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**SOUTHAM**  
**NEIGHBOURHOOD PLAN**  
**2011 TO 2031**



**SOUTHAM**  
**Neighbourhood Plan**

**Comments on Representations Received under Regulation 16**  
**Consultation**

Version 5

# Southam Neighbourhood Plan 2011 to 2031



Item No.	From	Regarding Plan Element Ref.	Representation	Steering Group Comment
1	National Highways	Objective 4	<p>Our principal interest is safeguarding the operation of the SRN, including the M40, A5 and A45. The closest junction to the SRN is the M40 Junction 12, located approximately 10km to the south-west of Southam.</p> <p>However, the parish boundary of Southam and subsequent NDP area does not encompass the SRN. Objective 4 of the NDP states that there is a target to deliver 1,100 new dwellings for the plan period. Although the parish boundary is a considerable distance from the SRN, any developments with the potential to impact the SRN would be subject to the development of Transport Assessments. This would be considered through the development management process to ensure impacts are appropriately assessed.</p>	No comment.
2	Coal Authority	General	No representation	No comment
3	Environmental Health	General	No representation	No comment
4	Sport England	Policy 1	<p>For clarity on the consultation response form for Policy 01. Local Green Spaces the reference to Local Green Space areas is incorrectly identified as being defined on Figure 10 though this should be Figure 11. Further to this the numbering for the LGS designations differ within the form differs from the Plan.</p> <p>Notwithstanding the above, Sport England queries whether the artificial sports pitch and courts at Southam College Playing Fields site (LGS 6) should be incorporated within the Local Green Space Designation with the former being a sports pitch and them providing health and</p>	It is not clear but we think that Sport England are advocating adding the hard surface sports area to the college field local green space. Whilst we agree with encouraging and enabling Sport as much as possible, protection of hard surface seems outside the definition of a Green Space.

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			recreational benefits to the local community	
5	Stansgate	Policy 01 – LGS 5	<p>1. There is no objection to the designation of the Peace Garden as a Local Green Space (LGS), provided that this can be shown to meet the criteria set out in paragraph 102 of the Framework.</p> <p>2. There are factual errors within the LGS assessment that should be corrected and the site re-considered before a designation is proposed. A larger-scale plan showing accurate boundaries of the proposed LGS needs to be provided to ensure there is no encroachment onto privately owned land.</p> <p>3. There are no public footpaths through the site. The “site description” is incorrect to say that “numerous footpaths traverse the site from east to west and north to south”.</p> <p>4. The “special qualities and local significance” section of the LGS assessment describes The Grange as unoccupied and in the ownership of Stratford-on-Avon District Council, which is no longer the case.</p> <p>5. The attached plan shows The Grange and land associated with The Grange, now owned by J R Gill Investments, over which there are no public rights of way.</p> <p>6. This plan shows the access driveways which are jointly owned by Stratford-on-Avon District Council and J R Gill Investments. There are public rights of access along these to provide access to the Grange Hall at the rear of the site and access to the Peace Garden.</p> <p>7. The plan also shows the area of car parking at the front (south-</p>	<p>No comment</p> <p>To be investigated</p> <p>There is indeed a footpath into and across the site and a tarmac multi-purpose driveway although they are not Public Rights of Way.</p> <p>Noted that the Grange has changed ownership but currently still seems unoccupied.</p> <p>Plan not received.</p> <p>Noted</p> <p>This is recognised.</p>

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			<p>eastern corner) of the site. This is owned by Stratford-on-Avon District Council with a 10 year license granted to J R Gill Investments. Whilst J R Gill Investments have been allowing members of the public to park in this area on an informal basis for the time being, there is no public right to access this land or use this car park.</p> <p>8. The “site constraints” section of the LGS assessment acknowledges that the site is situated within the conservation area. The “special qualities and local significance” section of the LGS assessment recognizes that this land comprises part of the setting of The Grange, which is a grade II listed building. It should also be acknowledged that there is a significant number of trees across the site, all of which are protected by the conservation area designation.</p> <p>9. The “special qualities and local significance” section of the LGS assessment refers to the site being “a green lung” and “an open setting to the listed building”, as well as referencing the site’s “...natural beauty...openness and tranquillity...”. These claimed attributes are protected by the conservation area status and by its status in forming part of the setting of a listed building, both of which are secured in existing legislation as well as existing national and local policies.</p> <p>10. This section goes on to refer to the peace garden as being “the most accessible part of the space”. This land is in public ownership and there is therefore no reason to think Stratford on Avon Planning Policy 1 December 2022 Stansgate Planning 2 Southam</p>	<p>Noted.</p> <p>No comment</p> <p>Among the elected representatives are the Town Council which has already resolved to support this designation.</p>

