

Tredington 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
General	N/A	Overall, the Plan is very clear and well-presented.
General	N/A	A map showing the policy designations/constraints of the entire Neighbourhood Area would assist in comprehension of the Plan.
General	Throughout	References to the NPPF should be to the 2021 version.
General	Throughout	Each policy should detail in the supporting text the Core Strategy policies/NPPF paragraphs to which it relates. This is in order to demonstrate that the NDP policies have been prepared to be in general conformity with the development plan and have appropriate regard to national policy, as required by the Basic Conditions.
General	Throughout	Some of the policy titles are very long and could be condensed to be more succinct.
General	Page 8, para 2 and throughout	It is questioned whether Armscote, Blackwell and Darlingscott are too large to be described as hamlets.
Introduction	Page 7, paragraph 3	Policy CS.16 states in regards to Category 3 settlements that " <i>approximately</i> 450 homes in total, of which no more than <i>around</i> 13% should be provided in any individual settlement" – Policy CS.16 is not as definitive in housing requirements as this paragraph suggests, and therefore the paragraph should be amended to reflect this.
Introduction	Page 7	Work has commenced on the South Warwickshire Local Plan which will replace the strategic policies of the Core Strategy once adopted. Reference to the South Warwickshire Local Plan should therefore be included. It is also suggested to add a small section setting out how the NDP is required to meet the 'Basic Conditions'.
Vision Statement	Page 27, first bullet point	Newbold-on-Stour and Tredington are identified as Local Service Villages in the adopted Core Strategy. As such, they have a role to play in meeting Stratford District's housing requirements, not just local ones. The wording should be amended to acknowledge and reflect this, otherwise the NDP would not be in general conformity with the Core Strategy.
Policy LE 1	Page 30	It is suggested that the policy is split into discrete parts 1, 2 & 3 or A, B & C for ease of reference.

Section	Reference/ page	Comment
		<p>First main bullet:</p> <ul style="list-style-type: none"> - The first subsidiary bullet should read 'There is a sufficient supply of sites...' - Fifth subsidiary bullet point should clarify this is Part O of the Development Requirements SPD. - "Do not create light, environmental or noise pollution" – it would be better if it could state "Do not create <u>unacceptable</u> light or noise pollution", otherwise this could infer that we should be refusing schemes which create any light pollution – internal light from a window could be said to cause light pollution so I wonder if this is too harsh as currently drafted <p>Second main bullet:</p> <ul style="list-style-type: none"> - Unsure what "there is an insufficient supply of sites to meet requirements over the Plan period" means. - "The applicant can demonstrate that their site/premises is no longer viable by the submission of the relevant data" – it is considered that this should state "viable for employment purposes" or something similar, to clarify what the test is here. - "Any environmental problems are resolved" – this seems a bit loose. It is considered that it would be better to be worded "Any <u>significant</u> environmental problems are resolved. <p>Third main bullet:</p> <ul style="list-style-type: none"> - "Limited extensions" – why do extensions have to be limited? If the site can take larger extensions without causing harm why should they be resisted, particularly given that we should be encouraging economic growth – restricting the size of extensions in this way could limit the opportunities for businesses to expand.
Policy LE 2	Page 32	<ul style="list-style-type: none"> - "Do not create light or noise pollution" – it would be better if the policy could state "Do not create <u>unacceptable</u> light or noise pollution" – see point above for Policy LE 1. - Fifth subsidiary bullet point should clarify this is Part O of the Development Requirements SPD.

Section	Reference/ page	Comment
Policy LE 3	Page 33	This policy refers to Class B1a but this doesn't exist anymore – it is now Class E which covers a large range of uses (not just office use) – as such this should be amended. The reference to Class B1a should not be replaced with Class E due to the range of uses that Class E covers, i.e. offices but also shops, cafes, gyms, etc.
Policy NE 1, last bullet	Page 37	Last bullet - it would not seem reasonable for this to be applied to minor developments.
Policy NE 2	Page 39	<ul style="list-style-type: none"> - First main bullet and first subsidiary bullet - It is unreasonable for this to be required of all developments; it is suggested that the wording is amended to refer to the loss of any trees, hedgerows and woodland having to be justified. - Third subsidiary bullet should then be amended to read '...that have been lost or damaged...' - Last bullet point should perhaps read 'objectives' rather than 'targets'. <p>Again, it would help if policy is split into 1 & 2 or A & B.</p>
Policy NE 3	Page 40	<ul style="list-style-type: none"> - The title should include the word 'Vistas' given what is identified on the maps. - Suggest first bullet is amended to acknowledge that it may not be applicable to small-scale schemes. - "All developments which are observed from, or impinge upon, the AONB or SLA will require a formal Landscape and Visual Impact Assessment" – this is <u>much</u> too onerous as it includes all development scales. LVIAs are only appropriate for major developments so this should instead state "All <u>major</u> developments..." otherwise we would have to ask for LVIAs on householder extensions/minor proposals within the AONB/SLA where an LVIA is not appropriate/applicable. - Same comment for the last bullet of this policy. We do not believe that a Landscape and Visual Impact survey is a thing – should this be Landscape and Visual Impact Assessment/Appraisal? If so, this is duplicating the third bullet point.
Policy NE 4	Page 45	Suggest that the first bullet reads 'Development proposals...'
Policy NE5	Page 46	Are the guidelines set out by the British Astronomical Society the most appropriate to consider in the context of assessing planning applications?

