Alcester Neighbourhood Development Plan

Pre-submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General) Regulations 2012)

The following collated document includes:

- Parish Councils & Councillors consulted
- Generic consultees
- Other consultees
- Comments from Main/Other Consultees and the Steering Group's response
- Schedule of significant comments from Stratford on Avon District Council and the Steering Group's response
- Schedule of minor comments from Stratford on Avon District Council and the Steering Group's response
- Comments from Mr A Matheson and the Steering Group's response
- Comments from the Public Consultation from both Launch day and questionnaires distributed to all households and businesses in the parish and the Steering Group's response

Alcester Neighbourhood Plan- PCs & Cllrs			Email sent	Response
Alcester Town Council	clerk@alcester-tc.gov.uk		03/10/2018	
Arrow PC with Weethley PM	arrow.weethleypc@gmail.com		03/10/2018	
Haselor Parish Council	council@haselorandwalcote.co.uk		03/10/2018	
Kinwarton Parish Council	kinwartonpcmgs@gmail.com		03/10/2018	
Wixford Parish Council	wixfordpcclerk@gmail.com		03/10/2018	
Exhall Parish Council	karendawnparnell@gmail.com		03/10/2018	
Coughton Parish Council	clerk@coughtonpc.org.uk		03/10/2018	
Great Alne Parish Council	greatalne.parishcouncil@googlemail.com		03/10/2018	
Cllr Daren Pemberton	daren.pemberton@stratford-dc.gov.uk	Ward Member Bidford East	03/10/2018	
Cllr Eric Payne	eric.payne@stratford-dc.gov.uk	Ward Member Alcester Town	03/10/2018	
Mike Gittus	mike.gittus@stratford-dc.gov.uk	Ward Member Kinwarton	03/10/2018	
Mark Cargill	mark.cargill@stratford-dc.gov.uk	Ward Member Bidford West and Salford	03/10/2018	
Peter Barnes	peter.barnes@stratford-dc.gov.uk	Ward Member Welford-on-Avon	03/10/2018	
Peter Moorse	peter.moorse@stratford-dc.gov.uk	Ward Member Hathaway	03/10/2018	
Simon Lawton	simon.lawton@stratford-dc.gov.uk	Ward Member Wootton Wawen	03/10/2018	
Susan Adams	susan.adams@stratford-dc.gov.uk	Ward Member Alcester and Rural	03/10/2018	
Wychavon dc	policy.plans@wychavon.gov.uk		03/10/2018	
County Councillor	markcargill@warwickshire.gov.uk		03/10/2018	

Generic Consultation consultees		Email sent	Response
Akins Ltd	windfarms@atkinsglobal.com	02/10/2018	
ancient monuments society	office@ancientmonumentssociety.org.uk	02/10/2018	
arqiva	enquiries@arqiva.com	02/10/2018	
Birmingham International Airport	andrew.davies@birminghamairport.co.uk	02/10/2018	
BT Group PLC	ian.binks@bt.com	02/10/2018	bounced back - not at this address
CABE	info@designcouncil.org.uk	02/10/2018	
CABE	kate.jones@designcouncil.org.uk	02/10/2018	bounced back - not at this address
Canal and River Trust	planning@canalrivertrust.org.uk	02/10/2018	
Capital and Property Projects	property@warwickshire.gov.uk	02/10/2018	
Coal Authority	planningconsultation@coal.gov.uk	02/10/2018	
Council for British Archaeology	webenquiry@archaeologyuk.org	02/10/2018	
Council for British Archaeology	casework@britarch.ac.uk	02/10/2018	
Cotswold Conservation Board	malcolm.watt@cotswoldsaonb.org.uk	02/10/2018	bounced back - retired - resent to martin.lane@cotswoldsaonb.org.uk
Cov & Leics Diocesan Advisory Ctte	dac@covlecportal.org	02/10/2018	
Civil Aviation Authority	mark.wakeman@caa.co.uk	02/10/2018	
Coventry Airport	rsweeney@coventryairport.co.uk	02/10/2018	
CTC - National Cycling Charity	righttoride@ctc.org.uk	02/10/2018	auto acknowledgment 2/10/2018
CTC - National Cycling Charity	cycling@ctc.org.uk	02/10/2018	
Historic England	e-wmids@historicengland.org.uk	02/10/2018	
Historic England	peter.boland@historicengland.org.uk	02/10/2018	
English Heritage Parks and Gardens	kim.auston@english-heritage.org.uk	02/10/2018	
Environment Agency	martin.ross@environment-agency.gov.uk	02/10/2018	
Environment Agency	swwmplanning@environment-agency.gov.uk	02/10/2018	
Everything Everywhere	windfarms.orange@everythingeverywhere.com	02/10/2018	bounced back - resent 3/10/2018
Force Crime Prevention Design Advisor	mark.english@warwickshire.pnn.police.uk	02/10/2018	
Forestry Commission	paul.webster@forestry.gsi.gov.uk	02/10/2018	auto acknowledgement 2/10/2018
Garden History Society	conservation@gardenhistorysociety.org	02/10/2018	
Georgian Group	david@georgiangroup.org.uk	02/10/2018	
Glide Sport UK	office@glidesportuk.co.uk	02/10/2018	
Homes and Communities Agency	mail@homesandcommunities.co.uk	02/10/2018	bounced back - email no longer in use resent to enquiries@homesengland.gov.uk
Highways Agency (east mids)	spatialplanningEM@highwaysengland.co.uk	02/10/2018	
Highways Agency (west mids)	nddrstwm@highwaysengland.co.uk	02/10/2018	
Inland Waterways Association	nick.kenilworth@fsmail.net	02/10/2018	Failed email delivery 09/10/2018
Inland Waterways Association	iwa@waterways.org.uk	02/10/2018	
Joint Radio company	windfarms@jrc.co.uk	02/10/2018	
Kernon Countryside Consultants	info@kernon.co.uk	02/10/2018	
London Oxford Airport	info@londonoxfordairport.com	02/10/2018	

MBNL(Acting for Everything Everywhere)	info@mbnl.co.uk	02/10/2018	bounced back - too big - resent 3/10/2018
MBNL(Acting for Everything Everywhere)	amanda.baker@mbnl.co.uk	02/10/2018	
Ministry of Defence	deopsnorth-lms7safe@de.mod.uk	02/10/2018	
Accessible Stratford	med2swan@gmail.com	02/10/2018	
Mr Butler (CPRE)	namb999@btinternet.com	02/10/2018	Email comments received 3/10/18
CPRE	office@cprewarwickshire.org.uk	02/10/2018	
National Air Traffic Services	nerlsafeguarding@nats.co.uk	02/10/2018	
National Grid Gas Distribution	plantprotection@uk.ngrid.com	02/10/2018	auto acknowledgement 2/10/2018. 25/10/2018- see comments. National Grid email: n.grid@ameccfw.com
National Grid UK Transmission	ap.enquiries@ukngrid.com	02/10/2018	Failed email delivery 09/10/2018
National Planning Casework Service	npcu@communities.gsi.gov.uk	02/10/2018	email bounced back - resent to pcu@communities.gsi.gov.uk
National Trust	james.sharp@nationaltrust.org.uk	02/10/2018	
National Trust	chris.lambart@nationaltrust.org.uk	02/10/2018	
Natural England	consultations@naturalengland.org.uk	02/10/2018	auto acknowledgement 2/10/2018. Full 24/10/2018- see comments
Natural England	jamie.melvin@naturalengland.org.uk	02/10/2018	24/10/2018- see comments
Network Rail	townplanning.LNW@networkrail.co.uk	02/10/2018	
Ofcom	spectrum.licensing@ofcom.org.uk	02/10/2018	
Off Route Airspace	steve.hyett@caa.co.uk	02/10/2018	
Off Route Airspace	marks.smailes@caa.co.uk	02/10/2018	
SDC Conservation	planning.conservation@stratford-dc.gov.uk	02/10/2018	
WCC Principle Highway Control Officer	joannearcher@warwickshire.gov.uk	02/10/2018	auto acknowledgement 2/10/2018
Ramblers Association	policy@ramblers.org.uk	02/10/2018	
Ramblers Association	michael.b43@02.co.uk	02/10/2018	auto acknowledgement 2/10/2018. Failed delivery 09/10/2018
SDC Planning and Environment	planning.applications@stratford-dc.gov.uk	02/10/2018	Ack 10/10/2018
Royal Agricultural Society of England	martynluscombe@hotmail.com	02/10/2018	
RSPB	colin.wilkinson@rspb.org.uk	02/10/2018	
Severn Trent Water	net.dev.east@severntrent.co.uk	02/10/2018	
Sport England West Midlands	planning.westmidlands@sportengland.org	02/10/2018	
Sport England West Midlands	bob.sharples@sportengland.org	02/10/2018	
Stratford-on-Avon Gliding Club	chairman@stratfordgliding.co.uk	02/10/2018	
Stratford-on-Avon Gliding Club	nick.jaffray@btopenworld.com	02/10/2018	
Sustrans	edward.healey@sustrans.org.uk	02/10/2018	
Thames Water Utilities	devconteam@thameswater.co.uk	02/10/2018	
The Design Council	kate.jones@designcouncil.org.uk	02/10/2018	email bounced back - not known at this address
Theatres Trust	planning@theatrestrust.org.uk	02/10/2018	
Upper Avon Navigation Trust Ltd	elainebaird@avonnavigationtrust.org	02/10/2018	
Victorian Society	notifications@victoriansociety.org.uk	02/10/2018	email bounced back - defunct email address. Resent to casework@jcnas.org.uk
Warwickshire Badger Group	sahyll@yahoo.co.uk	02/10/2018	

Warwickshire Bat Group	enquiries@warksbats.co.uk	02/10/2018	
Warwickshire Police	planningconsultations@warwickshire.police.uk	02/10/2018	
Warwickshire Police	ian.king@warwickshire.pnn.police.uk	02/10/2018	
Warwickshire Police Road Safety	roadsafety@warwickshire.police.uk	02/10/2018	
Warks Primary Care Trust	david.goodwin@coventrypct.nhs.uk	02/10/2018	email bounced back - not known at this address
Warks Primary Care Trust	graham.nuttall@property.nhs.uk	02/10/2018	
NHS Property Services Ltd	joanne.bowers@property.nhs.uk	02/10/2018	email bounced back - not known at this address
NHS Property Services Ltd	mark.jones@property.nhs.uk	02/10/2018	
Warwickshire Rural Housing Association	sarahbt@wrccrural.org.uk	02/10/2018	25/10/2018- see comments
Warwickshire Wildlife Trust	annie.english@wkwt.org.uk	02/10/2018	4/10/2018- see comments
Warks Wildlife Trust	gina.rowe@wkwt.org.uk	02/10/2018	auto acknowledgement 2/10/2018
WCC - planning	planningstrategy@warwickshire.gov.uk	02/10/2018	
WCC Archaeology	annastocks@warwickshire.gov.uk	02/10/2018	
WCC Capital & Property Projects Officer	julianhumphreys@warwickshire.gov.uk	02/10/2018	
WCC Extra Care Housing	timwillis@warwickshire.gov.uk	02/10/2018	
WCC NDP Liaison Officer	jasbirkaur@warwickshire.gov.uk	02/10/2018	01/11/2018- see comments
WCC Flood Risk	michaelgreen@warwickshire.gov.uk	02/10/2018	
WCC Ecology	planningecology@warwickshire.gov.uk	02/10/2018	
WCC Forestry	forestry@warwickshire.gov.uk	02/10/2018	
WCC Fire & Rescue Service	fireandrescue@warwickshire.gov.uk	02/10/2018	
WCC Gypsy & Traveller Officer	robertleahy@warwickshire.gov.uk	02/10/2018	email bounced back - too many recipients - resent 3/10 2018
WCC Health & Communities	timwillis@warwickshire.gov.uk	02/10/2018	
WCC Highways	highwayconsultation@warwickshire.gov.uk	02/10/2018	
WCC Land Registry	peterendall@warwickshire.gov.uk	02/10/2018	
WCC Libraries	paulmacdermott@warwickshire.gov.uk	02/10/2018	email bounced back - too many recipients - resent 3/10/2018
WCC Rights of Way	elainebettger@warwickshire.gov.uk	02/10/2018	
WCC Stratford Cycle Forum	johnharvey@warwickshire.gov.uk	02/10/2018	email bounced back - not at this address
Wellesbourne Airfield	mjlittler@hotmail.com	02/10/2018	
Wellesbourne Airfield	tower@wellesbourneairfield.com	02/10/2018	
Western Power Distribution	wpdwayleavesmidlands@westernpower.co.uk	02/10/2018	
Woodland Trust	enquiries@woodlandtrust.org.uk	02/10/2018	auto acknowledgement 2/10/2018
Warwickshire Rural Community Council	kims@wrccrural.org.uk	02/10/2018	
Warwickshire Amphibian and Reptile Team	tim@gribblybugs.com	02/10/2018	
Stansgate Planning	mail@stansgate.co.uk	02/10/2018	Response received 15/11/18 for Graftongate and Wythes
Coventry and Warwickshire Partnership NHS Trust	enquiries@covwarkpt.nhs.uk	02/10/2018	auto acknowledgement 2/10/2018
South Warwickshire Critical Commissioning Group	contactus@southwarwickshireccg.nhs.uk	02/10/2018	
Community Forum - Stratford area	southernareateam@warwickshire.gov.uk	02/10/2018	
Stratford Business Forum	jon@stratford-business-forum.co.uk	02/10/2018	
Strutt and Parker	simon.handy@struttandparker.com	02/10/2018	

Bromford Housing Group	michael.hill@bromford.co.uk	02/10/2018	email bounced back - not at this address
Stonewater Housing Association	matthew.crucefix@stonewater.org	02/10/2018	
Fortis Living Housing Association	mramdehal@fortisliving.com	02/10/2018	email bounced back - resent 3/10/2018 - bounced back
Warwickshire Rural Housing Association	neil.gilliver@midlandsrh.org.uk	02/10/2018	
Orbit Group	jacqueline.messenger@orbit.org.uk	02/10/2018	auto acknowledgement 2/10/2018 - resent to Rebecca Stevens
Waterloo Housing Group	reuben.flynn@waterloo.org.uk	02/10/2018	

Responded

Other consultees	Email address	Email sent	Response
Matthew Neal, SDC	matthew.neal@stratford-dc.gov.uk	03/10/2018	Ack 03/10/2018- see comments dated 11/12/2108
Alan Granger, Ragley Estates (via Stansgate)	alangranger@ragley.co.uk	03/10/2018	19/10/2018- see comments
C G Corbett & Sons, Oversley Hill Farm	cc.corbett@btinternet.com	03/10/2018	
Piers Daniell, Oversley Castle (via agent)	planning@jppc.co.uk	03/10/2018	
Framptons	Greg.Mitchell@framptons-planning.com	03/10/2018	16/11/2018- see comments
Sarah Bassett, Alcester Chamber of Trade	chairman@alcesterchamber.co.uk	03/10/2018	
St Nicholas Church	rector@alcesterminster.org	03/10/2018	
Our Lady & St Josephs RCC	ourladyandstjoseph@yahoo.co.uk	03/10/2018	
Alcester Baptist Church	pastor.abc@gmail.com	03/10/2018	
Alcester Methodist Church	revrichardwilde@gmail.com	03/10/2018	
Morrison Insurance Solutions	ian.m@morrisoninsurance.co.uk	04/10/2018	11/10/2018- see comments
Alcester Football Club	garywilliams1@talktalk.net	10/10/2018	
Mr & Mrs T Wythes (via Stansgate)			15/11/2018 and then amended 16/11/2018- see comments
Graftongate (via Stansgate)			15/11/2018- see comments

Responded

Main/Other Consultees	Comment	Policy	Response
Nicholas Butler, CPRE	I have skimmed through it and wonder a policy about your conservation area would be a good idea. They are mentioned under heritage assets in the Core Strategy's Policy CS.8, but not very convincingly. We need to take better care of them than that. And what about a policy about listed buildings and developments adjacent to them? Again, the Core Strategy is not forthright enough. Every town has a great deal of heritage to lose.		Already covered in HBE12.
Chris Talbot, Biodiversity Manager, Warwickshire Wildlife Trust c/o Warwickshire Biological Records Centre Warwick	We have just received a copy of the Alcester Neighbourhood Development Plan pre-submission consultation document. It is so good to have a proper and complete section on the natural environment, so many neighbourhood development plans just don't use the rich information Warwickshire has on the local environment.	NE	Noted with thanks
SDC	It will not be possible to provide a response until 11th December 2018, following the Cabinet meeting scheduled for Monday 10th December to which the Council's response to the consultation will be presented for approval. Major and minor comments subsequently received from SDC 11/12/2108.		Comments from SDC and ATC responses are listed on a separate document
Ian Millard, Morrison Insurance Solutions	1. Clearly the development of Arden Forest Ind Est is part of the key plan to offer additional employment opportunities to the area however whilst I appreciate there is more detailed outlined planning for this I question the level of detail of how this is integrated into the existing estate. An example of this would be that parking can be a challenge on the estate as new tenants arrive (Helping Hands being a recent example). Any typically the areas developed do not provide sufficient parking for the people that work there – How will this be dealt with as the Estate grows	EC5	Agreed- Amend EC5 wording to require adequate parking provison
	2. The Tech Initiative for a Unit close to the built up area of town that is mentioned and has a separate document (2015) is again a brief note but seems a very important opportunity with no real detail on the likelihood of this happening and the commitment for the council to make it happen.	Project 8	Outside remit of NDP- See Project 8
	3. Commitment to Health Space/living is mentioned often. We are internally trying to promote this but would like to see a greater involvement with The Town Council to see how green areas can help support the Town Workforce – Walking Areas, Outdoor Break out etc.		Additional project proposed (Project 9- to replace CLW2) to improve use and accessability of green spaces. TI1 also relates
	4. I am not certain that there is enough to recognise the increasing traffic issues that will occur as the town increases in size both Commercially & residentially (Albeit maybe this is not part of the remit of this document)		Outside remit of NDP- See Project 2
	5. I am interested to understand where the TC obtain business feedback from bearing in mind there is a lack of a Non High street business organisation, the Chamber of Commerce is predominantly high St focused and does I am sure provide valuable feedback for their areas.		A copy of the Summary doc was delivered to every business in addition to previous Business questionnaire in 2014
	6. The support of Land Change use makes sense and has been evident recently.		Noted
	7. 20 years ago Planning often included Bicycle racks as a nod to Green issues, Vehicle charging points seems much more relevant these days – Is this part of policy – I do appreciate this is DC Planning	HBE7	Policy HBE7 supports for residential provision. SDC SPD covers charging points for other developments
Alan Granger, Ragley Estates c/o Stansgate Planning	1. Objection is made to the draft proposals that the Bleachfield Street North Allotments and the Allimore Lane Allotments (shown as LGS 15 and LGS 17 within the draft Alcester neighbourhood development plan (draft ANDP)) should be identified as Local Green Spaces.	NE3	Advice sought from Planning Consultant see below. LGS 15 & 17 will be retained.