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			<p>NDP Consultation that the accessibility of this space is at risk if the LGS status is not imposed. The community simply needs to hold their elected representatives to account to secure this.</p> <p>11. There is then reference to the “threat of development” but, setting aside this very negative wording in respect of future development proposals that could bring significant benefits to the wider site and the local community, the sale of The Grange earlier this year has now clarified this situation, as shown on the plan submitted with these comments.</p> <p>12. There is no objective evidence that this site provides the ecological benefits claimed, which are more generalized comments on the benefits of protecting all flora, fauna, the food chain and ecosystems.</p> <p>13. The site is not a place of tranquillity. It is within 30m of a busy urban road, with residential properties to the south, a popular and well-used community hall to the west with associated access drive, a large office building and associated car park and access to the north and a well-used car-park to the east.</p> <p>14. Paragraph 101 of the Framework 2018 allows for the designation of land as Local Green Space where communities have identified green areas of particular importance to them. One of the criteria in paragraph 102 is that the green space should be “demonstrably special to a local community and [hold] a particular local significance, for example because of its beauty, historic significance, recreational value</p>	<p>Agreed that the text can be revised in this light.</p> <p>Agreed.</p> <p>Not agreed. The Peace Garden is at a lower level than the road and with the nearby trees adding both screening an atmosphere it is indeed a tranquil place.</p> <p>This Green Space was voted for in a specific public consultation in May 2018.</p>

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			<p>(including as a playing field), tranquillity or richness of its wildlife...”.</p> <p>15. National planning policy guidance advises that if land is already protected, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space. This is in paragraph 011 Reference ID:37-011- 20140306.</p> <p>16. The draft NDP does not demonstrate what benefit would be gained from the designation of this site as a Local Green Space, that is not already provided through national and local policies, as well as legislation, all of which protect heritage assets and the settings of heritage assets. The land is not tranquil and the ecology value has not been objectively established by an independent ecologist. Policies that add little or nothing to adopted Core Strategy policies or existing legislation should not be included within a neighbourhood development plan. There is no convincing case at this time to justify LGS status and there are inaccuracies in the assessment that need to be corrected.</p>	<p>Consideration has been given the current protection is very general, the cost/benefit ratio for LGS designation was enough to go ahead. See also public comment on the Conservation Area.</p> <p>The factual issues can be corrected.</p> <p>The benefit of LGS designation is that it is specific rather than a general inclusion as part of the grounds of a listed building and some nearby trees.</p> <p>It is not clear what the benefit would be of <i>removing</i> the LGS designation.</p>
6	Canal and River Trust	General	No representation	No comment
7	St Wulfstan Surgery	General	<p>St Wulfstan Surgery is a highly regarded, CQC rated Outstanding GP Surgery in Southam which was rated the 68th best in England for patient satisfaction.</p> <p>We have grown from a patient list size of 3836 in 2015, to 9430 today which represents a near 250% growth in 7 years. This means that our surgery has facilitated and absorbed the rapid population growth within</p>	<p>The desire to increase the GP capacity is both welcome and needed.</p> <p>Although not in the NDP there is a site being promoted beyond the Flying Fields if this surgery would be willing to operate a dual premises operation it would certainly benefit residents on the eastern side of the “bypass”.</p>

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			<p>Southam. We are operating from the same premises which we were working from in 2015 with no extension to the premises over this period of time. Our clinical space is now fully saturated and our lease is due to expire within the next 7 years.</p> <p>We would be keen to develop our own premises to ensure we can continue to offer high quality GP services and improve the health and wellbeing of our local community into the long term. As such we would most appreciate this consideration in the development of the Neighbourhood Plan, and any support that could be provided in identifying appropriate sites for a future development, or any other support that could be provided to make this aspiration a reality.</p>	
8	Barton Wilmore on behalf of CEMEX UK	General	<p>We write on behalf of our Client, CEMEX UK Operations (CEMEX) and welcome the opportunity to respond to the Draft Southam Neighbourhood Plan (the 'draft Plan') and write in respect of CEMEX's land interest at Southam Cement Works, the southern part of which falls within the Neighbourhood Plan area. We commend the Town Council in preparing a Neighbourhood Plan and appreciate all the work that it entails. The Southam Neighbourhood Plan will need to demonstrate it has met the 'Basic Conditions' as set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (alongside procedural compliance matters). To meet the Basic Conditions, the neighbourhood plan must: - Have regard to national policies and advice contained in guidance issued by the Secretary of State. -</p>	<p>The comment is noted. We hope the Aspiration, treated generally, will be treated as a serious input to the master planning.</p>

