

Tredington Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

Rep.No.	Name	Policy/Section	Representation
	Canal and River Trust	N/A	No comments
	Coal Authority	N/A	No comments
	Historic England	General Comments	<p>We commend the general emphasis placed upon the maintenance of local distinctiveness and the conservation of landscape character, building upon the findings of the Warwickshire CC Landscape Character Assessment. This and other documentation produced detailing the form and diverse built character of each settlement in the Parish provides a very thorough evidence base providing a solid platform for the policies and proposals put forward.</p> <p>In this respect we fully support the well thought out policies for the conservation of local distinctiveness and the protection of the built environment and archaeology and rural landscape character including green space, biodiversity and important views. We also commend the approaches taken in the Plan to ensuring that the design of new development is positively guided by the considerable research undertaken and thus can take cues from the historic character and vernacular of each particular locality.</p>
	National Grid	N/A	No comments

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	National Highways	General Comments	Due to the limited level of growth currently being proposed across the Neighbourhood Plan area, we do not expect that there will be any significant impacts on the operation of the SRN.
	Sports England	General Comments	<p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p>
	Gilbert and Sons – Landowners	Policy NE.9	<p>The designation of Land at end of Heron Way, Newbold on Stour as a Local Green Space under Policy NE 9 of the emerging Tredington Neighbourhood Plan is not properly justified and fails to accord with national guidance on such designations. In particular:</p> <ul style="list-style-type: none"> • The site does not serve the local community in any way • The site is not demonstrably special to the local community and • An additional designation is deemed unnecessary. The site should be deleted from the policy.
	Landowner	Policy NE.9	The designation of Land at Meeting House, Armscote, as a Local Green Space under Policy NE 9 of the emerging Tredington Neighbourhood Plan is not properly justified and fails to accord with national guidance on such designations. The site should be deleted from the policy.
	Resident	Policy NE.1	The conservation of natural habitats is essential as we have already lost large areas due to existing developments and the failure of developers to implement ecological offset which were conditions of planning consent (see Martingdales development in Newbold as an example). I would also stress that

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			any survey of the impact of development on the natural environment should be truly independent - ie not commissioned and paid for by the developer.
	Resident	Policy NE.2	This is another condition that must be enforced - as again all too often developers sign up to conditions like this and then break the condition without consequence
	Resident	Policy NE.6	Limit on permitted hours for bellringing practice at St Gregory's should be considered
	Resident	Policy NE.7	Statement regarding use of solar panels on domestic property wold
	Resident	Policy H.1	The BUAB for Tredington, fig 27 in the draft, seems to be inconsistent along the NE boundary, facing the River Stour. Why does it extend to the river for about half of the land (ie individual owner's land) but follows the line of buildings for the others. The land is very similar and as far as I can determine there is no justifiable reason to differentiate. This could well lead in future years to challenges! Why not simply follow the line of the river?
	Resident	Policy H.1	The proposed BUAB on the northern edge of Newbold re Ormond House does not include the whole of the curtilage of the property. It should. Planning consent re 21/03077/FUL was recently granted on the basis that the land concerned formed part of the curtilage of Ormond House rather than it lay in the open countryside. It was an 'infill' development. Similarly, application 22/02641/OUT, yet to be determined, similarly also forms part of the curtilage of Ormond House. Consistent decision making suggests that the relevant land in this instance should also lie within the BUAB.
	Resident	Policy BE.2	The requirement for conformity to 'reflect traditional form and shape' should also apply to any proposed and permitted self-build or custom built housing development within the parish.
	Resident	Policy IN 3	Readers need to know what 'DEFRA' and 'LLFA' stand for. This cannot be assumed. These should be spelt out in full at least once in the document.