	2. Policy CS.25 of Stratford District Council's adopted Core Strategy provides protection for allotments:"Development proposals that would result in the loss of public or private open space, including allotments, without suitable replacement being made, will be resisted unless: 1. It can be demonstrated that there is an absence of need or it is surplus to requirements; and 2. It does not make a valuable contribution to the amenity and character of the area."		The ANDP group is aware of the generic requirements of Policy CS.25. However, Policy NE3 of the ANDP specifically identifies areas within or adjacent to the town where specific protection is required. Such protection through Local Green Space designation is entirely justified in the context of Policy CS.25. There are numerous examples of Local Green Space designations in Neighbourhood Plans having passed examination within Stratford District despite Policy CS.25. The current protection afforded under Policy CS.25 is not a reason to delete any of the proposed designations including LGS15 and LGS17 in the ANDP.
	3. 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.		The guidelines (See Planning Practice Guidance) relating to the designation of Local Green Spaces do not require the demonstration of "additional local benefit that would be gained by designating sites as Local Green Space" as the contributor suggests. Each proposed Local Green Space has been independently assessed against the actual criteria outlined in the PPG and all draft proposed designations are deemed to qualify principally because of their local significance and because they are demonstrably special to the local community. This is clearly demonstrated by their physical condition being well-kept and maintained and by the fact that they are actively and regularly used by the local community.
	4 & 5. Appendix 4 of the draft ANDP confirms that the sites are managed by Alcester Town Council and are popular among residents. The appendix goes on to comment on the benefits generally of allotments. It states that all four allotment sites referred to in draft policy NE3 are well tended and that currently supply is equalling demand. However, the appendix does not demonstrate what additional local benefit would be gained by designating these two allotment sites as Local Green Spaces and therefore draft policy NE3 fails to accord with the relevant national planning policy guidance.		The Independent assessments which form part of the evidence base to the ANDP show how the established criteria have been followed and why the proposed Local Green Spaces are considered demonstrably special to the local community and of local significance.
	6. The draft ANDP does not demonstrate what benefit would be gained from the designation of these two sites as Local Green Spaces, that could not be gained through adopted development plan policy CS.25. Policies that add little or nothing to adopted Core Strategy policies should not be included within a neighbourhood development plan.		
	7. Paragraph 99 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 100 is that the green space should be "demonstrably special to a local community and [hold] a particular local significance".		

	8. The draft ANDP does not identify why these two allotments sites are of particular importance to the community, nor why they are demonstrably special or hold a particular local significance. In the absence of this justification, development plan policy CS.25 does provide suitable and sufficient protection for the allotments, and the proposed designation does not accord with the national advice found in paragraphs 99 and 100 of the Framework 2018.		
Further comments dated 16/11/2018	1. With regards to the site constraints in the site assessment for LGS17, these are incorrect as the site does not lie within the built-up area boundary as shown on the Alcester inset plan in the District Council's adopted Core Strategy. Nor does it lie within an Area of Restraint.		Agreed- LGS17 is not technically within the BUAB – Planning Consultant to amend the assessment
	2. With regards to the ecological significance, the site does not lie adjacent to the River Arrow. The ecological value claimed is therefore based upon the wrong premise. In any event, there is no objective evidence that the site provides the benefits claimed, which are more generalized comments on the benefits of protecting all flora, fauna, the food chain and ecosystems.		Agreed- LGS17 is not located next to the River Arrow – Planning Consultant to amend the assessment
	3. There is no dispute regarding the many benefits of allotments and there is no disagreement that well-used allotments should be protected from development that does not meet, in this District, policy CS.25. However, it remains that the "special qualities and local significance" claimed for this site relate to their use as allotments and are thus protected by adopted policy CS.25. In fact, this policy protection is strengthened by the fact that allotments in Alcester are so popular and so well-used.		Noted
	4. The allotments are barely visible from the footpath running along Allimore Lane and over the A435 and so it is difficult to see what "strong contribution" these allotments make to "local character and distinctiveness". As a result of their location, these allotments are not of particular significance with regards to "natural beauty". In any event the character of this area will change quite significantly with the major residential development on land to the north of these allotments		The strong contribution LGS17 makes to the local character and distinctiveness of the area is not restricted to whether the site is visible. The site is an active area of green space which is worked. There are a number of allotments in and around the town and they all contribute to a network of spaces which is cherished and valued by the local community. This creates the character and distinctiveness.
	5. 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.		The land is not already protected, other than being outside the current BUAB. This does not afford sufficient protection as development can take place outside the BUAB.
	6.Turning to site LGS15, this site lies within the Green Belt, where national planning policy guidance advises that "consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space". This is in paragraph 010 Reference ID: 37-010-20140306.		LGS15 is within the Green Belt. There are many examples of where a proposed LGS in the Green Belt has been endorsed by Councils and Examiners.
	7. There is no objective evidence that this site itself contributes to ecological significance. Instead there are general comments about the value of orchard trees for the Nobel Chafer and the value of protecting all flora, fauna, the food chain and ecosystems.		The evidence presented is proportionate having regard to the advice contained with the PPG. It would be overly burdensome and unviable for the QB to commission a detailed habitats and protected species survey for every proposed LGS. It is clear from the physical characteristics of the site that there is potential natural habitats which would support a variety of species. The QB does not rely solely on the ecological significance of this LGS for designation but it is a contributing factor.

	8. As with LGS17, it remains that the "special qualities and local significance" claimed for this site relate to their use as allotments and are thus protected by adopted policy CS.25. In fact, this policy protection is strengthened by the fact that allotments in Alcester are so popular and so well-used. The value of this site to the wider undeveloped land on this southern edge of the town is limited by its position tucked in between residential development on three sides.		Currently allotments may be protected in the Core Strategy under CS.15. However, this may not be the case in the future when the plan is reviewed. The QB is entitled to secure measures within the NP to protect local allotments.
	9. The objection raised in my letter of 19 October still stands.		Noted
Sarah Brooke-Taylor, WRCC	Various references to Alcester – possibly more clarification required each time to confirm whether this is Alcester town (ie including the parts within Kinwarton parish) or Alcester as per the designated Neighbourhood Area.		NDP only covers desigated area which is parish of Alcester
	The Town Council are aware of a potential site on Allimore Lane and it may be sensible to allocate this site within the NDP. Further representations regarding this site to be made separately.		Noted
	Policy HBE1 – what definition are you using for "key worker"?	HBE1	Agreed- Definition to be added to Glossary
	Policy HBE2 – why use different local connection criteria from those used by SDC? No definition of "close family". These criteria seem to only apply to "local needs housing".	HBE2	Agreed- Local connection criteria updated to match SDC criteria
	Policy HBE4 – this could create problems if an Extra Care facility at Moorfields Road ever comes to fruition.	HBE4	Agreed to update policy to read 'Proposals for the development of bungalows within the Built Up Area Boundary will be strongly supported. Developments of 10 or more units (except specialist accommodation) should include at least 10% bungalows.'
	Policy HBE9 – what definition are you using for "high standards of design"?	HBE9	Noted- Refer to SDC Development Requirements SPD Part A: How to Achieve Good Design
	Policy HBE10 – what about a scheme that is less dense than surrounding development?	HBE10	Noted- density must be "in keeping" not same
	Policy HBE11 – what definition are you using for "high quality"?	HBE11	Noted- See SDC Core Strategy CS.9
Natural England	Natural England does not have any specific comments- *but offers NE info sources*		Noted with thanks
National Grid	National Grid has identified that it has no record of such apparatus [electricity and gas transmission] within the Neighbourhood Plan area.		Noted
The Coal Authority	No specific comments to make		Noted
WCC NDP Liaison Officer	There is awareness that Alcester is at risk of flooding and it should be made clear that further development will need to take this into account – flood measures were implemented after 2007 events. The LFFA have two recent reports of flooding in Alcester.	Alcester Today	Agreed to add 'Please see NE 6' to this section
	Explanation: The two allocated housing sites (ALC1 and ALC2) are both classed as major developments therefore, the LLFA will be consultees on any planning applications that will be submitted.	HBE1	Noted
	Enhancing access to and utilisation of open green spaces: We support the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water Above ground SuDS could be utilised in open spaces. You could also encourage new developments to open up any existing culverts, providing more open spaces/green infrastructure for greater amenity, biodiversity and reduced flood risk; and the creation of new culverts should be kept to a minimum.	CLW2	An additional project initially proposed- Project 9- but this was rejected by the Steering Group and the original policy retained.

	Safeguarding rivers and ponds: See above point about not creating new culverts therefore safeguarding existing watercourses.	NE4	Agreed- add wording...'Development proposals which adversely affect existing rivers, streams and ponds including the creation of new culverts will not be supported'
	1.Objective B- Mitigating and preventing the increase of flood risk- "Planning applications for development within the plan area must be accompanied by site-specific flood risk assessment in line with the requirements of national and district policy but may also be required on a site-by-site basis based on locally available evidence." This could be made more specific, stating that if a site is over 1ha it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment must be submitted to the Lead Local Flood Authority for review.	NE6	Noted- Referred to Planning Consultant who indicated that no change was necessary.
	2. "No development proposals involving the discharge of surface water into the River Arrow to the north of Gunnings Bridge will be supported unless it can be demonstrated by means of approved comprehensive digital modelling techniques" The LLFA will review modelling and information submitted in relation to surface water discharge rates and check if it is adequate. The LLFA uses the SuDS hierarchy as a list of preferred drainage options when reviewing planning applications and would support developments discharging into a watercourse (subject to conditions). The preferred SuDS options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a surface water sewer. Connecting to a combined sewer system is not suitable and not favourable.		Agreed additional wording to be supplied to strengthen explanation and to add the text below to the Explanation text for the policy: The LLFA uses the SuDS hierarchy as a list of preferred drainage options when reviewing planning applications and would support developments discharging into a watercourse (subject to conditions). The preferred SuDS options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a surface water sewer. Connecting to a combined sewer system is not suitable and not favourable.
	3. "The use of sustainable drainage systems and permeable surfaces will be expected where appropriate"- you could reword this to state that "all developments will be expected to include sustainable drainage systems".		Agreed- text updated

	4. "Where appropriate, development proposals must incorporate suitable and sustainable means of drainage. Where site conditions are proven to be unsuitable an alternative drainage solution will need to be agreed with the local planning authority and water authority." – This could be written again to provide a stronger, more detailed point about SuDS. You could include the following: Discharge rates should be set to control run off at greenfield rates for a 1 in 100 year event, plus an allowance for climate change. You could suggest a 40% allowance as stated in our Standing Advice document (which can be found online at https://apps.warwickshire.gov.uk/api/documents/WCCC-1039-73), which was written in line with the Environment Agency's update dated February 2016. Please be aware that 5 l/s is NOT the minimum possible discharge rate achievable. In relation to this, the requirements set out in the following documents should also be adhered to in all cases: ? The National Planning Policy Framework; ? Paragraphs 030 - 032 of the Planning Practice Guidance (PPG); ? DEFRA's Non-statutory technical standards for sustainable drainage. On smaller development sites where the discharge rate is below 5 l/s, these rates are achievable through water reuse, protected orifices, and better design. SuDS features should be at the surface and adequate treatment of flows should be provided to ensure that final flows leaving the site do not degrade the quality of accepting water bodies. Flood attenuation areas must be located outside of flood zones and surface water outlines to ensure that the full capacity is retained. You could include a point that the Lead Local Flood Authority requires SuDS to be designed in accordance with CIRIA 753 SUDS Manual. The adoption and maintenance of all drainage features is a key consideration to ensure the long term operation and efficiency of SuDS. As part of the planning procedure the LLFA will expect to see a maintenance schedule, at detailed design stages. All SuDS features should be monitored and cleaned regularly as a matter of importance.		The Planning Consultant advised that this comment is too detailed and technical for the policy and so was not included.
	Project 3: Additional Car Parking: The document suggests that new car parks might be developed at some stage. Depending on the size and type of drainage, there is an opportunity to introduce SuDS and adequate treatment for flows, to ensure that discharge/run off flows leaving the car park site do not degrade the quality of accepting water bodies, providing greater amenity.	Project 3	Noted
Inland Waterways Association (Warks branch)	Whilst the main interests of the Inland Waterways Association (Warks branch) are the navigable rivers and canals of our area, we are happy to support Neighbourhood Plans in general terms for any community in Warwickshire. We believe your plan has been well researched, written and presented and gives a clear account of the needs and aspirations of the Alcester area. Hopefully the eventual adoption of your plan should help to maintain and improve the town and ensure any future development is well designed, sustainable and in keeping with the unique features of the existing environment.		Noted with thanks
Historic England (West Midlands)	Historic England is supportive of both the content of the document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness through good design and the protection of heritage assets (designated and undesignated) including through submission for inclusion in Stratford Councils Local List is to be applauded. Policies to conserve landscape character including green spaces and important views are equally supported. In conclusion, the plan reads overall as a well written, well-considered document which is eminently fit for purpose. We consider that an exemplary approach is taken to the historic environment of the Town and that the Plan constitutes a very good example of community led planning.		Noted with thanks
Stansgate Planning for Graftongate (Alcester) Ltd	1. Graftongate supports the inclusion of the land covered by the outline planning permission reference 16/02615/OUT within the BUAB as this in turn provides continued support for the development of individual units within the site.	Map 2 BUAB	Noted with thanks

	2. The objective is highly appropriate and Graftongate supports these aims.	Economy Obj A	Noted with thanks
	3. Graftongate is pleased that the Neighbourhood Plan is supportive of schemes that demonstrate direct benefits to the local area within the BUAB. Notwithstanding this it would be more appropriate that the Neighbourhood Plan support all employment development within the BUAB, not just that which can demonstrate direct local benefits. Any development will have indirect benefits to the local area, through support for other local services and facilities, shops, nurseries etc and is therefore desirable.Given the importance of the proposed extension to the Arden Forest Industrial Estate to the employment opportunities and existing businesses in Alcester Graftongate would propose the inclusion of an additional paragraph to the policy which offers specific support for the development of the land for a range of B1, B2 and B8 uses.	Policy EC5	Economic development should be encouraged not just where there is direct local benefit...The Planning Consultant suggested and it was agreed that the beginning of the policy is reworded to: "Proposals for new commercial developments, particularly where they demonstrate direct benefits to the local area...."
Stansgate Planning for Mr and Mrs T Wythes	This objective is strongly supported. There are elements of the community whose housing needs are not met by the housing currently available in Alcester and this shortfall should be addressed through the Neighbourhood Development Plan.	Housing Obj A	Noted with thanks. The Planning Consultant felt that it is unclear what evidence there is to support the claim that housing needs are not met by the housing currently available in Alcester. The NP does not have to allocate housing in it.
NB This is a revised set of comments dated 16/11/2018 from Mrs M Rogers, Stansgate Planning re Mr & Mrs Wythes land	The BUAB has been drawn tightly around the existing built up area of Alcester, extended only to encompass those parcels of land which already benefit from planning permission. Policy HBE 1 permits additional development only within the BUAB and there are no proposed allocations. As such the opportunities for additional residential development, required to meet Objective A, are extremely limited. There are parcels of land adjoining the BUAB which are excluded from the Green Belt and are suitable for residential development. These parcels should be included within the BUAB to allow future development. In particular the BUAB should be altered to include the land outlined in red on attached drawing 7928-600 *(in original document)*, which includes land owned by Mr and Mrs Wythes. This parcel of land is suitable for development and is discussed in greater detail below.	Map 2 BUAB	The Planning Consultant* felt that the merits of the site being promoted by this contributor should be considered by the group and TC. However, if the site was to be allocated in the next version of the NP then this would represent a significant modification to the current Reg 14 version. Consequently, a further Reg 14 consultation would be needed. Additionally, an exercise in looking at the reasonable alternatives of other potential sites would need to be undertaken. One site alone cannot be allocated. There is a process which needs to be followed which includes looking at a range of sites that are available (in this case arguably GB sites could be ruled out and sites considered within and around the town which are not in GB), getting them independently assessed and getting the views of the public. The Steering Group agreed that the BUAB should not be amended.
	A policy which supports development within the BUAB is supported but as written it is unduly restrictive. The policy states that there will be encouragement for: Community let housing; Service plots for self-build; and Schemes for key worker- yet because the BUAB is drawn tightly around the settlement there will be no land available to accommodate such development. Indeed specific support is given for the development of land off Allimore Lane yet the wording of the policy prevents it from coming forward because it lies outside the BUAB. **Policy HBE 1 should be amended to permit housing within or adjoining the BUAB**	HBE 1	The Planning Conusultant advised that Policy HB1 should not be amended to "permit housing within or adjoining the BUAB". This would fail the Basic Conditions and conflict with the Core Strategy and the NPPF.