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			<p>Contribute to the achievement of sustainable development. - Be in general conformity with the strategic policies of the development plan for the area (in this case, the Stratford Core Strategy, 2016). - Be compatible with and not breach European Union (EU) obligations; and - Meet prescribed conditions and comply with prescribed matters (namely the plan not breaching the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017). As above, the draft Plan must be in general conformity with the development plan for the area which in this case is the Stratford Core Strategy 2016. The Southam Cement Works site is identified as a Large Rural Brownfield site. This adopted policy highlights uses that are considered to be appropriate on the site including residential, employment, leisure, tourism and recreation. Moreover, that a comprehensive Masterplan must be prepared in conjunction with inter alia local communities and agencies. CEMEX are now reviewing the development options for the site and surrounding landholdings and are promoting the redevelopment of the site through the emerging local plan. A copy of the landholding submitted for consideration in respect of the May 2021 Call for Sites is enclosed. It is envisaged that Reg 34710/A3/VB/ac 2 9 December 2022 18 Issues and Options Consultation on the South Warwickshire Local Plan (SWLP) will commence in early 2023. It is envisaged that the wider landholding presents an opportunity for an employment led Garden Village focussed on the</p>	



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			<p>continued employment use and investment in the Southam Cement Works in the short, medium and long term with surrounding residential use. CEMEX are committed to the Southam Cement Works which is likely to remain operational for the next 25-30 years. CEMEX wish to continue to invest in the site and explore the potential for further employment uses both within the wider CEMEX operational and non-operational functions (i.e. training facilities, labs etc) but also the wider employment market in terms of start-up units for businesses etc. This is together with residential use. We note that the Draft Neighbourhood Plan includes a proposal for Aspiration A12. Potential Local Green Space as follows: 194 The southern extremity of the current Cemex quarry works, now disused, is a potential site for expanding the available Green Space for Southam and nearby villages. The site is to be reserved as a wildlife area and nature reserve for the benefit of Southam, Long Itchington and surrounds. As well as its importance as a nature reserve, its future potential lies in its recreational value and tranquil setting for local residents, walkers and visitors. Figure 38 Aerial View of the Southern End of the Quarry CEMEX must ensure health and safety requirements are met in terms of access to the Southam Cement Works and ensure compliance with restoration conditions and requirements on non-operational land. The land is unsuitable for public access as it is subject to Quarry regulations at present. This is expected to be the case for the operational lifetime of</p>	

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			<p>the Quarry; CEMEX expect it to remain operational for circa. 30 years. CEMEX propose to work with the District Council, Town, the community and stakeholders in developing and assessing the development proposals for the site, which we anticipate will be set out in a masterplan. We would suggest that the Masterplan would be the vehicle by which to review the Town Council's aspirations for public access. We look forward to working with the Town to bring forward the 34710/A3/VB/ac 3 9 December 2022 site in a holistic manner and discuss how the site can contribute to the aims and objectives of the Town and wider community. We attach for information the formal representation form in response to the NP consultation to ensure that our representations are registered as duly made.</p>	
9	Woolfbond planning on behalf of Rockspring Barwood Southam Ltd.	Policy 01	<p>See separate pdf document for full text of this representation. Points are summarised below as context for the comments.</p> <p><u>Introduction</u></p> <p>Appeal to nominate in the NDP a site north and south of Welsh Road West</p> <p><u>Assessment against basic conditions</u></p> <p><u>Local Green Spaces (Policy 01)</u></p> <p>No evidence provided as to where the green space deficiencies are.</p>	<p><b>Note- Comments below concerning the promoted site and related LGS designations have been discussed with and are supported by the District Council ward member.</b></p> <p>There is no obligation to nominate sites and the strategy has been to indicate preferences in broad terms rather than nominate. It is not clear how the proposed development would aid the expansion of the college as it seems to constrain the college site.</p> <p>Please refer to the Basic Conditions statements supplied with the NDP.</p> <p>Correct, this was not the intention of Policy 01 which is designed to protect the few that we have in Southam.</p> <p>Many of the green spaces in Policy 01 have public access and are valuable amenity space. Even sports fields,</p>

