

Barford Neighbourhood Plan - Submission Version

Comments of Warwick District Council

Policy B1 – Future Housing Development

It is considered that the policy requirement for housing development within the settlement boundary to meet **all** of the identified criteria is too restrictive and that some of the criteria/ bullet points identified are unnecessary and/or inconsistent with the emerging Local Plan/ National Planning Policy.

Bullet point 1

The preferred sites as defined by Plan Policy B1 (Map 5.7) omit reference to the land currently identified for allocation in the Publication Draft Local Plan south of Barford House (H20 for 8 dwellings) and therefore is not in conformity with the Local Plan.

Paragraph 5.7 refers to the County Car site that has been granted permission for residential development however this should be treated as a 'windfall' and not an alternative to the land south of Barford House which, in the District Council's opinion remains suitable and available for development and as an appropriate allocation in the Local Plan.

The site North of Westham Lane may benefit from being labelled as a site currently under construction as the implementation of a planning approval for 60 dwellings is currently underway.

The smaller parcel of land shown south of Westham Lane currently has Outline Planning permission for 8 dwellings and has already been taken into consideration in the context of the overall Local Plan housing numbers as a 'site with permission'.

The policy would benefit from an additional statement / bullet stating that whilst the identified / allocated sites should deliver the majority of all new housing developments for Barford over the plan period, other windfall proposals may be considered acceptable subject to other policies of the Neighbourhood Plan and Local Plan / National Guidance.

Bullet Point 2

This is considered overly restrictive. The numbers of houses for Barford as identified in the Local Plan amount to a rudimentary assessment of the potential capacity of the land parcels identified as being suitable for development. These are not prescribed 'target figures'. Ultimately the number of houses coming forward will be dictated by the precise environmental capacity of each area and the layout and design solutions that are presented within detailed planning applications.

Therefore the overall housing numbers presented in the Local Plan should not be treated as a target/ ceiling figure, but as guidance as to what numbers are likely to come forward/ form part of the Districts overall supply. It is therefore not appropriate for the Neighbourhood Plan to curtail any additional development beyond this figure provided that any additional developments are environmentally acceptable / accord with Local Plan / Neighbourhood Plan policies.

Bullet Point 3

Good planning should (wherever possible) defend locally valuable open spaces and facilities from alternative development. There should however be an acceptance that in some instances (in line with the National / Local Plan policy) development can occur at such locations provided that certain relevant tests/ requirements have been satisfied.

It is considered that bullet point three is therefore unnecessary.

Bullet Points 4 and 5

Appropriate access and parking provision are a necessary/ fundamental requirement of all development, therefore these bullets are considered unnecessary.

Other

Residential development beyond the confines of the Village Settlement boundary may occur other than for the purpose of providing for rural workers/ replacement dwellings (as stated in the policy). It may be allowed provided that it is in accordance with policies H3 (Affordable Housing on Rural Exception Sites), H12 (Housing for Rural Workers), H13 (Replacement Dwellings in the Countryside), H14 (Extensions to dwellings in the countryside) and policy BE4 (Converting Rural Buildings) of the Local Plan (2011-2029).

Policy B2 - Ensuring an appropriate range of tenures, types and sizes of future housing and meeting local housing need.

Seeks to emphasise the importance of delivering the right mix of housing and broadly reflects the thrust Local Plan policy regarding housing mix and reflecting local demand (Local Plan policy H4).

Policy B3- Ensuring the provision of accommodation and / or facilities to enable the elderly, infirm or disabled

Offers support for the provision of homes for older people. It is arguable that a policy is not required and this matter might be better presented as a sub-section of policy B2?

Policy B4 – Supporting existing local employment

Policy B4 appears to focus on supporting (by protection) existing employment opportunities/ sources of local employment. It may be more relevant to re-title this 'policy protecting local shops, services and employment uses within Barford' as this embraces the wider range of uses referred to in the text that supports the policy (other than 'pure' employment B1, B2, and B8 as prescribed in the Local Plan).

It could be argued that the requirements of this policy are adequately covered by Local Plan policy EC3 (Protecting Existing Employment Land and Buildings), TC17 (Local Shopping Facilities), TC18 (Farm Shops) and HS8 (Protecting Community Facilities).

Policy B5- New local employment opportunities

Offers support/ encouragement for new employment development with caveats, arguably offers no more than Local Plan policy. This policy only refers to new employment opportunities within the 'settlement boundary'. It is also considered necessary/ relevant to mention employment opportunities that could occur within the Neighbourhood Plan area within the rural context e.g. farm diversification etc. in accordance with Local Plan policy EC2 (Farm Diversification).

Policy B6 – Heritage Assets

This policy further emphasises the importance of Local Plan policy regarding the treatment of Listed Buildings and new/ future development in Conservation areas. It introduces the need for the consideration of locally identified important views (set out in the Plan).

Policy B7- General Design Principles

Sets general design principles and specifies the need to refer to the Village Design Statement as a necessary reference in development management decision making process within the Village Settlement Boundary. Introduces concept of identified views that are worthy of retention/ protection.

Policy B8- Biodiversity and Landscape Design Principles

This policy may benefit by being re-titled 'Protecting and enhancing environmental assets', this may better fit the extensive range of issues raised for consideration within the policy.

Policy B9- Agricultural Land

As currently set out Policy B9 would appear to curtail any future development outside the settlement boundary. It would not appear to be in accordance with the Local Plan policy NE5 (Protection of Natural Resources) that balances the need to preserve agricultural land/ quality with other compelling reasons for development.

Note the section on trees and woodlands might be better located within a section of the NDP setting out policies regarding the natural environment (biodiversity/ landscape and open spaces).

Policy B10 – Protection and enhancement of Local Green Spaces

This policy identifies important open spaces areas of nature conservation value and aims to protect them from development wherever possible.

Arguably, assets A6 and B5 and some of the farmland parcels identified in C6 (being agricultural land) are a little too broad/ vague to fit comfortably into this policy.

Policy B11- Traffic Management

Albeit traffic management is a locally important issue policy B11 appears to do little more than replicate Local Plan policy and therefore it may not be necessary/ required.

Policy B12- Transport Improvements

All planning applications for residential development are subjected to assessment / comment from Warwickshire County Council highways officers. Issues that may require mitigation are identified and specific improvements may require financial contributions to improve traffic related matters (e.g. highway improvements / cycleway provision or public transport matters). The policy appears a little confused as it appears to be asking for developer contributions to a range of issues other than just highway related matters (broadband and community facilities being the last two bullet points).

Policy B13- Parking

This policy appears to be at odds with the District Council's current parking SPD (Vehicle Parking Standards Nov' 2007). It could only be considered if appropriately 'evidenced' / researched.

Policy B14 – New Communications Technologies

Considered to replicate Local Plan policy BE5 (Broadband Infrastructure)

Policy B15- Provision, retention and enhancement of community facilities

This policy is proactive in supporting the enhancement of and/or the provision of additional community facilities within Barford.

Policy B16 – Allotments and Community gardens

This policy appears to be broadly in line with National / Local Plan policy.

