

Napton-on-the-Hill Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

Rep.No.	Name	Policy/Section	Representation
NoH001	(Resident)	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)
		Policy 2	Object - Nothing should be built outside the defined Built-up Area Boundary.
		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
		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
		Policy 6	Object
		Policy 7	Support

Rep.No.	Name	Policy/Section	Representation
		Policy 8	Object - Development alongside the canal is not appropriate (aside from the Brickworks already agreed).
		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.
		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
		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.
		Policy 14	I don't care.
		Community Aspiration 1	Support
		Community Aspiration 2	Object - Why one or the other? Very strange.
NoH002	<i>(Resident's Association Representative)</i>	Policy 1	Object - Only within the defined Built-up Area Boundary of the village.
		Policy 2	Object - Only within the defined Built-up Area Boundary
		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
		Policy 4	Support - Max 80 and must include all the canal side improvements, moorings, parkland promised us originally.

Rep.No.	Name	Policy/Section	Representation
		Policy 5	Support - No B1 business use should be allowed without the proviso it is not then changed to residential.
		Policy 6	Support
		Policy 7	Support
		Policy 8	Object - No development is desired by local people except the Brickyard.
		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.
		Policy 10	Support
		Policy 11	Object - No support for any development outside the Built-up Area Boundary.
		Policy 12	Support
		Policy 13	The Crown Inn
		Policy 14	Support
		Community Aspiration 1	Support
		Community Aspiration 2	Support
NoH003	(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.
		Policy 2	Object - see previous answer - no requirement

Rep.No.	Name	Policy/Section	Representation
		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
		Policy 6	Support
		Policy 7	Support - Vague
		Policy 8	Object - No development on the canal except at the brickyard
		Policy 9	Support - are Crown Green, The Green, Pillory Green; and Memorial Green (registered under the Commons Registration Act 1965.) required to also ne local green space?
		Policy 10	Support
		Policy 11	Object
		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, tress, copses with in the village?
		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</i>	Policy 1	Support
		Policy 2	Support

Rep.No.	Name	Policy/Section	Representation
	<i>Association (Warks Branch))</i>	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 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

Rep.No.	Name	Policy/Section	Representation
		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.
		Policy 7	Support
		Policy 8	Support - I do not see public art as being an essential.
		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

Rep.No.	Name	Policy/Section	Representation
		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
		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

Rep.No.	Name	Policy/Section	Representation
		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.
		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

Rep.No.	Name	Policy/Section	Representation
		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
		Policy 3	Support
		Policy 4	Support - Must have a Cycle and footpath to stop every 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.

Rep.No.	Name	Policy/Section	Representation
		Community Aspiration 2	Support
NoH009	(Resident)	<p>Policy 1</p> <p>Policy 2</p> <p>Policy 3</p> <p>Policy 4</p> <p>Policy 5</p> <p>Policy 6</p> <p>Policy 7</p> <p>Policy 8</p> <p>Policy 9</p> <p>Policy 10</p>	<p>Object - Napton is built on a hillside. points c, f and g rule out any building including extensions to homes in Napton. d, is too restrictive market demand should also be considered I would also like to comment on the process of this Neighbourhood Plan. I was born in Napton 89 years ago, the way information was collected and the consultation process has excluded people of my age, I have had to rely on someone to help me to make this response online which I don't like to have to do</p> <p>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</p> <p>Object - points c, e and f again prevent any building in or around Napton</p> <p>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</p> <p>Object - Points b, d and e again rule out any development c not defined enough</p> <p>Object - g jargon Last paragraph too vague could be used to put wind turbines on top of the Hill.</p> <p>Support</p> <p>Support</p> <p>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</p> <p>Object - 5 is not a good view at all especially since the estate on the Priors Marston Rd has been</p>