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			Unrestricted public access and rights of way.	although not unrestricted in access are valuable outdoor amenities.
			Analysis LGS 1 (Stowe Valley)	We are confident that our consultants made good assessments of the LGS's in the current Plan against NPPF requirements.  The attempt to devalue these spaces by citing widths of footpaths is not accepted and the reality is that LGS 1 was top of the poll of candidate LGS designations in a Southam public consultation and is used extensively.
			Analysis LGS 6 (College Field)	The comment about LGS 6 was addressed in the Reg 14 consultation. Sport England supports it (item 4 herein) and indeed wants it to be bigger. No representation was received from Southam College. The proposed development seems to occupy the additional playing field space that would be required were they to expand the pupil intake.
			Proposed Riverside Park	We note that the site around two drainage ponds is offered as parkland as part of the proposed development. Such space in similar SuDS surrounds in Southam has yielded little in community use.
			Housing Mix (Policy 07) Objection to the use of ageing data.	The data used is from an HNS from 2017 supported by population trends data from the County Council. The representation offers no evidence to the contrary.
			There also no evidence that a set proportion of bungalows within an overall mix of dwellings will not impact the viability of development..."	The connection with para 34 of the NPPF is not clear.
			Electric Vehicles (Policy 07) Policy duplicate building regulations and should be deleted.	Policy 10 is about the capacity of the domestic electricity infrastructure and ensuring that new homes have three phase power to help supply higher

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			Promotion of land north and south of Welsh Road West for inclusion as an allocation in the NDP.	<p>levels of electricity consumption caused by EVs and heat-pump-based heating backed up by electric heating. It is therefore not accepted that this Policy should be deleted.</p> <p>Please refer to response 102 in the Reg14 consultation.</p>
10	Residents & Local Workers	Policy 01	<p>General support with one objection.</p> <p>Objection - Several of the areas designated are not public green space, and are not open for public use LGS6, LGS11, LGS12, LGS13</p>	It is not necessary for an LGS to have unrestricted access by the public but the implication that we need more such space is accepted.
11	Residents & Local Workers	Policy 02	<p>General support with one objection.</p> <p>Objection - We must limit the number of new homes being built in Southam. We already have creaking infrastructure, and this lovely historic market town is becoming more of a suburb. The almost constant building works are also an unattractive disruption.</p>	No comment
12	Residents & Local Workers	Policy 03	<p>Full support with one comment:</p> <p>The Conservation area has already been subject to planning approval and has changed since this proposal.</p>	No comment
13	Residents & Local Workers	Policy 04	Full support with no comments.	
14	Residents & Local Workers	Policy 05	<p>Three support / two objections</p> <p>Southam town centre is already in decline ... putting additional dwellings within 1 km of the post office will fragment the town centre.</p> <p>As per my previous objection, we simply do not have the infrastructure to accommodate yet more homes within Southam. It feels as though we are becoming a dumping ground for</p>	<p>The Policy was not aimed specifically at adding new dwellings in the town centre but to ensure that those dwellings most suited to older and less mobile people were sited near to amenities.</p> <p>No comment.</p>

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			Stratford-upon-Avon and destined to become a packed and concentrated semi-rural suburb rather than to remain a beautiful historic market town.	
15	Residents & Local Workers	Policy 06	General support with one objection:  As my objection to Policy 05	No comment.
16	Residents & Local Workers	Policy 07	Three support / two objections  I believe there is a need for more single story dwellings for the older community as Southam has a higher % of retired people  As per my objection to Policy 05.	Agreed.  No comment.
17	Residents & Local Workers	Policy 08	Full support	
18	Residents & Local Workers	Policy 09	Full support	
19	Residents & Local Workers	Policy 10	Full support	
20	Residents & Local Workers	Policy 11	Full support	
21	Residents & Local Workers	Policy 12	Full support with comments:  Traffic noise and speeding near new housing estates is an issue that affect those living there. Please include plans to limit the traffic speed to 30mph on all roads within 100m of built up and residential area.  Including suitable for people to reach town and the College safely from nearby villages.  Again the problem of cars on the highway is a hazard to pedestrians and cyclists and roadside parking should be banned in high pedestrianised areas such as the Southam college	We don't believe setting speed limits is a task for the NDP but the point that speed limits need to keep pace with new developments (for safety rather than noise) is well taken.  We have to stay within the plan boundary, but the point is somewhat covered in the first sentence of the Policy by connecting to external routes where they exist.  Some of this is an enforcement issue rather than planning policy. There is scope for further restricting parking on Welsh Road West near the college, particularly at the three peak times of day.

