

Napton-on-the-Hill Neighbourhood Development Plan

Regulation 16 Representations: Comments by Napton Parish Council

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
NoH001	<i>(Resident)</i>	Policy 1	Object - Building already going on OUTSIDE the built up area boundary eg - West side of Howcombe Lane - new Builds, South of New Street- Barn 2. No need for "The housing needs survey indicated there is a need for 24 new homes in the parish for people with a local connection" because that assumes NBODY leaves or dies. Patently ridiculous! In the next 5 years 18 people will die and 12 families will move out of the village (source here gvta.org/stat//search).	At the recommendation of the District Council, the Parish Council commissioned Warwickshire Rural Community Council (WRCC) to conduct the local Housing Needs Survey. The Parish Council has no reason to doubt their findings. In addition the neighbourhood plan is required to meet its share of the wider housing need within the district in accordance with its Local Service Village (Category 2) status.
		Policy 2	Object - Nothing should be built outside the defined Built-up Area Boundary.	The neighbourhood plan conforms to the Core Strategy and makes an exception for affordable homes providing the listed criteria are met.
		Policy 3	Object - You should not be allowed to build "adjacent to" to Built-up Area Boundary of the village - where will that lead? Everywhere will eventually become adjacent ;This is a pure profit-based proposal for some people to make a lot of money.	The neighbourhood plan conforms to the emerging Site Allocations Plan in allowing self build adjacent to the BUAB.
		Policy 4	Support.	
		Policy 5	Object - No building shall be allowed outside the Built-up Area Boundary. As has already happened, developers simply pretend they are building a rural office (B1 business use) then have it converted to residential (no planning permission required for this now). See property example at Folly Lane 52°14'32.9"N 1°19'33.5"W.	Any development outside the BUAB has to accord with Policy AS 10 in the Core Strategy.
		Policy 6	Object.	
		Policy 7	Support.	

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		Policy 8	Object - Development alongside the canal is not appropriate (aside from the Brickworks already agreed).	The policy seeks to protect the canal heritage and its setting from any inappropriate development.
		Policy 9	Support - Additionally all the fields in the village not already developed as well as the village Green and the old village pond/stocks Green should be added to this list of Local Green Spaces.	Planning Policy Guidance prevents the blanket use of Local Green Space designations to prevent development. Village Greens are already protected.
		Policy 10	Support - Benches should be refurbished/installed for all of these viewpoints. The one at The Poplars is completely overgrown and unusable due to the home owners overgrown evergreen.	
		Policy 11	Object - Outside the Built-up Area Boundary development shall not be supported under any circumstances.	This policy builds on the criteria listed in Policy AS.10 of the Core Strategy.
		Policy 12	Support - Further, New deciduous tree planting shall be encouraged somehow. Perhaps one or more fields could be converted to a small copse/wood instead of infill housing?	
		Policy 13	Support - The Crown Inn should also be on this list.	The Crown Inn has permanently closed.
		Policy 14	I don't care.	
		Community Aspiration 1	Support.	
		Community Aspiration 2	Object - Why one or the other? Very strange.	
NoH002	(Resident's Association Representative)	Policy 1	Object - Only within the defined Built-up Area Boundary of the village.	The Parish Council are not aware of any Resident's Association based in Napton and neither the Parish Council nor the steering group have had any contact with such group at any point. Policy 1 only allows development within the defined BUAB.
		Policy 2	Object - Only within the defined Built-up Area Boundary.	Policy 2 is an exception to Policy 1, allowing a limited number of affordable homes to meet local need. This conforms to national

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		Policy 3	Object - Only within the defined Built-up Area Boundary of the village; Everywhere is up for grabs with the word "adjacent" - not OK.	and local policy. Policy has conformed to the approach adopted in the emerging Site Allocations Plan.
		Policy 4	Support - Max 80 and must include all the canal side improvements, moorings, parkland promised us originally.	The District Council has allocated the site in the emerging Site Allocations Plan and are currently assessing a planning application for up to 100 houses on the site.
		Policy 5	Support - No B1 business use should be allowed without the proviso it is not then changed to residential.	The neighbourhood plan is unable to prevent changes in planning legislation at the national level.
		Policy 6	Support.	
		Policy 7	Support.	
		Policy 8	Object - No development is desired by local people except the Brickyard.	The policy only seeks to protect the canal heritage and does not propose any development.
		Policy 9	Object - Add the other local green spaces to this list please. Field between Crown and Howcombe Lane, Pastoral field other side of Howcombe Lane, pastoral field by sports field, remaining allotments, Pastoral fields either side of New Lane, the village Green x 2.	It is not believed that these sites meet the national criteria set out in the NPPF for Local Green Space designation.
		Policy 10	Support.	
		Policy 11	Object - No support for any development outside the Built-up Area Boundary.	The policy only seeks to protect the countryside outside the BUAB and provides further detail to Policy AS.10 in the Core Strategy.
		Policy 12	Support.	
		Policy 13	The Crown Inn.	The Crown Inn has permanently closed.
		Policy 14	Support.	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Community Aspiration 1	Support.	
		Community Aspiration 2	Support.	
	(Resident)	Policy 1	Object - Housing needs survey stated 24 more homes required in January 2018. Between Jan 18 and Jan 20 39 new houses have been built. Therefore there is no need to build any houses at all, notwithstanding the 20-30 houses sold on the market in that period.	In addition to the local housing need of the village, the neighbourhood plan is required to contribute to the district wide housing need in accordance with its Local Service Village (Category 2) designation in the Core Strategy.
		Policy 2	Object - see previous answer - no requirement.	
		Policy 3	Object - See answer to 1. Not required.	
		Policy 4	Support - 80 MAX.	
		Policy 5	Object - Business development should be on the Brickyard site only.	There is no proposal for business development on the former brickyard site.
		Policy 6	Support.	
		Policy 7	Support – Vague.	
		Policy 8	Object - No development on the canal except at the brickyard.	The policy seeks to protect the canal heritage.
		Policy 9	Support - are Crown Green, The Green, Pillory Green; and Memorial Green (registered under the Commons Registration Act 1965.) required to also be local green space?	Government advice is that they do not need to be designated as Local Green Space if they are already protected as village greens.
		Policy 10	Support.	
		Policy 11	Object.	

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		Policy 12	Object - Why does the policy only try to prevent the negative? Why not encourage the positive? Can we support the planting of hedges, trees, copses within the village?	The purpose of the neighbourhood plan is to influence proposals for development, which includes the protection of trees. There could be a proposal to plant more trees in the village as a Community Aspiration but there are very limited powers and resources to implement this.
		Policy 13	Support.	
		Policy 14	Support.	
		Community Aspiration 1	Object - No need to 'reduce speed', we need to 'prevent excessive speed'.	
		Community Aspiration 2	Object - We should have a monorail like Springfield and escalators like in Barcelona.	
NoH004	<i>(The Inland Waterways Association (Warks Branch))</i>	Policy 1	Support.	
		Policy 2	Support.	
		Policy 3	Support.	
		Policy 4	Support - Supported providing the vista from the canal is not compromised by showing only high fences, blank walls or over high development rather than featuring the canal as an amenity and part of the green space.	
		Policy 5	Support - The Inland Waterways Association (Warks branch) does not support future marina development in this already congested area.	
		Policy 6	Support.	
		Policy 7	Support.	
		Policy 8	Support - The Inland Waterways Association (Warks branch) is extremely pleased to see this very positive attitude towards the	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			canal system.	
		Policy 9	Support.	
		Policy 10	Support.	
		Policy 11	Support.	
		Policy 12	Support.	
		Policy 13	Support.	
		Policy 14	Support.	
		Community Aspiration 1	Support.	
		Community Aspiration 2	Support.	
NoH005	<i>(Resident)</i>	Policy 1	Support.	
		Policy 2	Support.	
		Policy 3	Support.	
		Policy 4	Support.	
		Policy 5	Support.	
		Policy 6	Support - The emission of air pollutants could be reduced by encouraging 'no idling' zones. This means stationary vehicles should have their engines turned off. This is a particular issue outside Napton Post Office.	This could possibly be considered as part of the Community Aspirations.
		Policy 7	Support.	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 8	Support - I do not see public art as being an essential.	It is not essential, but has been used around the network as part of the interpretation of the canal heritage.
		Policy 9	Support.	
		Policy 10	Support.	
		Policy 11	Support.	
		Policy 12	Support.	
		Policy 13	Support.	
		Policy 14	Support.	
		Community Aspiration 1	Support.	
		Community Aspiration 2	Support.	
NoH006	(Resident)	Policy 1	Support..	
		Policy 2	Support.	
		Policy 3	Support.	
		Policy 4	Support - But I am happy if the allocation is slightly greater than 80 dwellings, maybe 90.	
		Policy 5	Support.	
		Policy 6	Support.	
		Policy 7	Support.	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 8	Support.	
		Policy 9	Support.	
		Policy 10	Support.	
		Policy 11	Support.	
		Policy 12	Support.	
		Policy 13	Support.	
		Policy 14	Support.	
		Community Aspiration 1	Support.	
		Community Aspiration 2	Support - Please make a cycle path from Napton to Southam.	
NoH007	(Resident)	Policy 1	Support - I agree with the policy and think that brownfield sites such as the Brickyard should be developed first because of the positive environmental impact.	
		Policy 2	Support.	
		Policy 3	Support.	
		Policy 4	Support - This site must be considered part of Napton residential development because the residents will use the village facilities. I also think that a footpath between the brickyard and south side of the village should be created along Brickyard road to reduce vehicular traffic.	
		Policy 5	Support - We need to be mindful of creeping development of country lanes such as Fells lane and Church lane where there is pressure for development.	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 6	Support.	
		Policy 7	Support.	
		Policy 8	Support.	
		Policy 9	Support - I strongly support the use of LGS as a significant feature of the village. e) the land above Quincy meadows is particularly important because it has been subject to a number of development applications and appeals. (original AC Lloyd development and subsequent development appeal and rejected applications). b) The land adjoining the church is iconic with numerous footpaths.	
		Policy 10	Support - The views make Napton, Napton. The views are a key feature of the village and enhance the sense of being in the countryside and enhance the amenity for all.	
		Policy 11	Support.	
		Policy 12	Support.	
		Policy 13	Support.	
		Policy 14	Support.	
		Community Aspiration 1	Support.	
		Community Aspiration 2	Support.	
NoH008	(Resident)	Policy 1	Support - The Brickyard must be considered part of Napton Built up area.	
		Policy 2	Support.	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 3	Support.	The Parish Council is working with the developer and LPA to try and improve connectivity between the village and any new development on the site
		Policy 4	Support - Must have a Cycle and footpath to stop everyone driving.	
		Policy 5	Support.	
		Policy 6	Support.	
		Policy 7	Support.	
		Policy 8	Support.	
		Policy 9	Support - The field above Quincy meadows is really important as a green route for the deer and animals. The Church land is amazing and must be preserved.	
		Policy 10	The views make Napton, they must be preserved for all and not blocked or built on.	
		Policy 11	Support.	
		Policy 12	Support.	
		Policy 13	Support.	
		Policy 14	Support.	
		Community Aspiration 1	Support - Reduce traffic on Godsons and Dog lane, preserve the green lanes.	
		Community Aspiration 2	Support.	
NoH009	(Resident)	Policy 1	Object - Napton is built on a hillside. Points c, f and g rule out any	The criteria listed in the policy does not prevent development, but

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			me to make this response online which I don't like to have to do.	accompanying Consultation Statement. This document sets out the techniques used to minimise on-line use including leaflet to every household, hard copies in public places and public meetings. The local housing needs survey pointed out that there is still a need for 3 dwellings for rent or shared ownership. There were also 22 households with a Napton address registered on the local authority housing waiting list, known as Home Choice Plus.
		Policy 2	Object - Napton has had a lot of affordable houses built over the last decade. Any more should only be built if they are legally protected for ever to be affordable and never sold on the open market.	
		Policy 3	Object - points c, e and f again prevent any building in or around Napton.	See response to Policy 1 above.
		Policy 4	Object - Something needs to be done with this site. Restricting number to 80 could make it not feasible cycle network not practical. By requesting impossible things nothing will be done.	The number of houses that can be built on the site is currently being discussed by the District Council and the developer as part of the recent planning application.
		Policy 5	Object - Points b, d and e again rule out any development c not defined enough.	The intention is again to ensure that any development meets the required standard in terms of its design.
		Policy 6	Object - g jargon Last paragraph too vague could be used to put wind turbines on top of the Hill.	The policy applies to small scale renewable energy that could help reduce carbon emissions and climate change, which accords with national policy initiatives.
		Policy 7	Support.	
		Policy 8	Support.	
		Policy 9	Object - Napton does not need any of these areas designated points a and d should or do have other protection b, c, and e are nothing special so do not fulfil the criteria. e is near to amenities and should be built on.	The proposed Local Green Spaces provide valued open spaces for the reasons set out in the neighbourhood plan, and meet the criteria described in the NPPF.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 10	Object - 5 is not a good view at all especially since the estate on the Priors Marston Rd has been built.	The views has been carefully assessed as part of the wider character assessment, and been selected after community consultation. The plan sets out the justification for their inclusion.
		Policy 11	Object - "intrinsic character" and "vernacular built form" too vague and open to personal views.	These are accepted planning terms.
		Policy 12	Object - Priority should be to the residents of the village. Trees should not block their views.	This policy seeks to protect important trees where possible because of their nature conservation and amenity value. The neighbourhood plan cannot and should not protect views from private property.
		Policy 13	Support.	
		Policy 14	Object - This could be used to put a mast on top of the Hill.	
		Community Aspiration 1	Support.	
		Community Aspiration 2	Object - There are enough footpaths in and around the village.	
NoH010	(Resident)	Policy 1	Object - most houses overshadow or are overlooked in Napton this policy just about rules out any building of new houses or extensions to existing houses in any "gaps".	The policy does not stop development but seeks to ensure that it is built in such a way as to meet certain design standards.
		Policy 2	Object - To use only the Housing needs survey it would have to be updated yearly to be of any use.	It is accepted that the local housing needs survey should be regularly updated. In addition there is research undertaken by the District Council and the housing waiting list.
		Policy 3	Object - Policy too restrictive i.e. a), e) and f).	Self build is still required to meet certain design requirements and not harm the wider characteristics and attributes of the village. To ensure a high quality development and provide certainty to the local community Policy SAP 4 in the emerging Site Allocations Plan states that the applicant, working with the District Council and the relevant parish council, will be expected to prepare a Design Code or Plot Passports for the site. These will be approved by the

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				District Council and form part of the planning permission for the site. The criteria set out in the neighbourhood plan seek to provide the matters that ought to be addressed in any such design code.
		Policy 4	Object - Too many restrictions i.e. 80 maximum needs to be feasible.	The District Council are currently assessing the planning application for the site and will to ensure that the total number of properties allowed does not cause demonstrable harm to the environmental qualities of the site.
		Policy 5	Object - Again the overlooking, overshadowing and gaps too restrictive. Napton has too much tourism now, impacts local roads. Not enough detail here.	Initial consultation indicated that the neighbourhood plan should encourage tourism because it helped support the viability of existing businesses and services.
		Policy 6	Object - Last paragraph needs to be more specific where these things would be allowed.	The last paragraph sets out general principles that apply throughout the neighbourhood area and is not site specific.
		Policy 7	Support.	
		Policy 8	Support.	
		Policy 9	Object - None of the designations need this protection. Policies such as the Core Strategy, SSI, and other criteria is enough to protect what is important. I have lived in Napton all my life and the scruffy agricultural field e), has never held any importance in the village, other than occasionally being used to sledge as are other fields in the village. Napton is on a Hill The copse c) is nothing special either. Why has e) been added it wasn't on the original Draft NDP, therefore not suggested by Napton community	The Government introduced the concept of Local Green Space in the NPPF and set out the criteria for designating them. The neighbourhood plan sets out the justification for including these particular sites in terms of how they meet this criteria. Site e) was added following feedback during the consultation on the draft plan (Regulation 14) and the outcome of recent planning decisions.
		Policy 10	Object - Only 1, 3 (if the tree is removed) and 6 are worth this recognition. There are so many wonderful views round here the others listed don't compare	As a consequence of the village's hill top location there are indeed many attractive views. However the plan can only designate those which are considered most important. All views were assessed and the justification for choosing these particular views is set out in the plan.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 11	Object - Too vague e).	The issue of e) is addressed more fully in the accompanying Character Assessment.
		Policy 12	Object - No consideration given to positioning in village considering residents.	The policy seeks to protect important trees for their ecological and amenity value.
		Policy 13	Support.	
		Policy 14	Object - Needs more detail.	
		Community Aspiration 1	Object - g) how.	Safer Routes to School is a national concept, and would be considered in more detail in association with the County Council.
		Community Aspiration 2	Object - only footpath which needs attention is along Vicarage Rd by the Granary.	
NoH011	(Resident)	Policy 1	Object - All houses in Napton are overlooked or overshadow others so unrealistic. Also which "gaps" the Character Assessment is full of them?	Because of the characteristics of the village more consideration needs to be given to the design and quality of new buildings.
		Policy 2	Object - A lot of Affordable houses have been built in Napton. do they remain affordable; they need protecting from being sold in the future then Napton wouldn't need any more.	The policies of the District Council and social housing providers seek to ensure that such properties remain as affordable in perpetuity.
		Policy 3	Object - As my answer to Policy 1.	
		Policy 4	Object - I don't agree with the restriction of the number 80 it might put developers off improving this site.	The number was stipulated by the District Council in the emerging Site Allocations Plan. The neighbourhood plan has to conform to the Local Plan.
		Policy 5	Object - Tourism does not need any more encouragement b, d, and e too restrictive.	Tourism supports the viability of local enterprises, and should therefore be encouraged. Criteria seeks to ensure that development is of the highest possible design quality.
		Policy 6	Object - more detail is needed to open with regard to wind power.	The policy clearly states it must be community-led small scale development.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 7	Support.	
		Policy 8	N/A.	
		Policy 9	Object - I have lived in Napton more than 70 years and can't see any need for this categorisation especially on farmland in the village e) The council has encouraged building on land in the village for years there is nothing special about this field. This agricultural field was not mentioned in the Draft consultation so not "community led" Napton Sports Club is an asset of the Villagers and should not be given this restriction.	The plan seeks to protect important open spaces in and around the village. It designates these as Local Green Space because they meet the criteria set in the NPPF. The plan justifies their inclusion. Site e) was added following the response to the draft plan and the outcome of recent planning decisions. Because it is such an asset to the villagers, the sports club is protected by designating it as a Local Green Space.
		Policy 10	Object - only 1,3,4 and 6 are good view Paragraph too open to interpretation needs detail.	The Steering Group gave careful consideration to all views in, out and within the village before deciding those listed were the most important.
		Policy 11	Object - e) open to interpretation of different views.	Any consideration of a proposal for development will have to consider these matters, which corresponds to national and local planning guidance.
		Policy 12	Object - needs of villagers should over ride importance of trees inside village.	Some trees have important ecological and amenity value and warrant protection when assessing development proposals. This accords with national and local planning policy.
		Policy 13	Support.	
		Policy 14	Object - Needs to be more specific, look at the unsightly green boxes stuck in any place round village.	Some developments do not require planning permission and cannot therefore be controlled through the neighbourhood plan.
		Community Aspiration 1	Support.	
		Community Aspiration 2	Object - don't need to extend the footpaths.	
NoH012	(Resident)	Policy 1	Object - This policy will in effect stop any future development in Napton which is not sustainable particularly c, d, e, f and g. The	The policy supports development in Napton providing it meets the listed criteria. This is to ensure that development is sensitively