Rep.No.	Name	Policy/Section	Representation
		Policy 11	built
		Policy 12	Object - "intrinsic character" and "vernacular built form" too vague and open to personal views
		Policy 13	Object - Priority should be to the residents of the village. Trees should not block their views
		Policy 14	Support
		Community Aspiration 1	Object - This could be used to put a mast on top of the Hill
		Community Aspiration 2	Support
			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".
		Policy 2	Object - To use only the Housing needs survey it would have to be updated yearly to be of any use
		Policy 3	Object - Policy too restrictive i.e. a), e) and f)
		Policy 4	Object - Too many restrictions i.e. 80 maximum needs to be feasible
		Policy 5	Object - Again the overlooking, overshadowing and gaps too restrictive. Napton has too much tourism now, impacts local roads. Not enough detail here
		Policy 6	Object - Last paragraph needs to be more specific where these things would be allowed
		Policy 7	Support
		Policy 8	Support
			Object - None of the designations need this protection. Policies such as the Core Strategy, SSI,

Rep.No.	Name	Policy/Section	Representation
		Policy 9	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
		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
		Policy 11	Object - Too vague e)
		Policy 12	Object - No consideration given to positioning in village considering residents
		Policy 13	Support
		Policy 14	Object - Needs more detail
		Community Aspiration 1	Object - g) how
		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?
		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
		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

Rep.No.	Name	Policy/Section	Representation
		Policy 5	Object - Tourism does not need any more encouragement b, d, and e too restrictive
		Policy 6	Object - more detail is needed to open with regard to wind power
		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.
		Policy 10	Object - only 1,3,4 and 6 are good view Paragraph too open to interpretation needs detail
		Policy 11	Object - e) open to interpretation of different views
		Policy 12	Object - needs of villagers should over ride importance of trees inside village
		Policy 13	Support
		Policy 14	Object - Needs to be more specific, look at the unsightly green boxes stuck in any place round village
		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 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,

Rep.No.	Name	Policy/Section	Representation
			recent market availability and planning applications should be looked at ie. people extending their homes because larger ones are not available
		Policy 2	Object - The Housing Needs Survey should not be the only point of reference this should be updated yearly
		Policy 3	Object - c, d, e, and f too restrictive
		Policy 4	Object - Restricting the number of properties to 80 will probably result in nothing happening to this eyesore
		Policy 5	Object - As previous policies b, c, d, and e ensures nothing is built
		Policy 6	Object - do not think Napton is the right place for solar farms and wind turbines
		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
		Policy 10	Object - Only 1. 3 , 6 and maybe 4 are worthy of this protection
		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
		Policy 12	Object - Trees within the village should not be protected other than the historic ones on The Green,

Rep.No.	Name	Policy/Section	Representation
		Policy 13	Support
		Policy 14	Object - Only concerned with impact on the environment these things impact people as well
		Community Aspiration 1	Object - how can they do f)
		Community Aspiration 2	Object - don't need an extended network of paths just need one on Vicarage Rd 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.
NoH013	(Resident)	Policy 1	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.
		Policy 2	Object - You will not get land offered for affordable housing without an element of normal development included in the proposal.
		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

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			regain some rural character let's not waste the chance.
		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.
		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
		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
		Policy 11	Object
		Policy 12	Support
		Policy 13	Support
		Policy 14	Support
		Community Aspiration 1	Support

Rep.No.	Name	Policy/Section	Representation
		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
		Policy 2	Object - enough affordable houses built over the last few years
		Policy 3	Object - too restrictive Napton's character not taken into consideration
		Policy 4	Object – Can't see any developer taking on this eyesore with such restrictions
		Policy 5	Object - doesn't look like support with so many restrictions. Napton has more than its fair share of Marinas and caravan sites.
		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
		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
		Policy 10	
		Policy 11	Object - 3 and 6 only

