

**Warwickshire County Councils consultation response to:  
Welford-on-Avon Draft Neighbourhood Development Plan Pre-Submission  
Consultation 10 December 2014 – 31 January 2015**

**Context of our response:**

The County Council welcomes communities proposing Neighbourhood Plans shaping and directing future development. It should focus on guiding development and when adopted by the District it will become a formal development plan document and will be used in planning application decision making process.

The County Council also shares the aspirations that underlie Neighbourhood Planning; the commitment to ensure your neighbourhood is a vibrant and sustainable place for local communities. The main responsibilities of the County Council are highways and public transport, education, social services, libraries and museums, recycling/ waste sites and environment. The County Council's role in Neighbourhood Planning centres on its ability to deliver the services and facilities it is responsible for.

The County Council has the following comments to make in relation to the draft plan and hopes they will be used to guide any amendments you see fit to make prior to formal submission.

Natural and Historic Environment

The council supports the policies as they carry additional protection to the historic environment and allocate areas of the Local Green Space, which include the flora and fauna. Unfortunately, the evidence documents on the webpages referenced in Appendix H could not be found, so the council could not comment on the robustness of the policies and subsequent allocations to warrant their additional safeguards.

We suggest that you ask SDC for permission to reproduce the ecological evidence for Welford-on-Avon from the Ecological and Geological Study (2012) [[link](#)]. This information may assist in supporting the allocation for the Local Green Spaces on ecological grounds and potentially the allocation of other verges or spaces that you may believe warrant safeguarding.

The council would also like to bring to your attention the evidence contained in the "Distinctiveness and Connectivity" maps contained in the Ecological and Geological Study (2012). This evidence identifies the parish's ecological resources and ecological corridors that link these resources together. In this way you may wish to consider using planning contributions and/or other potential funding opportunities to enhance these areas or create new links (subject to landowners permission). With this in mind you may wish to add a sentence such as:

*"The Neighbourhood Plan will look to actively promote the sensitive maintenance and enhancement of Local Green Spaces plus ecological connectivity to these sites and other sites of notable ecological importance through planning contributions together with other funding opportunities."*

This will enable you to allocate and future CIL or other funding to this objective.

As you will be aware NPA representatives visited the Historic Environment Record and presented some useful overview maps of the Historic Environment showing the Conservation Area, Listed Buildings and other information. Perhaps consideration could be made to include these again. In addition to this evidence, more detailed information and maps relating to the Historic Environment can be provided by the Historic Environment

Record from Warwickshire County Council to help in supporting your Historic Environment policies.

Subject to resources, the council can assist further please do not hesitate to contact Archaeology Information and Advice on 01926 412734 or Ecological Services on 01926 418076

### Public Health Warwickshire

Public Health Warwickshire support that some spatial elements regarding are included in the draft plan, particularly those related to the wider determinants of health. Those elements raised include:

- Different types of housing is needed for the population to meet local housing needs, particularly smaller family homes to support the long term future of the area, particularly given the current older age profile.
- It was highlighted that affordable housing was needed, helping to ensure a mix of resident profiles are able to be part of the community and support the long term future of the area. More evidence can be provided by Tim Willis from County Council who leads on Extra Care housing matters. Tim's contact is; [Timwillis@warwickshire.gov.uk](mailto:Timwillis@warwickshire.gov.uk)
- Green spaces were highlighted as important and those of particular importance to the community for social or recreational use will be protected.
- Tree planting was encouraged. This can help to reduce the impact of climate change and provide ecological habitats.
- Employment opportunities including home working, small units etc were highlighted and that superfast broadband was an essential infrastructure was raised. Employment is a vital part of good health and access to the internet can support healthy behaviours.
- Education was highlighted as important infrastructure. Having local places for school will help to minimise travel thereby reducing traffic. It will also help with community cohesion.
- The importance of the footways and cycle paths in the area and that these should be retained, maintained and expanded. These provide opportunities for physical activity, supporting a healthier lifestyle.
- Maximise road safety by looking at different options including road crossing and improving paths.
- Maintenance and provision of allotments. Allotments can provide opportunities for physical activity, improved mental wellbeing, social cohesion as well as healthy eating.
- Some flexibility in policies and proposals as to what would be allowed with regards to development (with mitigation) that would still allow the neighbourhood and community to benefit.