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			Character Assessment referred to in e) is inaccurate, badly written, continually refers to "gaps" and "spaces" and has little understanding of the history of Napton and how it has developed. The Housing Needs Survey should not be the only point of reference, recent market availability and planning applications should be looked at ie. people extending their homes because larger ones are not available.	designed to meet the characteristics and attributes of the village, and is sensitive to its setting and surroundings. This conforms to the NPPF and the National Design Guide (September 2019) which forms part of the Government's collection of planning practice guidance.
		Policy 2	Object - The Housing Needs Survey should not be the only point of reference this should be updated yearly.	It is accepted that the local housing needs survey should be regularly updated. However it is not the only reference. The District Council is also required to keep its Local Plan under constant review with annual monitoring reports.
		Policy 3	Object - c, d, e, and f too restrictive.	See above response to Policy 1 objection. Self build is still required to meet certain design requirements and not harm the wider characteristics and attributes of the village. To ensure a high quality development and provide certainty to the local community Policy SAP 4 in the emerging Site Allocations Plan states that the applicant, working with the District Council and the relevant parish council, will be expected to prepare a Design Code or Plot Passports for the site. These will be approved by the District Council and form part of the planning permission for the site. The criteria set out in the neighbourhood plan seek to provide the matters that ought to be addressed in any such design code.
		Policy 4	Object - Restricting the number of properties to 80 will probably result in nothing happening to this eyesore.	The neighbourhood plan states 80 dwellings because this is what was stated in the emerging Site Allocations Plan. The District Council are currently assessing the planning application for 100 dwellings on the site and will need to ensure that the total number of properties allowed does not cause demonstrable harm to the environmental qualities of the site.
		Policy 5	Object - As previous policies b, c, d, and e ensures nothing is built.	See above comments about the need to ensure that any development is sensitively designed to protect the characteristics of the village.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 6	Object - do not think Napton is the right place for solar farms and wind turbines.	The policy states community led small scale development only.
		Policy 7	Support.	
		Policy 8	Support.	
		Policy 9	Object - Napton is surrounded by green space- the countryside, the village has lots of green space within the village. The scruffy piece of farmland e) has not been identified by Napton community in the draft document as being special, it was suggested by Stratford District Council!. It doesn't fit the criteria for this designation. None of the list need this designation.	The plan seeks to protect important open spaces in and around the village. It designates these as Local Green Space because they meet the criteria set in the NPPF. The plan justifies their inclusion. Site e) was added following the response to the draft plan consultation and the outcome of recent planning decisions.
		Policy 10	Object - Only 1. 3 , 6 and maybe 4 are worthy of this protection.	The Steering Group gave careful consideration to all views in, out and within the village before deciding those listed were the most important.
		Policy 11	Object - c) I thought the land at the junction of the poplars, the Butts and Howcombe Lane had previous buildings on it not ridge and furrow.	Information taken from SEA by Lepus. Commissioned by SDC.
		Policy 12	Object - Trees within the village should not be protected other than the historic ones on The Green.	Some trees have important ecological and amenity value and warrant protection when assessing development proposals. This conforms to national and local planning policy.
		Policy 13	Support.	
		Policy 14	Object - Only concerned with impact on the environment these things impact people as well.	The plan can only consider demonstrable environmental impacts and not any perceived health implications for the local community.
		Community Aspiration 1	Object - how can they do f).	There could, for example, be a one way system on some roads in the village.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Community Aspiration 2	<p>Object - don't need an extended network of paths just need one on Vicarage Rd.</p> <p>There isn't any section on this for other comments so here I wish to make comments about how this consultation was conducted. A small group of people compiled a draft Plan with their ideas and priorities. this was put out for consultation one copy in the shop and one in the garage, The Parish Council on their website says the Plan is community led but Stratford District Council has influenced the Plan in the Local Green Spaces. This is misleading and not accurate. Very few people in the village know about this consultation.</p>	<p>The Parish Council initially explored the idea of preparing a neighbourhood plan with the local community, and decided to go ahead. Volunteers were invited to come forward and form a steering group to draft the neighbourhood plan on behalf of the parish council and undertake the appropriate consultation. This approach has been adopted by many town and parish councils preparing neighbourhood plans. The eventual steering group was reasonably representative of the local community in terms of age, gender and address. It also had a good mixture of skills. The steps taken to consult the local community are clearly set out in the accompanying Consultation Statement. The Parish Council believe it has exceeded the statutory requirements to engage the wider community and other stakeholders, and given them every opportunity to influence the content of the plan. A leaflet was distributed to every household, posters and notices were put around the village and there were three open meetings where local residents could ask questions and make comment.</p> <p>As part of the Regulation 14 consultation, the views of the District Council were sought by the Steering Group/Parish Council. This is a statutory requirement.</p>
NoH013	(Resident)	Policy 1	<p>Object - Over the last 20 years the majority of building has taken place within the confines of the built up area. This has led to the loss of rural character & congestion by traffic in the village on roads with limited capacity. At times the village can become impassable to vehicles other than cars. The village needs to be able to spread out more with development taking place along the roads into the village to prevent urbanisation & congestion becoming any worse within the village. You talk about off road parking but this is not legally enforceable & in many cases vehicles still end up parked on the road. There are no infill areas remaining within the built up area, we need to let the village spread to retain rural character.</p>	<p>The neighbourhood plan is obligated to conform to the Core Strategy to meet the basic conditions. The Core Strategy stipulates that development should be within the BUAB. The intention is to prevent villages sprawling across open countryside.</p>

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		Policy 2	Object - You will not get land offered for affordable housing without an element of normal development included in the proposal.	Policy 2 acknowledges this may occur.
		Policy 3	Support - If the policy allows for affordable housing, self-build homes & custom housebuilding adjacent to the built up area. Then surely it should also recognise the need for normal village growth adjacent to the built up area. I have lived in this village for over 60 years and watched its rural character steadily eroded away, we now have an opportunity to let the village spread and regain some rural character let's not waste the chance.	Affordable housing and self-build housing are both exceptions to the normal requirement for new market homes to be within the BUAB or on a brown field site. This is stipulated in the Core Strategy, to which the neighbourhood plan must comply. As stated above the intention is to protect the open countryside from unfettered and unconstrained housing development.
		Policy 4	Support - Support the use of a brownfield site, but some of the requirements listed for the proposal will do nothing to aid the development of the site. These need revisiting for practical, common sense and achievable goals.	The neighbourhood plan builds on what was in the emerging Site Allocations Plan. The District Council are currently assessing the planning application for a 100 dwellings and seeking to balance the viability issues with the environmental constraints.
		Policy 5	Support.	
		Policy 6	Support.	
		Policy 7	Support.	
		Policy 8	Support.	
		Policy 9	Object - Land listed above at b] is just an agricultural field. It is used by many people in the village to exercise dogs who are all trespassing!!! If this is to be listed as green space, then you should include every agricultural field adjoining the village. If you leave it in the final plan then you will be party to its misuse!!! I have already responded to this but my representation seems to have been ignored so much for consultation	The field has been proposed as a LGS largely because it affects the setting of the Church. The text describing the site in the NDP was amended as a result of comments and concerns expressed during the early consultation. It is well known that the field has designated Bridle Way and Footpath crossing it, and whilst the alleged acts of trespass are unfortunate, they are outside the scope of this plan
		Policy 10	Support - Incorrect spelling of Dannells Hill. It is Daniels Hill named after the tenant of the land back in the 1920/30's.	This stretch of road has many names locally. The electoral register refers to Danils Hill Farm. Plan has been amended accordingly.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 11	Object.	
		Policy 12	Support.	
		Policy 13	Support.	
		Policy 14	Support.	
		Community Aspiration 1	Support.	
		Community Aspiration 2	Support.	
NoH014	(Resident)	Policy 1	Object - This policy is too restrictive, it doesn't allow for the future of Napton as it has developed in the past, no positive suggestions on how housing can be accommodated for people not entitled to affordable housing. By not building larger housing or allowing extensions (building in "gaps") families will be discouraged from living in the village and the school and other amenities will suffer.	The policy supports development in Napton providing it meets the listed criteria. This is to ensure that development is sensitively designed to meet the characteristics and attributes of the village, and is sensitive to its setting and surroundings. This conforms to the NPPF and the National Design Guide (September 2019) which forms part of the Government's collection of planning practice guidance. In addition, the neighbourhood plan has supported the development of 80 dwellings on the former brickworks site. The Parish Council are mindful of the potential impact on the infrastructure of the village.
		Policy 2	Object - enough affordable houses built over the last few years.	The local housing needs survey has identified a need for three properties for rent/shared ownership. In addition the District Council's waiting list contains a number of people living in the Napton area. However it is accepted that this information needs to be regularly updated.
		Policy 3	Object - too restrictive Napton's character not taken into consideration.	See above response to Policy 1 objection. Self build is still required to meet certain design requirements and not harm the wider characteristics and attributes of the village. To ensure a high quality development and provide certainty to the local community Policy SAP 4 in the emerging Site Allocations Plan states that the applicant, working with the District Council and the

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 4	Object – Can't see any developer taking on this eyesore with such restrictions.	relevant parish council, will be expected to prepare a Design Code or Plot Passports for the site. These will be approved by the District Council and form part of the planning permission for the site. The criteria set out in the neighbourhood plan seek to provide the matters that ought to be addressed in any such design code.
		Policy 5	Object - doesn't look like support with so many restrictions. Napton has more than its fair share of Marinas and caravan sites.	The neighbourhood plan builds on what was in the emerging Site Allocations Plan. The District Council are currently assessing the planning application for a 100 dwellings and seeking to balance the viability issues with the environmental constraints. Although perhaps a visual eyesore the site has other environmental assets including ecological and geological features.
		Policy 6	Object - Describe community led. The Parish Council on its website says this Neighbourhood Plan is community led. 50 out of 1,144 people responded to the original draft of this document that is less than 5% of the community. Is that a mandate for such changes or control described in this document.	The steps taken to consult the local community are clearly set out in the accompanying Consultation Statement. The Parish Council believe it has exceeded the statutory requirements to engage the wider community and other stakeholders, and given them every opportunity to shape and influence the content of the plan. A leaflet was distributed to every household, posters and notices were put up around the village and there were three open meetings where local residents could ask questions and make comment. The figure of 1144 includes all age groups including children.
		Policy 7	Support.	
		Policy 8	Support.	
		Policy 9	Object - Considering my response to policy 6 I don't think there is very much COMMUNITY support for any of these designations. e) was suggested by Stratford Council, not the community.	The plan seeks to protect important open spaces in and around the village. It designates these as Local Green Space because they meet the criteria set in the NPPF. The plan justifies their inclusion. Site e) was added following the response to the draft plan and the

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 10	Object - 3 and 6 only.	outcome of recent planning decisions. The Steering Group gave careful consideration to all views in, out and within the village before deciding those listed were the most important. The justification for their inclusion is listed in the neighbourhood plan.
		Policy 11	Object - don't think c) is accurate.	This information came from the SEA by Lepus.
		Policy 12	Object - concern about trees within the village blocking views. Support.	Some trees have important ecological and amenity value and warrant protection when assessing development proposals. This conforms to national and local planning policy. The neighbourhood plan cannot protect views from private property.
		Policy 13	Object - Utilities need to be more sympathetic to character of village.	
		Policy 14	Object - f is ambitious but not practical.	
		Community Aspiration 1	Object - don't need more footpaths.	
		Community Aspiration 2		
NoH015	(Resident)	Policy 1	Object - many of the criteria restrict any kind of building so Napton is mothballed!	The policy supports development in Napton providing it meets the listed criteria. This is to ensure that development is sensitively designed to meet the characteristics and attributes of the village, and is sensitive to its setting and surroundings. This conforms to the NPPF and the National Design Guide (September 2019) which forms part of the Government's collection of planning practice guidance. In addition, the neighbourhood plan has supported the development of 80 dwellings on the former brickworks site.
		Policy 2	Object - Many affordable houses built over the last 10 years adequate for now.	The local housing needs survey has identified a need for three properties for rent/shared ownership. In addition the District

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
				Council's waiting list contains a number of people living in the Napton area. However it is accepted that this information needs to be regularly updated.
		Policy 3	Object - Criteria c, d, e, and f rule out any building in Napton being on a hill.	See above response to Policy 1 objection. Self build is still required to meet certain design requirements and not harm the wider characteristics and attributes of the village. To ensure a high quality development and provide certainty to the local community Policy SAP 4 in the emerging Site Allocations Plan states that the applicant, working with the District Council and the relevant parish council, will be expected to prepare a Design Code or Plot Passports for the site. These will be approved by the District Council and form part of the planning permission for the site. The criteria set out in the neighbourhood plan seek to provide the matters that ought to be addressed in any such design code.
		Policy 4	Object - too restrictive particularly specifying 80 as a total number the community want the eyesore cleared up.	The neighbourhood plan builds on what number of dwellings was in the emerging Site Allocations Plan. The District Council are currently assessing the planning application for a 100 dwellings and seeking to balance the viability issues with the environmental constraints. Although perhaps a visual eyesore in places the site has other environmental assets including ecological and geological features.
		Policy 5	Object - Napton has a lot of marinas and caravan parks so specify what tourism would be supported i.e. b&b, holiday lets.	At this stage there is no specific information as to what should or should not be encouraged to justify such an approach, so every planning application has to be assessed on its merits
		Policy 6	Object - Napton village not the place for wind turbines.	The policy clearly states it must be community-led small scale developments subject to certain criteria.
		Policy 7	Support.	
		Policy 8	Support.	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 9	Object - DONT support any of these designations. I have lived in the Village all my life and have not seen any evidence that these sites are so important that they need more protection than they have at present.	The plan seeks to protect important open spaces in and around the village. It designates these as Local Green Space because they meet the criteria set in the NPPF. The plan justifies their inclusion. Site e) was added following the response to the draft plan and the outcome of recent planning decisions.
		Policy 10	Object - Napton is a great place to live with good views but compared with other places round the country, not really exceptional, there are wind turbines and radio masts on the horizon, the Priors Marston new estate sticks out on the side of the Village, the Character Assessment is inaccurate it says this estate fits in! Only 1. 3 and 6 are worth recognising.	The Character Assessment highlighted the unique and valued qualities of the village, especially the topography and views it afforded over surrounding open countryside. The steering group gave careful consideration to all views in, out and within the village before deciding those listed were the most important. The justification for their inclusion is listed in the neighbourhood plan.
		Policy 11	Object - disagree with c) not accurate.	
		Policy 12	Object - Trees often an issue within the village blocking views this is not recognised in policy.	Some trees have important ecological and amenity value and warrant protection when assessing development proposals. This conforms to national and local planning policy. The neighbourhood plan cannot protect views from private property.
		Policy 13	Support.	
		Policy 14	Object - more consideration as to where this can be done sympathetically and recognising appropriate places or not for masts already have one on the horizon.	
		Community Aspiration 1	Object - too vague	
		Community Aspiration 2	Object - no more footpaths	
			There is no place on this form for comments on the consultation, so I wish to add that the consultation has been very poor and excluded many villagers ie older people without the technology or ability to access the documents placed at the garage and shop due to age or disability. This is probably why there was only a 5%	The Parish Council initially explored the idea of preparing a neighbourhood plan with the local community, and decided to go ahead. Volunteers were invited to come forward and form a steering group to draft the neighbourhood plan on behalf of the parish council and undertake the appropriate consultation. This