	A policy which supports the provision of housing to meet local needs both written and reasonably adjacent to the BUAB is strongly supported. However Policy HBE 2 and its explanation is written to support only affordable accommodation in accordance with the Stratford Core Strategy, with an allowance for market housing if is required for viability reasons. It makes no reference to other forms of housing which are required to meet identified local needs, including bungalows as set out in Policy HBE 4. The policy needs amending to properly support all forms of local needs housing. In particular it needs to recognise that local needs housing can be split into two categories - affordable housing and local needs market housing and support both forms. Local needs market housing is required to ensure there remains a proportion of homes within the settlement which are available for local people in perpetuity. Any such properties should be first available, at each sale, to people fulfilling the local connection criteria already set out with the policy. The NPPF 2018 now defines affordable housing as 'housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownerships and/or is for essential local workers) and which complies with one or more of (the following) definitions: affordable housing, starter homes, discounted market sale housing, other affordable routes to home ownership.' The restrictive interpretation within the Neighbourhood Plan is not policy compliant and needs amending to reflect the NPPF. **Policy HBE2 should be updated to support the provision of a wide range of local needs housing. This must include all the forms of affordable housing which fall within the NPPF definition (including discounted market sales housing). Local needs market housing should also be included.**	HBE 2	Agreed- Policy HBE2 to be amended to take account of the new definition of affordable housing
	We strongly support this policy which identifies the very real need for bungalows in Alcester. It is felt that the land owned by Mr and Mrs Wythes could meet some of this identified need, being situated just 7 minutes walk from the town centre.	HBE4	Noted

	The Neighbourhood Plan contains clear support for the development of land *off* Allimore Lane, including that within the ownership of Mr and Mrs Wythes. Notwithstanding this, and as outlined above, should the Neighbourhood Plan be adopted as written the land could not be successfully brought forward for development other than as an entirely affordable rent or shared ownership scheme without other forms of affordable housing such as discounted market sales housing and without local needs market housing. This is more restrictive than the Stratford on Avon Core Strategy and more restrictive than the NPPF. The preceding comments identify ways in which the Plan could be amended to support the development of the land owned by Mr and Mrs Wythes, and bring the Plan in line with national guidance and the Core Strategy. An alternative way to ensure the development of the Wythes land would simply be to allocate the land for development through the Neighbourhood Plan. The land was put forward to Stratford District Council as part of its Call for Sites in March 2018 and a copy of that submission is attached herewith for information, together with the access appraisal which was submitted then and has previously been forwarded to Alcester Town Council. Since that submission further discussions have taken place with the Highways Consultants who have indicated the existing access road is suitable for accommodating at least 30 additional dwellings. The prospective developers of the site have a meeting with the Town Council to explore the future of the site later this month and at that time anticipate providing an updated highways report together with new indicative layouts showing in the region of 30 dwellings. **The Neighbourhood Plan should include a new policy for the allocation of the land outlined in red on attached drawing 7928-100 *(in original document)* for the development of approximately 30 homes. The owners, their agents and the prospective developers would welcome the opportunity to discuss and help draft an appropriately worded policy with the Town Council.**	Omitted Policy- Allocation of land off Allimore Lane for Housing	This was considered by the Planning Consultant- please see comments above* under Map 2 BUAB
Framptons on behalf of Gallagher Estates Ltd	This submission is made on behalf of Gallagher Estates Ltd in the context of the Alcester Neighbourhood Development Plan 2018 – Pre-submission Consultation Version (NP), and relates to land north and south of Allimore Lane, Alcester. A plan identifying the land to the north and south of Allimore Lane is attached at APPENDIX 1. It should be noted that the area of land located to southern end of land south of Allimore Lane is located within the Parish of Arrow and Weethley and therefore not included within the designated Neighbourhood Plan Area.		The response from the Planning Consultant is noted below. The area of land located to southern end of land south of Allimore Lane is located within the Parish of Arrow and Weethley and Map 2 Built up Area Boundary has been amended accordingly.

	Policy HBE 1 'Residential Development within the Built-up Area Boundary' states that *"All areas outside of the Built-up Area Boundary are classed as open countryside. New housing in the countryside will only be permitted in accordance with the criteria in paragraph 79 of the NPPF and Policy AS.10 of the Core Strategy"*. This policy does not allow for Reserve Housing Sites to come forward in accordance with Core Strategy Policies CS.15 and CS.16. The NP has failed to properly acknowledge the Site Allocations Plan which is currently in preparation to identify the Reserve Housing Sites. It is therefore recommended that an additional sentence is included within Policy HBE 1 to allow for the coming forward of Reserve Housing Sites, in the knowledge that these will be located outside of the Built-up Area Boundary but within the Neighbourhood Plan Area. The Neighbourhood Development Plan Steering Group has identified that there are parcels of land on either side of Allimore Lane "which might lend themselves to futureas part of its Call for Sites in March 2018 and a copy of that submission is attached herewith for information, together with the access appraisal which was submitted then and has previously been forwarded to Alcester Town Council. Since that submission further discussions have taken place with the Highways Consultants who have indicated the existing access road is suitable for accommodating at least 30 additional dwellings. The prospective developers of the site have a meeting with the Town Council to explore the future of the site later this month and at that time anticipate providing an updated highways report together with new indicative layouts showing in the region of 30 dwellings. The Neighbourhood Plan should include a new policy for the allocation of the land outlined in red on attached drawing 7928-100 (in original document) for the development of approximately 30 homes. The owners, their agents and the prospective developers would welcome the opportunity to discuss and help draft an appropriately worded policy with the Town Council.ortance.Development here provides the opportunity to strengthen and enhance the settlement edge by rounding off the settlement inside the A435. The extent of development at land south of Allimore Lane, Alcester would not result in the identity and or/integrity of the settlement being undermined as a result of the reduction in the gap with the adjacent settlement. The site is bound to the west by A435 which would act as an appropriate development boundary. The sites to the north of Allimore Lane have been permitted in the context of the Landscape Sensitivity Study, which shared the same conclusions for ALC12, ALC13 and ALC15.	HBE1	The NDP is not obliged to allocate land for housing. If the District Council decide to allocate additional land adjacent to Alcester for housing in their Site Allocation Plan then the NDP would not be able to prevent this from happening. There is no guarantee that land adjacent to Alcester will be allocated. Policy HBE1 should not be amended to include a sentence which would allow reserve sites to come forward. This would be too vague and uncertain. Either the NDP should allocate a site/s or it should be silent on allocations. If it is silent then there is a chance that the District Council will choose a site for allocation through the Site Allocation Plan. The Steering Group notes that the three sites to the south of Allimore Lane have been promoted through the SHLAA and call for sites exercise. The Steering Group notes that there is a claim that the site is deliverable but is not privy to any evidence which confirms this. The Steering Group finds it difficult to believe that the development of this greenfield site will "strengthen and enhance the settlement edge". This in any case is a matter of detail which is not available at this stage. In conclusion the Steering Group agreed to remain silent on this issue.
	Policy HBE 3 'Housing Mix' is not in accordance with Core Strategy policy CS.19. There is no evidence provided setting out the justification for the removal of a ranged percentage or the change in percentage mix. Policy HBE 3 should be amended to be fully in accordance with Core Strategy policy CS.19 and to include the same caveats as CS.19.	HBE3	The Planning Consultant felt that Policy HBE3 on housing mix does not conflict with the Core Strategy. The percentages are within the banding in the Core Strategy. This approach has been recently endorsed by the Examiner in the Stratford NDP. No change needed.

	Policy HBE 4 'Bungalows' places a policy requirement on Developments of 10 or more units stating that they should include at least 10% bungalows. There is no evidence base for such a requirement on all developments of 10 or more dwellings. If bungalows are required for the elderly or for down-sizing then such a requirement could be incorporated as ground floor flats – this is an approach currently accepted by Officers at Stratford-on-Avon District Council and other housing and planning authorities around the country. The provision of ground floor flats rather than bungalows is also a much more efficient use of land. Bungalows by their nature require larger plots which then has a knock- on effect to the number of dwellings that can be delivered on each site. The 2015 SHMA does identify a need for bungalows within Stratford District, however the document makes a comment on the differing rental levels of a 2-bed flat and a 2-bed detached bungalow stating "Affordable Rented housing can therefore be considered to be similar to social rented housing but at a potentially higher rent. The 80% (maximum) rent is to be based on the open market rental value of the individual property and so it is no possible to say what this will actually mean in terms of cost (for example the rent for a two-bedroom flat is likely to be significantly different to a two-bedroom detached bungalow)". In these terms it appears that a detached bungalow may be more expensive to rent than a 2-bed flat. Therefore, any ambiguous reference to 'bungalows' should be replaced by single storey ground floor dwellings.	HBE4	The NDP needs to be amended to acknowledge that there are other forms of accommodation which can be suitable for older generations and those with mobility issues e.g. ground floor flats. However, it should also be noted that ground floor flats are a fundamentally different house type which many may not find desirable due to the lack of private (not shared) amenity space and the fact that they are not detached. Many people of an older generation are unlikely to downsize from a large detached house to a ground floor flat. There is sufficient evidence in the explanation to justify the need for bungalow accommodation, however it was agreed to strengthen this and underline the difference between bungalows and ground floor flats. This is not just about properties for rent. The cost of renting a bungalow over a ground floor flat is therefore irrelevant.
	Policy TI 1 'New Development and Connectivity' includes requirements for major development to provide direct connections to the existing network of public footpaths, cycleways and bridleways and rights of way with clear signposting and full accessibility for all users except where it can be clearly demonstrated to physically impossible. There is also a requirement for developments to improve accessibility to existing routes, and any visual impact on existing routes should be minimised through screening landscaping and planting. Further requirements also include that developments should seek to encourage a modal shift to reduce car journeys by integrating into existing footpaths, cycleways and bus routes which may require developers liaising with local public transport providers. Such development should also provide bike storage. It is considered that the requirements of Policy TI 1 are not in accordance with Core Strategy Policy CS.7 'Green Infrastructure' and Core Strategy Policy CS.26 'Transport and Communication'. The Draft Neighbourhood Plan does not include any reference to the adopted Core Strategy policies CS.7 and CS.26 within the supporting text.		Policy TI1- There is no conflict between proposed Policy TI1 in the NDP and CS.7 and CS.26 in the Core Strategy. Reference can be made to the Core Strategy policies if they are relevant.
	Policy NE 5 'Protecting Valued Landscapes and Important Views' states that *"The Valued Landscapes and Important Views should be conserved from any significant adverse impact resulting from new development (such as distracting from or obstructing views)".* The Valued Landscape identified at VL6 (as shown on map 6), located along Allimore Lane is limited to and restricted to the eastern *"view from old railway bridge, Allimore Lane looking South East towards Oversley Woods"* (page 61) and therefore does not impact upon the allocated site to the north of Allimore Land nor any potential forthcoming Site Allocation Plan sites to the north and south of Allimore Lane.	NE5	Noted
Andrew Matheson, Resident	Comprehensive response to NDP- See separate document	Various	See separate document

Alcester Neighbourhood Development Plan

Pre-submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General) Regulations, 2012

Alcester NDP Steering Group responses to schedule of Significant comments from Stratford-on-Avon District Council

(Appendix 1)

Suggested new text underlined deleted text ~~struckthough~~

Page number	Section	Comment	Response
Page 5	Introduction – Section 1.2 (The Neighbourhood Plan Area)	It is noted that the Neigbourhood Area excludes those parts of the built-up area of the town falling within (1) Arrow with Weethley parish and (2) Kinwarton parish. It would have been preferable to include those areas within the designated Neighbourhood Area, although it is recognised that this is an issue that will need to be pursued outside the scope of the current Plan. It is considered that this section does not adequately explain why a joint NDP has not gone ahead with Kinwarton parish, particularly given the obvious links. Recommend that in the first paragraph, insert the words "a large proportion of" after "includes" as it needs to be acknowledged that a part of the town is actually within the parish of Kinwarton.	Comments noted – an explanation of the reasons for not producing a joint NDP are included in the submission version (see 1.2). Noted but this paragraph describes the Neighbourhood Plan Area of which Kinwarton does not form part.
Page 13	Policy HBE 1 (Residential development within the Built-up Area Boundary)	It is noted that the Built-up Area Boundary replicates that in the Core Strategy, although it excludes those parts of the town falling within (1) Arrow with Weethley parish and (2) Kinwarton parish. It is questionable therefore whether this policy really creates any 'added value' especially given different policies could potentially apply within the same Built-up Area Boundary. As a minimum it is recommended that the part of the Built-up Area Boundary that falls within Arrow and Weethley parish should be clearly shown as excluded from the Neighbourhood Area. The Policy states that 'schemes for key worker housing will also be encouraged.' This appears to be at odds with the explanatory text to HBE 2 (Local Needs Housing) which identified a need for affordable housing but not specifically for key worker accommodation. The term 'key worker' is, in any case, not defined (whether in the Plan itself, the Core Strategy or the NPPF). Furthermore, no need for 'key worker' accommodation is identified in the 2017 Survey (only housing for rent or shared ownership sale from a housing association, or	Noted – new colouring is now included on the map of the BUAB to exclude those areas which fall within Kinwarton and Arrow with Weethley parishes. "Key worker" is now defined. Steering Group wish to keep reference to 'key worker' in the policy.

		owner-occupation). It is therefore recommended that reference to key worker housing is deleted.	
Page 14	Policy HBE 1 Explanation	Because there are no site allocations / reservations proposed, additional housing supply (over and above existing commitments) will, by definition, be sourced from unallocated 'windfall' development. Experience suggests that such sites are rarely likely to be large and (in particular) over the current 10-unit threshold for affordable housing provision. The potential contribution of such sites to affordable housing supply and consequently their ability to address the local needs referenced on page 17 is therefore likely to be very limited. The final two paragraphs appear to conflate two distinct issues: namely housing supply within 'Alcester' as defined for the purposes of the Core Strategy on the one hand and the designated Neighbourhood Area on the other. The two areas are not identical and it is important that the Plan should provide clarification on this point. The Core Strategy figure of 530 homes includes a site of 119 dwellings on the edge of Alcester but in Kinwarton Parish. This needs to be clarified because as presented it suggests that a further 95 homes need to be provided in Alcester to meet the Core Strategy target which is not the case. In addition the Core Strategy does not refer to the 530 homes figure as a "requirement" more an" indicative target". The southern edge of allocation ALC1 is commensurate with the settlement boundary and as such, any land outside ALC1 / south of Allimore Lane is going to be outside of the Built-up Area Boundary and therefore not relevant to this policy. As such it is suggested that the third paragraph is deleted.	Noted but prefer to keep. Noted – amendments made to explain the situation. Agreed – amendment made Agreed – moved to HBE 2
Page 15-16	Policy HBE 2 (Local Needs Housing): Potential Local Need Scheme – Allimore Lane	The Town Council will be aware that initial discussions have taken place concerning a possible community-led housing scheme on land at Allimore Lane. If such a scheme is to include the provision of serviced plots for custom/self-build homes, as well as homes contributing towards meeting the need identified in the 2017 survey (referenced on page 13) then it may be preferable for the Plan to allocate land for such a scheme.	Noted – the Steering Group decided not to allocate sites.

