

Tredington 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 Reg 14 Consultation?	Tredington PCNPG Comment
General	References to the NPPF should be to the 2021 version.	No	Agreed and actioned
General	It is questioned whether Armscote, Blackwell and Darlingscott are too large to be described as hamlets	No	
General Page 12	Formatting – Heading merges with text	Yes	Agreed and actioned
Policy LE 1	<p>It is suggested that the policy is split into discrete parts 1, 2 & 3 or A, B & C for ease of reference.</p> <p>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.</p>	No	<p>Agreed and actioned</p>
Policy NE 1, last bullet	It would not seem reasonable for this to be applied to minor developments.	No	<p>Developments on the periphery of villages can impact the wildlife to a significant degree. For example, the Greenacres and Ormond Lodge in Newbold. Hence the Groups decision to apply these criteria to all developments.</p>
Policy NE 3	- Suggest AONB and SLA are written in full in policy itself.	No	Agreed and actioned

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	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?	No	They are the only definitive criteria we could find to illustrate residents’ views on “Dark Skies” .
Policy NE6	Move bullet point ‘Installation of electric vehicle charging facilities will encourage noise reduction’ to the explanation .	Yes	Agreed and Actioned
Policy NE 9	<p>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.</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>NB. The application goes before the Planning Committee on 7 December.</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>	No	<p>The LGSs have been suggested and supported by residents. “Accessibility” is not a criterion in the NPPF, even though the assessor uses it as a factor. The assessor is also not consistent as they support the Old Meeting House which is not accessible to residents.</p> <p>We have retained the original numbering for LGS to avoid confusion. There are issues to be resolved on at least two- the Old Meeting House for example. Once</p>

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			these issues are resolved we will renumber.
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.	No	Agreed and Actioned
Footnote 6	Change to read "7"	No	Agreed and Actioned
Footnote 32	Update of NPPF version and para: July 2021, para82	No	Agreed and Actioned
Footnote 50	Change to read: Priority River Habitat – Mapping and Targeting, Publications, Natural England 11 Sep 2014.	No	Agreed and Actioned
Footnote 54 and 55	Change to read: Department of Levelling Up and Ministry of Housing, Communities & Local Government Guidance 6 March 2014, Light Pollution.	No	Agreed and Actioned
Footnote 58	Update of NPPF version and para: (July 2021): Paragraphs 8c, 174e and 185	No	Agreed and Actioned
Footnote 68	Update version of NPPF: July 2021	No	Agreed and Actioned
Footnote 70	Change to read: Avon Planning Services, Tredington Neighbourhood Development Plan, Local Green Spaces (LGS) Site Assessments, September 2020.	No	Agreed and Actioned
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	No	Agreed and Actioned
Footnote 84	Change to read: 85	No	Agreed and Actioned
Footnote 86	Change paragraph references to: 174, 175, 177	No	Agreed and Actioned

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Footnote 89	Change to read: National Planning Policy Framework July 2021	No	Agreed and Actioned
Footnote 94	Change to read: Greenage	No	Agreed and Actioned
Footnote 97	Change to read: River Basin Planning Guidance, Department for Environment Food & Rural Affairs, September 2021.	No	Agreed and Actioned
Footnote 104	Change to read: Woodwise, Trees for Water, Tree and Woodland Conservation, Spring 2022	No	Agreed and Actioned
Footnote 105	Change to read: Flood Map for Planning Service, Gov.UK	No	Agreed and Actioned
Footnote 115	Add: April 2022	No	Agreed and Actioned
Page 90 - Line 5 and 6	Change “60” to “50” Delete: “Since that statement was made”; Insert: “ Since 2011,”	No	Agreed and Actioned
Footnote 122	Change to read : Warwickshire County Council Bus Service Improvement Plan October 2021	No	Agreed and Actioned
Footnote 123	Delete “Spending Arrangements, June 2019”; Insert: “ User Guide, April 2021”	No	Agreed and Actioned
General	References to the NPPF should be to the 2021 version.	No	Agreed and Actioned
General	It is questioned whether Armscote, Blackwell and Darlingscott are too large to be described as hamlets	No	The Oxford Dictionary defines a hamlet as “a small settlement, generally one smaller than a village, and strictly (in Britain) one without a church.” Blackwell and Armscote fall under this definition. Darlingscott has a church but is very small compared with

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			the two LSV villages. The Steering Group decided to categorise all three as hamlets.
Future, P27	<p>Housing – second sentence suggest amending to: “The result is an <u>indicative need for a</u> 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>	No	<p>Agreed and Actioned</p> <p>Agreed but these are issues that face all five communities and need to be highlighted in the Plan.</p> <p>Agreed. However this part of the Plan is setting the context for the policies and all of these issues were raised by residents during the process.</p>
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	No	Agreed and deleted from policy

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Policy BE2	Where is the justification for requiring housing densities of 20 dwellings/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.	No	We are dealing with rural communities and the Steering Group believe that developments above 20 dwellings/ha would compromise the rural nature of the settlements.
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.	No	We do not agree. Provision of masts is an operators responsibility but the masts are subject to Planning permissions. This policy highlights the need to support such applications to provide a reliable service. This becomes more important when set against the requirement to encourage home working.
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”	Yes	Noted and actioned
Policy BE.1 Maintain the Rural Character	First bullet point (Conserve the rural character of the Parish and communities by building at housing densities of 20 dwellings/ha or less) seems overly prescriptive – the third point achieves what this needs to whilst allowing for	Yes	Noted. The Group are trying to preserve the rural

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of the communities	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		nature of the villages. High density housing erodes the rural character hence our choice of what we think is an acceptable figure.
Policy BE.4	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” 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> ”	Yes	Noted and actioned
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	Yes	The planning application will not be approved. It is essential going forward in rural communities to ensure that there is a comprehensive and reliable communications network. This needs to be established at the outset of any planning proposal.
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	Yes	A bespoke survey of residents could easily be conducted through “Survey Monkey”.
Policy H2	<ul style="list-style-type: none"> • Add 'local' and delete 'identified' to heading – 'Meeting Local Housing Needs' 	Yes	Agreed and actioned

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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'. 		Agreed and actioned