Section	Reference/ page	Comment
Policy NE6	Page 47	"Peacefulness" – difficult word to define. Is there a more technical word that would work better here?
Policy NE7	Page 48	<ul style="list-style-type: none"> - First bullet point "all aspects of energy efficiency" is vague. - Last bullet should be more specific i.e. "All new dwellings and commercial premises should have <u>electric vehicle</u> charging facilities..." rather than "car changing facilities". It should also clarify this is Part V of the Development Requirements SPD.
Policy NE 9	Page 51	<p>It is noted that there are a large number of Local Green Spaces identified, of various character. Some of these include potential Reserve Housing Sites identified in the Site Allocations Plan Preferred Options document 2020. It is questioned whether all of the proposed LGS meet the criteria for designation.</p> <p>LGS 3 in Newbold-on-Stour - It is understood that a large part of this area has been identified through a legal agreement to provide compensatory habitat improvements as a result of housing development on land to the south known as The Martingales. That being the case, it might be appropriate as a LGS.</p> <p>Armscote LGS - NB. Current application proposals for the change of use of The Old Meeting House (21/03090/FUL and 21/03091/LBC pending, 20/01782/FUL and 20/01790/LBC refused, 17/01018/FUL and 17/01019/LBC withdrawn, etc.) and its curtilage to garden.</p>
Housing, Strategic Objective	Page 58	This should acknowledge that Newbold-on-Stour and Tredington are identified as Local Service Villages in the Core Strategy. As such, they have a role to play in meeting District-wide housing needs not just needs of the Neighbourhood Area. Text should be inserted at the end of this page to explain that the District Council is considering whether any reserve housing sites should be identified in these LSVs in the Site Allocations Plan.
General - Housing	Pages 58 - 63	<p>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)</p> <p>Paragraph 013 of the PPG sets out that "Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required. Subject to the transitional arrangements set out in paragraph 018, this should include policies for First Homes.</p> <p>Policies for First Homes should reflect the requirement that a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes."</p>

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		<p>Paragraph 018 of the PPG states that “For areas that do not meet the criteria for transitional arrangements, new development plans, including local plans and neighbourhood plans, should take account of the new First Homes requirements from 28 June 2021.”</p>
Policy H 1, Explanation	Page 59	<ul style="list-style-type: none"> - Should add at the end of the last sentence ‘...as they are not identified as Local Service Villages in the Core Strategy.’ - The final bullet doesn’t include all of the residential development types which are supported by AS.10 e.g. bad neighbour sites.
Policy H 3	Page 63	This policy should state that can only apply to proposals that require planning permission and are not covered by permitted development rights.
Policy BE 4	Page 73	This policy is much less restrictive than AS.10(d) – there is no viability test to demonstrate that residential is the only viable use and that the building is capable of conversion is required.
Policy IN 4	Page 81	<ul style="list-style-type: none"> - “Developments comprising new or additional non-residential floorspace must make provision for adequate parking to meet the changing/expanding role” – it is unclear what this means or how it could be applied in practice. - “All new dwellings and commercial or community developments where floor space is increased must provide connections to existing pedestrian and cycle routes” – should this have the text “where possible” added? - Final bullet should be clearer - “electric vehicle charging facilities” rather than “car charging points”
Policy LA 1	Page 83	Third bullet – it would be worth clarifying that it needs to be marketed for community use
Policy LA 2	Page 86	First bullet - it is not for the applicants to ensure this as such, the Education Authority would advise.
Policy LA 4	Page 90	First bullet should read ‘should be protected’ and second bullet should read ‘will only be supported’. This is because the Parish Council is not the planning authority for making decisions on applications.