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	Stratford District Council	General	References to the NPPF should be to the 2021 version.
		General	It is questioned whether Armscote, Blackwell and Darlingscott are too large to be described as hamlets
		General Page 12	Formatting – Heading merges with text
		Policy LE 1	It is suggested that the policy is split into discrete parts 1, 2 & 3 or A, B & C for ease of reference. Second main bullet: - “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.
		Policy NE 1, last bullet	It would not seem reasonable for this to be applied to minor developments.
		Policy NE 3	- Suggest AONB and SLA are written in full in policy itself. Last bullet point should read “Proposals which have a clear adverse impact...”
		Policy NE5	Are the guidelines set out by the British Astronomical Society the most appropriate to consider in the context of assessing planning applications? 1.
		Policy NE6	Move bullet point ‘Installation of electric vehicle charging facilities will encourage noise reduction’ to the explanation .
		Policy NE 9	The manner in which proposed LGSs are assessed is an interesting approach in that the NDP is proposing LGS sites that have been rejected as suitable within the independent assessments. It is

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			<p>hard to see how the designation of these sites is justified, therefore, given that they have been independently assessed as non-compliant with the NPPF criteria.</p> <p>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> <p>The numbering for the Tredington LGS doesn't make sense – there is no LGS3. I understand this is due to the way the assessments have been undertaken, but it is confusing for readers of the Plan.</p>
		Policy H 1, Explanation	- The final bullet doesn't include all of the residential development types which are supported by AS.10 e.g. bad neighbour sites.
		Footnote 6	Change to read "7"
		Footnote 32	Update of NPPF version and para: July 2021, para82
		Footnote 50	Change to read: Priority River Habitat – Mapping and Targeting, Publications, Natural England 11 Sep 2014.
		Footnote 54 and 55	Change to read: Department of Levelling Up and Ministry of Housing, Communities & Local Government Guidance 6 March 2014, Light Pollution.
		Footnote 58	Update of NPPF version and para: (July 2021): Paragraphs 8c, 174e and 185
		Footnote 68	Update version of NPPF: July 2021

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		Footnote 70	Change to read: Avon Planning Services, Tredington Neighbourhood Development Plan, Local Green Spaces (LGS) Site Assessments, September 2020.
		Footnote 78	Change to read: A Rural Exception Site is defined as: "Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding." National Planning Policy Framework July 2021
		Footnote 84	Change to read: 85
		Footnote 86	Change paragraph references to: 174, 175, 177
		Footnote 89	Change to read: National Planning Policy Framework July 2021
		Footnote 94	Change to read: Greenage
		Footnote 97	Change to read: River Basin Planning Guidance, Department for Environment Food & Rural Affairs, September 2021.
		Footnote 104	Change to read: Woodwise, Trees for Water, Tree and Woodland Conservation, Spring 2022
		Footnote105	Change to read: Flood Map for Planning Service, Gov.UK
		Footnote 115	Add: April 2022
		Page 90 - Line 5 and 6	Change "60" to "50" Delete: "Since that statement was made"; Insert: " Since 2011,"
		Footnote 122	Change to read : Warwickshire County Council Bus Service Improvement Plan October 2021

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		Footnote 123	Delete "Spending Arrangements, June 2019"; Insert: " User Guide, April 2021"
		General	References to the NPPF should be to the 2021 version.
		General	It is questioned whether Armscote, Blackwell and Darlingscott are too large to be described as hamlets
		Future, P27	<p>Housing – second sentence suggest amending to: "The result is an indicative need for a small number of houses spread across the communities with an emphasis towards bungalows." Third sentence – remove "if accepted" and amend wording afterward to "will focus development inside the village boundaries".</p> <p>Infrastructure - speeding, parking and traffic management aren't planning issues</p> <p>Local Amenities – a lot of these issues are not planning related, this is more of an Action Point than a Strategic Objective for an NDP.</p>
		Policy LE 1	It is suggested that the policy is split into discrete parts 1, 2 & 3 or A, B & C for ease of reference.

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			<p>First main bullet point – how could a proposal encourage local employment?</p> <p>Second main bullet:</p> <p>- “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>
		Policy NE 1, last bullet	It would not seem reasonable for this to be applied to minor developments.
		Policy NE 3	<p>- Suggest AONB and SLA are written in full in policy itself.</p> <p>Last bullet point should read “Proposals which have a clear adverse impact...”</p>
		Policy NE5	<p>Are the guidelines set out by the British Astronomical Society the most appropriate to consider in the context of assessing planning applications?</p> <p>Figure 20 is very small</p> <p>2.</p>
		Policy NE 9	The manner in which proposed LGSs are assessed is an interesting approach in that the NDP is proposing LGS sites that have been rejected as suitable within the independent assessments. It is hard to see how the designation of these sites is justified, therefore, given that they have been independently assessed as non-compliant with the NPPF criteria.