Page number	Section	Comment	
	Policy HBE 2 (Local Needs Housing): Definition of 'local connection' for local needs housing	The 'local connection' criteria defined in the policy differs from the standard criteria in use by Stratford District Council (which could create practical issues) and only appear to apply in the case of 'Local Need' schemes. It would be preferable if the same 'local connection' criteria were to apply across all new affordable housing schemes. Unlike for schemes within the Built-up Area boundary, there is no scope for 'serviced plots for those wishing to build or commission their own housing'. It is inferred from the above that the District Council's standard Priority Nominations arrangements will continue to apply in respect of all non Local Needs schemes: although in practice – for the reasons noted above – the scope for delivering such schemes is likely to be very limited in any case.	Agreed – definition altered to match that used by SDC. Noted
	Policy HBE 2 (Local Needs Housing): Former School Site, Moorfield Road	The Town Council will be aware of the long-running discussions regarding an Extra Care Housing scheme on this site. The site is owned by Warwickshire County Council, who have been actively exploring its potential for hosting an Extra Care housing scheme. This is an ongoing project, with design solutions to flood risk and other issues still to be resolved. Nevertheless, two important considerations are evident: 1. This is a large brownfield site requiring redevelopment; its significance is enhanced by its size and prominent townscape setting, as well as the potential contribution it could make to housing supply. 2. This is almost certainly the only site of sufficient size close to the town centre likely to be able to support delivery of an Extra Care Housing Scheme. It is considered to be disappointing that the Plan does not include any site-specific proposals for this site. It is recommended that further consideration be given to the future redevelopment of the site and to the inclusion of a site-specific allocation for an Extra Care Housing scheme.	Noted – the Steering Group are aware of the proposals to develop this site but such proposals are dependent on major flood mitigation work being undertaken by the Environment Agency which is entirely outside the control of the Town Council. Policy HBE 6 (Specialist Accommodation) entirely supports a development of this nature without being site specific.

Page number	Section	Comment	
Page 16	Policy HBE 3 (Housing Mix): Market Housing Mix	It is considered unclear where the market housing threshold for this policy has originated from. Given that there are no site allocations promoted within the NDP and the issue that the town is surrounded by the West Midlands Green Belt, it is questioned whether there will be the prospect of achieving any in-fill schemes of this number of houses. The 'mix' figures are not quoted as a 'range' and as such can be extremely difficult to achieve – however, it is acknowledged that the figures quoted are within the parameters of Core Strategy Policy CS.19.	Noted – the figures are within the range required by the Core Strategy.
Page 16	Policy HBE 3 (Housing Mix): Affordable Housing Mix	The 'mix' figures are not quoted as a 'range' and as such can be extremely difficult to achieve – however it is acknowledged that the figures quoted are within the parameters of Core Strategy Policy CS.19. However, it is unclear on what basis specific percentages are specified compared to the range identified in Policy CS.19 in the Core Strategy no evidence is provided to suggest the need for a more rigid policy than that currently applied under CS.19. Flexibility is important as it ensures developers can tailor their proposals in accordance with viability and the character of the area. The figures do not hint at the community's aspiration in relation to providing smaller homes. As an example of an alternative approach that might be worth considering is within the Stratford-upon- Avon NDP which has added "at least" before the figure for 1 and 2 bed dwellings, adding "no more than" before the figures for 3 bedroom and 4+ bedroom dwellings. In relation to the 10-unit threshold, it is considered that this would reduce the ability of the Plan to manage the profile of the size and type of new homes developed during the Plan period, compared to counterpart Core Strategy Policy CS.19 which has no minimum size threshold. This could lead to imbalance within the housing stock, which could in turn put pressure on an already limited affordable housing stock.	Noted and agreed Agreed – amendment made Agreed – amendment made

Page 16	Policy HBE4 (Bungalows)	Whilst the intention of the Policy is laudable, a number of concerns are raised: • In practice there are likely to be very few sites of 10+ homes coming forward without specific site allocations within the NDP itself. So in reality the actual yield from this policy is likely to be very limited. • There is no indication of prioritisation as between affordable and market housing. • It could compromise the delivery of an Extra Care Housing scheme at Moorfield Road. There is arguably greater evidence of a need for Extra Care Housing than there is for bungalows. The term "strongly supported" should be clarified or replaced with "supported". Strong support may imply that such considerations outweigh other provisions of the plan and it is not clear that that is justified or what was intended.	Noted – amendments made to exclude Specialist Accommodation so that it does not impact the delivery of the Moorfield Road site. Agreed – amendment made
Page 17	Policy HBE 5 (Healthy Living)	This policy introduces a requirement for the submission of Air Quality and Overheating Risk performance calculations which is not in accordance with the Core Strategy or the draft Development Requirements SPD and is not supported by the validation requirements of the Council. In addition it is considered that such requests are not reasonably proportionate for minor applications below 10 dwellings.	Agreed – policy amended to restrict it to major applications.
Page 18	Policy HBE 6 (Specialist Provision)	This Policy could be more specific about which policies in particular should be considered. Is it intended that this should permit developments outside the Built-up Area Boundary? Is there a limit to the number of retirement dwellings supported? It is considered that in itself this policy is unlikely to be effective as it is both ambiguous and fails to identify specific priorities. A better approach might be to identify specific accessibility standards that all new homes should meet. It would also be useful for the Plan to refer to the Public Sector Equality Duty in this respect (see Section 149 of the Equality Act 2010 – the 'protected characteristics' most likely to be of relevance in the context of a land use plan are those of 'age' and disability').	Agreed – policy amended This policy is concerned with supporting Specialist Accommodation – it does not seek to identify accessibility standards.

Page number	Section	Comment	
Page 19	Policy HBE7 (Electric Car Charging Points)	The intention of this policy is supported however it is unclear whether the aim is to secure one charging point per dwelling or per parking space. For flats, listed buildings, holiday lets and retirement properties there may be a reasoned justification to not provide these facilities. Perhaps introduce 'where appropriate...' to the start of the wording. Stratford-on-Avon District Council's draft Development Requirements SPD (March 2018) sets out what is considered a more practical requirement for 1 electric vehicle charging point per dwelling with a garage or driveway and 1 charging point per 10 spaces of communal parking. It is noted that this policy only applies to residential development, and it is suggested that consideration is also given to non-residential development. The draft Development Requirements SPD sets out a requirement for non-residential development of 1 charging point per 10 spaces of parking.	Agreed – wording amended to '...at least one permanently wired electric car charging point per dwelling'. Agreed. Noted Agreed – policy now covers non-residential development
Page 22	Policy HBE 12 (Heritage Assets)	It is considered that the policy conflicts with the requirements of Core Strategy Policy CS.20 which sets out a number of tests for the re-use of buildings in residential use. These include the need to demonstrate that residential use is the most suitable viable use for the building itself and the policy should be amended to reflect this.	Noted – policy amended in accordance with recommendations contained in Schedule of Minor Comments received from SDC.
Page 40	Policy NE3 (Local Green Spaces)	Of the 19 proposed Local Green Space sites, it is recommended that the following 8 sites are removed as follows: • Site 6 (Oversley Wood) is not in reasonably close proximity to the town of Alcester, being over 1 mile from the historic centre of the town and on the opposite side of the A46 by- pass. Additionally, the site is over 90ha in size, which clearly cannot be classified as 'local in character' and is definitely an 'extensive tract of land'. Therefore it is considered that Site 6 does not meet the assessment criteria set out in the NPPF for Local Green Space designation. In addition the site is designated as 'Ancient Woodland' within the Core Strategy which already affords it a high level of protection within the NPPF (paragraph 175(c)).	Agreed

		• Site 8 (Hopkins Precinct Play Area) is the play area adjacent to Hopkins Precinct, and whilst the District Council supports the need for an improved play space in this general area a long term need has been identified to improve the area around Hopkins Precinct and the land to the rear. The District Council is committed to maintaining a play space within the vicinity but due to the likely future need to renovate and improve the wider area it is recommended that the Local Green Space designation is removed from this specific location. This will provide flexibility in the location of a play area as part of any redevelopment as there is currently no guarantee that the site is capable of enduring during or beyond the end of the plan period.	Not agreed – this site has been independently assessed as suitable for designation as a Local Green Space
		• The following 6 sites lie just outside of the Built-Up Area Boundary for Alcester and within designated green belt lad. As such it is recommended that as a Local Green Space Designation essentially provides the same level of protection as green belt designation it is considered unnecessary to designate these sites as Local Green Space. Development proposals within the green belt are assessed against Core Strategy Policy CS.10: • Site 7: St Mary's Park, Kinwarton • Site 9: Bleachfield Street Play Area • Site 12: Gas House Lane Recreation Ground (Centenary Field) • Site 14: Whitehall Farm Green Space • Site 15: Bleachfield Street North Allotments • Site 16: Bleachfield Street South Allotments	Not agreed – these sites have been independently assessed as suitable for designation as Local Green Spaces
		On the basis of the above 8 sites being removed as LGS designations then the remaining sites would need to be renumbered accordingly.	Not required

Page number	Section	Comment	
Page 47	Policy NE6 (Mitigating and Preventing increased flood risk)	This policy states that 'all proposals must demonstrate that flood risk will not be increased elsewhere and that the proposed development is appropriately flood resistant and resilient.' It is suggested that this requirement should just be for those areas that require flood risk assessments under national policy requirements. Recommend that a separate map showing the extent of surface water flooding in the town would be helpful – Appendix 6 is considered not fit for purpose as it should cover the entire town as a minimum.	Agreed – amendments made Agreed – the map has been replaced

Alcester Neighbourhood Development Plan

Pre-submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General) Regulations, 2012

Alcester NDP Steering Group responses to schedule of minor comments from Stratford-on-Avon District Council

Suggested new text underlined deleted text ~~struckthough~~

Page number	Section	Comment	Response
General	Paragraph Numbering	Paragraph numbers should be inserted throughout. This will be essential as the Neighbourhood Development Plan (NDP) progresses to enable users including the Examiner to accurately refer to relevant sections of the NDP.	Agreed
General	Green Belt	The Plan generally does not appear to differentiate between Green Belt and non-Green Belt areas. As there are differences between the type of housing that might be acceptable, this issue needs to be addressed.	Residential development is dealt with in Policy HBE 1 which restricts it to within the BUAB ie outside the Green Belt. Development in the Green Belt is dealt with in the Core Strategy.
General	Policies / Proposals map	It would be helpful if a single, consolidated policies/proposals map could be incorporated into the Plan.	Regrettably this is not possible.
General	Compliance with revised NPPF	There is reference to the NPPF throughout the Plan. Should it be deemed a possibility that the Plan won't be formally submitted to the Local Planning Authority under Regulation 15 of the Neighbourhood Development Plan Regulations prior to 24th January 2019, the policies will need to be assessed against the July 2018 revised NPPF and the Plan will need amending accordingly.	Noted – all references are to the July 2018 version of the NPPF.
Page 3	Index	Housing and Built Environment Section – It is suggested that as these are two different subjects they should be split into different sections. Transport and Infrastructure Section – It is suggested that as these are two different subjects they should be split into different sections. Policy CLW 2 – change "utilization" to "utilisation" Policy NE 5 – add the word "important" before the word "views"	Noted but Steering Group prefer to keep as drawn. Noted but Steering Group prefer to keep as drawn. Agreed Agreed

Page 4	Introduction – Section 1.1 (What is a Neighbourhood Development Plan?)	It is considered that section 1.1 (What is a Neighbourhood Development Plan) doesn't actually explain what a Neighbourhood Development Plan is, as alluded to in the heading. It is suggested that some explanatory text is added to the section to refer to the Localism Act etc (see section 2, page 4 of the Snitterfield NDP as an example). Second paragraph - 1st sentence: Suggest rephrasing the first sentence to start: "Once 'made' (adopted), Stratford-on-Avon District Council…" Second paragraph - Last sentence: Suggest rewording to "The NDP has regard to National Policies and is in general conformity with the strategic policies of the Stratford-on-Avon District Core Strategy"	Agreed – new explanatory text included. Agreed Agreed
Page 7	Introduction – Section 1.3 (The Plan Making Process)	For accuracy it is recommended that the first sentence is amended to read: "There is a formal process set down in Neighbourhood Planning Regulations 2012 for ~~making~~ producing a Neighbourhood Plan and its adoption. ~~getting it approved.~~" Recommend that the paragraph below the list of dates is amended as follows: "Following amendments, if any, a Submission Version of the Plan will then be produced and submitted to the Local Planning Authority ~~i.e. Stratford District Council, for approval, having again taken into account any comments the~~ for a further consultation to take place. The Plan, together with all representations to the consultation will then be submitted for Independent Examination. If the Plan passes this scrutiny, possibly with further minor modifications, it will be put to the Town's residents in a referendum. If that outcome is positive the ~~p~~Plan will then be adopted by the District Council and its policies will inform planning decisions."	Agreed Agreed

Page 7-8	Historical Information	The value of the first four paragraphs in terms of relevance and usefulness to the NDP is questioned and it is suggested that these paragraphs could be deleted.	Comments noted – Steering Group prefer to retain this important information.
Page 9	Alcester Today	It is suggested that in the fourth paragraph there may be some merit in mentioning the two folk festivals per year as they attract visitors from all over the country over 2 weekends each year. In the ninth paragraph it is recommended that clarification is provided as the inference in the current text is that there are few infill and brownfield sites, however it is not clear that this is what is intended. Also is the "Area of Special Landscape" referring to the "Special Landscape Area" policy CS.12 in the Core Strategy?. If so, it should be correctly referenced.(also on page 13 and page 65). In the final paragraph it is recommended that the following typo is corrected as follows: "According to the 2011 Census, 42% of ~~the~~ its employed residents work within the town."	Regrettably the Folk Festivals no longer take place and the site has been sold. Agreed – definitions checked and altered. Agreed
Page 10	Key Issues: Infrastructure	It is considered that the key issue in relation to Infrastructure is imprecise and unspecific. It is suggested that it could be rephrased to read: "New housing development must be accompanied by corresponding *Infrastructure* improvements." It is considered that the key issues for Road safety and Flooding are imprecise and unspecific and recommend that they are reworded.	Agreed Agreed - reworded
Page 13	Objectives and policies for the development of Alcester - Section 6.1 Housing and Built Environment	It is recommended that in the third paragraph the word "surrounded" is replaced with "washed over" at the beginning of the second line.	Agreed
Page 13	Policy HBE 1 (Residential development within the Built-up Area Boundary)	It is suggested that the second paragraph would more appropriately positioned in the introductory text, probably as a new third paragraph. This should also refer to parts of Coughton Parish and Arrow with Weethley Parish being inside the Built-up Area Boundary. Recommend that the word "encouraged should be replaced with "supported" in the third and fourth	Noted – prefer to keep the wording in the policy itself. We believe the reference should be to Kinwarton Parish rather than Coughton. Agreed

		paragraphs and "permitted" replaced with "supported" in the final paragraph.	
Page 14	Policy HBE 1 Explanation	It would be helpful to quote the application numbers for the two Core Strategy allocations. It may also be helpful to show these and any other sites referred to on a Map (Map 2?) within the NDP so that readers do not have to rely on other documents to understand the relevance of their inclusion. The second sentence of the fifth paragraph contains two typos and should be amended to read: "This gives a high ratio of 12.8% private rented accommodation (Warwickshire Observatory)."	Agreed – new map included. Agreed
Page 15	Map 2: Built Up Area Boundary	It is recommended that a key is provided for the Map so that it is clear what it is showing in isolation of the policy text. Those parts of Coughton and Arrow with Weethley parishes inside the Built-up Area Boundary should also be shaded blue. It probably isn't necessary to show that part of Kinwarton Parish outside the Built-Up Area Boundary in blue.	Agreed Agreed – believed to refer to Kinwarton Parish not Coughton.
Page 15-16 Policy HBE 2 (Local Needs Housing)	Policy HBE 2 (Local Needs Housing)	It is recommended that the word "permitted" is replaced with "supported" in the first sentence. It is recommended that the word "reasonably" is removed from the first sentence as it is too imprecise and open to interpretation. Second bullet point – it is not clear why this is necessary as it is not a requirement of associated local or national policies on the provision of local needs schemes.	Agreed Agreed Agreed