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			response to the Draft. The previous Parish Plan made the effort by a questionnaire to every household.	approach has been adopted by many town and parish councils preparing neighbourhood plans across the country. The eventual steering group was reasonably representative of the local community in terms of age, gender and address. It also had a good mixture of skills. The steps taken to consult the local community are clearly set out in the accompanying Consultation Statement. The Parish Council believe it has exceeded the statutory requirements to engage the wider community and other stakeholders, and given them every opportunity to influence the content of the plan. A leaflet was distributed to every household, posters and notices were put around the village and there were three open meetings where local residents could ask questions and make comment. The housing needs survey was also sent to every household and invited residents to comments on future development.
NoH016	<i>(Resident/Business/Work in area)</i>	Policy 1	Object - You should give consideration to all land adjacent to the BUAB. Most infilling has been completed. For a village to thrive it must grow, but on a controlled basis and not what we've witnessed in the area over recent years due to Stratford's incompetence.	The policy to restrict market development to within the BUAB conforms to the policies in the Core Strategy. The Parish Council decided not to allocate additional sites for development outside the BUAB because 1. it has already substantially met the District Council's housing requirement for a Local Service Village (Category 2) and 2. it supports up to 80 dwellings on the former brickworks site. However affordable housing and self build housing will be permitted adjacent to the BUAB subject to certain criteria.
		Policy 2	Support	
		Policy 3	Support.	
		Policy 4	Object - I don't feel the site can afford all that is being requested.	
				The neighbourhood plan mirrors the number of dwellings prescribed in the emerging Site Allocations Plan and the various site requirements. The District Council are currently assessing the planning application for a 100 dwellings and seeking to balance the viability issues with the environmental constraints. Although perhaps a visual eyesore in places the site has other environmental assets including ecological and geological features.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 5	Support.	
		Policy 6	Support - Do you support? a/ wind farms in the Parish? b/solar ?? on greenfield site within the parish?	The policy clearly states it must be community-led small scale developments subject to certain criteria.
		Policy 7	Support - In general but there is a limit.	
		Policy 8	Support.	
		Policy 9	Object - Do you have the landowners permission?	Whilst the landowners must be informed and given an opportunity to comment during the preparation of the plan, their permission is not required.
		Policy 10	Object - Do you have the property owners permission?	See above.
		Policy 11	Support.	
		Policy 12	Object - Again land owners should be respected just look at the carnage of HS2.	This policy seeks to protect important trees when assessing a planning application. Whilst compulsory purchase is applicable in some limited circumstances such as major infrastructure projects, this policy is primarily for routine planning applications which are normally by the land owner.
		Policy 13	Support - These facilities need to be supported.-use it or lose it.	
		Policy 14	Support - Will it happen? and when?	
		Community Aspiration 1	Support.	
		Community Aspiration 2	Support - Who will finance the improved infrastructure?	
NoH017 to - NoH32	(Residents/ Business/Work in area)			These representations have not been individually responded to by the Parish Council as they largely repeat comments made in NoH001 to NoH0016

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
NoH033	(Resident)	Policy 2	Support - properties often need to a lot smaller and genuinely affordable than is usually the case when built by developers. There are plenty of designs for built off side and erected in days properties especially 'bungalows'. Policy needs to allow for novel forms of construction.	The policy needs to strike a balance between restoring a brownfield site with a viable residential development whilst protecting and enhancing the environmental features of the site. Asking the developer to undertake such offsite improvements is probably excessive.
		Policy 3	Support - See response to Policy 2. Explicitly allow for and encourage novel forms of construction.	
		Policy 4	Object - Policy needs to include works to improve the canal tow path from the A425 and the Folly Public House - this will be increasing used as the housing is occupied/. Current tow path is dangerous in places.	
		Policy 5	Support.	
		Policy 6	Object - I make these comments having worked (at Warwickshire CC) as a Renewable Energy Adviser with related experience in sustainable construction, climate change adaptation and economic development / regeneration. I have studied where our energy comes from and how this is going to change in coming years. This policy is wholly inadequate. The world has changed in the time it has taken to produce this plan - climate change / low carbon future is now a district, county, national and international priority - yet this plan - despite the title of SO4 almost ignores it. The draft policy talks about almost everything but the words in the SO4 Objective. Please delete and start again. Parish Council draft Minutes for 3rd Feb' 2020 included ... Warwickshire CC Cllr XXX - WCC cabinet are taking actions in response to the climate emergency. These include objectives around reducing use of paper, reducing the Council's carbon footprint and making environmental considerations part of all decision making processes. WCC are attempting to lever in Central Government funding for climate change initiatives. SDC Cllr XXX - Cllr XX gave an update from the SDC climate change task and finish group:-	The policy can only relate to development and the use of land. To meet the basic conditions it is also required to conform to national and local planning policy. Whilst commendable many of the matters outlined in this response are outside the scope of a neighbourhood plan. Furthermore we are approaching the end of a lengthy statutory process and it is not possible to start again. They will no doubt feature in a future review of the neighbourhood plan.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>➤SDC have established that 83% of Council emissions are generated by the provision of Leisure and Waste collection services. ➤ Emissions from domestic properties in the area are higher than the national average. The Parish Council has agreed to work together on environmental issues with the Napton Environmental Action Team (NEAT - formed in 2019) at its meeting in MARCH 2020 - and NEAT has already supported NPC in the wording of a response to SDC on the recent consultation SPD on Climate Change. None of this changing attitude / priorities is reflected in the consultation NDP. Key things that need including are ... (I will be happy to help with new wording) .. # GENERAL - that climate and biodiversity loss - and therefore issues to address them must be taken seriously - and will be given a high priority in the consideration of planning application. In the light of these comments I suspect NPC may well be prepared to accept a redraft in along the lines suggested # GENERAL - Needs a statement about objectively balancing competing objectives (i.e. energy proposals against landscape protection) - currently the document feels written to stop - in this case - renewable energy projects. # MITIGATION - an expectation that energy - both directly used within buildings after completion is minimised and that embedded in construction materials are considered / included in from the first design stages to improve overall performance and minimise costs. Studies have shown a minimal 8% additional cost to meet the equivalent of Level 1 Code for Sustainable Homes when the designer has existing experience. All designers need to get to this point. This cost will pay for itself handsomely through lower running costs - and in the short term is a small hit on developers - well within standard profit expectations. # ADAPTATION - Standard 'off the shelf designs' do not allow for weather extremes (over-heating and rainfall) and the consequences not only on occupants directly suffering from the extremes in their homes - but also on local infrastructure. Napton is well known to have a lot of drainage problems with blocked sewers - this will increase if developers are not expected to improve the infrastructure - or incorporate adequate water retention on site - ideally for re-use.</p>	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>The same issue applies to planting - we will need species that can withstand and flourish under changing weather patterns / a different climate. # the NDP proposal "A proposal for community-led small-scale renewable or low carbon energy development, (such as ground source heat supply, solar farms or wind power for local supply) will be supported providing there are no adverse impacts on the local environment that cannot be adequately mitigated. The overarching aim is that the overall balance of outcomes from such projects should be positive for the local community." ... is far too restrictive. ## Firstly - it should not include a restriction to 'community led' or small scale. A local farmer, other business or resident - should be encouraged to bring forward proposals. 'Small scale' is a too nebulous term and either needs defining or removing. Whatever the scale - when a planning application is submitted - scale and impact can be considered at that time. ## Secondly, "no adverse impacts on the local environment that cannot be adequately mitigated" - again this is too restrictive and I suspect comes from a perspective that is overly cautious and maybe based on fear of the unknown. I and would be happy to help with alternative wording.</p>	
		Policy 7	Object - The balance between protecting our heritage assets and other objectives - whilst important (health reasons) - has been used to quash other developments including renewables. Times are changing - the balance needs re-addressing.	The balance in the policy reflects national guidelines in the NPPF.
		Policy 8	Somehow extra funds need to found (\$106?) for canal towpath repairs - especially between the A425 and the Folly Inn.	Outside the scope of the plan. This is a land management issue.
		Policy 9	# The Objective - "to protect the natural environment" does not relate to the text below which focuses on local green spaces. Natural environment normally refers to habitat, nature and biodiversity - and not to spaces that look green and pleasant. Needs changing.	The objective covers the natural environment and surrounding landscape. It also is implemented by policies 9-12 not just Local Green Space.
		Policy 12	Support - # needs more TPO's as some large mature trees have	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 13	recently been felled near the top of the hill. # planting needs to take account of current and future climate changes # NPC to be encouraged to get involved in more tree planting both for food, biodiversity and CO2 capture and storage.	
		Policy 14	Support.	
		Community Aspiration 1	Support - However there are said to be serious health risks to humans, wildlife including insects with the introduction of 5G and many more transmitters that will be needed. We should not fall over backwards to encourage 5G until more research has been done.	
		Community Aspiration 2	Support.	
			Support - Is there also an issue about access to and within properties - with lots of steepes and an increasingly elderly population?	
034	Sport England		<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role</p>	The parish has an excellent sports facility, which is protected in the Policy 9 of the neighbourhood plan as a Local Green Space.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out</p>	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p>http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides</p>	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>	
NoH035	(Network Rail)		Network Rail has no comments on the plan.	
NoH036	(Severn Trent)	Policy 6	<p>Policy 6 – Environmental Quality – subsection f)</p> <p>Severn Trent is supportive of this policy particularly in section 'f) to minimise flood risk and encourage efficient water and waste management systems including SuDS.' Management of surface water is an important part of planning a new development, it is vital that surface water flows are managed sustainably and where possible diverted into natural water systems. Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impacts of climate change, and providing wider benefits around water quality, biodiversity and amenity.</p> <p>Severn Trent would suggest that the policy ensures that developers follow the drainage hierarchy which is included within Planning Practice Guidance Paragraph 80,</p>	<p>Could add reference to paragraph 80 of Planning Practice Guidance.</p>

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>“The aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:</p> <ol style="list-style-type: none"> 1. into the ground (infiltration); 2. to a surface water body; 3. to a surface water sewer, highway drain, or another drainage system; 4. to a combined sewer.” <p>The inclusion of the following policy wording is recommended: <i>‘All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.’</i></p> <p>The wording of the policy should go further in relation to water efficiency, whilst we are supportive of the wording ‘encourages efficient water systems’ we are aware that new development will result in a need for an increase in the amount of water to be supplied and issues with sustainability of some of our water sources are placing supply resilience at risk. It is suggested that the following policy is included</p> <p><i>‘Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.’</i></p> <p>Policy 6 – Environmental Quality – subsection g) Severn Trent is also supportive of subsection g) minimisation of the fragmentation of habitats and creation of green infrastructure networks that improve biodiversity. Severn Trent wants to encourage new development to enhance biodiversity and ecology links through new development and by allowing appropriate space for water so it can be managed in an effective way. Severn Trent is supportive of the principles of blue - green corridors and making space for water. To enable planning policy to support this</p>	<p>This perhaps more appropriate within the District wide Local Plan.</p> <p>This is also more appropriate within the District wide Local Plan as green infrastructure is more strategic in its nature.</p>

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>approach, it is recommended that the following wording is included within the policies.</p> <p><i>'Development should where possible, create and enhance blue green corridors to protect watercourses, and their associated habitats from harm.'</i></p>	
NoH037	(Natural England)		Natural England does not have any specific comments on this draft neighbourhood plan.	
NoH038	(Highways England)	General	<p>In relation to the Napton-on-the-Hill Neighbourhood Development Plan, the principal interest is in safeguarding the operation of the A45/M45 corridor which routes approximately 16km to the northeast from the Plan area. We understand that a Neighbourhood Development Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Development Plan for Napton-on-the-Hill is required to conform to the Stratford-on-Avon District Core Strategy (2011-2031), which is acknowledged within the document.</p> <p>It is noted that no specific housing or employment sites have been allocated in the Core Strategy for the Parish, although the Neighbourhood Development Plan will support small scale housing and employments within the main built-up areas of the village.</p> <p>Considering the limited level of growth proposed across the Neighbourhood Development Plan area, it is not expected that there will be any impacts on the operation of the SRN. We therefore have no further comments to provide and trust the above is useful in the progression of the Napton-on-the-Hill Neighbourhood Development Plan.</p>	
NoH039	(National Grid)	General	<p>Proposed development sites crossed by or in close proximity to National Grid assets</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p>	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			National Grid has identified that it has no record of such assets within the proximity of sites planned for allocation within the Neighbourhood Plan.	
NoH040	(Ward member and Resident)	General	<p>EXECUTIVE SUMMARY</p> <p>Policy 4 requires total removal and replacement because it defies the community consultation carried out for the specific purpose of establishing this policy.</p> <p>Policies 1, 2, 3, 4, 5, 6, 8, 10, & 14, require amendment for reasons expressed in this submission.</p> <p>Community Aspirations 1 & 2 require amendment for reasons expressed in this submission.</p> <p>I do not believe appropriate community consultation and engagement has taken place, hence the small number of responses, nor that the responses have been satisfactorily addressed.</p> <p>I have divided my response into sections A to E, supplying these as separate documents: A - My original response at Reg 14 Stage B – An extract from the Consultation Statement Appendix 7 which is apparently a summary made of my comments in document A above, with reactions to the responses to my inputs at Reg14 stage. C – The consultation of August 2019 on Napton Brickworks which has been excluded from the NDP. C1 - The consultation questionnaire which as stated on its front cover was designed to elicit views for the NDP, the SAP and any planning applications on the brickworks site. C2 - The actual consultation responses. C3 – The numerical and % responses independently calculated and linked to questions C4 – The report of the consultation published to the community (October 2019 Parish News) C5- My comments on the SAP Policy Rural.1 amended to conform</p>	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>to the findings of the Brickworks consultation and align with community wishes. D- My comments on the proposed Policies E- My comments on the SEA screening document</p> <p>OVERVIEW</p> <p>In January 2019, I submitted a document of seven pages in response to the Parish Council/Steering Group consultation (Document A). This was a 'pre-submission draft for public consultation' bearing the date November 2018 (Reg14). I commented on that document on 9 January 2019. I consider most of my comments are still valid and have not been satisfactory addressed. The Reg 16 version of the NDP dated October 2019 is probably 90% similar, although without a document revision history it is difficult to track the changes that have been made. I am now the District Council ward member, as I had been previously, but I was an ordinary resident of Napton in January 2019.</p> <p>My response at this Reg16 stage is, I am afraid, necessarily complex.</p> <p>The Steering Group/ Parish Council have produced a 'Consultation Statement Appendix 7' (Document B). Original comments of (anonymised) have been summarised in a table. It appears I am respondent number 32 of 62 (although it seems there are only 51 resident respondents). My seven pages have been reduced to 24 lines with a further 2 that do not appear to be my comments. Further, I said that I was not happy with the draft overall , but this has not been attributed to respondent 32. With those exceptions the extraction of my points appears to have been well been done but now lack context and explanation. This may be why of the 24 lines, I regard only 6 as having a reasonable response for their rejection. I have therefore resubmitted Document A to the examiner and Document B with a response to those responses. It looks to me that other respondent inputs have also been dismissed without full justification, but without actually knowing what was originally said, it is difficult to be sure.</p>	

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			<p>Section C refers to the former brickworks. The brickworks site has quite correctly justified a section of its own in the draft NDP because it would be the single largest development area (indeed the only one specifically identified for development) and is of great interest to the community.</p> <p>However, this is the most egregious element of the whole NDP because of the defiance of community wishes expressed in the property constituted community consultation of August 2019.</p> <p>The section of the NDP Consultation Statement is as follows: <i>3.9 An outline planning application was submitted by GVA on behalf of St. Phillips in October 2018 for up to 100 dwellings on the site of the former brickworks. As part of this proposal pre-application discussions were undertaken with relevant local stakeholders and the wider community. This included a meeting with the Parish Council on 20 February 2018. There was also a public exhibition in the village hall on 21 May. Approximately 120 people attended , of which 59 completed feedback forms.</i> In my opinion neither the process nor that analysis were objective and certainly not community led. It comprised a (private?) meeting with the Parish Council with a Developer, followed by an exhibition by that Developer with feedback forms analysed by the same Developer. This was to support a specific planning application that they were prompting.</p> <p>Not even mentioned in the Consultation Statement is the consultation of August 2019. This was published by the Parish Council, designed to elicit views for the NDP, the Site Allocation Plan and any relevant planning applications.</p> <p>The August 2019 Consultation Survey was entirely community led, unbiased, independently analysed, run and promoted by democratic representatives. Section C evidences this in detail. By circulating that survey to every home and obtaining 115 detailed responses, this was easily the most valid of all surveys in the whole the NDP period and process, but has been completely ignored for reasons unknown. As Ward Member, I changed my</p>	<p>This exercise was undertaken by the applicant as part of the pre-application consultation, minutes were taken and members of Stratford District Council planning team were also present</p> <p>The community consultation led by the Ward Member was not part of the statutory consultation process (Regulation 14) for the neighbourhood plan.</p>

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			<p>position after seeing the results of the survey and submitted input to the SAP policy as Document C5 in accordance with those community wishes.</p> <p>The overall NDP process would have been more valid if it had followed this engagement model.</p> <p>For the NDP as a whole, I see that 62 responses were indicated, of which 51 were local residents. Quite rightly, names have been redacted, but I do wonder if this includes those involved in the production of the NPD - which is at least 18 persons. According to SDC reports the Parish Plan that this replaces had a resident response rate of 65%, an equivalent of 276 resident addresses, and a 30% response rate from local businesses. This NDP has a response rate of 11% - 51 residents, and no local business (as far can be seen). If it assumed that say, half of those involved with the NDP production responded, it would 9% of residents. This rate is surely a cause for concern. Whilst I cannot claim complete knowledge the evolution of the NDP, it gives the impression of taking place in private meetings of the steering group and confidential sessions of the Parish Council. Draft documents have not been available to the public until the formal Reg 16 stage. I therefore find it difficult to agree with the conclusion of Section 5 of the NDP Consultation Statement in my present state of knowledge.</p> <p>Notwithstanding the foregoing comments about process - the research, descriptive elements, and some of policies are aspects upon which personally I can agree. This response selects those issues upon which I do not agree.</p> <p>In document D I make comment on individual proposed policies. There are also some errors indicated in the SEA Screening (Document E).</p> <p>To repeat my comments from response at Reg14, I respect and thank those in the community that put much hard work into this endeavour.</p>	<p>A neighbourhood development plan is not comparable to parish plan. The latter is an informal non-statutory document prepared and adopted by a parish council that has limited, if any weight to decision makers when assessing planning applications. A neighbourhood development plan is a statutory document that had its origins in the Localism Act 2011 and is enshrined in planning legislation. Once made (adopted) by the District Council it becomes part of the development plan for the area. Whereas a parish plan can cover any topic it chooses, a neighbourhood development plan can only cover matters relating to development and the use of land. The only thing they have in common is that they are both led by the parish council.</p> <p>The Consultation Statement explains how the neighbourhood plan was promoted to all those who live, work and have a business interest in the area - and gave them the opportunity to comment and influence the content of the plan. The Parish Council therefore believes it has met its statutory requirements in terms of consultation .</p> <p>The District Council commissioned the consultants Lepus to undertake the SEA screening, and the Parish Council had no involvement in its preparation or content.</p>