Rep.No.	Name	Policy/Section	Representation
		Policy 12	Object - don't think c) is accurate
		Policy 13	Object - concern about trees within the village blocking views
		Policy 14	Support
		Community Aspiration 1	Object - Utilities need to be more sympathetic to character of village
		Community Aspiration 2	Object - f is ambitious but not practical
			Object - don't need more footpaths
NoH015	(Resident)	Policy 1	Object - many of the criteria restrict any kind of building so Napton is mothballed!
		Policy 2	Object - Many affordable houses built over the last 10 years adequate for now
		Policy 3	Object - Criteria c, d, e, and f rule out any building in Napton being on a hill
		Policy 4	Object - too restrictive particularly specifying 80 as a total number the community want the eyesore cleared up
		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
		Policy 6	Object - Napton village not the place for wind turbines
		Policy 7	Support
		Policy 8	Support
		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

Rep.No.	Name	Policy/Section	Representation
		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
		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
		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% response to the Draft. The previous Parish Plan made the effort by a questionnaire to every household.
NoH016	(Resident/Business/Work in area)	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.
		Policy 2	Support – Support
		Policy 3	Support
		Policy 4	Object - I don't feel the site can afford all that is being requested.

Rep.No.	Name	Policy/Section	Representation
		Policy 5	Support
		Policy 6	Support - Do you support? a/ wind farms in the Parish? b/solar ?? on greenfield site within the parish?
		Policy 7	Support - In general but there is a limit
		Policy 8	Support
		Policy 9	Object - Do you have the landowners permission?
		Policy 10	Object - Do you have the property owners permission?
		Policy 11	Support
		Policy 12	Object - Again land owners should be respected just look at the carnage of HS2
		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	(Resident)	Policy 1	Object - The built-up boundary is too tight. This forces more compact development and loss of gardens/space between houses. Result - an urban housing density
		Policy 2	Object - To be for local need
		Policy 3	Support - A welcome opportunity for younger residents to stay in village and own their home. Conditions too restrictive and in some cases impossible to achieve.
			Support

Rep.No.	Name	Policy/Section	Representation
		Policy 4	Object - Object as no space left within built up line.
		Policy 5	Support
		Policy 6	Support
		Policy 7	Support - Too many odd conditions SDC can do that!
		Policy 8	Object - Object until it is made clear that much of land mentioned is privately owned and not available for dog walking.
		Policy 9	Object - These decisions should be made by SDC Planning Dept on a case by case basis.
		Policy 10	Support - Support if agricultural building is exempt. Policy not clear!
		Policy 11	Support - How is a veteran tree classified?
		Policy 12	Support
		Policy 13	Support
		Policy 14	Support
		Community Aspiration 1	Support
		Community Aspiration 2	
NoH018	(Resident)	Policy 1	Object - Napton is built on and around a hill. Most houses overshadow or overlook others, this is the character of Napton and villagers accept this when they live here. This policy prevents any building in the village in gaps in views or anywhere really and doesn't make any positive suggestions on accommodating villagers in the future
		Policy 2	Object - Enough for the present time

Rep.No.	Name	Policy/Section	Representation
		Policy 3	Object - I support the building of self-build houses but the policy is too restrictive in c) d) e) and f) it excludes any building in the village
		Policy 4	Object - the number of units 80 could put developers off also all the expectations/demands or conditions in this policy
		Policy 5	Object - As with previous policy any wish to encourage business is negated by the restrictions in b) d) and e). Also tourism should be defined as there are already plenty of marinas and caravan sites. Napton campaigned unsuccessfully in the past to prevent Black Prince marina
		Policy 6	Object – Too vague
		Policy 7	Support
		Policy 8	Support
		Policy 9	Object - I haven't seen evidence to support any of this in the community. Napton Sports Club should be protected by village trustees not Stratford. The Land adjacent to the Brickworks has an SSI designation on it so doesn't need another. The copse is nothing special it does need proper management but this designation won't help with that and the scruffy agricultural field off Vicarage Rd e) is nothing special and only suggested by Stratford Council for this designation. The land by the church is disgusting and used as a dogs toilet so nothing special
		Policy 10	Object - Only 1,3,and 6 are good views although not wonderful views just a view over countryside. none of the others should be used to prevent building as they are nothing special
		Policy 11	Object - don't agree that c is accurate and d and e are too subjective
		Policy 12	Object - Priority should be given to residents in the village over trees
		Policy 13	Object - Not sure if the garage should be in here although convenient it is not essential and not