Page 18	Policy HBE 6 (Specialist Provision)	It is recommended that this Policy would be more appropriately positioned before Policy HBE 5 (Healthy Living). Suggest amending the title and wording of this policy to refer to 'Specialist Accommodation' instead of 'Specialist provision' and amend the first sentence of the policy to read: "Proposals for specialist accommodation will be supported, provided the proposals meet other relevant policies within the Neighbourhood Plan". It is suggested that the remainder of the existing text within the policy is moved to the Explanatory text as it is a statement of intent, rather than policy.	Agreed – policies reordered. Agreed
Page 19	Policy HBE 8 (Renewable Energy)	The policy is considered laudable however it should be worded in such a way that support for renewable energy is "supported **subject** to criteria...". As currently worded it seems all renewable energy schemes would be categorically supported and 'should not' cause nuisance and harm etc. The Council may wish to be more cautious in historically sensitive landscapes and near to listed buildings, where residential amenity may be affected or where landscape sensitivity may suggest that the location is not preferred. It is considered that the term "undue nuisance" is too ambiguous and needs to be clarified in order for it to be applied.	Agreed – wording added which requires adherence to "other policies in the NDP". Agreed
Page 20	Policy HBE 9 Development Design and Policy HBE 10 responding to local character	There is a lot of cross-over between this policy and HBE 10 (Responding to local character) and it is suggested that consideration be given to amalgamating the two policies. In addition the policy could also cross refer to the emerging Development Requirements Supplementary Planning Document (SPD).	Noted but prefer to keep them separate. Agreed – reference included
Page 20	Policy HBE 9 (Development Design)	Unclear what is meant by the term 'inclusive' and recommend that this is clarified within the policy or explanatory text. Recommend replacing the words "be resisted" with "not be supported" in the first paragraph.	Agreed – removed Agreed

		Consideration should be given to introducing wording to reflect NPPF paragraph 130 which seeks to prevent the deterioration of design quality through subsequent amendments to planning approvals.	Agreed – new wording included.
Page 20	Policy HBE 10 (Responding to local character)	Replace the words "be resisted" with "not be supported" in the final paragraph. Delete the final sentence ~~"Special regard will be given to any Heritage Asset (See Policy HBE12)."~~ as it is considered that this text is unnecessary and does not add any additional weight as the matter is covered in policy HBE 12.	Agreed Agreed
Page 20	Policy HBE 10 - Explanation	This reference to the Stratford District Design Guide in the last sentence will need to be replaced with reference to the new design guidance in the Development Requirements SPD once adopted.	Agreed - updated
Page 22	Policy HBE 11 (Space between buildings, signage and lighting street furniture)	Suggest replacing the title of this policy to 'Public Realm'. Recommend removal of the final sentence of the policy as it is not the role of the NDP to control street lighting and surveillance.	Agreed Agreed - deleted
Page 22	Policy HBE 12 (Heritage Assets)	Amend the first sentence to read: "Development within or adjacent to the Alcester Conservation Area and/or affecting a heritage asset or within the setting of a heritage asset, will only be supported ~~provided that~~ if it conserves or enhances the Conservation Area or heritage asset." Third paragraph: • Replace the word "sensitive" with "appropriate" • It is not clear what is meant with reference to "negatively impact the collective value of buildings" and it is recommended that this is clarified in the text in order for it to be applied consistently. Amend the fourth paragraph to read: "Where a development proposal will cause harm to a heritage asset, it will be supported only where ~~the~~ an assessment ~~procedure and tests outlined in Policy CS.8 of the Core Strategy have~~ of the significance of the harm to the heritage asset has been carried out, and the proposal can be shown to be justified."	Agreed Agreed Agreed

Page 25	Policy EC 1 (Development within the Town Centre)	It is questioned why enhancement or support of the viability and vitality of the town centre needs to be demonstrated as, by definition, such uses are appropriate in town centres anyway. Further it is not clear how such an assessment would be carried out. It is recommended that the first sentence is amended to read: "Proposals that provide new retail, offices, hospitality, or tourism units or to look to enhance/extend existing units for the same uses ~~or extend existing units~~ will be supported ~~where it can be demonstrated that they will enhance or support the vitality and viability of the town.~~" Recommend that the second sentence is amended to read: "Development that results in any loss of parking provision in the town will ~~only~~ not be supported ~~where~~ unless it is replaced by equivalent or enhanced provision in a suitable location." Recommend that the fourth sentence is amended as follows: • Replace the words "units from business use" to "premises" • Finish the first sentence after the word "viable" and begin a second sentence starting "Any applications for change of use will need to be supported by..." Recommend that the final sentence is amended to read: "Where permission is required, change of use ~~from business to residential for commercial units above ground level~~ of commercial premises above ground floor level to residential will be supported where separate access and adequate resident parking provision is provided and where development would not result in the loss of, or adversely affect the ground floor business use."	Agreed Agreed Agreed Agreed
Page 28	Policy EC 2 (Supporting employment on Brownfield Sites)	Recommend that the word "Applications" is replaced with "Proposals" in the first sentence. The second part of this policy appears to have more to do with knowledge based and other high value-added sectors than brownfield sites. Should it be a separate policy? If it is retained it is suggested that this is amended to read: "The Plan supports the retention of sites or buildings ~~that provide~~ for employment uses and will encourage ~~schemes involving companies in~~ proposals for the creation of employment opportunities associated with knowledge based and other high value-added sectors."	Agreed Agreed

Page 28	Policy EC 3 (Supporting Business Start up)	Recommend that the word "Applications" is replaced with "Proposals" in the first sentence and replace "living" with "live" in the second paragraph. Reference to the provision of 'home office space' in new residential development is considered ambiguous. Clarification is recommended to establish whether this is a requirement for all new homes.	Agreed Agreed
Page 28	Policy EC 4 (Employment land change of use)	Recommend that the first sentence is amended to read: "Where planning permission is required for land currently in employment use (including offices, retail, hospitality, tourism and other commercial uses), proposals for changes of use ~~will be supported for~~ to other employment uses will be supported." Second paragraph: Recommend that the first sentence is ended after the word "supported" on the second line and begin a new sentence to start: "Any applications will need to be supported by evidence..." Recommend that the final paragraph is amended to read: "~~The partial use of land in employment use for residential purposes~~ Development proposals for a mixed-use scheme of employment and residential uses will only be ~~permitted~~ supported if ~~it~~ the residential element is necessary to enable the development or change of use of the site to an employment use and the residential element should not ~~normally~~ occupy the majority of the site."	Agreed Agreed but on reviewing policy, sentence needs to end after word "viable". Agreed
Page 28	Policy EC 5 (Support for Commercial Development)	The reference to "highlighting local distinctiveness" in the first paragraph is considered unclear in meaning and as such it is suggested that this is deleted, along with a number of other amendments for the sentence to read: "Proposals that demonstrate direct benefits to the local area, ~~highlighting local distinctiveness and~~ supporting and promoting use of the local workforce and, products ~~and supply chain~~ will be supported within the Built-Up Area Boundary."	Agreed

		In the third paragraph it is recommended that the word "Environmental" is added at the start of the first sentence and the sentence "In particular environmentally friendly, soft landscaping will be supported." is deleted as it is considered too specific. Recommend that the final paragraph is amended to read: "Proposals that include <u>the provision of</u> low-cost business space ~~will be supported~~ within the Built Up Area Boundary to meet the needs of micro or small enterprises and to support firms wishing to start-up or expand <u>will be supported</u>."	Agreed Agreed
Page 29	Policy EC6 (Education and Childcare Provision)	Recommend replacing the words "Applications for" with "Proposals for new" in the second paragraph. It is noted that whilst the policy requests high quality design for new build, it doesn't mention high quality design being a requirement for extensions to existing facilities and it is suggested that this aspect should be considered for inclusion within the policy.	Agreed Agreed
Page 31	Policy EC 7 (Further Education support)	It is recommended that the words "particularly where they offer vocational courses" in the first sentence are deleted as they are considered irrelevant for the purposes of the policy intent. It is suggested that the second paragraph can be deleted since any site within the Built-Up Area Boundary would by default be close to good transport links and is therefore unnecessary.	Agreed Agreed
Page 31	Objective C (Promoting Tourism)	The word 'all' assumes that every development of this nature will be supported regardless of any negative impacts. It is therefore suggested that the word 'all' is deleted.	Agreed

Page 31	Policy EC 8 (Support for new or improved tourist attractions and accommodation)	The first and third paragraphs of this policy appear to overlap to some extent, and there is some repetition on the first and third paragraphs of the corresponding explanatory text. In the second paragraph it is recommended that the words "Applications must" be replaced with "Proposals will need to". In the third paragraph it is considered unclear what is being referred to re: "provision of improved or additional town centre heritage facilities" which seems to suggest creating some new listed buildings as it is written, which is clearly not the intention of the policy. It is therefore suggested that the wording is amended to provide more clarity.	Agreed Agreed Agreed
Page 32 6.3 Transport and Infrastructure	Section 6.3 - Transport and Infrastructure	Transport comes under the category of infrastructure along with education, utilities, broadband, Green infrastructure etc. As such it is recommended that the heading be changed to just 'Infrastructure'.	Noted – prefer to keep title as drawn.
Page 33	Policy TI 1 (New development and connectivity) First paragraph, last line	Clarification recommended over what is meant by "major developments" in the first sentence, possibly within a footnote or the glossary of the NDP. Recommend that the words "...which include new routes..." are deleted from the first sentence and the word "ensure" is inserted between the words "and" and "full" on the second line. Recommend deleting the words "...on existing routes..." from the second paragraph.	Agreed Agreed Agreed
Page 34	Policy TI 3 (High Speed Broadband)	Recommend that the text within the second paragraph is moved to the explanatory text.	Agreed

Page 36	Policy CLW1 (Community and Leisure facilities development)	Recommend that the second paragraph is amended to read: "Proposals for ~~N~~new leisure and community facilities will be ~~encouraged~~ supported providing that they are compatible with existing neighbouring uses. New sites for such facilities ~~will be supported where they are~~ should be located in close proximity to the community they serve or accessible via good footpath/cycle links." In the third paragraph it is recommended that the words "be resisted" are replaced with "not be supported" It is recommended that the final paragraph of the policy is deleted since if it can be demonstrated an existing community facility is no longer required then there is no requirement to provide a replacement facility.	Agreed Agreed Agreed
Page 36	Policy CLW2 (Enhancing access to and utilisation of open green spaces	Recommend that the first sentence is amended to start "Proposals to improve access..." and suggest that the wording "which is consistent with retaining biodiversity" is deleted as it is not relevant to the policy. Recommend that the words "where possible" are added to the end of the second paragraph. It is considered that this policy should refer to character when considering potential development in the river corridor as it is identified as an Area of Restraint by the Core Strategy.	Agreed Agreed Agreed
Page 38	Policy CLW 5 (Protecting against air, noise and water and light pollution)	Recommend that the title is reworded to "Protecting against air, noise, water and light pollution". Recommend that the order of the paragraphs is switched around to make the policy wording flow better Recommend replacing the words "would" with "will" and "be resisted" with "not be supported" in the (new) first paragraph.	Agreed Agreed Agreed

Page 39	Policy NE 1 (Trees, hedges and landscaping)	Recommend changing the title of this policy to 'Trees, hedges and landscape features' to avoid using the term landscaping which can have different associations. In addition it is recommended that the term 'landscaping' is replaced with 'landscape features' though out the policy. Recommend that the second paragraph is amended to read: "Significant or sensitive ~~applications~~ development proposals will also ~~be expected to include a~~ need to demonstrate how they have incorporated a landscape led strategy from the outset ~~showing~~ in order to avoid retro-fitting of poor quality or token landscape features: - ~~Existing and proposed hard and soft landscaping~~ - ~~Consideration of near and distant views of any development from the principal public vantage points, showing existing and proposed landscaping and that proposed to be established after 10 years, and~~ - ~~Details of areas to be retained for open space and/or woodland and how it will be managed in future."~~	Agreed Agreed Agreed
Page 40	Policy NE 2 (Biodiversity)	Recommend the first sentence is amended to read: "Development ~~should~~ will not be supported unless it contributes to and enhances the natural and local environment; ~~by~~ minimisinges impacts on biodiversity and providinges net gains in biodiversity wherever possible." It is recommended that the second sentence of the policy is retained but amended to read "Existing ecological networks should be retained and enhanced. New ecological habitats and networks are particularly encouraged and measures to improve landscape quality, scenic beauty and tranquillity and to reduce light pollution are encouraged.'	Agreed Agreed

Page 40	Policy NE3 (Local Green Spaces)	Recommend that the opening sentence is amended to read: "The Plan identifies the ~~areas of~~ <u>following sites to be designated as</u> Local Green Space ~~at the following locations~~:" It is recommended that the sentence following the list of site, starting "The above designations..." is deleted as it is unnecessary. Recommend that the word "permitted" is replaced with "supported" in the penultimate paragraph. Recommend that the policy should refer to Map 5 and also the individual site assessments in Appendix 4.	Agreed Agreed Agreed Agreed
Page 41	Policy NE 4 (Safeguarding Rivers and Ponds)	Recommend that the words "be resisted" be replaced with "not be supported".	Agreed
Page 41	Policy NE 5 (Protecting Valued Landscapes and Important Views)	Recommend that the policy is redrafted to read: "Development proposals must demonstrate how they are appropriate to, and integrate with, the character of the landscape setting whilst conserving, and where appropriate, enhancing the character of the landscape including important local features. It is recommended that the valued landscapes and important views that have been identified need more justification (See other NDPs within Stratford District for examples, such as Tysoe). Development proposals should ensure that all important vistas of the valued landscape (as shown on Maps 6 and 7) and skylines are maintained and safeguarded, particularly where they relate to heritage assets and town approaches.	Agreed Agreed – justification now included.
Page 41	Policy NE 5 (Protecting Valued Landscapes and Important Views)	Suggest that a comment is added to state that proposals which have an adverse impact on the landscape, skyline or important views will not be supported.	Agreed
Page 42	Higher level policies for Natural Environment Objective A	Suggest the addition of the following two Core Strategy policies within the list of higher level policies: • Policy CS.6 (Natural Environment) • Policy CS.7 (Green Infrastructure)	Agreed – references included
Page 43	Map 5: Local Green Spaces	Recommend that Sites 6, 7, 8, 9, 12, 14, 15 and 16 are deleted (for the reasons set out in comments to Policy NE 3 in Appendix 1) and the remaining sites renumbered accordingly.	Not agreed – please see comments in response to Significant Comments received from SDC re policy NE 3.

Page 45	Map 6: Valued Landscapes (and Appendix 5): Valued Landscapes	This map appears to be showing views rather than valued landscapes. Valued Landscapes VL4 and VL5 are located outside of the designated Neighbourhood Area and should be omitted. The annotations of the numbered landscapes do not show up particularly well on the map.	Agreed – VL4 and VL5 deleted. Agreed – map redrawn
Page 46	Map 7: Important Views	It is considered that the map is of poor quality and appears to have been imported from another document, recommend that the quality is improved. Suggest that it might be more useful to show the views and valued landscapes on one map if possible. Recommend that an assessment of each of the views be included in the NDP (as has been done for the valued landscapes) as an Appendix. This map shows key open spaces so this should also be in the heading. Presumably reference to Map 10 on the key should be deleted.	Agreed – map redrawn Noted but not possible. Agreed – now included Agreed - Not included on new map.
Page 47	Policy NE6 (Mitigating and Preventing increased flood risk)	Recommend that the word "No" is removed from the start of the sentence and the word "not" is inserted between "will" and "be" on the first line. Recommend that the first line of the fifth paragraph is amended to read: "~~Where appropriate~~, development proposals ~~must~~ will be expected to incorporate suitable and sustainable means of drainage, where appropriate."	Agreed Agreed
Page 55	Appendix 3: Broadband Coverage	Recommend that the map is redrafted and it appears to have been imported from another document and it is unclear what it is meant to be informing the reader.	Map deleted
Page 56	Appendix 4: Local Green Spaces	Recommend that Sites 6, 7, 8, 9, 12, 14, 15 and 16 are deleted (for the reasons set out in comments to Policy NE 3 in Appendix 1) and the remaining sites renumbered accordingly.	Not agreed – please see comments in response to Significant Comments from SDC re policy NE 3.
Page 59	Appendix 5: Valued Landscapes	Recommend that VL4 and VL5 are removed as they are outside of the NDP area.	Agreed
Page 62	Appendix 6: Flood Map	The Flood Map should show the Environment Agency flood zones for the entire town of Alcester.	Agreed and map updated.

