrant any such S106 Legal agreement to insist upon any such provision. Criteria b and c) – these are more akin to a 'dark skies' policy. Street lighting is generally controlled by the Local Highways Authority. Domestic lighting is normally permitted development.
Policy HA 1	Page 47	Suggest re-wording criterion a) as follows: "As appropriate, proposals should demonstrate how development will impact upon designated and non-designated heritage assets and their settings. Proposals must set out how the affected assets will be conserved, enhanced or mitigated".
Figure 29	Page 48	The BUAB should be amended to accord with the SAP Preferred Options (June 2022)
General – Development	Pages 55-63	The Government has introduced criteria for 'First Homes', a specific kind of discounted market sale housing that is also classed as affordable housing: First Homes - GOV.UK (www.gov.uk)

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		Neighbourhood Plans need to reflect these new requirements, therefore you are advised to incorporate the First Homes requirement within an NDP policy.
Policy Dev 1	Page 55	<p>The Policy is a bit repetitive. Suggest rewording first paragraph to “All development should minimise, and where appropriate, mitigate its impact on the rural character of the village. In particular, development proposals should:”</p> <p>Suggest deleting criterion a)</p> <p>Criterion d) delete “...such as dew ponds and ridge and furrow fields” – either list all features, or none at all.</p> <p>Unsure how criterion e) can be achieved. Do you mean ‘glimpsed’ views between buildings? If so, why is this so important?</p> <p>Criterion g) may well be impractical and will certainly not be appropriate in all cases.</p> <p>Criterion h) – street furniture and signage would be controlled by the County Council and therefore could not be influenced by the Neighbourhood Plan. This criterion should be deleted.</p>
Policy Dev 2	Page 57	<p>Criterion a) delete “be of a high quality design and” as it is duplicating the first paragraph.</p> <p>Criterion c) re-draft to read “include a mixture of architectural styles”</p> <p>Replace criterion f) with “protect neighbour amenity”</p> <p>Criterion g) – Replace ‘older’ with ‘listed’</p>
Policy Dev 3	Page 58	<p>Need to re-title the policy to refer to the settlement boundary/location of development.</p> <p>2nd paragraph – this does not reflect all the forms of residential development considered acceptable in the countryside under the provision of Policy AS.10. Additionally, it is considered that the policy should allow for self-build and custom-build housing outside but adjacent to the Built-up Area Boundary, in accordance with Policy SAP.6 of the Site Allocations Plan Preferred Options (June 2022).</p> <p>The Built-up Area Boundary (Figure 18) should be located with this policy for ease of reference.</p> <p>3rd paragraph – this should refer to Figure 35.</p>
Policy Dev 4	Page 60	<p>The combination of Policy Dev 5 and 6 into one consolidated Policy Dev 4: Housing for local people, is welcome. The purpose of the policy as is understood is to support local needs housing schemes. As such it would be useful to rename the policy ‘Local Needs Schemes’ in order to be consistent with Policy CS.15 of the Core Strategy. It is important to note that local needs schemes include local market housing where there is an identified need.</p>

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		<p>Within the policy there are concerns about the reference to require a viability appraisal to include open market housing in order to achieve cross-subsidy, and indeed reference to open market housing in general. Core Strategy Policies CS.15 and AS.10 (and the Development Requirements SPD) do not allow open market housing on local needs schemes - any market housing has to have a restrictive covenant that states it will be for local people, and it has to meet an identified local housing need. Therefore it is recommended to delete this paragraph and just reference that local needs housing schemes can include local market housing where there is an identified housing need. Local needs schemes can include both affordable and local market, it all depends on the evidenced need.</p>
Policy Dev 5	Page 61	<p>This Policy states that EVC points are required for each open market dwelling but does not reference affordable housing dwellings. In addition, the EVC standards of this policy are different to those provided at Policy L&E5.</p> <p>The policy should comply with the adopted Development Requirements SPD and the SPD should be referred to in the explanatory text for the policy as evidence.</p>
Policy Dev 6	Page 61	<p>This site is identified as a potential site for approximately 10 self-build/custom-build dwellings in the Site Allocations Plan Preferred Options (June 2022).</p> <p>This policy safeguards land on the east of Long Marston Road as a Reserve Housing site. Notwithstanding the latest Preferred Options version of the SAP which now identifies the site as a self-build/custom-build site, as the land is for 'up to 8 dwellings' this will not attract an on-site affordable housing contribution.</p>