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 1, 2 & 3	<p>'Be supported' is a somewhat unfortunate term to use in the context of Stratford's Planning application planning application methodology. This has changed in this version, a description repetitively used in the document. The core Strategy uses 'be acceptable' - the NDP should be consistent with this. ('Supporting' an application has a specific meaning at Stratford driving applications to committee in certain circumstances.</p> <p>'Small' – is a loose description repetitively used in the document. A 'Small' number of dwellings should be indicatively defined to avoid doubt How would a planning committee decide what 'small' meant? The District (pop 128000) uses 10 dwellings - it seems a reasonable rationale to half that to define 'small' in Napton - a community with a population of 1% the size of the District.</p> <p>Both of the forgoing should apply to other policies but I will not repeat the comment, for brevity.</p> <p>The policy constrains development to a tight BUAB, calls for infill but then retains gaps. I believe the BUAB is too tightly drawn, for instance the exclusion of Chapel Green and is worthy of further consultation. It is inconsistent with other policies which permit dwellings outside the BUAB which should be addressed in the wording.</p> <p>Many respondents have identified a 'bungalow problem'. Given the fairly tight constraints on new build dwellings and the consistently and widely expressed desire for bungalows, this policy does not address the shortage of bungalows. The few bungalows that do exist have been, and are permitted to be, converted into larger two storey houses. Such a policy stance perpetuates and exacerbates that shortage. A paragraph should be added such as 'Bungalows are a welcome form of development. Proposals that</p>	<p>The neighbourhood plan has to be in general conformity with the Core Strategy, and not absolute conformity.</p> <p>Why restrict to no more than 5 dwellings? This is an arbitrary figure chosen with no justification or supporting evidence. Why not limit to 4 dwellings or 6 dwellings? Policy CS12 in the Core Strategy similarly does not give a figure but states that 'the scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement'. Policy AS.10 adds that the following is acceptable in principle 'Small-scale housing schemes, including the redevelopment of buildings, within the Built-Up Area Boundary of a Local Service Village'. The neighbourhood plan is consistent with the approach in the Core Strategy.</p> <p>The neighbourhood plan adopts the BUAB that was defined and formally endorsed by the District Council.</p> <p>Developers are no longer keen to build bungalows because of the high cost of building land and the footprint of a bungalow is usually double that of a two storey house. Land owners have a right to extend their properties. Whilst this sometimes requires planning permission, the Government are now relaxing controls and it often now falls within permitted development.</p> <p>The proposed self build plots will provide may provide an</p>

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			result in the loss of bungalows will be resisted except in exceptional circumstances.'	opportunity for bungalows. Some have also been provided at Quincy Meadow
		Policy 4	This policy is unacceptable. There is no community consultation evidence to support this policy as written; only developer led input. This policy should be deleted and replaced by wording that reflects the community consultation results that indicate up to 65 dwellings and some commercial units, as per my RURAL.1 submission configured from the outcome of that consultation.	The policy does not allocate the land for development. It has neither the skills nor resources to investigate the viability, suitability and deliverability of a brownfield site. However it supports the proposal that came forward in the emerging Site Allocations Plan for the reasons identified in the neighbourhood plan. In part this has been superseded by the planning application now being considered by the District Council. The Parish Council has been engaged in discussions with the developer and District Council and it is mindful that a careful balance has to be struck between the viability issues of the site and, amongst other things, the need to protect important environmental features.
		Policy 5	Policy 5 has been rewritten from the earlier draft and is new to the public. The policy is splits in two so that different constraints apply inside and outside the BUAB. For instance impacts in terms of traffic, parking, noise, air pollution, light pollution, ecology and landscape are apparently not issues in open countryside, which is clearly not correct. This policy requires rewording as many of these matters have historically been problems. The cumulative effects of development were alluded to in my earlier submission.	Any proposed development will also be assessed against Policy AS.10 and CS.22 in the Core Strategy. Any applications outside the Napton BUAB will also be considered against Policies 10 and 11.
		Policy 6	I refer and reinforce to my earlier comments at Reg14. A well intentioned policy, but e) and the final paragraph may have unintended consequences. The demolition waste recycling centre has been hugely controversial and unpopular as was the intent for a wind far adjacent to the village. Both might be found to promoted by this wording which I am sure would not gain approval the community. Some sort of rigorous test should be alluded to in the final sentence. In air quality I would like to see 'no idling' zones promoted either under this policy or aspirationally. The schools and shop are obvious locations.	The policy refers to community-led and small scale proposals. The final sentence in the last paragraph was inserted at the request of the District Council.
		Policy 8	There have been two large unsatisfactory marinas promoted by (then) British Waterways and their successors but opposed by Napton's community and the District Council. This policy should reinforce that position irrespective of whether it aligns with the	The policy seeks to protect and improve the existing canal heritage. There is no proposal to build marinas.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			canal and river trust objectives. Such considerations are not presently mentioned. I pointed this out in my first submission.	
		Policy 9	This method of protecting important areas represents an improvement over relying on views. I support the areas selected, particularly the area above Quincy Meadows.	
		Policy 10	The reduction in the number of views and the selection I find satisfactory. The photograph of View 6 does not match the map 120o vista – I would agree with the arrows on the map - from Dannells Hill to the Dasset Hills. A more panoramic 120o photograph should be substituted to match the arrows. I would also wish that wording is added 'The location and direction of these important views is indicated on Policy Map 3. General illustrative photographs of these views are included although the boundaries of the frames are not absolutely definitive.'	Better/more representative photos can be supplied if required.
		Policy 14	I maintain my earlier comments from reg14.	
		Community Aspiration 1	I maintain and reinforce my earlier comments from reg14. In particular the desire to create a safe cycle track to Southam by any means possible, in addition to within the parish. This may be in a planning environment by use of S106 or CIL money in addition to grants, so not entirely out with the planning environment as has been said. Note the context the context of the emerging Climate Change SPD.	The neighbourhood plan cannot include proposals for land outside the neighbourhood area. However this proposal may be included as a community aspiration providing there is evidence of need and it is a viable proposition. At the current time there is no such evidence to support this idea.
		Community Aspiration 2	I maintain and reinforce my earlier comments from reg14 re Banbury. See Aspiration 1 above.	
		SEA Screening	<p>SEA and HRA Screening Document dated Feb 19 Lepus Consulting</p> <p>This report contains number of factual errors. It is for others to judge any effect upon conclusions.</p> <p>Figure 2.2 et al. All of the village maps appear to be based on OS dated of 2017 and omit the Quincy Meadows housing development. This is more than theoretical because, as planning</p>	These comments need to be directed to the District Council who commissioned the consultants Lepus to undertake the SEA screening on their behalf.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>inspectors have noted, this development, has significant effects on views and on the footpath that intersects the development. Whilst noting the foreword 'This report was prepared between December 2018 and February 2019 and is subject to and limited by the information available at the time', I would have thought the maps should be updated as this development is large and significant in the context of Napton..</p> <p>2.6.1 The closest NHS hospital is Daventry (11km). The next nearest Rugby St Cross (15km) then Warwick (17km)</p> <p>2.6.2 There are only 2 pubs not 3.</p> <p>2.7.3 There is no secondary school in Priors Marston.</p> <p>2.7.4 There are 4 bus stops in the parish not 2.</p> <p>2. 11.3 I would question whether footpath views and environments can be considered not at risk within the BUAB. Indeed at the time of the consultation, one footpath is being diverted for development and another features in a planning appeal and resubmitted application (see comments on 2.2 above)</p> <p>Please see: DOC A – NRSecA Reg 16 Response DOC B - NRSecB Response to Responses NDP App7 DOC C1 – NRSecC1 Brickworks Questionnaire DOC C2 – NRSecC2 Brickworks Consultation Data DOC C3 – NRSecC3 Brickworks Survey Numerical DOC C4 – NRSecC4 Brickworks Survey Report DOC C5 – NRSecC5 Brickworks Site Allocation Plan Policy</p>	
NoH041	(Historic England)	General	<p>Our previous comments on the Regulation 14 Plan remain entirely relevant that is:</p> <p><i>"Historic England is extremely supportive of both the content of the document and the vision and objectives set out in it. We particularly commend the use of historic characterization and assessment to provide a context and a sound evidence base for well thought out Plan policies. In this and other respects Historic</i></p>	These positive comments on the plan are noted.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>England considers that the Plan takes an exemplary approach to the historic environment.</p> <p>The recognition in the Plan of the importance of the local historic environment is highly commendable and Historic England strongly support that view. The emphasis on the conservation of local distinctiveness through good design and the protection of locally significant buildings and landscape character including archaeological remains, green spaces and important views is equally to be applauded. Those who have clearly worked extremely hard in drafting the Plan are to be congratulated”.</p> <p>Overall Historic England considers that the Napton-on-the-Hill Draft Neighbourhood Plan constitutes a very good example of community led planning.</p>	
NoH042	(WCC Flood Risk Management)	<p>Landscape and open spaces; Protecting the Character and setting of the village; Constraints to development; Objective 6 – To value and protect the natural environment</p> <p>Objective 1; Policy 4 – Site of former Napton Brickworks Protecting the character and setting of the village</p>	<p>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.</p> <p>Potential incorporation of SuDS into planned green corridors through use of a network of swales and attenuation basins/ ponds.</p> <p>If a site is over 1ha or is for 10 or more houses 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.</p> <p>You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield</p>	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		<p>Policy 1 – residential development</p> <p>Policy 6 – Environmental Quality</p>	<p>sites.</p> <p>All developments will be expected to include sustainable drainage systems.</p> <p>You could include an additional point that encourages new developments to open up any existing culverts on a site providing more open space/green infrastructure for greater amenity and biodiversity; and the creation of new culverts should be kept to a minimum. New culverts will need consent from the LLFA and should be kept to the minimum length.</p> <p>You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites.</p> <p>All developments will be expected to include sustainable drainage systems.</p> <p>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 CIRA 753 SUDS Manual.</p>	<p>Add sentence to the explanatory text.</p> <p>Add sentence to the explanatory text.</p> <p>Add sentence to the explanatory text.</p>
NoH043	(Resident)	General	<p>Background</p> <p>I have significant concerns as to how this document has evolved from its onset. There appears to be little actual evidence that any form of proper consultation with the Community has actually taken place throughout the formative period. It seems that the content is very much the ideas of the group of volunteers who have come together to help develop the plan and, in the form it is</p>	<p>The Consultation Statement demonstrates that the Parish Council has met, and hopefully exceeded the statutory requirements to engage all those who live, work or have a business interest in the area.</p>

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			<p>currently written in, it is a pre-defined view of what the community might, or might not support, but which will be very difficult to fundamentally change because of its structure.</p> <p>Neighbourhood Development Plans [like their predecessors, Parish Plans] are required to reflect the wider community aspirations for the future over a 10+ year's period. If this evidence is not gathered before a draft is produced, it is difficult to get back to the point of what individual ideas and aspirations actually are in the Community [together with the measure of support], if adopted in the Plan.</p> <p>My comments under "resident 29" have subsequently been truncated in summary form and then entered into the document : NDP APPENDIX 7 Consultation Statement Responses.pdf and, in many cases have been "noted", but do not seem to have been taken on board, or a reason as to why they have not been accepted. In particular, one major issue being the start of the overall process was flawed at the outset when the work was started. I do not believe the process was geared up to engaging our community and continues in this way even at this stage. Other than the statutory notice being placed in the "Stratford Herald" newspaper, pinned onto the Parish Noticeboard, placed in the shop and published in the Parish magazine [which is on subscription and hence is not delivered to all householders], there will be a significant number of our residents & businesses who will not know that it is available for viewing so they can comment on it if they wish. The document is 87 pages & cannot possibly be read in the shop or at the Parish Clerk's house as a printed copy. It is available online, but there are still a reasonable number of residents [particularly the elderly] who do not have access to the internet or struggle to read long documents online.</p> <p>Two questions that needs to be asked are: why were all of the</p>	<p>A neighbourhood development plan is not comparable to a parish plan. The latter is an informal non-statutory document prepared and adopted by a parish council that has limited, if any weight to decision makers when assessing planning applications. A neighbourhood development plan is a statutory document that had its origins in the Localism Act 2011 and is enshrined in planning legislation. Once made (adopted) by the District Council it becomes part of the development plan for the area. Whereas a parish plan can cover any topic it chooses, a neighbourhood development plan can only cover matters relating to development and the use of land. The only thing they have in common is that they are both led by the parish council.</p> <p>There was a leaflet drop to every household and business in the</p>

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 1	<p>householders not alerted by a letterbox drop with a simple A5 leaflet [cost ~ £10] or a more expensive option of printing 500 copies in black & white & then posted through the letterboxes to give them a real chance to comment?</p> <p>Also, No public meeting has been arranged to give the residents & businesses an opportunity to discuss the content.</p> <p>I remain concerned that the current draft has a number of flaws in it and in no way can claim to represent the views of the overall Community because of the reasons stated above.</p> <p>On page 2, "Forward" paragraph 5, I quote <i>"As part of the statutory process the Steering Group consulted all those who live, work or have a business interest in the area on the content of the draft plan. We believe that this is vitally important if this plan is to be owned and shared by the wider local Community"</i>. I do not believe this has been carried out in a meaningful way.</p> <p>Object - The built-up area boundary [BUAB] is far too tight/restrictive in terms of any future local development that might be required by members of the community [not commercial development]. We are in desperate need of compact/small houses to be available as "local market" homes for young people who do not meet the criteria for housing association accommodation as well as older people wishing to downsize. There is just not enough land available within this BUAB. No land has been identified for this type of small development. This also applies to any self-build requirements. The recent SAP may address this requirement but, if so, it will be in conflict with this Policy. As it stands, this statement is at odds with a) as no potential land either exists or has been identified as existing Comment on b) applies Needs to include a reference future housing needs surveys – this is a dynamic demand f) g) h) & i) Comment on b) applies</p>	<p>village. Businesses, farms and outlying properties in the rest of the Parish were contacted via post.</p> <p>There were also three open meetings in the Village Hall that were well publicised. Here members of the Steering Group were available to answer and discuss any issues relating to the neighbourhood plan.</p> <p>The BUAB was defined by the District Council using their methodology and is endorsed in the neighbourhood plan by the Parish Council.</p>

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 2	<p>Object – Affordable Housing is a defined term. The definition needs to recognise that there may be requirements for "Local Market Housing" as defined in comments for Policy 1 above. It is important for the community that its future sustainability includes providing low cost housing for starter buyers on limited means as well as suitable housing for downsizing for the elderly Or located in an expanded BUAB, if community support is forthcoming As well as any future Housing Needs Survey that is carried out</p> <p>Yes</p> <p>This is badly written. It needs to be clarified so that it is equally inclusive for Local Market & Affordable House [Housing Association Development]</p>	Affordable housing is defined in the NPPF. The local housing needs survey established the need for particular type of property within the village and policies in the plan require developers to have regard to this need.
		Policy 3	<p>Object - All of the comments for supporting Policy 3 are either restrictive of prescriptive and, in practice will be very difficult to apply fairly in the future. In principle, every application for this type of development should be considered in its totality, rather than each individual criteria. As written, this will severely restrict any form of legitimate proposed "Self-Build Homes and Custom Housebuilding" to the extent that, in many cases, it will not be viable.</p>	The policy in the neighbourhood plan applies the principles outlined in the emerging Site Allocations Plan.
		Policy 4	<p>Object - I have provided comprehensive input to this Policy previously when SDC carried out a SAP Consultation in September 2019. The document I submitted is attached as SAP SDC Napton Brickworks Sept 2019.doc. My principle objection is that this piece of land is adjacent to already de facto commercial/industrial land. It also has extant planning approval for several light commercial units which were started, but never completed. The current proposed development is Developer led and which is currently under consideration for some 80 large open market dwellings. In August 2019 a structured survey was delivered to all householders in the Parish concerning their views on the future of the site. The results are somewhat different to the stated Policy above and an analysis from our District Councillor at the time is also attached for your information. Report Napton Brickwork Public Consultation August 2019 v3.docx As to Policy 4, I cannot support any of it on the grounds given here.</p>	<p>The policy endorses the policy in the emerging Site Allocations Plan. The District Council are currently assessing a planning application for residential development on the site. As a brownfield site it has viability issues, and residential development is more likely to be deliverable. Nevertheless this needs to balance the clean up of the site with, amongst other things, the need to protect the environmental features. The development has to be developer led as this site is very unlikely to attract public investment.</p> <p>The community consultation led by the Ward Member was not part of the statutory consultation process (Regulation 14) for the neighbourhood plan</p>