Page 65	Glossary	Affordable Housing – redraft in line with the updated definition in the revised NPPD July 2018 Re-name "Area of Special Landscape" as "Special Landscape Area" and move under 'S' in the Glossary. Recommend using the definition in the Core Strategy (Page 239) which provides an accurate definition of Special Landscape Areas. Brownfield Land – Recommend adding the words "(also known as Previously Developed Land)" Core Strategy – Recommend removing the words "in particular, that" Green Belt – Recommend using the definition in the Core Strategy glossary (page 234) which provides an accurate terms for Green Belt land.	Agreed – definition updated. Agreed Agreed Agreed

	Alcester Neighbourhood Plan Alcester NDP Steering Group responses to comments from Andrew Matheson (42 Malt Mill Lane, Alcester)	
	Comment	**Response**
General	1. The Examiner will be grateful for numbered paragraphs – as I know from the experience of making the comments here, it is often complicated to reference content accurately without paragraph numbers.	Agreed
	2. The Plan cannot be applied retrospectively; there is therefore no purpose to giving it a commencement year earlier that the year of submission ie 2018 or 2019. There is no obligation for the Plan to coincide with the Local Plan dates.	Not agreed – our Planning Consultant advises that the dates should remain as drawn.
	3. Repetition of Core Strategy content in different or fewer words is unnecessary and in some instances can be unhelpfully misleading; the Neighbourhood Plan does not need to be as broad-ranging as the Core Strategy particularly if the Core Strategy has more authoritative evidence.	Noted – references reviewed throughout the NDP.
	4. Whilst the Plan group is to be congratulated on (finally) progressing the Plan to a consultation stage, it would appear that a further iteration is required to make the most of the Plan opportunity for Alcester. The content should be more Alcester specific with justified allocations of land to meet known needs. Whilst many Neighbourhood Plans are complemented for concentrating on the vital local matters the Alcester Plan seems to spread its interests too wide for the supporting material.	Noted – the Submission Version of the plan progresses the Plan in accordance with consultation responses received.
	5. Many of my comments may appear to be critical but it is at this pre-submission stage that drafting errors can be corrected to ensure success and minimise modifications at the Examination stage.	Noted
Comments in the order of the Plan document:		
Map 1	The choice of pink for the outline of the Neighbourhood Plan area is unfortunate because it is the colour that the Core Strategy Policies Map uses for the Conservation Area; since the two documents will commonly be read together, another colour would be preferable to avoid potential confusion.	Agreed – map colouring amended.
1.3 para 3	It is incorrect to suggest that the Examination may only make "minor modifications".	Agreed – amendment made

3 para 5	The reference to the "War Memorial Town Hall" is potentially confusing since, to that point, the building has only been referred to as the Town Hall.	Agreed – references updated
3 para 7	The "The 2008 Stratford-on-Avon District Retail Survey" should either be fully referenced and/or included in the list of Supporting Documents.	Agreed – added to references
3 para 7	The term "Health and Well-being Town" should be referenced and explained in the Glossary.	Agreed – added to glossary
3 para 8	Ditto comments above regarding the reference to the "War Memorial Town Hall".	Agreed
3 para 8	The Glossary definition of "Area of Special Landscape" is incorrect since, like the Green Belt, protection is not against all development but rather 'inappropriate development'; a cross-reference to Core Strategy Policy CS.12 would be appropriate.	Agreed – definition changed
5	The "September 2017 the Alcester NDP Emerging Policies Document" and the analysis of the responses to it should be referenced and/or included within the Supporting Documents.	Agreed – all now included in Supporting Documents.
6.1 para 1	Since the Conservation Area is larger than the Town Centre the opening wording is potentially confusing.	Agreed – wording amended
6.1 para 3	Oversley Green and Kings Coughton are washed over rather than "surrounded by" the Green Belt.	Agreed - amended
6.2 para 3	The "2014 Stage 2 Questionnaire", the "2015 Household Questionnaire" and the "Feedback on the Emerging Policies in 2017" are all important sources of evidence and should all be referenced and/or included within the on-line Supporting Documents.	Agreed – all added to Supporting Documents.
Housing and [the] Built Environment		
Objective A	The objective is to "provide for" and yet no attempt is made to allocate specific, suitable sites for any form of housing development, despite the content noting that there is presently a shortfall of sites for at least 95 dwellings against the current Core Strategy assessments of needs. No justification is provided for the assumption that these and/or other particular needs can be met by "infill within the Built-up Area Boundary"; the Core Strategy Policy CS.15B specifically invites Neighbourhood Plans to identify sites. This leaves the town vulnerable to speculative developer proposals should Stratford District at any time be unable to show that it has a 5 year supply of suitable and deliverable sites. The two major new housing sites in the town were determined in	Comments noted but Steering Group decided not to allocate sites. Further analysis of the housing numbers for "Alcester" as a whole as defined by SDC show that there is in fact no shortfall. The Steering Group is under no obligation to allocate sites.

	exactly these 'back-foot' circumstances. The Town Council should surely be in a good position to address and resolve the "access and ownership restraints" noted, at least to the extent that 95 future dwellings can be accommodated. By use of a Neighbourhood Development Order accompanying the Plan it would then be possible to define quite specifically the preferred nature of the development on this/these site(s), in line with at least some of the other Plan policies for housing. In the absence of specific proposals the main housing policies add little if anything beyond what the Core Strategy already indicates, either directly or by implication, for Alcester.	
HBE 1	Whilst the Policy says that community-led housing schemes, serviced plots for those wishing to build or commission their own housing and schemes for key worker housing "will be encouraged" in practice the opportunity has been foregone to identify the scale of these needs and the most suitable locations for these particular types of housing; in reality therefore the 'encouragement' is toothless and lacks the direction for a forward-looking Plan.	Noted
HBE 2	Although the Policy has some support in para 77 of the NPPF, I don't believe that this Policy is in 'general conformity' with the equivalent Core Strategy Policy CS.15G. That Policy says (*my emphases*) "development may include small-scale *community-led* schemes brought forward to meet a need identified *by that community*"; Policy HBE 2 does not respect the *community-led* core of the Policy but opens up development opportunities to commercial developers that can evidence a local need in some form. Further, the obligation in Policy HBE 2 for "Secure arrangements ... to ensure the housing will remain affordable and available to meet the continuing needs of local people" is not a land use matter and is therefore beyond the scope of a Neighbourhood Plan; this provision is unlikely to survive the Examination and/or is open to easy challenge by a developer. The Core Strategy Policy challenges local communities to identify specific sites which, within the broader policy restraints, are considered the most acceptable so that developers do not successfully pursue those sites which may be the least acceptable. The Neighbourhood Plan ought therefore (with a huge 84% respondent support) to restrict "opportunities" to those tested with the community, alongside the scale of identified needs, through the Plan consultation process.	Comments noted – having taken advice from our Planning Consultant we are advised that there is no conflict between this policy and the Core Strategy. Community led housing is supported under policy CS.15 and this can sit alongside neighbourhood planning. We understand that similar policies have been endorsed by examiners elsewhere.
HBE 3	No clear justification is provided for departing from the equivalent Core Strategy Policy CS.19 in respect of site size – the Neighbourhood Plan ignores market sites below 10 units – and flexibility –	Noted – we are advised that this policy does not depart from Policy

	the Neighbourhood Plan does not adopt the percentage range approach of the Core Strategy. Whilst it is appropriate that local requirements may be more specific than the District, no substantial evidence is provided vis-à-vis the District data to suggest any significant difference. It is unclear at whom this element of the Policy is directed: "The requirement for and provision of affordable housing within the Neighbourhood Area will continue to be monitored throughout the Plan period in order to ensure that the most up-to-date evidence is used to identify the current need. Such evidence will be used to inform the provision of affordable housing on qualifying sites". It appears that this is a commitment from the Parish Council to ensure that the data to which developers must have regard is up to date; if that is so then the commitment needs to be one of the projects listed outside of the land use Neighbourhood Plan content; it is not a matter that is designed to bind prospective developers.	CS.19 – the percentages are within the bands specified. Wording amended to provide that provision of affordable housing will be monitored by the Town Council.
HBE 4	Bungalows are an extremely expensive form of housing provision – the area of land required is more than double that needed for 2 1/2-bed apartments. Developers would therefore have reason to expect that the cost of provision and its affordability by those who indicated a preference for a bungalow had been evaluated in arriving at the policy terms, otherwise the Policy becomes undeliverable. The use of the word "strongly" in this Policy has no meaning; either there is support or there is not. As written the Policy is not clear on whether the second expectation – that "developments of 10 or more units should include at least 10% bungalows" – is, like the first expectation, to apply "within the Built Up Area Boundary". Since housing for the elderly is critically reliant on good access to the community facilities generally located in the town centre it may be reasonable to assume that this should be so.	Noted Agreed – delete word "strongly" Agreed – wording amended to make the position clear.
HBE 5	The Ministerial Statement of March 2015 on 'Housing standards: streamlining the system' was clear that "local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings". In effect Policy HBE 5 suggests that national housing standards should be improved but it is not the place of Neighbourhood Plans to do this; the Government has been anxious to avoid the proliferation of varying local building standards. I note that Core Strategy	Noted – wording amended in accordance with advice from SDC.

	Policy CS.26 (D) will be applied to all proposals for new development, *where it is considered justified by the scale of the development*; unlike Policy HBE 5 this attempts to be proportionate. An air quality assessment will therefore already be required where there is a risk of significant air quality effect either from a new development causing an air quality impact, or by creating exposure to high concentrations for new residents. None of the content under "Higher Level Policies" appears relevant to and evidence for the significant additional obligations arising from Policy HBE 5 as written.	Noted – Higher Level Policies moved to appropriate policy.
HBE 6	Policies have to be implemented as they are worded and therefore care is required. The wording here does not actually mention "accommodation" or "housing" – "provision" is extremely vague - and the implication is that all proposals should provide for a mix of ages whereas retirement villages and extra care living schemes clearly do not cater for a wide age range. Given that "Concern has been expressed anecdotally that Alcester already has a lot of housing for the elderly" and the site of the old Primary School has been earmarked for elderly persons housing it is perhaps surprising that this Policy does not concentrate on facilitating more adapted housing, but this would require more than anecdotal evidence.	Agreed – title of policy now changed to "Specialist Accommodation".
HBE 7	The provision of electric charging points within dwellings (as distinct from within public spaces) is not a land use matter and therefore is not eligible to be included within the Neighbourhood Plan.	Disagree – we are advised that this policy is acceptable.
HBE 8	As noted above, care is needed in the wording of policies. Within this policy no hint is provided as to what might constitute either "nuisance" or "undue nuisance" leaving the developer to decide for themselves. With a subordinate clause removed the second sentence actually reads with a form of double negative: "Plans coming forward should ensure that adverse impacts are ..... not in conflict with any other policies in this Plan". The "Higher Level Policies" content here appears largely to relate to the provision of public charging points (see comment above) whereas the Policy relates to electricity generation?	Agreed – wording amended Agreed – Higher Level Policies moved.
HBE 9	There is no value in a Policy saying "Development proposals that do not demonstrate high standards of design will be resisted" unless positive guidance is provided on what constitutes "high standards" for Alcester; all Policies should guide positive proposals. The guidance – which could helpfully be more specific to Alcester – is provided in Policy HBE 10 and therefore I see no value in having two	Noted – policy now refers to Stratford SPD on Design. The Steering Group wish to keep two separate policies.

	policies where one would do. The wording says that "new development will be encouraged to have regard to the Building for Life 12 criteria" but with no clue as to how the 'encouragement' will be enacted; I think the wording should say "is" rather than "will be".	
HBE 10	As noted above Policies HBE 9 & HBE 10 could be combined to advantage; sentences such as "Proposals that do not positively contribute to local character will be resisted" have no place in a positively framed Plan. Many Neighbourhood Plans helpfully include an Appendix that attempts to capture the character of the settlement with annotated photographs.	Wording of both policies amended in line with SDC advice.
HBE 11	There appears to be some error in the wording of the Policy title since I doubt that a core concern is "lighting street furniture"? The "Explanation" says that the Policy is seeking "improvements" but the Policy is not place specific; it would be more helpful to the purpose of the policy if specific needs for improvement were identified (and these might later link to Town Council "projects"). Since development proposals cannot require others to take action it may be that co-operation warrants a specific mention in the Policy or explanation.	Agreed – title amended
HBE 12	Conservation Areas and Heritage Assets (especially Listed Buildings) are not treated exactly the same within the planning system and therefore conflating the two within the opening sentence is potentially confusing; whilst Conservation Areas should be conserved or enhanced, heritage assets are protected according to their "significance", as defined within the NPPF. The fourth paragraph of the Policy implies there is a two stage process to the support for harming heritage assets: 1: the assessment procedure and tests outlined in Policy CS.8 of the Core Strategy and 2: the proposal can be shown to be justified; in reality it seems more likely that the first step will conclude with 2? To the fifth paragraph must be added (to have regard to the NPPF) "according to their significance". I feel that the Neighbourhood Plan would have a more local feel if the non-designated assets in Alcester were identified and justified; the local knowledge is here in Alcester and, provided criteria are applied consistently, local knowledge should prevail. Whilst I can see that Stratford District has committed to preparing a Local List this should not inhibit the production of a neighbourhood list of which all or part may be included in the Local (District) List. Within the Explanation there is the phrase "the SDC Alcester Conservation Area Appraisal (2008), to	Agreed – policy amended in line with SDC advice. Agreed – policy amended in line with SDC advice. Noted – Steering Group decided not to produce a Local List. It is now included as a Project for the Town Council. Agreed – amendment made

	which appropriate weight should be given when applications are determined". The Neighbourhood Plan will become a Local Plan document and so phrasing that reads as an instruction to the District Council is not appropriate; "will" should replace "should be". Map 3 is somewhat incongruous since it only identifies Designated Heritage Assets and so I believe either the title should say that or (as suggested above) it ought to be extended to non-designated Heritage Assets (which may sit outside the map boundary).	Agreed – maps amended
Economy		
Map 4	Presumably shows the Town Centre area defined within the Core Strategy and should therefore be declared as such.	Agreed - amended
EC 1	It is regrettable that the Policy does not identify the ways in which new developments could "enhance or support the vitality and viability of the town"; once again it is left to developers to interpret what this might mean. Given that further investment is unlikely in these uncertain times for central shopping areas it would be helpful for the Plan to be realistic but more specific about what would benefit the town. Since (as quoted later) "almost three fifths (57%) of visitors indicated that Alcester did not need any additional facilities or services" it is reasonable for the Plan to concentrate on attracting facilities for existing and new residents; if there is land suitable and available for new construction (eg facing onto the Waitrose car park perhaps) then this ought to be identified. In paragraph 5 of the Policy the requirement, where upper floors are converted, to ensure "adequate resident parking provision" seems perverse to the planning gain sought since the location is within the town centre; an occupant without a car will not be disadvantaged since there is convenient access to public transport whereas an occupant with a car will make better evening use of the available public spaces.	Noted but Steering Group have no plan to allocate sites. Noted but wording is required to ensure that there is no impact on daytime use of public car parks.
EC 2	The Term "Brownfield Sites" is not used within the NPPF and is used within the Core Strategy to mean the same as the NPPF term "previously developed land". If there is such land existing within the Neighbourhood Area then it should be part of the purpose of the Plan to identify those sites, perhaps with an indicative brief for the type of development(s) that would be appropriate; if there	Noted – definition added Noted – the Steering Group has no plan to allocate sites.

	are no such sites then the Policy has little value. The expressed preference for "schemes involving companies in knowledge based and other high value-added sectors" is unexplained and it might be argued that these often involve low numbers of employees, therefore perhaps not a good fit with the stated objective?	Noted – the policy has been reworded in line with advice from SDC.
EC 3	It is unexplained why this Policy is restricted to "within the Built Up Area Boundary"; the NPPF seeks also to encourage diversity and building re-use within the rural economy. In the second paragraph of this Policy it would seem prudent to add "where the amenity of neighbouring properties is fully addressed".	Agreed – amended Agreed - amended
EC 4	Context is everything when changes of employment uses are being proposed; the injection of an office within a busy shopping frontage may be unhelpful and the reuse of an out-of- town commercial building for shopping would be contentious. Further, Core Strategy Policy CS.23 says: "Throughout the District, the change of use of a property from one falling within Class A1 of the Town and Country Planning (Use Classes) Order to one within another class will be resisted unless the proposal satisfies the provisions of Policy CS.25 Healthy Communities". Therefore the opening paragraph of the Policy ought to be reworded to say that proposals for changes of use for employment sites should normally consider other, compatible employment uses before any other uses are considered. A full or partial residential use for some commercial sites may be entirely inappropriate and therefore paragraphs 2 & 3 of the Policy – which might easily be merged - must not be seen to override such considerations; the Policy therefore needs to say 'Where a planning consent is required and a residential use may be appropriate……'	Agreed – amended in line with advice from SDC.
EC 5	The "Explanation" notes that "96% considered that a better range of premises would improve the competitiveness of Alcester as a business location" and yet that is not at the heart of this Policy – other than an unnecessary repetition of the content of Policy EC 3. The Policy might start with support for 'proposals that will widen the range of business premises which could……'. Core Strategy Policy CS.23 says that "a Retail Impact Assessment will be required for comparison retail proposals over 1,000 sqm and convenience retail proposals over 2,500 sqm for sites outside Stratford-upon-Avon town centre"; the Neighbourhood Plan cannot arbitrarily set a lower threshold; in any event I doubt that it is helpful for the Plan to go beyond the Core Strategy policies and suggest or imply that retail development outside the town centre is an acceptable option in any circumstance.	Agreed – amended in line with advice from SDC.