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22	Residents & Local Workers	Policy 13	Full support with one comment:  Cycle parking allocated spaces needs to be doubled. As a 1 bed unit will most likely have two occupants and so on.	We don't agree that one bedroom flats are most likely housing two adults.
23	Residents & Local Workers	Policy 14	Full support	
24	Residents & Local Workers	Policy 15	Full support	
25	Residents & Local Workers	Policy 16	Full support with comments:  Current commercial properties in the town should not be down graded to residential, ie the police station and law court as this will fragment the town commercial environment.  No building on the high street should be residential, and we simply must encourage new businesses to open which are not yet more cafés! We now have four or five cafés on (or just off) the high street, and an abundance of charity shops, yet very few stores from which people might regularly purchase a variety of other items. In all honesty, I would rather drive out to Tesco than use the high street, which is a shame considering it is within walking distance. I appreciate it is difficult to attract new businesses given the rental costs, but perhaps this latter point could be looked at with subsidies for certain required businesses - grocers, butchers, bakers, other locally sourced/made produce.	No comment  No comment
26	SDC	Para 2.2	New comment:  Spelling / formatting issue	Agreed. This will be fixed automatically with the restoration of the figure number for the plan area map. (see 27 below)
27	SDC	Overall Policy map	New comment:  Figure number needed	Agreed – this figure number has been lost somehow and will be restored as figure 10 with all subsequent figure numbers incrementing by 1.

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28	SDC	Para 4.2.2	New comment: Remove '0' from paragraph	Will be fixed automatically with 27 (see above)
29	SDC	Policy 05	New comment: Formatting issue it is 'CS.15' not CS15	Agreed
30	SDC	Policy 06 – Self build and custom housing provision	New comments:  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.	Agreed  Agreed  Agreed  Agreed
31	SDC	Policy 06 – Self build and custom housing provision	Comments from Regulation 14 version:  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 inevitably argue that the whole Neighbourhood Plan area is sustainable given that it is a short drive to Southam.	The term "infrastructure" as used here means services such as water, sewerage, power. It would seem that a clearer term should be used in the Policy.  One theme of the Neighbourhood Plan is to discourage "short drives" in favour of walking and cycling and so changing "sustainable" to the more precise "within or adjacent to the BUAB" would be acceptable.
32	SDC	Policy 08	Comments from Regulation 14 version:  There is concern that criterion a) is too restrictive, as written. Re-draft to read "New development should	It is unclear what obligations would arise from "supporting the installation

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			support zero carbon by supporting the installation of appliances that do not consume fossil fuels".	of appliances..." and so the suggested amendment is not felt to help achieve the objectives of the Policy (help zero carbon) in any way.
33	SDC	Policy 10	<p>Comments from Regulation 14 version:</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> <p>Now that Building Regs secure EVCPs is this policy redundant.</p>	<p>This Policy has been discussed at a workshop with WPD (including power distribution company WPD's Operations Director) and the quoted evidence includes a pilot project in South Wales to demonstrate the practicality of routinely laying in 3 phase power to all new developments. The marginal cost of doing this is slight compared to retrofitting later and allows for greater domestic capacity and flexibility in distribution. This is not just about EV charge points but also expected growth in heat pumps and the "top up" electric heating that they usually need.</p>
34	SDC	Policy 16	<p>Comments from Regulation 14 version:</p> <p>Restricting change of use from retail to residential will not be enforceable because of relaxed national policy.</p> <p>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.</p> <p>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.</p>	<p>Agree but please refer to para 152 "...this Policy encourages developments that improve the existing commercial centre in preference to ... change of use". We don't see this as "restricting" what we don't want but simply encouraging what we do.</p> <p>It is true that the Policy is silent on change of use but as worded, the Policy does not set out any <i>prevention</i> measures on change of use. Something that is not favoured doesn't mean it's banned altogether.</p> <p>The Policy perhaps should use "property" rather than "site" to cover this point.</p>
35	SDC	Para 117	<p>New comment:</p> <p>Formatting issue - Speech mark missing on the end of the quote.</p>	<p>There is no quote in para 117 but may be referring to 171. If so, this is deliberate for a quote continuing across multiple paragraphs.</p>
36	SDC	Policy 02, Brownfield Land	<p>Comments from Regulation 14 version:</p>	<p>This comment is not clear: the Policy is about land within the Plan Area rather than the BUAB.</p>