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			<p>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> <p>The numbering for the Tredington LGS doesn't make sense – there is no LGS3. I understand this is due to the way the assessments have been undertaken, but it is confusing for readers of the Plan. The numbering of the assessments should be changed to correspond with the proposed LGS so that they are numbered in numerical order.</p>
		Policy H 1, Explanation	- The final bullet doesn't include all of the residential development types which are supported by AS.10 e.g. bad neighbour sites.
		Policy H2	"Where viability for 100% affordable housing provision cannot be achieved, an element of market housing may be included within a rural exception scheme to subsidize the delivery of affordable homes." This does not accord with our Core Strategy
		Policy BE2	Where is the justification for requiring housing densities of 20dwellings/ha or less? Policy CS.9 of the Core Strategy states at Part B.3 that "Densities should be appropriate to the site taking into account the fact a key principle of good design is the relationship between the height, width and depth of buildings". Densities of over 20 dwellings/ha may be appropriate depending on the site.
		Policy IN1	I don't think its reasonable to require new developments to ensure a reliable mobile phone network – surely this is the responsibility of the phone operators.
		Policy LE.3 Encourage home working	Bullet 5 states "in the case of conversions, the building should be capable of conversion without major extension" suggest adding at end "and/or rebuild"
		Policy BE.1 Maintain the	First bullet point (Conserve the rural character of the Parish and communities by building at housing densities of 20dwellings/ha or less) seems overly prescriptive – the third point achieves

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		Rural Character of the communities	what this needs to whilst allowing for flexibility. We should be assessing the density in the context of the character of the area, not simply by applying a numerical value. Plus the NPPF encourages the effective use of land – having a strict figure prevents flexibility in allowing higher densities where they may be appropriate
		Policy BE.4	<p>Typo in bullet one – think it should read “does not have an <u>unacceptable</u> (rather than acceptable) impact on the visual and landscape amenity of the area”</p> <p>Bullet 6 should include additional text at the end of the sentence “Residential is the only viable use for the building <u>where residential use is proposed</u>”</p>
		Policy IN.1	Bullet point 1 – what if these things aren’t achievable by the applicant, i.e. they are outside of their control? It would mean the policy can’t be met
		Policy LA.1	The loss or partial loss of existing community facilities will not be supported unless it can be demonstrated that the facility is no longer valued or of use to the village” – how would we define/identify whether the facility was still “valued” by the village
		Policy H2	<ul style="list-style-type: none"> • Add ‘local’ and delete ‘identified’ to heading – ‘Meeting Local Housing Needs’ • Delete ‘affordable’ in bullet point one (local needs scheme as per cs.10 can meet affordable and local market sale need). Would recommend sentence ‘This Plan will support small-scale community-led housing schemes* on sites adjacent to the defined built-up areas of the communities** providing the following criteria are met:’. ** = are ‘communities’ defined in the Plan? * = provide definition of local needs schemes CS.15/DRSPD. • Add ‘up-to-date’ in front of Housing Needs Survey on sub-bullet point 1

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			<ul style="list-style-type: none"> • Add further sub bullet point (3) to say 'Secure arrangements exist to ensure the housing will remain affordable and available to meet the continuing needs of local people'. • Delete the 2nd bullet point re viability and recommend putting a point in the references to say that Local needs schemes as per CS.15/ AS.10 can an identified need for affordable housing and also local market sale housing. We do not allow open market housing regardless of viability, unlike the NPPF. • 'All developments will be expected to include sustainable drainage systems' – Does this policy just relate to local needs schemes or market led schemes as well? Surely it should be for all development to meet this if that is the ambition so would recommend it is removed from this policy, and add to IN2? • Add 'local' and delete 'identified' to heading – 'Meeting Local Housing Needs'