	For the Economy section (and subsequently) the "Higher Level Policies" appear to relate to the Objective which is much broader than the actual Policies. Since the Examination will test each Policy against the Basic Conditions (which include the higher level policies) and a Basic Conditions Statement must accompany the Plan, there should be 'higher level policies' content for each Policy (and irrelevant content should be omitted).	Noted – Higher Level Policies allocated to policies.
EC 6	I note that the Policy says that "New sites within the Built Up Area Boundary for [education and childcare facilities] will be supported", but realistically are there such sites? If a need is identified then it goes without saying that a site will have to be found but it seems most unlikely that a "new" site will be found within the built-up area. Design considerations have been addressed earlier. In the absence of any evidence of need or evidence of the suitability of existing sites for expansion I would suggest that this Policy is not appropriate. The phrase "where they are located in close proximity to the community they serve" used here and in other later Policies is wording more appropriate to a District-wide Policy; this Plan is only concerned with Alcester and therefore the Plan could and should identify specific locations which would serve the community well if it is to add local detail beyond the Core Strategy.	Agreed – policy amended to remove reference to BUAB. Agreed - amended
EC 7	It is unclear to what extent there is a land use issue behind this Policy. Many of the opportunities that are sought already happen within existing premises within the Neighbourhood Area (or beyond). I see no evidence that suggests that there is significant demand for additional premises and, arguably, the Plan already encourages the reuse of existing buildings for the type of uses referenced here. Perhaps a Town Council project could help facilitate matchmaking between provider and service user?	Noted but Steering Group prefer to keep policy.
EC 8	As noted above, "strongly" within a Policy wording has no useable meaning; exactly what would be most valued needs to be specified instead of a blanket invitation. In paragraph 2 of the Policy there is a stray semi-colon that alters or confuses the meaning of the wording. In the fourth paragraph I believe "enjoyment or engagement of the" should be replaced with "enjoyment of or engagement with the".	Agreed – delete word "strongly" Agreed – amended Agreed – amended

Transport and Infrastructure		
TI 1	My reading suggests that paragraphs 1 and 3 of this Policy say roughly the same thing whilst paragraph 2 seems to be at odds with the other paragraph since it seems to require physical/visual barriers between new and existing "routes" – pedestrian and traffic? I question whether this Policy says anything more than the Core Strategy but if the new "major sites" were known and identified in the Plan then specific guidance could be given that would be helpful to prospective developers and phrases such as "except where it can be clearly demonstrated to be physically impossible" would be unnecessary. Although "safety" is mentioned a number of times in the "Explanation" it does not feature within the Policy?	Agreed – policy reworded in line with advice from SDC.
TI 2	I do not believe that this Policy says anything more specific that the law and the positive policies that are already within the NPPF & the Core Strategy. Paragraph 1 of the Policy factually states a limit to the options for the telecoms provider but not the application of the Policy.	Noted but prefer to keep.
TI 3	"The government is proposing that full fibre broadband should be fitted as standard in all new homes" is a statement not a Policy but it does rather illustrate where the responsibility is considered to rest for pursuing the broadband issue, which is only very marginally a land use matter. There is nothing Alcester-specific in this Policy.	Agreed - deleted
Community, Leisure and Well-being		
CLW 1	A Neighbourhood Plan should go further to identify the nature of the shortfall in provision rather than encourage anything in a nebulous way, the consequence of which may be that the viability of existing provision be undermined eg Lifestyles. Not all potential improvements are land-use related – there could be ways to extend the range of provision within existing buildings unaltered.	Noted but Steering Group agreed that the policy should be generic rather than specific.
CLW 2	It is difficult to conceive of the types of development envisaged that would, of themselves, "improve[s] access to and recreational usage of open green spaces"; this seems to more appropriately lie within the Town Council "projects" at the end of the document.	Noted but prefer to keep.

Objective C	Given the nature of national policies it seems improbable that there are Alcester-unique circumstances where it would be relevant "to protect public health by proposing that developments that would cause pollution and have an adverse impact on health be rejected".	Noted but Health and Wellbeing is very important in Alcester and prefer to keep.
CLW 3	This seems to be a very nebulous Policy to address needs which might or should be specified much more specifically to ensure complementary provision rather than just more of the same.	Noted but prefer to keep.
CLW 4	On page 35 it is stated that "The town has 4 sites of allotments, all well-used, and the most recent one in School Road met the shortfall that was referred to in the SDC Core Strategy (Policy AS.2, B5)". The status of these allotment sites is unspecified but statutory allotments are already protected from loss. The evidence supporting further provision at this time therefore appears to be tenuous at best.	Noted but NDP covers whole plan period and further allotments may be required.
CLW 5	I question whether there will ever be circumstances where Alcester-unique factors would make pollution considerations beyond those nationally "appropriate"; on the face of it this Policy does not 'add local detail' which is the purpose of a Neighbourhood Plan. The noted "objections received from residents neighbouring the SIG Roofspace facility" might not be justified by the evidence.	Noted – policy amended in line with advice from SDC.
Natural Environment		
NE 1	What are "Significant or sensitive applications"? In the absence of a definition how does the decision-maker have the potential to make appropriate decisions? This Policy should add worthwhile content to the range of applicable policies in the Core Strategy otherwise confusion rather than clarity is provided for the potential applicants.	Noted – policy amended in line with SDC advice.
NE 2	"Existing ecological networks should be retained and new ecological habitats and networks are particularly encouraged" but the Plan neither sets out the existing networks – pulling together the existing evidence - nor their potential to be enhanced and by whom. Where policies draw from pieces of evidence from others the Policy wording should not assume or rely on the supporting documents having been read.	Noted – 2018 Ecological Report references included.
NE 3	It is notable that the list does not seek to extend the existing range of recognised local green spaces. The NPPF requires that all the stated criteria are met for Local Green Space designation and the related Guidance says "If land is already protected by designation, then consideration should be	Noted. All LGS have been independently considered.

	given to whether any additional local benefit would be gained by designation as Local Green Space" (Paragraph: 011 Reference ID: 37-011-20140306). To assist the Examiner the supporting Appendix 4 should *exactly* follow the NPPF and Guidance criteria; the fact that "The above green spaces all contribute to quality of life and the health and well-being of the community" is entirely irrelevant for this Policy if the NPPF criteria are not met. I note in particular that the allotments are included and yet these may be already statutorily protected and are also the subject of Policy CLW 4 (see comments under that heading). Further Oversley Wood would already appear to be within the Green Belt and therefore Local Green Space designation will add nothing to the restraints that already exist (not to mention that it is arguably "an extensive tract of land"). The Policy phrase "Development that would harm the openness or special character of a Local Green Space or its significance and value to the local community will not be permitted unless there are very special circumstances which outweigh the harm to the Local Green Space" is not consistent with what the NPPF says is the nature of the protection afforded. "Where appropriate, CIL funds will be used to enhance these designations to ensure a suitable quantum and quality of recreational and amenity space is available for the Neighbourhood Area"; this is not a land use Policy but a Town Council "project" and so should be listed alongside those.	We are advised that allotments are regularly endorsed by examiners. Agreed – Oversley Wood has been deleted from the list of LGS following independent assessment. Disagree – this phrase was passed by the examiner of the Stratford Town NDP. Agreed - deleted
NE 4	This Policy appears to say the same thing twice, once positively and once negatively? I question whether the Policy adds anything to the protections already afforded by statute through the Environment Agency and the national/district planning system.	Agreed – wording amended
NE 5	Appendix 5 which is said to set out "Valued Landscapes" in reality shows a series of photographic "views" without any related detail or comparative justifications; views are very difficult to illustrate successfully particularly if these views are suggested to be "characteristic". VL4 & VL5 are outside the Neighbourhood Area and therefore cannot be included (the Plan can only relate to the Neighbourhood Area) and VL3 is such a long distance view that everything or nothing might be considered to impact upon it. In contrast VL6 is so narrow a view that it is difficult to see what value it might have when compared with dozens of other views. Arguably VL1 & VL2 have already been compromised by Corinthian Court. In contrast, the Conservation Area views will readily be recognised as residents as at the heart of what is valued.	Noted - further information and justification is now included on each Valued Landscape.

	The wording "does not adversely impact" is only capable of interpretation subjectively. Wording such as "proposals should consider and address their impact on" requires that issues are put into the open and important absent considerations can be identified.	Noted – wording amended in line with SDC advice.
NE 6	The only part of this Policy that does not largely repeat national and district policy or guidance refers to the surface water impact of "development north of Gunnings Bridge" but it is a puzzle that any development south of the bridge is absolved from such consideration. However, national policy is designed to keep surface water outside of the drainage system as far as possible and to slow down/manage the natural flow of water into rivers rather than prevent this. It is wrong to imply that the Neighbourhood Plan is the only/main protection against the impact of flooding.	Agreed – reference to Gunnings Bridge removed. This comment is not understood.
Projects	Although the document says "These projects are not formally part of the Neighbourhood Development Plan" they are actually included as a section of it. To be compliant with the NPPF expectation I believe it would be much clearer if sections 7 & 8 were made an Annex to the Plan document. Some of these projects are the most valuable and Alcester-specific of all the content. I am puzzled as to how the "Project 8 – Alcester Tech Concept" might differ from the Minerva Mill site that already exists?	Noted but prefer to keep as Appendix. Noted but prefer to keep the project.
Monitoring and Review	The Plan itself needs to include a commitment to monitor and review the Plan at least every 5 years. Some Neighbourhood Plans are reviewed early to coincide with the review of the related Local/District Plan.	Agreed – amendments made
Appendix 1	It is evident from the table here that very few of the "Key Issues" are addressed directly by policies within the Neighbourhood Plan. It would appear that the Appendix retrospectively relates content back to the key issues.	Noted – appendix deleted and put in Supporting Documents.
Appendix 2	Whilst this may be useful numerical supporting evidence it has no value in a document that plans forward.	Noted but prefer to keep showing the extent of development in Alcester.
Appendix 3	This map is almost impossible to interpret and adds nothing to a document that plans forward.	Agreed – delete Appendix
Appendix 4	See my comments above on the format for this Appendix.	Noted – prefer to keep in existing format.
Appendix 5	See my comments above on the format for this Appendix.	Noted – prefer to keep in existing format.

Appendix 6	The map here is partial when compared with the boundary of the Neighbourhood Area and a cross-reference to the related Environment Agency website would suffice and be more appropriate given that data may change over the Plan period.	Agreed – new map included.
Appendix 7	This should be part of the "Projects" section of the document.	Noted – prefer to keep.
Glossary	The Glossary is helpful but care must be taken to avoid any differences/confusion with the equivalent Glossary within the NPPF.	Noted
References	It would be helpful if the references related to footnotes within the Plan document; I have commented above about instances where references relied on have not been detailed.	Noted but considered impractical at this late stage.

Consultee	Comment	Policy/Project	Action
Mrs B Kirkman, Alcester Baptist Church Secretary	Traffic and parking congestion around Town Hall and Baptist Church esp Sunday mornings- number of church members using wheelchairs and walking frames- limted parking outside church- members finding it more difficult to park safely		Noted- see Projects 2 & 3
Andrew Matheson	Comprehensive document- Comments on the Alcester Neighbourhood Plan-*saved to folder* - see separate document	Various	See separate document
Public- Launch day	Be flexible with the approach to positioning of new schools	EC6	Agreed- Remove 'within the BUAB' wording
Public- Launch day	We need to be less prescriptive over the location of a potential future school	EC6	Noted- as above
Public- Launch day	Bungalows would be excellent for older people in the town	HBE4	Noted
Public- Launch day	Good document- very interesting		Thank you!
Public- Launch day	Electric charging points could be offered to purchaser as an option	HBE7	Noted
Public- Launch day	Rivers should be kept wood and weed free to allow water to flow freely		Outside the remit of the NDP- Environment Agency
Public- Launch day	Schools need more classrooms to enable children to attend them	EC6	Noted and supports policy EC6
Public- Launch day	All drainage systems should be regularly cleaned out to enable the drains to flow and not get blocked up		Outside the remit of the NDP- WCC Highways
Public- Launch day	Please add Alcester Crown Green Bowling Club, Meeting Lane to Local Green Spaces		Noted- land owner consulted but refused. Refer to Steering Group
Questionnaires	Very laudable ideas		Thank you!
	Who decides price of affordable housing		The Government
	Flood risk is based on B49 postcode- insurance issues		Noted
	Electric car charging points- not in each house	HBE7	Not restrospective
	Charging points should be included in initial planning permission	HBE7	Noted
	Protect the High Street	EC1/Project 2	Noted- see EC1 and Project 2
	Aspirations are great but unobtainable		Noted
	Local newspaper resurrected		Outside remit of NDP
	Swimming pool is an expensive luxury- money better spent on other things	Project 5	Noted
	Path to nowhere next to Bleachfield St allotments should be completed		Outside remit of NDP- see new Project 9
	Overall a good plan		Thank you!
	Careful not to overdevelop our beautiful town		Noted
	Large housing estates are never going to be the answer to the housing shortage- problems with schooling. St Nicholas School already oversubscribed		Noted
	Alcester is firmly on a flight path- hear noise at 11.30pm		Noted
	Collective school provision and terrible congestion for those trying to get to work. Alcester is full to any further extensions or developments concerning education. Term time it takes 1hr to do 8 miles		Noted
	Please help to stop gas boosting station off A46		Outside remit of NDP/designated area. ATC has objected.
	More houses will detract from the character of Alcester as a small market town and its community spirit. The schools and doctors are already suffering from too many residents in the town	HBE1 and HBE2	Noted- NPPF requires sustainable development- NDP policies aim to protect
	Encouragement of solar panels on all buildings, plus any green sources of energy, wind, geothermal, biomass, renewables	HBE8	Noted- see HBE8

	Discourage the use of plastic packaging in Alcester shops, business, health, leisure, education, local government		Outside remit of NDP
	More provision for elderly- with residential care homes- would help with natural release of housing when age moves you on	HBE2, HBE3 and HBE6	Noted
	No mention of already existing Greig Hall- an iconic building for the town- let's bring it back to life	CLW1	Noted- see CLW1 and Project 4
	Give Alcester it's own swimming pool. Greig Hall has stood empty for some time, could this not be considered for such a purpose. It would complement the gym facilities and would meet the needs of all age groups in the local area, providing leisure and promoting health & wellbeing	EC4, CLW1 and CLW3	Noted- see Projects 4 & 5
	There needs to be defined wording in residential development for buildings to be no more than 3 storeys	HBE10	Agreed- Add bullet to HBE 10 to say "...buildings heights should not normally be higher than 3 storeys..."
	Let's have Shopmobility in the area, like Evesham- the now empty Post Office would make a great site		Outside remit of NDP
	Targetting fly tipping and dog fouling		Outside remit of NDP
	Don't agree with one bedroom units despite the price	HBE3	Noted
	More public transport should be available as not all, especially elderly, people drive. Community town bus?	TI1	Outside remit of NDP
	There is a need for social housing in Alcester. Not everyone wants affordable housing. This is Tory policy and there is no place here for politics just homes.	HBE2	Noted- affordable includes social rented- see Glossary definition
	Surely it is vital that all new developments have solar heating in their build	HBE5	Noted- not always possible/appropriate
	If the local needs housing is costed properly, how can it not be viable?	HBE2	Local needs housing is cross subsidised by local market housing
	All new housing should be fitted with solar panels	HBE8	Noted- not always possible/appropriate
	Since the by-pass was constructed the view from the top of Primrose Lane has been obstructed by trees. Some tree clearance and a viewing area would show our beautiful town off to all would be walkers and ramblers	NE5	Outside remit of NDP- forms part of the sound buffer- referred to County Cllr M Cargill (WCC Highways)- "I would imagine that those trees are the landowners as they are a significant distance from the road. Highways tend to only deal with trees adjacent to the road".
	Having read this plan, the policies outlined are so broad it is difficult to form a strong view on any of them.		Noted
	One omission in the plan is any mention of how the policies outlined will be monitored and evaluated? How will we know if the aims have been achieved (as the aims expressed are very broad) and not "smart".		Agreed- To include a simple paragraph under 1.3 as folllows: The Plan period will run concurrently with the Core Strategy until 2031. However, national and local planning policy is fluid and changes over time. Similarly the evidence base underpinning this NP can and will change over time. The Town Council therefore commits to regularly monitor changes in national and local policy and the way in which the NP is implemented in planning decisions in the Neighbourhood Area. A review of the Plan will likely be necessary every 5 years to ensure that the policies contained within it are effective and up to date and to reflect any reviews or updates of the Core Strategy.