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 5	<p>Object - It is difficult to understand how any “business development” can be constrained to be within the BUAB. There is little, or no suitable land for this within the area as currently defined and all of the “support” bullet points are basically “we do not support business development” in this area.</p> <p>The clear winner for “business development” would be to develop an imaginative plan to utilise the brown field location of the ex-Napton brickworks land by the canal. It is already a commercial/industrial area in need of development and it is not suitable for domestic dwellings. It currently still has extant planning permission for light commercial use and hence would not be too difficult to provide a suitable setting for some imaginative, high-tech business units, thus taking pressure of other land close to the BUAB. This could provide potentially good employment prospects for local people, particularly the younger generation who wish to live & work within the community [it would also have high “green credentials”]</p>	Commercial/industrial development on the former brickworks is unlikely to overcome the viability issues. The previous permission for live/work units not implemented, probably because of the viability issues.
		Policy 6	Support - Comments made in Q17 would provide a very suitable solution for Policy 6 to be met in full.	
		Policy 7	Support.	
		Policy 8	Support.	
		Policy 9	Support.	
		Policy 10	Support.	
		Policy 11	Support - The comments do not reflect on a specific point that, exceptionally, certain types of development can enhance the value of the countryside if carried out in sympathy with their surroundings and a mention of this could be included in the opening sentence to Policy 11.	
		Policy 12	Support.	
		Policy 13	Support.	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Policy 14	Support.	
		Community Aspiration 1	Support.	
		Community Aspiration 2	Support.	
			Please also see: Neighbourhood Draft Plan Final.pdf NDP APPENDIX 7 Consultation Statement Responses.pdf SAP SDC Napton Brickworks Sept 2019.doc Report Napton Brickwork Public Consultation August 2019 v3.docx	
NoH044	(St Philips Ltd – Napton Brickworks)	Policy 4	<p>St Philips owns the former Napton Brickworks and so has a key interest in the content of the Plan. St Philips fully supports the inclusion of a specific policy for the Brickworks in the NNP, and supports a large number of changes that have been made to the draft Plan since the previous consultation stage.</p> <p>Whilst fully supporting the inclusion of Policy 4 (Site of the Former Napton Brickworks), St Philips is promoting a greater number of dwellings on the site than the “up to 80 dwellings” that Policy 4 refers to. Consequently, St Philips has to object to this element of Policy 4, and has other comments on its content.</p> <p>On the basis that St Philips cannot tick both ‘Support’ and ‘Object’, we have ticked ‘Object’, but wish to emphasise that this is not an objection to the inclusion of the Policy or the support that it provides for the development of the site. This is evident from the comments that are set out in full in the accompanying letter to Stratford upon Avon District Council.</p>	
		General	<p>St Philips is committed to delivering the successful redevelopment of the Site, in accordance with Policy in the adopted Stratford upon Avon Core Strategy (the CS), the draft Stratford upon Avon Site Allocations Plan (the SAP), and the draft Napton Neighbourhood Plan (the NNP).</p> <p>St Philips has engaged in the preparation of the SAP, and submitted comments to the Regulation 19 Proposed Submission</p>	

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			<p>SAP in September 2019. St Philips supported the proposal in the SAP to allocate the Site as a 'Site Specific Proposal' (Policy RURAL.1), rather than as a 'Reserve Site' which are to be released only when certain conditions set out in the CS are met. The approach of allocating the Site as a Site Specific Proposal is supported because it is consistent with:-</p> <ul style="list-style-type: none"> a) the Parish Council's wish to see the Site developed to address the ongoing negative impacts that result from the site being vacant; b) the objectives of Policies CS.16, AS.10 and AS.11 in the CS; c) the Site being included on the Stratford upon Avon Brownfield Land Register; and d) the Site having previously benefited from planning permission for redevelopment. <p>St Philips commented on the Regulation 14 version of the NNP in December 2018. We note that the Parish Council has included a full response to St Philips' representations on the Reg 14 plan within the October 2019 Consultation Statement. This is very helpful, and we note that a number of changes have been made to the Reg 16 version of the NNP which have mitigated or met St Philips' comments on the Reg 14 version. We come back to these later.</p> <p>The Parish Council is also aware that St Philips has submitted an outline planning application (OPA) for the redevelopment of the site for up to 100 dwellings and associated supporting infrastructure, including open space, with all detailed matters reserved for later approval, except for means of access. The application was submitted to Stratford District Council on 20 Nov 2018 (18/03435/OUT). The OPA is referred to in the draft NNP. We note, however, that the Parish Council has not commented on the OPA in the draft NNP (although has commented on the OPA itself). This is appropriate, given that the OPA remains under consideration by the LPA at the time of writing.</p> <p>St Philips has been focused over the past 12 months on</p>	

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			<p>responding to and positively addressing the comments that the LPA has received from a number of statutory and other consultees, including the Parish Council. This has focused in particular on matters relating to the Site's ecology and the potential impact on the development of noise from the unregulated commercial uses on the opposite side of the canal. At the time of writing, a further submission on these and other matters is being considered by the LPA. However, the timescale for the determination of the OPA, and the outcome, remains uncertain. For the purpose of these representations, we note only that the further submission to the LPA in relation to the OPA proposes some amendments to the Indicative Masterplan and Parameter Plan to address comments that have been made, and that the OPA continues to propose up to 100 dwellings.</p> <p>With the above background in mind, our comments on the Reg 16 version of the NNP are as follows.</p> <p>Changes to the NNP since the publication of the Regulation 14 Version</p> <p>1. In relation to the Parish Council's reaction to St Philips' comments on the Regulation 14 version of the NNP, we comment as follows.</p> <ul style="list-style-type: none"> • St Philips was supportive of the inclusion of the Parish's 'position statement' on the Site within the Regulation 14 version of the NNP. St Philips is pleased that the Regulation 16 NNP now includes a Policy, rather than a position statement, which properly reflects the support for development of the site having regard to the relevant policies of the CS, the draft SAP, and the Parish Council's wish to see the site redeveloped. St Philips does have some comments on the content of Policy 4, which are set out later in these representations. • St Philips notes that the Reg 16 draft version of the NNP has removed the reference to the Site being included within the BUAB of Napton, after any planning 	

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			<p>permission has been granted. This follows comments from both St Philips and the LPA. St Philips supports the change. St Philips considers, however, that the NNP should set out more explicitly the merits of the allocation, and the benefits arising from the redevelopment of the site, given that:-</p> <ul style="list-style-type: none"> - its redevelopment falls clearly within the remit of, and is supported by, Core Strategy Policies CS.15 E (Large Rural Brownfield Sites), CS.16 A (insofar as that relates to Large Rural Brownfield Sites) and AS.11(Large Rural Brownfield Sites); - Core Strategy Policy AS.10 (criterion (g)) further supports its redevelopment; - draft Policy RURAL.1 of the Reg 19 version of the SAP promotes the allocation of the Site as a 'Site Specific Proposal' (rather than as a 'Reserve Site'). <ul style="list-style-type: none"> • St Philips notes and supports the recognition in the Consultation Statement that the CAB TECH land sits outside the OPA site (and therefore the scope of Policy 4). • St Philips notes and supports the removal of the reference to self-build plots from the content of Policy 4. Such plots were removed from St Philips' Indicative Masterplan during the design process associated with the OPA, and following consultation with key stakeholders and the public exhibition for local residents and businesses. • St Philips was concerned that the wording of policy relating to 'Important Views', in the context of View 6, appeared potentially incompatible with development of the Site and the benefits that will bring in terms of the 	

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			<p>reclamation and remediation of a former brownfield site, the removal of anti-social activities and the removal of a current eyesore in the landscape. For this reason, St Philips supports the removal of View 6 from the NNP.</p> <p>Comments on the Reg 16 version of the NNP</p> <p><i>Objective 2 - To Support Appropriate Development on Brownfield Land</i></p> <p>2. The final sentence in paragraph 8.61 states that “A small industrial development now occupies part of the site”. The NNP is presumably referring to the CAB TECH premises and so this reference appears at odds with the recognition in the Consultation Statement that it sits outside the Site. The NNP should be reworded to make this clear, and/or the Parish Council might consider including a plan of the Site to show its boundary.</p> <p>3. Paragraph 8.65 refers to Policy AS.11 of the CS, part of which is then quoted, whereas paragraph 8.66 notes that Policy AS.11 refers explicitly to four brownfield sites but does not refer to the Napton Brickworks. Whilst Para 8.67 goes on to explain that the draft SAP proposes to allocate the Site for residential development, the Site’s redevelopment for housing is in any event supported by policies CS.15A, CS16E (which assumes that 1,245 dwellings will be accommodated on Large Rural Brownfield Sites 2011 – 2031) and AS.11. This support exists irrespective of the additional support that the draft SAP provides. This should be made clear in the NNP, although St Philips is pleased nonetheless that the NNP records the support that the draft SAP provides.</p> <p>4. Paragraph 8.69 states that:-</p> <p><i>“If housing on this site is to be regarded as sustainable development, it must access the services and facilities available in the village and not become an isolated community in the open countryside. Towards this purpose links with the main village are being encouraged in the Site Allocations Plan through a high quality</i></p>	<p>Correct para 8.61 accordingly.</p> <p>Add reference to policies CS.15 and CS.16 in the Core Strategy.</p>

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			<p><i>walking and cycling route along Brickyard Lane to/from Napton-on-the-Hill. This could improve the viability of services and facilities within the village. In addition, any residential development on the former brickworks site will impact on infrastructure in and around the village, especially roads”.</i></p> <p>5. St Philips does not agree with the inference that the Site may only be regarded as “sustainable development” if its development provides a “high quality walking and cycling route along Brickyard Lane to/from Napton-on-the-Hill”. That would ignore the variety of substantial benefits that the NNP acknowledges will arise from redevelopment which include remediation, the removal of an eyesore, the mitigation of anti-social behaviour and the contribution that the Site’s development will make towards local housing need.</p> <p>6. St Philips agrees that it is important that the development of the site takes reasonable measures to enhance walking and cycling links between the Site and the village. To this end St Philips is proposing in its OPA a variety of measures that support safe and convenient pedestrian and cycle access along and across the A425, and which provide good quality connections from the Site to Brickyard Lane and the PROW network.</p> <p>7. St Philips notes that the reference in paragraph 8.69 is taken from the Reg 19 version of the SAP. The Parish Council may not be aware that the SAP was reflecting the comments that the District Council’s Development and Enabling Officer had made in response to consultation on the OPA. St Philips has responded to the Development and Enabling Officer’s comments, and the OPA Case Officer and County Highway Authority has accepted that the measures noted in paragraph 6 above (and paragraph 18 below) provide appropriate enhancement of walking and cycling routes between the Site and the village. St Philips considers that paragraph 8.69 should be amended to say that reasonable opportunities should be taken to support safe and convenient walking and cycling connections between the Site and the village.</p>	<p>The reference to the requirement for a walking and cycling route along Brickyard Lane is a direct quote from the emerging Site Allocations Plan. The neighbourhood plan does however state that if housing on this site is to be regarded as sustainable development, it must access the services and facilities available in the village and not become an isolated community in the open countryside. It adds that links with the main village are being encouraged in the Site Allocations Plan through a high quality walking and cycling route along Brickyard Lane to/from Napton-on-the-Hill.</p> <p>The neighbourhood plan cannot make these changes as the outline planning application has yet to be determined. Similarly the latest version of the Site Allocations Plan has not been published. The District Council’s views are therefore not yet known.</p>

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			<p>Policy 4 – Site of the former Napton Brickworks</p> <p>8. St Philips is pleased to note that paragraph 8.70 expresses the Parish Council's support for the principle of residential development on the Site. That support is qualified by the content of Policy 4 on which we comment as follows.</p> <p>9. The first part of Policy 4 states that:-</p> <p><i><u>"The Parish Council supports the allocation of up to 80 dwellings on the site of the former brickworks providing it meets all the specified requirements listed in Proposal RURAL.1 of the Site Allocations Plan. "</u></i></p> <p>10. The reference to the Site accommodating "up to 80 dwellings" was included in the Position Statement in the Regulation 14 version of the NNP. At the time, St Philips recommended that the Position Statement be amended to state that the development would comprise "up to 100 dwellings, including up to 35% affordable dwellings."</p> <p>11. When St Philips held its public consultation event ahead of the submission of the OPA it exhibited a Masterplan that included approximately 80 dwellings, all of which were proposed in the main body of the Site. As we explained in St Philips' representations to the Reg 14 version of the NNP, it became apparent during consultation with stakeholders, including the Parish Council, residents and businesses, and in discussion with the LPA, that a key concern with the exhibited Masterplan was the lack of surveillance near the entrance to the Site from the A425 where some of the anti-social activities that have taken place have been focused. St Philips responded by incorporating a measured amount of additional development in this part of the Site. This increased the total number of dwellings to up to 100 and positively addressed the concerns that had been raised.</p> <p>12. The Site's capacity has been tested during the consideration of the OPA in the light of the findings of robust environmental and</p>	<p>The neighbourhood plan is not allocating the site for 80 dwellings, but supporting what was in the emerging Site Allocations Plan. The outline planning application has yet to be determined and the Parish Council do not yet know whether the District Council will accept the proposed 100 dwellings.</p> <p>The Parish Council are aware that there are currently on-going discussions between the applicant and the District Council about the outline applications and the scale and layout may alter as a consequence.</p> <p>The District Council also confirmed at the meeting that there may be constraints to development on the site</p>

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			<p>technical assessments relating to ecology, ground conditions and other matters. It is notable also that the LPA's policy officer confirmed at a meeting at the District Council's offices on 9 April 2019, which was also attended by representatives of the Parish Council, that there is no policy based reason to cap the amount of dwellings at 80 or, indeed, any other level. Rather, the Site's capacity should be determined having regard to the findings of technical assessments and evidence, and to design related matters.</p> <p>13. Having demonstrated through the planning application process that the site is capable of accommodating more than 80 dwellings, St Philips proposed in its representations to the Reg 19 SAP consultation that that RURAL.1 be amended to refer to a capacity of "approximately 100 dwellings". This will ensure the delivery of housing is not unnecessarily restricted.</p> <p>14. In summary:-</p> <ul style="list-style-type: none"> • the increase in capacity to up to 100 was a positive response to comments and concerns expressed by a number of stakeholders; • there is no policy based reason for the capacity of the site to be limited to 80 dwellings; • the NNP does not provide any evidence based reason to restrict capacity to 80 dwellings; • there are no technical, environmental or amenity based reasons to limit capacity to 80 units; • in any event, the reference to "up to 100" dwellings in the NNP and OPA is a maxima. <p>15. For these reasons St Philips objects to the continued reference in the NNP to a limit of 80 dwellings, and proposes that be increased to up to 100 dwellings.</p> <p>16. St Philips recommends also that the wording be changed to express support for the "allocation and development" of the site, rather than just its allocation.</p>	<p>The Parish Council is happy to update the neighbourhood plan if the outline planning application is determined and/or the emerging Site Allocations Plan is progressed.</p>

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			<p>17. The first part of Policy 4 goes on to say that the Parish supports the allocation of the Site providing that development:</p> <p><i>“meets all the specified requirements listed in Proposal RURAL.1 of the SAP”.</i></p> <p>18. In this regard St Philips’ notes that it made a number of comments on the specific requirements of RURAL.1 in its representations to the Reg 19 version of the SAP. Those are summarised below for completeness.</p> <p>- The first specific requirement is that development be restricted to “previously developed parts of the site.” Whilst this may appear consistent with the site’s status as a Large Rural Brownfield Site, St Philips considers that restricting development in this manner will constrain the delivery of best outcomes from redevelopment. In saying this, it is clear from the submitted OPA that St Philips’ proposals have paid regard to matters such as landscape sensitivity and ecological considerations, that the developable area of the site is restricted to circa 3 ha, and that it corresponds generally with those areas of the site that were previously developed. At the same time, the optimum outcomes in terms of design, ecological mitigation and landscaping arise from a proposal that focuses on the previously developed parts of the site, but which does include land outside those core areas (including the development close to the access from the A425 which is included to address concerns raised by the Parish and others in relation to surveillance and the potential otherwise for anti-social behaviour to endure). To address this St Philips has proposed that the policy might be amended to say that housing development will be restricted “generally to the previously developed parts of the site.”</p> <p>- The final specific requirement relates to the provision of “a high quality walking and cycling route along Brickyard Lane to/from Napton-on-the-Hill”. As noted</p>	<p>The Parish Council are happy to update the neighbourhood plan if the outline planning application is determined and/or the emerging Site Allocations Plan is progressed.</p> <p>These matters are still in a state of flux. The Parish Council are happy to update the neighbourhood plan if the outline planning application is determined and/or the emerging Site Allocations</p>

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			<p>already, St Philips acknowledges that measures should be considered to maximise the connectivity of the site to the village and, indeed, the OPA incorporates various transport measures (described in the TA and various supplementary submissions) that deliver improved connectivity including:-</p> <ul style="list-style-type: none"> • provision of bus stops on the A425 (east and westbound); • extension of the existing footway along the A425 to meet the site entrance; • implementation of a central refuge island on the A425 to assist pedestrian crossings; • a reduction of the speed limit on the A425 from the existing 30mph to the site entrance; • provision of cycleway and pedestrian links from the development to Brickyard Road; and • provision of connections to existing Public Rights of Way. <p>The provision of a footway and cycle path along Brickyard Road to the village has been carefully considered throughout the design process. St Philips has, however, concluded that is not feasible. This is largely due to the restricted width of Brickyard Road which would need widening to accommodate dedicated footpath/cycleway provision, which would involve land outside the control of the land owner and local authority.</p> <p>St Philips met with the Highway Authority and Development and Enabling Officer on 21 August to discuss connectivity with the village. The Development and Enabling Officer suggested that the closure of Brickyard Road might support this objective. However, St Philips, the Highway Authority and the LPA concluded that Brickyard Road is lightly trafficked and operates well within its capacity such that it provides a realistic option for those who may wish to walk to the village. Moreover the Highways Authority's Safety Team does not think that the closure of the road is needed, and closure would not be supported on highway grounds. The discussion concluded that Brickyard Road may be considered</p>	Plan is progressed.