Further detail matters you may also want to consider are:

- Specifying that 'Building for Life 12' standards (Design Council) are used to inform development.
- Specifying that homes are built to Lifetime Homes Standards. This means housing is suitable for all, so that people can stay in their homes for longer without needing to move to different accommodation. This doesn't mean building only bungalows and sheltered accommodation, but building homes that enables people to remain independent and/or cared for in their own home for as long as possible. Age demographics of the neighbourhood may not remain the same over the next 20

years, lifetime homes will retain a mix of housing stock as it is flexible and suitable for all ages and need.

- Specifying that affordable housing should be incorporated into the heart of the community and not sited on the peripheries.
- Community orchards could be planted as part of the tree planting programme. This would provide access to locally grown fruit, improving healthier eating opportunities.
- Incorporating measured miles and walking school buses as part of the walk routes discussed (this will help to alleviate traffic which has been highlighted as a concern).
- Improvement/installation of signage to highlight distance to local amenities in order to encourage walking and cycling as a form of sustainable and active transport.
- Installation of a range of equipment in green spaces including outdoor gym equipment or trim trails to increase multifunctional use of the space and encourage physical activity outdoors.
- Improving cycle parking outside the local amenities, helping to reduce the traffic highlighted and promote active travel.
- Unclear on whether there are any community facilities in the village e.g. parish church hall, community centre etc. These should be protected where possible for good community and social cohesion, helping to reduce social isolation.

The above suggestions include examples of features that could be implemented using Community Infrastructure Levy (CIL) or community grant funding if available. We would be happy to support you to explore these options in more detail. We are currently developing a document which will outline some of the practicalities and costs involved in implementing these public health measures.

- Public Health Warwickshire has developed guidance using the Building for Life 12 principles which is attached for your information and may provide further support in your neighbourhood plan.
- We can also provide population information, health profiles and statistics for your area if needed.

For further information please contact the Wider Determinants Team on 01926 413797.

#### Highways comments

The highways department has the following comments to make in relation to Policy HLU8 included in the draft neighbourhood plan.

The policy states:

*“Development of Residential Gardens, Backland Development and Tandem Development will be resisted except for small, well designed residential sites which:*

- *Do not have a detrimental effect on the surrounding area and neighbouring properties, and*
- *Do not have the potential for loss of amenity of neighbouring properties; through loss of privacy, loss of daylight, visual intrusion by a building or structure, loss of a car parking, loss of mature vegetation or landscape screening, additional traffic resulting from the development, and*
- *Are of a scale and size suitable for the plot, and*
- *Have direct highway access.*

The County Council queries the wording on the second bullet point, specifically “*additional traffic resulting from the development*” as it is fair to assume any new development of a residential nature will result in additional traffic. If it is desired to preclude development that would result in an increase in traffic that would pose an adverse effect on the highway network, the Parish may wish to rephrase this aspect of the policy. It is suggested that development proposals should include a Transport Assessment or Transport Statement which identifies the impact the development proposal would have on the highway network. Should an adverse impact be identified, then the development could be considered unacceptable.

The fourth bullet point reads “*have direct highway access*”, and it is considered that this may be too broad a statement, i.e. highway access could be to an adopted highway, public highway, via a private track. It is therefore suggested that its meaning is further clarified in any revision you may make to the policy.

### Transport

Whilst the County is supportive of the future implementation of improvements in road safety and sustainable transport options (public transport, walking and cycling) the County Council currently does not have any identified budget to implement these improvements. It is likely that developer funding would have to be sought to implement any improvements.

### Minerals Planning and safeguarding

The village of Welford on Avon lies within the river corridor of the Avon Valley which is within an unconsolidated sand and gravel mineral safeguarding area where there are reserves of sand and gravel.

As part of the Minerals Plan process we have undertaken a request for sites throughout the county in 2014 but no sites in Welford on Avon were submitted.

The County Council has a duty to safeguard mineral resources. It will seek to ensure that where there are known deposits of mineral of local or national importance, that these are not needlessly sterilised by non-mineral development, whilst not creating the assumption that these resources will be worked. If it is necessary for non-mineral development to take place prior extraction of the mineral may take place where it is considered practicable and environmentally feasible.

### Funding and Obligations (CIL and S106 monies)

Although Appendix B point (5) does recognise infrastructure as:

“Infrastructure to meet the needs of all new developments which impact on the parish will have been secured in advance of their construction. This includes the provision of primary school places at Welford School, primary health care services and the provision of adequate waste water systems”.

It would be useful to have an “Infrastructure Plan” for CIL/S106 monies that may be secured and how they would be spent.

