Southam Neighbourhood Development Plan

Submission Neighbourhood Plan Regulation 16 Consultation (Neighbourhood Planning (General) Regulations, 2012)

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

Page number/ Policy/ Topic	Representation	New Comment since Regulation 14 Consultation?
Para 2.2	Spelling / Formatting issue	Yes
Overall Policy map	Figure number needed	Yes
Para 4.2.2	Remove '0' from paragraph	Yes
Policy 05	Formatting issue it is 'CS.15' not CS15	Yes
Policy 6 – Self build and custom housing provision	Formatting issues – remove 'housing' after self- build in the first sentence. Remove text in first para: "provided the site is sustainable through new or existing infrastructure" as not required. Final sentence formatting issue – change to Stratford-on-Avon District council. The plan has taken out local connection criteria that was included in reg 14. Minor schemes, i.e. 10 or less dwellings, wouldn't secure contributions/obligations for infrastructure, i.e. AH, NHS, as we don't have the policy hook – this policy isn't sufficient in itself as it's far too vague. What is meant by "provided the site is sustainable" – saying either within the BUAB or within/adjacent to the BUAB would be much clearer (the latter also being consistent with the SAP) – applicants will inevitable argue that the whole Neighbourhood Plan area is sustainable given that it is a short drive to Southam.	Yes

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Policy 8	There is concern that criterion a) is too restrictive, as written. Re-draft to read "New development should support zero carbon by supporting the installation of appliances that do not consume fossil fuels".	No	
Policy 10	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? Now that Building Regs secure EVCPs is this policy redundant.	No	
Policy 16	Restricting change of use from retail to residential will not be enforceable because of relaxed national policy. The policy suggests no scope for change of use from commercial to residential even when it's been demonstrated that a commercial use isn't viable – as written there is a risk that buildings could remain vacant. The policy should differentiate between ground and upper floors. The policy should push for commercial uses being retained at ground floor, but this is not reasonable with upper floors.	No	
Para 117	Formatting issue - Speech mark missing on the end of the quote.	Yes	
Policy 02, 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.	No	
Para 102	Amend sentence as follows: The District Council's Self-Build and Custom Housebuilding Register, updated as at 1st April 2019 lists approximately 42 41 expressions of interest identifying Southam as a preferred site or one of the preferred sites.	No	
Policy 12, Safe Walking and Cycling	Amend the 1 st paragraph to read 'We require that developments Developments should provide safe pathways'.	No	
Policy 14, Flood Risk Mitigation	The policy should have more of an emphasis on flood prevention.	No	

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Policy 07, Self-Build Provision	The policy should refer to self-build and custom housebuilding. The title should be changed to cover both elements. Amend the first para to read: "Proposals that involve schemes for self-build housing and custom-build housing will be supported provided the site is sustainable through new or existing infrastructure subject to the provision of appropriate infrastructure".	No
	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.	
Para 94	Policy CS.16 states in regards to Main Rural Centres that "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:	No
	Main Rural Centres: approximately 3,800 homes" 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.	
Policy 05	The previous title was more appropriate and should be changed back. The policy is too restrictive/ prescriptive in terms of stating 1km from the post office and is unlikely to be deliverable. The policy needs to be changed to support local needs housing, and they can say bungalows for example will be supported.	No
	Suggested text alterations Meeting local housing needs Small-scale community-led housing schemes on sites beyond, but reasonably adjacent to, the defined Village Boundary will be supported where all of the following criteria are satisfied:	

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	a) there is a proven and as yet unmet housing need, having regard to an up-to-date Housing Needs Survey b) the content of the scheme, in terms of the type, size and tenure of homes proposed reasonably reflect the local identified local need. c) appropriate arrangements will be put in place via a planning obligation to secure delivery of the scheme in accordance with the intended purpose, also ensuring that in perpetuity the homes will prioritise people with a local connection to the Parish of Southam in the first instance. There are also no identified need for 3 bed bungalows in the HNS.	
Policy 05	As written the policy states bungalows "will be supported provided that such proposals also meet the needs of Policy 04" — concerned that this doesn't allow for any assessment of design, neighbouring amenity, heritage, highways, etc. How it's written implies that if you apply for a bungalow which meets Policy 04 (designing out crime) it's acceptable. A more appropriate wording would be "will be supported in principle provided that such proposals also meet the needs of Policy 04"	Yes
Policy 07	There is too much detail in the policy. There is no appetite for registered providers to do 3 bed one storey homes. It is unlikely that there will be sites coming forward large enough in the BUAB to attract an on-site affordable housing contribution.	No
Policy 07	The draft now mentions First Homes, the preference is to mention First Homes but state that they are to be considered if there is an identified need.	No
Policy 07	Definition of affordable housing –Need to check it is the current NPPF version. The NDP seems to in explanatory note 110, also set a percentage (10%) of bungalows for schemes of more than 20 homes. Whilst it is to be commended that the NDP wishes to ensure all needs are being catered for, a consistent and deliverable approach is needed.	No

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General	NDP should refer to NPPF 2021	No
General	Maps would be better next to the policies they relate to	No
Section 2.3	paragraph 37 – fifth line should be "protected characteristics"	No