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			<p>suitable as a secondary route for pedestrians and cyclists and that the works proposed as part of the current application are acceptable and maximise connectivity with the village. St Philips has proposed that the final bullet point in RURAL.1 be replaced with the following:-</p> <p><i>“Provide measures to enhance connections between the site and the village including along the A425 corridor and connections between the site and existing Public Rights of Way and Brickyard Lane”.</i></p> <p>19. The remaining specific requirements in RURAL.1 require the following:</p> <ul style="list-style-type: none"> • <i>“Comprehensive management plan to be implemented for the whole site</i> • <i>Undertake comprehensive archaeological, ecological and geological assessment of the site</i> • <i>Secure appropriate treatment of any contamination</i> • <i>Retain the existing hedgerows and trees along the site boundaries wherever possible</i> • <i>Ensure the quarry slopes remain stage to avoid slippage</i> • <i>Ensure drainage into the canal is regulated and managed</i> • <i>Ensure development does not have an adverse impact on the integrity of the canal</i> • <i>Design and layout of the development must be well-related to the canal</i> • <i>Undertake a landscape assessment</i> • <i>Mitigate the noise impacts of adjacent business uses through the layout & design of development”</i> <p>20. St Philips has no objection to any of these requirements (given that all have been addressed in the preparation of the OPA) but has recommended that the following additional wording is included in policy RURAL.1 to provide flexibility and to take account of St Philips’ desire to secure the principle of redevelopment:</p>	

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			<p><i>"The Council understands that where applications are submitted in outline, the detailed assessment of technical matters may, in some cases, be reserved for later approval and will therefore be dealt with at this stage of the planning process."</i></p> <p>21. St Philips considers that the NNP should similarly be amended.</p> <p>22. In summary, St Philips has proposed that Policy RURAL.1 be revised in relation to:</p> <ul style="list-style-type: none"> • the reference to net developable area; • the reference to maximum capacity; • the restriction of development only to previously developed areas of the site; and • certain aspects of the "specific requirements". <p>23. We consider that the changes are necessary to ensure that the policy does not unnecessarily constrain the delivery of housing from the site, or the achievement of the best possible environmental and design related outcomes from its development.</p> <p>24. The final part of Policy 4 states that development should meet an additional seven requirements on top of those in the SAP. We reproduce and comment on each as follows.</p> <p>25. The development of the Site should:</p> <p><i>"a) have regard to the needs identified in the latest Housing Needs Survey for the parish"; and in this regard, the development will include affordable housing and so will meet the needs identified.</i></p> <p><i>"b) include sufficient mitigation to protect Napton Hill Quarry SSSI and Local Wildlife Site, and Sandstone Doggers Local Geological Site from any adverse impacts"; which are matters that are covered by the LPA when carrying out its development management</i></p>	<p>The Parish Council feels these matters are ongoing as part of discussions between the applicant and the local planning authority. It is happy to update the neighbourhood plan if the outline planning application is determined and/or the emerging Site Allocations Plan is progressed. Until such time the neighbourhood plan has no basis upon which to make any alterations.</p>

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			<p><i>functions and which are addressed by the OPA.</i></p> <p><i>“c) include a fully equipped children’s play area within the public open space; d) include mitigation measures to prevent anti-social behaviour in and around the site, especially off road cycling”; and the OPA includes a proposed LAP.</i></p> <p><i>“e) provide 2 crossing points on the A425 to enable safe public access”; which St Philips proposes is deleted as it duplicates matters that are covered in criterion (g) and may not be consistent with the final content of the SAP.</i></p> <p><i>“f) provide comprehensive structural landscaping within the site to minimise visual intrusion in the open countryside, particularly from public viewpoints around the periphery of the site”; which is covered by the parameters incorporated in the OPA and will be covered by the landscaping reserved matter in due course; and</i></p> <p><i>“g) provide effective links to the services and facilities available within the village including a safe and accessible road, footpath and cycle network” which is also a matter for the development management process at OPA and reserved matters stages and which is demonstrably capable of being met have regard to the position noted above.</i></p> <p>26. On this basis St Philips has no objection to the additional matters that are added into Policy 4, other than in relation to (e) which we propose be deleted.</p> <p>Conclusions</p> <p>27. St Philips is pleased to submit these further representations to the NNP, and is grateful for the Parish Council’s positive engagement in the OPA process. St Philips’ comments are made having regard to the significant amount of technical work that has been undertaken as part of the OPA process since the publication of the Regulation 14 version of the NNP. They are also made having regard to the substantive changes that the Parish Council has made to the NNP in the intervening period.</p>	

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			<p>28. Overall, St Philips is pleased to express its broad support for the relevant content of the NNP, albeit with some reservations and some proposals for change. In summary:</p> <p>St Philips supports:-</p> <ul style="list-style-type: none"> a) the Parish Council's confirmation of its positive support for the allocation of the site in the SAP; b) the inclusion of a policy relating to the Site, as opposed to a Position Statement; c) confirmation that the site is not to be included in the BUAB; d) confirmation that the NNP recognises that the CAB TECH land lies outside the Site boundary; e) the removal of reference to self-build plots from Policy 4; and f) the removal of View 6 from the NNP. <p>St Philips objects to:</p> <ul style="list-style-type: none"> g) the continued reference to the site's capacity being up to 80 units, with there being no policy or other basis for restricting the number of units to this figure; h) the reference in para 8.69 to the need for high quality walking and cycling links along Brickyard Lane, given that (i) that is outside the control of St Philips; and (ii) that the LPA and Highway Authority have accepted that the enhanced pedestrian and cycle links that are proposed in the OPA are effective and appropriate; i) the inclusion of criterion (e) in Policy 4 which duplicates both criterion (g) and may conflict with the final content of RURAL.1. <p>St Philips proposes that:</p> <ul style="list-style-type: none"> j) Policy 4 be amended to express support for both the allocation and development of the site for housing and for up to 100 dwellings; k) it be made clear that Policy 4 relates to the requirements of policy RURAL.1 as finally set out in the adopted SAP; and 	

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			<p>l) the NNP sets out more explicitly the merits of the allocation, and the benefits arising from the redevelopment of the site, given that:-</p> <ul style="list-style-type: none"> - its redevelopment falls clearly within the remit of, and is supported by, Core Strategy Policies CS.15 E (Large Rural Brownfield Sites), CS.16 A (insofar as that relates to Large Rural Brownfield Sites) and AS.11(Large Rural Brownfield Sites); - Core Strategy Policy AS.10 (criterion (g)) further supports its redevelopment; - draft Policy RURAL.1 of the Reg 19 version of the SAP promotes the allocation of the Site as a 'Site Specific Proposal' (rather than as a 'Reserve Site'). <p>29. Amended in this way, St Philips considers that the NNP will reflect the full potential of the Site to deliver well designed and beneficial housing development. The NNP will also be more positively and accurately worded, will better reflect the objectives and content of the Core Strategy, and will be flexible enough to accommodate any changes to the content of RURAL.1 in the adopted SAP. In this way the NNP will better meet the Basic Conditions relating to conformity with the Development Plan.</p>	
NoH045	(RSL – Rosconn Group)	General	<p>We write in response to the consultation of the Napton-on-the-Hill Neighbourhood Development Plan (NNDP) Submission Version dated October 2019.</p> <p>Rosconn Strategic Land (RSL) welcome the opportunity to comment on the Draft NNDP and having reviewed the document and its supporting evidence, provide comments below. RSL represent the owners of land at Godson's Lane which is currently the subject of a proposal for 4 detached dwellings. We wish to raise a number of objections to the Draft NNDP and therefore consider that the Regulation 16 document fails to meet the</p>	<p>In response to this representation the Parish Council would offer the following comments:</p> <ul style="list-style-type: none"> • the BUAB was initially defined and formally adopted by the District Council using their methodology, and then put forward in the emerging Site Allocations Plan. The Parish Council has broadly accepted this BUAB after agreeing some minor changes/corrections with the District Council; • whilst there is still an outstanding requirement to find an additional 21 dwellings by 2031 within the BUAB, at no time has the District Council raised concerns that the neighbourhood plan will not meet its housing requirement as

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		Policy H1	<p>following basic conditions, in that it does <u>not</u>:</p> <p>have regard to national policies and advice contained in guidance issued by the Secretary of State; contribute to the achievement of sustainable development; and generally, conform with the strategic policies contained in the development plan, namely the Stratford-upon-Avon District Core Strategy.</p> <p><u>Policy H1</u></p> <p>RSL object to Policy H1. The NPPF advises at paragraph 13 that neighbourhood plans should support the delivery of strategic policies contained in local plans and should shape and direct development that is outside of these strategic policies. Paragraph 29 continues that neighbourhood planning gives communities power to shape, direct and help deliver sustainable development in their area. It however also states that Neighbourhood Plans should not promote less development than set out in the area's strategic policies or otherwise undermine them.</p> <p>In terms of housing and its delivery, paragraph 59 of the NPPF reiterates the Government's objective to significantly boost the supply of homes and through the remaining parts of Section 5, outlines how this will be achieved through both Local and Neighbourhood Planning. In this context, paragraph 69 clearly indicates that Neighbourhood Plans have a role to play through an expectation that Neighbourhood Planning groups should consider allocating small and medium-sized sites to achieve the Government's key objective of meeting housing needs.</p> <p>More detailed guidance in the PPG on Neighbourhood Planning also states: "Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale (PPG ID: 41-103-20190509).</p>	<p>a Local Service Village (Category 2);</p> <ul style="list-style-type: none"> • In addition to meeting this shortfall the Parish Council has supported the provision in the emerging Site Allocations Plan for up to 80 dwellings on the former brickworks site. An outline planning application for up to 100 dwellings is currently being determined by the District Council. The application includes 31 affordable homes. Whilst immediately outside the BUAB this brownfield site is less than a quarter of a mile from the village; • there is no statutory requirement for a neighbourhood development to allocate sites for development in order to meet the basic conditions. It has provided a criteria based approach to assessing development proposals; • the site off Godson's Lane was initially defined as an important view, but the feedback from the District Council and some members of the local community suggested it would be more appropriate to designate it as a Local Green Space. The whole purpose of consultation is to seek the views of key stakeholders and review the plan and its policies in the light of comments received. In addition the site was the subject of a refused planning appeal, which was upheld on appeal. This informed the thinking of the Steering Group and the neighbourhood plan was amended accordingly; • aside from a site for self build, the emerging Site Allocations Plan has not allocated any reserve sites for residential development in the parish; and • the criteria listed in Policy 1 does not prevent development coming forward but seeks to ensure that its design is in-keeping with the characteristics and key attributes of the village. The National Design Guide (September 2019) forms part of the Government's collection of planning practice guidance. For example: <p><i>Para 40. Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. Some features are physical, including:</i></p> <ul style="list-style-type: none"> - the existing built development, including layout, form,

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			<p>In terms of Strategic Housing policies, Section 8 of the draft NNDP correctly makes reference to Policies CS.15 and CS.16 of the Core Strategy which set out the District's housing requirement and its relevance to Napton-on-the-Hill. As a Local Service Village, Napton is expected to deliver 84 dwellings and that these should be met either through planning applications for small scale schemes within its built-up area, or otherwise on sites identified within a subsequent Neighbourhood Plan. As further acknowledged, there remains a shortfall of at least 21 dwellings to be delivered in the village. It has been established by a number of recent appeals in the District that the overall District housing requirement and the targets expected to be delivered by individual settlements within the hierarchy are not to be treated as a ceiling, reflecting the Government's objective of encouraging a boost in housing supply.</p> <p>Notwithstanding the clear encouragement given national planning guidance regarding the role of Neighbourhood Planning in meeting housing needs, and the strategic policies within the adopted Core Strategy on Napton's role in meeting both District and local housing needs, the draft NNDP fails to make any housing allocations to meet its current identified shortfall of at least 21 dwellings. This is also despite the recent Housing Needs Survey indicating a need for 24 dwellings from local households.</p> <p>Section 8 of the draft NNDP identifies various perceived constraints to development within or adjacent to the village, claiming that of the 24 sites assessed through the District Council's SHLAA, the majority of sites were not considered to be 'deliverable', whilst only 2 were identified as 'likely to be deliverable'. This however misinterprets the SHLAA and suitability of sites, with no sites in the SHLAA across the entire District being considered 'deliverable' as this requires a change in policy, such as an allocation through an NDP for instance. This has not prevented the District Council proposing to allocate multiple 'reserve' housing sites across the District in its emerging Site Allocations Plan to deliver just under 4,000 dwellings, all of which were considered to be 'likely to be deliverable' in the SHLAA.</p>	<p><i>scale, appearance, details, and materials;</i></p> <ul style="list-style-type: none"> - <i>local heritage – see below – and local character – see Identity ;</i> - <i>access, movement and accessibility;</i> - <i>environment – including landscape and visual impact, microclimate, flood risk, noise, air and water quality;</i> - <i>views inwards and outwards.</i> <p><i>Others are non-physical, such as:</i></p> <ul style="list-style-type: none"> - <i>the aspirations, concerns and perceptions of local communities.</i> <p><i>Para 52. Well-designed new development should respond to existing local character and identity. This includes considering:</i></p> <ul style="list-style-type: none"> - <i>the height, scale, massing and relationships between buildings;</i> - <i>views, vistas and landmarks;</i> - <i>the scale and proportions of streets and spaces;</i> - <i>soft landscape, landscape setting and backdrop;</i> - <i>light, shade, sunshine and shadows; and</i> - <i>colours, textures, shapes and patterns.</i>

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			<p>Furthermore, paragraph 8.38 states that a further constraint on the village allocating sites is that there is no capacity within the local High School to accommodate additional pupils – this is no longer the case as the District Council will be able to confirm.</p> <p>Whilst it is recognised that there are constraints to development within and adjoining the village in view of its hillside location, it is notable that other Neighbourhood Plans in the locality have been able to allocate sites. Loxley is a lower order village compared to Napton and whilst also located on a hillside within a Special Landscape Area has allocated 3 sites in its recently made Neighbourhood Plan to meet the strategic housing requirements of the District and local needs arising within the village.</p> <p>Moreover, aside from the fact the draft NNDP does not seek to allocate a site or sites for housing, it is also of concern that it fails to accord with Paragraph 11(a) of the NPPF which requires that plans should positively seek opportunities to meet the development needs of their area. Rather than be positively prepared, the draft NNDP (both in terms of Policy H1 and the Plan as a whole) seeks to impose further levels of constraint to potential development within the built-up area boundary.</p> <p>Policy H1 effectively repeats the allowances made within Policy CS.15 of the adopted Core Strategy, and other Development Management policies within that plan. In addition, it also seeks to impose further criteria within the policy and elsewhere in the Draft NNDP, which will make it almost impossible to deliver any further new housing within the built-up area boundary of the settlement. For instance, notwithstanding the fact the village and surroundings are designated within the Core Strategy as a Special Landscape Area (Policy CS.12), criterion (e) of Policy H1 requires new development within the built-up area boundary to have regard to the findings of an accompanying Character Area Assessment which effectively finds all open spaces within and surrounding the village of some importance in varying degrees. Criterion (g) also states that new development should not affect gaps and important open spaces which are of particular significance to the form and character of the settlement.</p>	

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			<p>Separate comments are made below in respect of policies regarding the designation of Local Green Spaces and Important Views within the village, as these are further constraints on development within the built-up area boundary that are likely to have a negative effect on the draft NNDP being able to actually deliver its housing requirement. To demonstrate this, it is relevant to refer to the previous Pre-Submission Draft of the NNDP and the comments this generated. Within the Consultation Statement (October 2019), Appendix 6 provides responses to comments made by Stratford on Avon District Council (SDC). On page 34, SDC raise concern in respect of paragraph 8.31 that insufficient explanation has been given as to why the NDP does not make a specific allocation for the outstanding housing need. The Steering Group's response was that there is no statutory requirement to allocate land in the NDP and instead decided to explain why they hadn't done so. As highlighted above, RSL do not consider this is a reasonable position to take in the context of planning positively to meet its identified housing needs. Elsewhere on page 41, comments are provided in respect of Policies 8 (Local Green Space) and Policy 9 (Important Views). SDC comment that Policy 8 would appear to undermine the intentions of Policy 1 (Residential Development – now Policy H1), whilst its comments on Policy 9 raise concerns that the extent of the 13 proposed Important Views across the Parish would prevent any development from taking place in view of the fact any is likely to have some degree of visual harm.</p> <p>In light of the circumstances, there is no evidence to demonstrate that the Steering Group have made a genuine effort to allocate a site or sites to meet either its identified local housing needs or the strategic housing requirement for which it is expected to make a contribution. This is therefore not considered to conform with either national planning guidance or the strategic policies of the adopted Core Strategy. Furthermore, the Draft NNDP would fail to encourage sustainable development, as outlined within the Core Strategy.</p> <p><u>Policies 9 (Local Green Space) and 10 (Important Views)</u></p>	

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			<p>RSL are currently promoting a small-scale housing scheme for 4 dwellings within the built-up area boundary of the village. A previous scheme for 5 dwellings was refused on a detailed design matter, notwithstanding that SDC agreed that the principle of housing at the site was acceptable and there was no unacceptable harm from a landscape and visual impact perspective. A revised scheme to address the previous reason for refusal was refused by SDC in February 2020 on the same grounds and is now the subject of an appeal.</p> <p>At the time of the publication of the Pre-Submission Draft NNDP in November 2018, RSL had already submitted its first application for 5 dwellings. Policy 9 (now 10) - Important Views of the Pre-Submission Draft version of the NNDP sought to identify 13 Important Views across the village to protect locally valued views from the village over adjoining countryside, helping to remind the local community of the landscape beyond and their rural location. The policy stated that development that would have a harmful impact on Important Views would not be supported. Important View 3 – Vicarage Road identified a long-distance view from Vicarage Road to the south east of the village towards open countryside beyond the settlement edge – this view includes RSL’s site in the foreground to the extreme right of the photograph at page 67 of the document. RSL did not raise objection to this proposed Important View at that time as it was considered its small-scale development would not be harmful in Landscape and Visual impact terms, a view that was shared by SDC’s Landscape Officer. It is notable this view has now been deleted from the Submission Draft NNDP.</p> <p>In terms of Policy 8 (now 9) – Local Green Space, the Pre-Submission Draft identified 4 such areas of land for such designation, none of which included RSL’s site. The Draft Plan confirmed that these areas were identified by the local community as valuable green spaces and which were considered to meet the criteria for designation set out at paragraph 100 of the NPPF.</p> <p>Within this context, it is again relevant to make reference to the</p>	