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			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.	
37	SDC	Para 102	<p>Comments from Regulation 14 version:</p> <p>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.</p>	Agreed (and the word "approximately" is no longer required).
38	SDC	Policy 12, Safe Walking and Cycling	<p>Comments from Regulation 14 version:</p> <p>Amend the 1st paragraph to read '<del>We require that developments</del> Developments should provide safe pathways'.</p>	Agreed
39	SDC	Policy 14, Flood Risk Mitigation	<p>Comments from Regulation 14 version:</p> <p>The policy should have more of an emphasis on flood prevention.</p>	We stand by the reply made (and changes that arose) to a similar comment on the Reg 14 version.
40	SDC	Policy 07, Self-Build Provision	<p>Comments from Regulation 14 version:</p> <p>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".</p> <p>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-</p>	We assume this in fact applies to Policy 06. These comments were dealt with in Reg 14 public consultation and don't apply to the Reg 16 submission version.

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			on-Avon District or by having close family living in the District... The criteria in the NDP policy should be re-defined, or removed.	
41	SDC	Para 94	<p>Comments from Regulation 14 version:</p> <p>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:</p> <p>Main Rural Centres: approximately 3,800 homes”</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>	<p>Agreed. We propose to change the wording to read:</p> <p>“The Core Strategy identified Southam as one of eight Main Rural Centres (MRCs) in the Stratford on Avon District to accommodate 3,800 homes between them. As of 2018 Southam had planning commitments or completions for 1108 dwellings.”</p>
42	SDC	Policy 05	<p>Comments from Regulation 14 version:</p> <p>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.</p> <p>Suggested text alterations</p> <p>Meeting local housing needs</p> <p>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:</p>	<p>Some confusion has been caused by the fact that the Policy 05 justification still carries the previous title. 4.4.2 title should read: “Justification: Siting of Ground Floor Single Level Dwellings”</p> <p>We disagree with this comment. The concept of “within 1km of the Post Office” is simply intended to be specific about what is meant by “near the amenity centre of Southam”.</p> <p>This is not the intention of Policy 05.</p>

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## 2011 to 2031



Item No.	From	Regarding Plan Element Ref.	Representation	Steering Group Comment
			<p>a) there is a proven and as yet unmet housing need, having regard to an up-to-date Housing Needs Survey</p> <p>b) the content of the scheme, in terms of the type, size and tenure of homes proposed reasonably reflect the local identified local need.</p> <p>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.</p> <p>There are also no identified need for 3 bed bungalows in the HNS.</p>	Agreed
43	SDC	Policy 05	<p>Comments from Regulation 14 version:</p> <p>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.</p> <p>A more appropriate wording would be “will be supported in principle provided that such proposals also meet the needs of Policy 04”</p>	There is a mistake in the reference in the Policy wording. The last sentence should refer to Policy 03 (conservation area) not Policy 04.
44	SDC	Policy 07	<p>Comments from Regulation 14 version:</p> <p>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</p>	It is not clear what “registered provider” means here. In relation to affordable housing, is it housing associations?

# Southam Neighbourhood Plan 2011 to 2031



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			forward large enough in the BUAB to attract an on-site affordable housing contribution.	We are aware of nascent plans for a major development outside the BUAB but within the Plan Area.
45	SDC	Policy 07	New comment:  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.	Disagree – not clear what “identified need” means but there will always be a need for this type of home.
46	SDC	General	New comment:  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.	Yes it is.  Propose to delete para 110.
47	SDC	General	Comments from Regulation 14 version:  NDP should refer to NPPF 2021	It does.
48	SDC	General	Comments from Regulation 14 version:  Maps would be better next to the policies they relate to	This comment was made and considered previously. We think they are better together to avoid repetition.
49	SDC	Section 2.3	paragraph 37 – fifth line should be “protected characteristics”	Agreed.
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## Appendix 1 – Representation from Woolf Bond Planning