	The plan is not very ambitious, visionary etc. The impression is that it merely seeks to maintain what already exists as opposed to expand facilities/opportunities.		Noted
	Personally, I would propose the development of a multi use Arts Centre within the Community, leisure and well being section as sport facilities are quite good.The economic advantages brought to an area by the Arts is well documented and this is an area of interest which needs development in Alcester. An Arts Centre which offered intergenerational courses, business facilities, a cafe, cinema club, dance, drama, comedy, crafting, pottery, painting, hosted festival related events such as literary etc, could really act as a community resource and hopefully generate income. Like the food festival, it could attract tourists and really put Alcester on the map. So let's see some ambition.	CLW1	Noted- see CLW1 and Projects
	Allotments and Growing Spaces- Strongly wish to keep and add to	CLW4	Noted
	Design of some recent developments has been poor- lacking in 'real' design/planning, innovative and reacting to local need. Responding to local character is 'not' about trying to mimic or 'play safe'- it is about offering new concepts in building/architecture/space. Why not consult more innovative building companies rahther than the usual big names who are acting to make a profit and churn out poor spaces?	HBE9/10	Noted- see HBE9/10
	Specialist provision for local people	HBE6	Noted
	Keep the Greig Hall- seems a hidden agenda here to rid us of our Greig Hall- left to the people	CLW1	See also Project 4
	No out of town developments- Alcester is too small for this and it would kill the High St as it has done in other areas.	EC5	Noted- EC5 development is restricted to BUAB
	Good to see Green Spaces protected- very important!		Noted
	Housing developments could be designed with roads around the back of the houses so that housees look onto a green, community traffic free area	HBE5	Noted
	Thank you to everyone for their hard work in putting this document together for Alcester		Thank you!
	Keep up the good work		Thank you!
	Provision of a more affordable and local supermarket		Outside remit of NDP
	Reinstate and use the Greig Hall ASAP		See Project 4
	This should be more robust to ensure the conectivity is clearer and fully adopted into the overall town- unlike previous expanded developments in commercial areas.	TI1	Noted
	Please do not allow development outside the Built up Area Boundary even for affordable housing or key worker schemes.	HBE2	Noted
	Could the Town Council please actively try to educate local people about responsible dog ownership and the countryside code? I see so many dog owners not picking up after their dogs and allowing them to run free in the fields and woods upsetting our precious wildlife.	NE3	Outside remit of NDP
	Developments appear to be an accepted policy (large or small?) within this ANDP. Stratford and Leamington are now about to meet the impact of small rural towns- traffic, hospitals, ambulance and fire service plus utility services. All linked to over developing.		Noted- NPPF requires development
	As you have indicated on page 4, Alcester is an historic town and should not be included in the above town's policies- also traffic including buses, heavy goods vehicles are not needed along the heritage High St. 20mph max not indicated from the Gunnings Bridge side.		Noted- Conservation Area protected by HBE12 and Project 2
	Add: Well maintained roads and footpaths		Outside remit of NDP- WCC Highways
	Add: Reduced crime/low crime rates and reduced and low levels anti-social behaviour		Outside remitof NDP- Warwickshire Police

	Can too easily be used as a 'get-in' by developers wanting to build outside Boundary	HBE2	Noted
	In view of government proposals re electric vehicles- this is a must for the future	HBE7	Noted
	Not enough safeguards written in	HBE8	Noted- HBE12 also provides protection Conservation Area
	Parking a vital amenity. Visitors who can't park easily will never return	EC1	Noted- see Project 3
	Too much access to green or 'wild' places is bad for many species eg Tawny owls lost from Arrow Nature Reserve. Aim should be to improve, not just retain, biodiversity	CLW2	Noted- see NE2
	As above. Use of words 'any development' too broad.	CLW3	Agreed- Amend wording to read 'Any development proposal meeting a proven local need which would create or enhance facilities....'
	Light also needed to grow veg, as well as space- high fences all around not good	CLW4	Noted
	Hedge hog holes in fences: nesting bricks in houses etc	NE2	Outside remitof NDP
	It is important when developing further housing, that the council make sure that there are adequate schooling and medical facilities in the town.		Outside remit of NDP- WCC/NHS. School provision supported in EC6
	This is doubtless well intended, but at the same time potentially dangerous. Prise open the door and eventually flood gates open. Developers will identify any relaxation of rigid guidelines and capitalise upon that situation. The plan should insist upon ALL proposals conforming to the mix, as determined by HBE 3, and if those figures are valid, there will be no problem. I strongly oppose the suggestion.	HBE2	Noted
	More a comment upon the status quo; but while welcoming the concerns raised, how realistic is the intent ?	HBE5	Noted
	I refer to the proposal for 300+ homes, approved some years ago, that in order to preserve the house numbers ,while accommodating concerns expressed over drainage arrangements, (post planning approval granted !), caused a revision by the developer to move houses closer to the route of the bypass, and in the process , I have been informed that those properties are now specified with non opening windows on the aspect nearest to the carriageway, presumably to bring the noise levels inside the homes to tolerable levels.		Noted- Outline planning permission already granted. Reserved matters awaited
	This policy is too prescriptive. Surely ANY plans involving plans to bring employment into the area should be seriously considered ?	EC2	Noted- EC5 also supports
	How do you prove that ANY business use is not viable ?	EC4	Outside remitof NDP- evidence would be supplied to SDC by applicant
	Surely adequate access to public transport and footpaths are relevant considerations to both proposals ?	EC6/7	Noted covered by policies EC6/7
	What are the emissions envisaged, and what are safe levels ?	TI 2	Agreed to reword this bullet: "The need to comply with the most up-to-date guidelines on safety in place at the time of the application"
	How can any development improve access, to existing green space ? This is fanciful thinking which is just opening additional opportunities to developers. Any doubters should refer to the proposed housing development at Saltwell green space, which is the subject of such a plan, submitted to , I believe, Dudley council.	CLW2	Noted- see new Project 9
	Hugely important, particularly in view of the recent temperaturerise/climate change warnings, and of the failure of central government to even reach the modest self set targets for new tree planting.	CLW3/ NE1	Noted

	Every action aimed at preserving/increasing allotment space should be encouraged. However the provision relating to new housing is sadly in the realms of Utopia. Not every home owner can or will want to grow their own produce; and if you consider even the size of the average existing allotment being a requirement for each new home, what is the likely increase in price that profit conscious developers will require for the same? This potentially exacerbates the huge problem for first time buyers even getting started upon the home ownership pathway.	CLW4	Noted
	Pavements in particular in Roman Way and Newport Drive need urgent attention, particularly Newport Drive where pavements are being heaved by tree roots, trees planted by then owners in the 1960s, in places raised by around 100mm. This is a danger to all pedestrians, for disable buggies having to cross the road to avoid them.		Outside remit of NDP- WCC Highways
	Vegetation bylaw- should be introduced as many other towns do, restricting where vegetation extends over pavements and highways reducing the width considerably		Outside remit of NDP- WCC Highways
	Vehicles parking on pavements also adds to the problem, which should be banned.		Outside remit of the NDP- see Project 3
Waitrose & Partners Alcester	I have discussed the plan with my Property department and we are on support of the outline principles of this document.		Thank you!
	I consider this to be too broad a statement which could be used to justify permitting development in otherwise unsuitable areas outside the built-up boundary. This policy could be open to misuse.	HBE2	Noted - policy is restricted to small sites responding to identified local need only
	I feel that a distinction between detached, semi and terraced housing should be included. I believe the provision of quality housing should also be a policy to help meet the needs of businesses for qualified and skilled people as stated under the explanation of EC7. There needs to be the correct balance between affordable and quality housing to attract professional people to the area and I dont think this balance is currently present.	HBE3	Noted - it is hoped that policy HBE3 will provide a range of housing to suit different demographics
	Perhaps this is a policy that could also cover the requirement for adequate off road parking for all new developments. This could be covered elsewhere but it should be a policy to help prevent the problems of cars parked on roads in residential areas. A minimum of 2 parking spaces per house should be required and this should not include any garage as garages are seldom used for parking these days.	HBE7	The requirement for off road parking provision for new developments will be dealt with in the SDC Supplementary Planning Document - consultation draft March 2018
	The map provided does not cover the whole Neighbourhood and is an indication that areas such as Kings Coughton are not adequately considered by the Town Council. There is a scheduled monument and several listed buildings in Kings Coughton, these should be identified.	HBE12	Agreed - Heritage Asets Map to be added which covers whole Neighbourhood Area.

	This policy should not be restricted to new developments. There is currently inadequate walking and cycling facility through Kings Coughton. The footpath to the east of the A435 requires improvement to make it suitable for children and mothers with pushchairs as well as disabled people. Further there needs to be a link or links between the east and west side of the village in view of the exceptionally high traffic usage of the road. The windage from passing vehicles, especially large HGV's, makes current usage potentially dangerous and the lack of dropped kerbs is a further hazard. There should be a policy to provide cycle connection from Alcester to Route 5 of the National Cycle Network to the north. Such improvements would also link Alcester to Kings Coughton and Coughton for access to facilities including hotel and pubs, rugby/social club, many businesses, a school and even Coughton Court itself with its extensive grounds and house. It would be a real benefit if these could be connected with a cycle route and a safe pedestrian route. This also has a relevance to policies EC7 and CLW 1.	TI1	Improvements to existing highways including footpaths is beyond the remit of the NDP - it is the responsibility of WCC as Highways authority. Project 1 looks to review cycling and pedestrian routes
	It is just a pity this policy was not considered when approving the change of use of the large facility to the south of Kings Coughton! This is a sign of how Kings Coughton is not in the minds of the Town Council and I feel that this has not changed adequately within this Neighbourhood Plan.	CLW 5	The NDP cannot be retrospective
	The policy seems to relate to new developments but the explanation and map also relate to existing properties. This map does not cover the whole Neighbourhood and once again suggests that the outlying areas are not in the forefront of the minds of the Councillors.	Appendix 3 Broadband coverage	The map of broadband coverage will be removed and a link included
	Lack of Councillor Representation for Kings Coughton- Perhaps this helps explain why Kings Coughton is not adequately considered in this Plan.		Kings Coughton is part of Alcester West Ward and is represented by 5 town councillors
	The vehicle by which the appropriate housing mix is met to meet the social needs of the residents of Alcester must be via negotation of planning consents for development WITHIN the Built- up area. To permit development outside this boundary poses a signficant threat to the status of any adjacent green areas and will undermine the integrity and protection of the town from ad hoc speculative developments	HBE2	Noted - development would only be permitted for local needs on sites reasonably adjacent to the BUAB
	Add: Commitment for continued free parking		Outside the remit of the NDP - car parking is controlled by SDC
	Town support for any scheme to reduce traffic impact on the A435 through Kings Coughton		Outside the remit of the NDP - highways are a matter for WCC
	I don't believe we need any new housing- Alcester is already sprawling. We need to keep Alcester as a small town, rather than an urban sprawl which we do not have the facilities to support. Instead of encouraging more families to move into the area, perhaps they should sell housing in areas that already have housing available such as Stratford.		Noted - the SDC Core Strategy allocates housing to Main Rural Centres such as Alcester. The BUAB restricts the location of new development
	Excuses will <u>always</u> be found for market housing. A numerical definition of "affordable" needs to be set.		Affordable housing is required for larger development under the Core Strategy
	There needs to be greater emphasis on leisure facilities and leisure activities. We need to encourage all residents to lead a healthier lifestyle by providing more opportunities and facilities for active life styles (eg improve the Greig Hall gym and other facilities, more local walks and cycle paths etc)		Policy CLW 1 supports improvement of such facilities
	Alcester should have a swimming pool and provision made for a golf course adajcent		Noted
	Social housing should be provided by L.A not private developers. Curently this policy has been wrong for many years	HBE2	Noted - outside the remit of NDP
	This policy will fail, so why bother	HBE7	Noted

	Would not like to see wind turbines in Alcester!!!	HBE8	Noted
	Absolutely no to this one	EC4	Noted - reason for objection not clear
	Why can't the land adjacent to the River Arrow from the junction The Old Stratford Road and the new Stratford Road up to Oversley Green Bridge be included on your list?	NE3	Proposed new LGS - Steering Group did not agree that this should be included as an LGS
	Like to see more 1 & 2 bed houses & bungalows for young and elderly & possibly 4 unit flats and bedsits.	HBE1/3	Noted - policy HBE 4 supports bungalows
	Like to see most houses with solar panels on roof for renewable energy	HBE8	Noted - supported by HBE 8. SDC Supplementary Planning Document - draft March 2018 also refers
	I do not agree with losing the Greig Hall- due to impact of Trustees refusal to spend money on getting back intouse. Many people in Alcester will be glad to help in this respect. Any leisure facility must be supported	CLW1	Noted - Project 4 refers
	We could do with another long stay (for workers) car park. Not enough spaces for visitors for 3/4 hours stay! Suggesed area on field on Evesham St most appropriate. Also 6th formers park on school field on Birmingham Rd- brilliant idea!	EC8	Noted - Project 3 refers
	Crime & Antisocial behaviour? It is a major concern to this community. The County Council/Police should be pressed to provide more effective deterrents and convictions for the ongoing crimes & ASB being committed here		Outside the remit of the NDP - this is a matter for the police
	Charging points in new properties & fast charging points in public area/car parks etc essential (& properly maintained and supported)	HBE7	Noted - policy HBE 7 refers
	Larger housing developments must be subject to conditions for expanding schools and infrastructure	EC6	Noted
	Planning conditions should be essential to support improved/adequate public transport (very poor now)	TI1	Noted
	More need for conditional consents & funding for community facilities- swimming pool? Should consider size and growth of Alcester would support swimming pool facility, perhaps shared with schools.	CLW1	Noted - Project 5 refers
	Health provision has not kept up with population growth and ageing community. Access to GP appointments is not satisfactory in terms of waiting period and appointment times	CLW3	Noted - outside the remit of NDP
	Re: traffic and infrastructure. Additional policy re congestion and car parking. In view of plans to attract tourists and business to the town coupled with the proposed building of 360 new homes bringing 540 (1.5 cars per family) cars to the area needs tight control to alleviate both items	TI policies	Noted - Project 2 and 3 refer. A policy on the issue would be outside the remit of the NDP
	Under Healthy Living (Policy HBE5)- Any new homes built must remain cool in the summer and not trap heat	HBE5	Noted
	Not starting with "problems"- traffic and parking- requires study 24/7, then rearrange. The rest will follow.		Projects 2/3
	Town centre unbalanced- too many pubs (exert control), cafes, takeways, charity shops. The main supermarket not everyone's choice- suggest Co-Op instead? How do?		Outside remit of NDP
	Value Heritage. Environment	HBE12	Agreed
	Bungalows to be kept to a minimum as they take up too much space. Two storey affordable housing should be priority.	HBE4	HNS indicates need for bungalows
	Changes in retail shopping nationally could mean significant reduction in the number of shops- these could be residential in the future and suitable conversion supported.	EC1	Noted but retail preferred

	New developments should not all be required to have growing space. Many residents do not want garden space.	CLW4	Noted- not mandatory
	No room for small towns in this country anymore?		Noted
	Land off Allimore Lane between existing housing and new development?	NE3	Privately owned land- not aware of any community value
	I would like to see Policy CS.10 of the Core Strategy added to Policy HBE1 such that the last sentence reads'...of the NPPF and Policies AS.10 and CS.10 of the Core Strategy'. Thank you	HBE1	Agreed- Amend wording
	Very good. Well done. Thank you		Thank you!
	Community & leisure services should be on the basis of "amenity" rather than "need"; as such facilities should be available to encourage community and leisure activities.	CLW1	Noted
	Public transport- Policy should place greater emphasis on need for more services (buses), more regular and more frequent (and not subject to delays as at present); and for services which better interconnect with train arrival & departure times; and later buses as well, to allow return by bus after cinema, theatre and other performances.		Outside remit of NDP- Wcc
	The ANDP should include: The feasability of a public swimming pool should be proactively investigated and proposals for such a facility should be encouraged.		Outside remit of NDP- see Project 5
	A feasability study for a pedestrian link between Birmingham Road and Conway Fileds should be undertaken, with a causeway/ bridge across rge River Arrow, and visitor information relating to the Abbey and local wildlife.		Project 6