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			<p>response to the Pre-Submission Draft NNDP by SDC. At both pages 40 and 43 of the Consultation Statement (October 2019), SDC make the following comment twice in respect of Table 9 and Map 2 which detailed the proposed Local Green Spaces:</p> <p>“It is surprising that land south of Vicarage Road and to the north of recent housing development hasn’t been identified as a LGS to bolster its protection”.</p> <p>It is also notable that this consultation response was ratified by SDC’s Cabinet meeting on 25th January 2019, 11 days after having refused RSL’s first planning application at Godson’s Lane. The Steering Group’s response is that it agreed with SDC’s comment and in light of the dismissal of the subsequent appeal, amended the Plan to identify RSL’s site as Local Green Space E.</p> <p>Paragraph 99 of the NPPF states that the designation of LGS allows communities to identify and protect green areas of particular importance to them. It continues that such designations should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. RSL object in the strongest terms to the approach taken by the Steering Group, aided by the input from SDC to designate land RSL is currently promoting for a small-scale housing development within the built-up area boundary of the village. At an early stage of preparing the NNDP, the Steering Group had sought the views of the local community and assessed all potential spaces within the village which were not already protected to determine those considered to accord with national planning guidance. RSL’s site was not originally one of these areas identified within the Pre-Submission Draft NNDP where the Steering Group felt it met the criteria for being designated as a LGS and there was no support from the local community to do so.</p> <p>The reason for now proposing to designate the site as LGS appears to be as a direct result of wanting to frustrate and prevent development, which in principle is acceptable in the context of the current planning policy framework. The suggestion by SDC to strongly advise the Steering Group to allocate the site as a LGS in order to “bolster its protection” clearly demonstrates this to be</p>	

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			<p>the case – the justification for such an action must therefore be seen as a mere retrospective action that does not relate in any way to the requirements of national guidance or the wishes of the local community. Any local support for such an action will also now be strongly influenced by the Steering Group and SDC's clear opposition to allowing sustainable development within the built-up area boundary that helps meet the housing shortfall within the village. Furthermore, this approach is completely at odds with the guidance at paragraphs 99 and 100 of the NPPF as it is not consistent with local planning in terms of sustainable development and the delivery of homes.</p> <p>The Submission Draft NNDP sets out at page 64 the justification for the designation and how it is considered to meet the criteria of paragraph 100 of the NPPF. It is firstly relevant to understand that the proposal by RSL does not include the entire area proposed for LGS designation, relating to an area of 0.6 hectares to the southern extent of the site (see attached Location Plan and Site Layout Plan), and as such, the majority of this agricultural field will remain undeveloped. The specific detailed design reason for the previous scheme for 5 dwellings at the site being refused has been addressed and a green space along the existing public footpath between Vicarage Road and Fell's Lane will be provided. There were no conditions imposed on the 2013 scheme by A C Lloyd to the south east relating to the RSL application site or wider field, as claimed by the document.</p> <p>In terms of the Draft NNDP's view that the proposed LGS meets the criteria within the NPPF, RSL do not consider that criterion (b) has been satisfied. The NPPF requires such designations to relate to land which is demonstrably special to the local community. Firstly, the fact that it was not initially proposed as a LGS indicates that neither the Steering Group nor the local community were of the opinion that this particular area was demonstrably special to warrant its protection. The reason for designation subsequently in this version of the draft derives from SDC's suggestion that it should be protected to prevent a small part of it being developed for housing. Furthermore, there appears to be no evidence to suggest that the local community felt it necessary to impose such</p>	

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			<p>a designation as part of the consultation on the Pre-Submission version. Again, this appears to have been solely driven by comments made by SDC rather than the local community which seems to go against the spirit of neighbourhood planning.</p> <p>RSL also wish to raise concern about the legal requirements regarding publicity and consultation. The PPG "Open space, sports and recreation facilities, public rights of way and local green space" advises as follows:</p> <p>"A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) <u>should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space</u>. Landowners will have opportunities to make representations in respect of proposals in a draft plan." (our emphasis) (Paragraph: 019 Reference ID: 37-019-20140306)</p> <p>Neither RSL nor the landowner of the land in question have been approached by the Steering Group regarding its intention to designate the land as a LGS, with inclusion in the Submission Draft being the first indication of the Steering Group's intention. This is therefore contrary to the advice within the PPG.</p> <p><u>Conclusions</u></p> <p>In conclusion, RSL wish to object to Policies H1, 9 and 10 of the Submission Draft version of the NNDP. For the reasons stated, we consider the Plan as drafted does not meet the basic conditions, particularly that it does <u>not</u> have regard to national policies and advice contained in guidance issued by the Secretary of State; contribute to the achievement of sustainable development; and generally, conform with the strategic policies contained in the development plan, namely the Stratford-upon-Avon District Core Strategy.</p> <p>We would therefore respectfully request that changes are made to Plan as necessary to address the objections raised prior to submission for its independent Examination. Please keep me informed regarding the progress of this document and if in the</p>	

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			<p>meantime there are any queries or you require further information, please do not hesitate to contact me.</p> <p>Please also see: 3325-01Z Site Plan 3325-02 Site Plan in Context 3325-021 Location Plan</p>	
NoH046	<i>(Coal Authority)</i>	General	Having reviewed your document, I confirm that we have no specific comments to make on it.	
NoH047	Windfarms	General	No Comment.	
NoH048	<i>(Noralle Traditional Country Homes)</i>	General	<p>I am writing to you on behalf of Noralle Traditional Homes Ltd to respond to the submitted Napton Neighbourhood Plan, for which representations are due today.</p> <p>Noralle are successfully promoting a small site at Dog Lane/Fells Lane, Napton for a self-build/custom build scheme within policy SAP4 of the Stratford on Avon Local Plan; Site Allocations Plan. The site is owned by a local family and is designated within the (as yet unadopted) Site Allocations Plan, identified as <u>Site SCB6</u>.</p> <p>We are therefore writing to you now to ensure that there is consistency between the two plans and above all to make sure that the emerging Napton Neighbourhood Plan is fully 'receptive' to the proposal. We believe it is. However, we do have some constructive comments to make on the Plan.</p> <p>Introduction.</p> <p>Noralle Traditional Country Homes is based in Napton. Its office is located at Brookfields on the edge of the village. It is a well-established company which has built a strong reputation in the area for building attractive, well-designed and often bespoke homes using local styles and materials. Indeed, there are several individual homes and smaller developments within Napton village which have been built by Noralle.</p>	This representation appears to be generally supportive with the neighbourhood plan's approach to self build and custom build properties, and raises no objections.

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			<p>Napton Neighbourhood Plan.</p> <p>We very much welcome the time and effort which has been devoted to producing the Submission Version of the Napton Neighbourhood Plan. It is clear, attractive and well-written and we support the generally positive approach of the Plans policies and proposals.</p> <p>Neighbourhood Plans are of course designed to <u>complement</u> and <u>contribute additionally</u> to the proposals within the Stratford on Avon Local Plan and therefore we welcome the support which is given to bringing forward self-build and custom build sites, such as our client's land, which is already included in the Stratford on Avon Site Allocations Plan and aims to widen the housing opportunities and life chances for people within Napton on the Hill.</p> <p>Chapter 2 which looks at the policy context, emphasises the commitment to growth within the rural settlements within Stratford on Avon District and acknowledges the need for modest growth, whereby Category 2 settlements, of which Napton is one. Category 2 villages are intended to accommodate some 700 dwellings over the plan period – with no more than 12% occurring in any one settlement. Self-build housing, since it is a statutory requirement, is seen as additional to the formal housing figures.</p> <p>Chapter 3 explores the history of the village. We certainly support the recognition of the importance of retaining local facilities within Napton which depend upon maintaining a vibrant and growing community. Paragraph 3.21 in particular, refers to the successful campaign to save the village school 25 years ago, which ultimately resulted in a new school for Napton. This achievement was based on the willingness of the community to accept new development which could support a primary school for the village – a school which has since grown from strength to strength.</p>	

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			<p>Chapter 4 also acknowledges the diverse nature of both new and existing housing within the village which helps to shape the character of Napton. Bringing forward a self-build and custom build scheme is entirely consistent with that objective.</p> <p>Chapter 5 looks at the profile of the area and in particular the patterns of anticipated housing needs. The Housing Needs Survey conducted in January 2018 concludes that whilst 109 of the 135 respondents were content with their current housing, a total of 24 households within the village are looking for additional homes. This of course doesn't include those people from outside the village who might well want to take up a self-build opportunity who would be included in the Self-Build Register but would probably not appear in the local housing survey.</p> <p>Chapter 6 addresses the 'Key Issues' and separates these issues into 'positive' and 'negative' impacts. Strangely, the issue that <i>'The housing needs survey indicated there is a need for 24 new homes in the parish for people with a local connection'</i> is categorised as a <u>Negative</u> Issue'. We would regard this as a <u>Positive</u> issue, since the community is using the Neighbourhood Plan to actively address local housing needs. Similarly, the <i>'Ability to work from home'</i>. Is listed as a 'negative issue', when in fact this is a 'positive issue' which should be strongly encouraged, albeit it is pointed out that the broadband reception in Napton is poor – which is acknowledged.</p> <p>Chapter 7 cites a very strong and positive 'Vision' for the village and some valuable and sensible objectives. We strongly support the first objective which states that the village wishes: <i>'To support appropriate residential development within the village, including homes to meet the identified local need'</i>.</p> <p>Chapter 8 sets out the policies, beginning with the criteria for defining the village settlement boundary on Policy Map 1. We note that according to the methodology in paragraph 8.11, self-</p>	

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			<p>build sites should be included (only once they have received appropriate consent and a material start has been made). On that basis we are content with the boundary with respect to our client's site at Dog Lane/Fells Lane which is currently outside the boundary. In addition to this site, there will, no doubt, be scope for future growth from additional modest sites to ensure that Napton remains a vibrant and growing community. Whilst Chapter 8 focuses on the number of dwellings already granted consent within the plan period in meeting the Local Plan target, it should be emphasised that the purpose of a Neighbourhood Development Plan is not to simply record those planning consents which have happened in any event, but to make positive proposals for additional homes if they are needed.</p> <p>Paragraph 8.36 refers to the Council's SHLAA and the fact that all but two of the 24 sites considered for development around the edge of Napton were regarded as '<i>not deliverable</i>'. One of the two sites which was regarded as '<i>Likely to be deliverable</i>' was my client's site at Dog Lane/Fells Lane – which has been allocated for self-build and custom building. The accurate account of the constraint caused by the capacity of Southam College to accept new pupils within paragraph 4.37 thankfully does not catch self-build sites since we understand they are treated as statutory requirements and in any event are regarded as <i>de-minimus</i> since they are so small.</p> <p><u>Policy 1: Residential Development</u>: This policy is supported with the caveat that it perhaps should (in the interests of clarity) refer to an exclusion for self-build housing even though self-build/custom building is covered under Policy 3.</p> <p><u>Policy 3: Self-build homes and Custom Build sites</u>: We warmly welcome this policy which accurately encapsulates the District Council policy on self-build and custom building which, as Paragraph 8.59 states, lie outside the built-up boundary until they are delivered. We are prepared, content and indeed willing to</p>	

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			<p>work positively and productively with both the District Council and the Parish Council to deliver self-build and custom build plots on the SCB6 site at Dog Lane/Fells lane, incorporating approximately 5 dwellings according to the criteria <i>a to h</i> outlined in Policy 3. The detailed design of the scheme will be discussed in advance with both the District and Parish Councils ensuring that there is a Design Code to control the nature, scale and design of the housing to meet peoples' needs, whilst at the same time protecting the interests of the community.</p> <p>This letter does not comment specifically on other policies within the plan but nevertheless supports the general thrust of the vision, objectives and policies. With reference to community facilities, it is important to note that some local services such as shops and pubs have seriously declined over recent years and the village school was only protected after a prolonged campaign. The need for continuous modest growth to protect local services and preserve Napton's way of life is paramount. We hope that this small self-build /custom build site at Dog Lane/Fells Lane goes some way to achieving this.</p>	
NoH049	Resident	General	<p><u>Final Submission Consultation – Representation Form</u></p> <p>May your attention be brought to the fact that the above – mentioned form is not being circulated within the Parish.</p> <p>Villagers have to be interested enough to find the modified plan and then search for the Final Submission Consultation form on line.</p> <p>Many of our residents cannot do that and many more will do not that, as it is too time consuming.</p> <p>For our 1995 and 2007 Parish Plans, comments were sought by delivering a survey form to every household in the Parish. Response rewarded the effort.</p>	<p>The Regulation 16 consultation is organised and conducted by the District Council.</p> <p>The local housing needs survey undertaken by Warwickshire Rural Community Council on behalf of the Parish Council was distributed to every household in the village, and included an opportunity to comment on future development in the village. A leaflet on the</p>

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			<p>Return of forms this time will be minimal due to lack of publicity and most returns therefore will be from people involved in the process. That will provide a very biased view on what is a flawed process.</p> <p>It would appear that of 167 parishioners suggested changes to the first draft plan only 54 were accepted. Indeed, one was correcting a name wrongly given to the road by our house see address xxxx. The plan team response was to take Google Maps as a definitive source as opposed to 74 years of local knowledge. What other presumptions have been made!</p> <p>Policies contain contradictions.</p>	<p>draft plan (as part of the Regulation 14 consultation) was distributed to every household.</p>
		Policy 1	<p>One cannot encourage development within a tightly drawn Built up area boundary AND insist that development does not overshadow, overlook or affect gaps and open spaces. Few, if any spaces are left for development within the built up boundary. This policy seems to negate development in what is in fact a neighbourhood development plan.</p> <p>Criteria (b) Sensitive on a small scale. Who makes that judgement? Is small development fifty or five homes. A limit is needed now rather than leave to a keen planning consultant.</p>	<p>The BUAB was defined by the District Council. The criteria listed in Policy 1 do not prevent development coming forward but seeks to ensure it is a high quality and is appropriate to the character and setting of the village.</p> <p>The wording is primarily taken from the District Council's adopted Core Strategy, to which the neighbourhood plan has to conform.</p>
		Policy 2	Support for Napton residents or family off.	This would be determined by the social housing provider.
		Policy 3	Support, but conditions should be left to experts, not unelected residents.	The policies in the neighbourhood will be applied by the District Council when assessing planning applications.
		Policy 4	It is understood that a policy for 65 homes was agreed for the Brickyard site, why and when did this policy change? Can we revert?	The permission granted for 65 work/live units has now lapsed. The District Council has suggested up to 80 dwellings in its emerging Site Allocations Plan. An outline planning application for

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		Policy 5	Support outside built up boundary. Business development should not be proposed within the BUAB when there is obviously no suitable space available. Are the proposed development policies so worded as to actually deter any form of development? It certainly looks so as all criteria requested for development cannot be met. Leave to planning and building regs departments as our experts.	up to 100 dwellings is currently being considered by the District Council. Businesses currently within the BUAB may still want to expand their premises. The policies in the neighbourhood will be applied by the District Council when assessing planning applications.
		Policy 6	Support - As many of the plan group are new to the village, I took time to provide a list of some village assets. Such as Langley's Pit, the ducking well, village pump etc. None seem to have been noted!	These are not community facilities.
		Policy 7	Object - As we cannot dictate to Canal and Rivers Trust.	
		Policy 8	Object - The idea is fine but the plan group say all land owners involved have been contacted about this policy. Having asked around this is untrue, hence my objection.	The steering group used its best endeavours to contact all landowners and give them an opportunity to comment and influence the content of the neighbourhood plan.
		Policy 9	Object - Neither Napton Councillors or plan group are elected, nor represent the views of the majority of residents. Trying to dictate whose homes and land should have protected views over is already causing local friction.	The Localism Act 2011 gave parish councils the right to prepare a neighbourhood plan. All views have to be from public vantage points accessible to all rather than private property.
		Policy 10	As a local developer for some forty years I would trust SDC planning department to make judgements rather than local laymen who may or may not have a personal interest.	
		Policy 11	Support.	
		Policy 12	Covered by planning legislation.	

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NoH050	Stratford District Council	General	There is too much repetition throughout the document and text copied from the Core Strategy which in some cases is unnecessary.	Difficult to respond when no examples are provided.
		General	Instead of referring to the NPPF as the 'Framework' it would be better to refer to it as the NPPF as this is the generally accepted abbreviation.	The National Planning Policy Framework itself uses the abbreviation 'Framework' not NPPF.
		General	It should be noted that the Site Allocation Plan (SAP) is still an emerging document and the evidence base to inform any reserve sites, including that of infrastructure needs, is being updated based on the most up to date information. As such allocations and reserve sites within the SAP are subject to change as the plan progresses. It should also be noted that the SAP not only identifies reserve sites but also self and custom build sites and other site specific allocations. A link to the SAP can be followed here: https://www.stratford.gov.uk/planning-building/site-allocations-plan.cfm	The neighbourhood plan can be updated as and when necessary.
		General	A number of policies make reference to the Housing Needs Survey (HNS). It may be helpful to add in 'or any other evidence brought forward for the local community' (similar to AS.10) as the HNS may become out of date during the plan period or be superseded.	Agree change.
		General	There are a number of references to the impact of development on neighbours through overshadowing and overlooking. It may be helpful to expand this reference further, similar to Policy CS.9 and include impacts such as odours, noise and disturbance.	Agree change. Add reference to odours, noise and disturbance to Policies 1, 3 and 5.
		General	There doesn't appear to be a policy for new dwellings in the countryside such as rural workers dwellings etc.	It was felt that this is adequately dealt with in para 79 of the Framework and Policy AC.10 in the Core Strategy.
		Contents, pg. 3	It would be helpful to the reader of the plan to have all of the policies listed, together with the policy number, title and page number. This makes it easier to navigate through the document.	A table showing the policy number, title and page is on page 4, immediately after the Contents Page.
		Page 4	It would be helpful if a list of Maps and Figures was included.	This can be added once the plan is finalised
		Page 6, para 1.1.	The plan period on the cover and at para 1.12 is 2018 to 2031. However, if dwellings that have been granted consent and	The Parish Council has chosen the plan period 2018-2031. However to calculate the balance of houses required to meet the

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			constructed since 2011 are to be included (See Table 6, p.39) then the NDP plan period should cover the same timeframe as the Core Strategy.	Core Strategy requirement for a Local Service Village (Category 2) between 2011-2031 the plan has to establish what has already been built between 2011 - 2018.
		Page 8, para 2.3	Reference should be made to the February 2019 version of the NPPF.	Agree change. Add reference accordingly.
		Page 9, para 2.9	2 nd bullet point: Replace 'Local Plans' with 'Core Strategy'.	This paragraph was directly lifted from the District Council's planning website. It is a general statement about what comprises the development plan, which will not need constantly updating over the life of the neighbourhood plan. For example the development plan will at some point also include the Site Allocations Plan as well as the Core Strategy. Technically these are local plans.
			3 rd bullet point: Add: 'made' before 'neighbourhood plans'.	Agree change, but if doing this you also have to add the word 'adopted' to bullets points 1 and 2.
		Page 9, para 2.12	Insert "around" between "than" and "12%".	Agree change.
		Page 10, para 2.17	First bullet point – para 4.1.15 in the SAP refers to BUABs in 'made' NDPs prevailing over those BUABs in the SAP which is a very relevant point. Suggest making reference to this.	Agree change. Add reference to BUABs in 'made' NDPs prevailing over those BUABs in the SAP.
		Page 10, para 2.18.	The timescales for producing the SAP have been delayed and are currently being reviewed. They will be set out in a revised Local Development Scheme (LDS) which is due to be adopted by Council in late spring/summer. See: https://www.stratford.gov.uk/planning-building/local-development-scheme.cfm However, it is unlikely that the SAP will be adopted before summer 2022.	Update all references to SAP accordingly.
		Page 20, Map 2.	The colours for East (south), Central (south) and Central (north) are very similar which makes it difficult to tell them apart on the map. The lettering within each character assessment is also unclear in some cases.	The map was kindly produced by the District Council. Will request that the colours be clarified.
		Page 22, para 5.8.	Reference is made to 140 survey responses, however paragraph	Correct accordingly.

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			5.10 refers to 135 responses.	
		Page 23, para 5.18.	It would be helpful if this site was mapped in order to help the reader understand the context. It would also be beneficial if this paragraph could also set out exactly what need this scheme actually meets.	The site is now occupied and well established so no need to provide detail for the reader.
		Page 26, para 5.33.	It is not clear why 'Cross Roads Garage' has been listed as a 'social and community facility'. Is it a commercial business?	All the facilities listed are commercial business. The paragraph simply refers to local facilities available in the village which support its sustainability.
		Page 26, para 5.68.	Suggest amending 'amenities' to read 'local facilities'?	Presumably this comment refers to para 5.38. Agree change to 'local facilities'.
		Page 27, Map 3.	There should be separate maps for 'local amenities/facilities' and 'listed buildings' as they are not linked. The maps should be produced at a scale appropriate to view the detail. The map is very small and the listed buildings cannot currently be viewed. The numbering (of local facilities) within the map itself is so large it obliterates the building/space in question, together with its surroundings. Some of the numbers overlap meaning that the numbers cannot be read. This does need to be rectified.	Again the map was kindly produced by the District Council. Will discuss whether the two elements can be separated.
		Page 27, Map 3 (list of local amenities)	It is unclear as to how the windmill can be classified as a local amenity when it is a private residence. Can the war memorial, the local garage or the bus stop be classed as an amenity?	Agree to remove war memorial and windmill. Amended map to be produced once inspectors comments have been received
		Page 28, para 5.41 to para 5.44.	The sports facilities and village greens (discussed at paras 5.41 to 5.44) should be mapped.	It might be more appropriate to add them to them to the map showing Local Green Space. Amended map to be produced once examiner's recommendations have been received and approved by District Council.
		Page 30, para 5.50 to 5.52.	The SSSIs, LWS and other sites of interest (referred to in para's 5.50 to 5.520 should be mapped.	Agree to discuss possibility with District Council.
		Page 35, para 8.2.	Second line, replace 'certain' with 'the'.	No change required.
		Page 35, para 8.2.	Bullet point 2 should read "Stratford on Avon District Core Strategy".	Agree change. Plan amended

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		Page 35, para 8.2.	Bullet point 3 – see general comment regarding SAP.	No change required. SAP will not be adopted before neighbourhood plan is made.
		Page 37, para 8.12.	This paragraph refers to ‘broad acceptance’ of the SAP BUAB, subject to some minor tweaks to take into account some of the recent planning permissions. SDC were aware of these modifications and are accepting of them. However, there are 4 other differences between the SAP and NDP BUAB which are not referenced within the explanatory text. The NDP BUAB does not include two farmyards (and associated buildings) or the extents of two minor curtilages. Reference is made to the District Council’s methodology for identifying a BUAB (which includes provision for farmyards etc), however the methodology for Napton’s BUAB is not included and therefore it would helpful for an explanation to be provided as to why the other changes exist.	The boundary shown in Map 1 was agreed between the District Council and Parish Council after extensive discussions following the publication of the draft SAP. It now takes into account all recent planning permissions and other minor modifications. It is therefore correct in all respects with the exception of the need to include Manor Farm. The Parish Council accepts that this is an omission as a consequence of a cartographical error and that Manor Farm should have been included within the BUAB shown in Map 1.
		Page 39, para 8.15.	Insert ‘around’ between ‘than’ and ‘84’ for accuracy	Agree change and text can be amended
		Page 43, para 8.38.	As mentioned previously, the SAP is still an emerging document and the timetable for adoption has been delayed. The assumptions that the Pre-submission SAP were predicated on have been re-assessed and could be revised in the next iteration of the SAP due Autumn 2020. Evidence underpinning the SAP continues to be updated which could have a bearing on the outcome of education provision.	
		Page 44, Policy 1	How is ‘sensitive infill development’ to be defined?	Criterion b) conforms and echoes what is in the Core Strategy. Policy CS.12 in the Core Strategy refers to ‘the scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement’. Policy AS.10 adds that the following forms of development and uses in the countryside are acceptable in principle and includes ‘small-scale housing schemes, including the redevelopment of buildings, within the Built-Up Area Boundary of a Local Service Village’. There does not appear to be a definition as to what small scale means. Policy 1 in the neighbourhood plan simply reflects this approach and adds value to the strategic context already provided by the Core Strategy. See comments below.
		Page 44, Policy 1 – criterion b	It would be helpful to understand what is meant by ‘small scale’.	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Page 44, Policy 1 – criterion c	It is suggested that the wording is revised to read “does not cause unacceptable harm to the amenity of neighbouring properties or uses”.	b) and c) could be combined to say: <i>it is on a small scale that it is appropriate to its surroundings and does not cause unacceptable harm to the amenity of neighbouring properties or uses including odours, noise and disturbance.</i>
		Page 44/45, para 8.40.	It would be inappropriate to apply this restriction as it would be contrary to the provisions of policy CS.15 in the Core Strategy which does not restrict tenure and occupancy of dwellings on sites within physical confines/boundaries of LSV’s such as Napton.	Delete last sentence of para 8.40. The point about having regard to the local housing need survey is repeated in para 8.41.
		Page 46, Policy 2	<p>Support is given to the overall principle of this policy, however It is suggested that the wording is revised to read: “Small-scale community led housing schemes on sites beyond, but reasonably adjacent to, the defined Village Boundary of Napton-on-the-Hill will be supported where all of the following criteria are satisfied:</p> <p>There is a proven and as yet unmet housing need, having regard to an up-to-date Housing Need Survey</p> <p>The content of the scheme, in terms of the type, size and tenure of homes proposed, and their accessibility, reasonably reflect the local identified need.</p> <p>Appropriate arrangements will be put in place via a planning obligation to secure delivery of the scheme and regulate its future occupancy to ensure the continued availability of the housing to meet the needs of the local people.</p> <p>Where viability for 100% affordable housing provision cannot be achieved, an element of market housing may be included within a rural exception scheme, to provide sufficient cross subsidy to facilitate the delivery of affordable homes. In such cases, proposers of schemes will be required to provide additional supporting evidence in the form of an open book development appraisal for the proposal containing inputs assessed and verified</p>	Agree change though replace ‘defined Village Boundary’ with ‘Built-up Area Boundary’ and no need to refer to ‘Napton-on-the-Hill’.

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			by a chartered surveyor.	
		Page 47, para 8.56.	This policy is in the proposed Submission Site Allocations Plan (July 2019) not the Core Strategy and is SAP.5 and not SAP.1.	Amend accordingly.
		Page 49, objective 2.	Should there be a policy that covers other brownfield sites in the plan area, not just the Napton Brickworks?	The sites don't warrant a separate policy beyond what was in the Core Strategy and it would late in the statutory process to add new policies that have not yet been consulted upon
		Page 49, objective 2	With regards to Napton Brickworks, it should be noted that the wording in the SAP was relevant at the time of the NDP being developed, however the SAP is an emerging document and as such is still subject to change.	Update references to SAP as appropriate.
		Page 51, Policy 4.	This policy is quoting text from a policy in the version of the SAP dated July 2019. As previously mentioned, the SAP is still an emerging document and the evidence base to inform any reserve sites, including that of infrastructure needs, is being updated based on the most up to date information. As such allocations and reserve sites within the SAP are subject to change as the plan progresses.	Make it clear which version of the Site Allocations Plan the policy is referring to.
		Page 51, Policy 4.	A number of criterion are requesting the provision of measures outside of the perimeter of the site on land which will not be the applicant's ownership. It is unclear how these 'mitigation measures' could be insisted upon via the NDP.	Proposal RURAL.1: Napton Brickworks in the emerging Site Allocations Plan lists specific requirements for any scheme coming forward. Policy 4 similar lists aspects that any planning application ought to satisfactorily address. However it solely relates to onsite works that could potentially impact on adjoining land and environmental features. For example one of the Parish Council's main incentives to reclaim the site was to reduce anti-social behaviour. Any works on site should therefore address this issue and not acerbate the problem by facilitating access to adjoining land.
		Page 54, Policy 5 – criterion b.	It is suggested that the wording is revised to “does not cause unacceptable harm to the amenity of neighbouring properties or uses”.	The Parish Council would accept: <i>b) does not cause unacceptable harm to the amenity of neighbouring properties or uses, including Napton Hill Quarry SSSI and Local Wildlife Site, and Sandstone Doggers Local Geological Site.</i>

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
		Page 54, Policy 5	The final paragraph is not related to the remainder of the policy and should be deleted. If there is sufficient evidence for a tourism policy, a separate policy should be created for this purpose.	Agree change. Could add tourism policy to Community Aspirations.
		Page 54, Policy 5.	It would be helpful if there was a policy protecting or enhancing existing employment sites (A good example of a policy is E1 in the Claverdon NDP).	It would be inappropriate to introduce a brand new policy at this late stage in the statutory process as it has not been available for comment during Regulation 14 and 16 consultation.
			It would be helpful if there was a policy to encourage home based working (A good example of a policy is E3 in the Claverdon NDP). 1 st part. Some forms of business and economic development are suitable outside the BUAB e.g. conversion of rural buildings (See Policy AS.10 in Core Strategy).	It would be inappropriate to introduce a brand new policy at this late stage in the statutory process as it has not been available for comment during Regulation 14 and 16 consultation.
		Page 54, para 8.76.	Last paragraph. This could be applicable to other forms of development and not just business related ones. This appears to be acknowledged in 2 nd sentence in paragraph 8.76.	Suggested above that last paragraph be deleted.
		Page 55, Policy 6	It would be useful if the gateways were identified on a map.	Suggested above that last paragraph be deleted.
		Page 55, Policy 6.	It is suggested that reference is made to the fact that SDC declared a climate change emergency in summer 2019.	Add reference to declaration.
		Page 55, Policy 6 – criteria a.	It would be helpful to have the land use criteria as individual policies with explanatory text to accompany them. All of these ‘subjects’ have been listed as separate and distinct policies in other Plans, with explanatory text provided for each one to inform the reader why the policies are particularly relevant to their parish together with associated maps where appropriate (i.e. flooding or sites of biodiversity interest).	Such substantial additions are probably not appropriate at this stage in the statutory process. The wording as drafted was accepted in other made neighbourhood plans outside the District where it was regarded as meeting the basic conditions.
		Page 55, Policy 6 – criteria a.	Putting all of these issues together into one policy may not be the most appropriate way of dealing with these various subjects, particularly since they are mutually exclusive and not in any way reliant upon one another in terms of an overall assessment of a proposal.	As submitted its wording would require any development to incorporate design features on the range of environmental matters included in the policy irrespective of whether the proposal had any direct impact on such matters. The parish Council therefore suggest a modification so that the policy would apply its criteria as relevant to the proposal concerned. At the start of the policy insert:

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		Page 55, Policy 6.	<p>The village is not an Air Quality Management Area (AQMA) and as such, this would appear 'excessive'.</p> <p>These are not land-use matters and should be omitted from the policy.</p> <p>Final paragraph. This should also be a separate policy</p>	<p><i>'As appropriate to its scale, nature and location'</i></p> <p>The policy wording as drafted has been endorsed in other made neighbourhood plans. A substantial rewording is not appropriate at this late stage in the process. Claverdon policy is very wordy. The above comments from Historic England are very complimentary about the neighbourhood plan.</p> <p>This wording appears in the nearby made Braunston Neighbourhood Plan and made Welton Neighbourhood Plan. The above comments from the Inland Waterways Association are very supportive.</p> <p>The Parish Council feels it would be inappropriate to make changes to the proposed LGS at this late stage. Any extensions to the proposed boundary of the LGS have not been consulted upon with the appropriate land owners or the local community at either Regulation 14 or Regulation 16 consultation stages. The Parish Council were however mindful of comments made during the Regulation 14 consultation, especially those made by the District Council.</p>
		Page 57, Policy 7.	<p>Reference should be made to 'conserving' not 'preserving' heritage assets. The policy may benefit from being reworded (See Claverdon NDP as an example of a good 'heritage assets' policy.</p>	
		Page 58, Policy 8.	<p>It is unclear as to what the policy is trying to achieve. The first paragraph is a statement, not policy and should be removed. The remainder of the policy does not make it clear whether it relates to development of the canal itself or the setting of the canal. It is thought that the canal would be classed as a heritage asset and development within its vicinity should be assessed against a revised Policy 7. It is unclear as to how many of the criterion could be achieved or insisted upon.</p>	
		Page 69, Policy 9 and associated Map 2).	<p>SDC is satisfied that sites A, C and E have sufficient justification to comply with para 100 of the NPPF. However, there are concerns over sites B and D.</p> <p>Site B appears to be 'random' in its selection. Why does it not include land to the south of Church Road, either side of the church as this land also acts as a setting for the listed church? The strip of land as drawn on the map does not provide any obvious context for the village or the church and fails to adhere to the strict criteria for allocating a site as an LGS set out in the NPPF.</p> <p>Site D is a large area of land and the western edge as shown on the map is arbitrary in nature since it does not follow a natural feature or field boundary. It is not clear how this site would benefit from the additional 'protection' of LGS and I remain unconvinced the site meets the strict criteria for allocating a site</p>	

Rep.No.	Name	Policy/Section	Representation	Comments by the Parish Council
			as LGS as set out in the NPPF.	
		Page 74, Policy 10.	Final paragraph. Consider replacing “a harmful impact” with “significant adverse impacts”.	Agree change to Policy 10.
		Page 77, Policy 11	c) heritage assets and sites of archaeological interest such as ridge and furrow; ridge and furrow, as a non-designated heritage asset, is not protected and its loss through ploughing cannot be controlled or stopped through the planning regime.	Agree change although ridge and furrow does receive protection in some made neighbourhood plans.
		Page 79, Policy 12.	Policy 12 relates to trees and loss of ancient woodlands. In relation to loss of ancient trees the NPPF only supports this where there are wholly exceptional reasons. Suggest re-drafting first paragraph to read “Development deemed to harm irreplaceable habitats such as ancient trees or veteran trees will not be supported”.	Agree change.
		Page 80, Policy 13.	The list of community facilities does not tie in with those listed/shown on Map 3.	Ensure conformity between Map 3 and Policy 13.
			It is suggested replacing the paragraph starting “The loss of any of the following services” with : “The loss or partial loss of existing community facilities will not be supported unless it can be demonstrated that the facility is no longer in active use and has no prospect of being brought back into use or is to be replaced by a new facility of at least an equivalent standard in no less convenient location for users.	Agree change.
		Page 80, Policy 30.	Proposals which enhance and improve existing community facilities will be supported where they are compatible with neighbouring uses”.	
			It is still unclear as to why Cross Roads Garage is a community facility.	It is a local service in the same way that a shop or public house is.
		Page 81. Community Aspirations.	It is recommended that a section be included on how CIL monies would be spent on local projects, particularly those that relate to objectives and policies in the NDP.	As the Community Aspirations Section is not part of the statutory neighbourhood plan, the parish Council will give further thought to this issue. However it will probably need to await the outcome of the planning application for the former brickworks as this could

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		Page 85. Community Aspiration 2.	Delete the linking 'or' as the two points are not mutually exclusive.	have a significant impact on any CIL monies. Replace 'or' with 'and'.
		Page 86, para 10.1.	Reference is made to reviewing the NDP. It is suggested making reference to the emerging Site Allocation Plan and Core Strategy review as potential trigger points for a review of the NDP.	Amend section accordingly.