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		Policy 14	enough to pressure the owners to keep it if it wasn't viable
		Community Aspiration 1	Object - Council allowing green boxes to be put round village in such prominent positions questions how the mitigations would work
		Community Aspiration 2	Object - not practical proposals
			Object - no more footpaths
NoH019	<i>(Business/Work in area)</i>	Policy 1	Object - I object that this Plan is all about preventing any housing in Napton c. f, and g pretty much exclude any building because Napton is on a hill. d, the housing needs survey quickly goes out of date other ways should be considered like the availability of any sort of housing at the time then a balanced approach can be made. e, The Character Assessment attached to this Plan is inaccurate and very subjective and was written with very little understanding of the history of Napton
		Policy 2	Object - Enough affordable houses have been built for a while
		Policy 3	Object - these restrictions cannot be appropriate considering Napton is a hillside settlement
		Policy 4	Object - Too many restrictions and unreasonable requests i.e. a cycle network! The limit of 80 may prove to put developers off they will need to make some profit.
		Policy 5	Object - This policy does not seem to promote business and wont supporting tourism exacerbate the perceived traffic problem
		Policy 6	Object - Not at the expense of the residents enjoyment wind power is mentioned where would this go? not enough detail here it needs to be clear and transparent what is appropriate and what is not
		Policy 7	
		Policy 8	Support

Rep.No.	Name	Policy/Section	Representation
		Policy 9	Support
			<p>None of these designations are appropriate. As a land owner of one of the proposed designations I have not been notified formally or informally of this process. Is there a legal requirement for this? There is no historical evidence of the agricultural field off Vicarage Rd being important to the community and in need of protection. This is identified on the plan as a pastoral field above Quincy Meadows Development for some reason. People occasionally used the field to sledge without permission as they did in other fields in the village. There is evidence however that in 2011/ 2012 the field was identified as a preferred site by the community for housing. The Parish Council disregarded the community at this time and chose to support building on the Priors Marston Rd on the edge of the village. This field was not identified by the community in this Draft Plan initially someone at Stratford Council suggested it was included. The field does not fit into the category, a) BEAUTY, it is not beautiful it is a scruffy piece of land, it is unsustainable so will never improve. b) HISTORIC SIGNIFICANCE, it does not have any other than years ago being purchased for a school (which did not go ahead) and being a preferred site for building houses. c) RECREATIONAL VALUE only the footpath the same as many other fields which have not been designated. d) TRAQUILITY the field is close to a busy road so very noisy, e) RICHNESS OF WILDLIFE there is not much wildlife being almost surrounded by houses</p>
		Policy 10	
		Policy 11	Object - Only 1,3 and 6 are worth considering as important.
		Policy 12	Object - e is subjective and c not accurate
		Policy 13	Object - trees should not be protected if they affect houses in the village
		Policy 14	Object - 15 is good to have but not essential
		Community Aspiration 1	Object - subjective needs to be clear
		Community Aspiration 2	Support

Rep.No.	Name	Policy/Section	Representation
			Object - no more footpaths
NoH020	<i>(Business/Work in area)</i>	Policy 1	Object - criteria c) f) and g) to restrictive does not take into account building on a hill and Napton's existing character d) Housing needs surveys need to be updated yearly to be of any use or use other criteria e) this document is badly written and inaccurate. It is also subjective and lacks historical knowledge. , and understanding
		Policy 2	Object - Napton should not need any more in the lifetime of this Plan
		Policy 3	Object - By all these criteria it excludes any building within or near the village
		Policy 4	Object - Too low number (80)to make it feasible so nothing will be done to improve this site Suggesting a cycle network is unrealistic
		Policy 5	Object - needs more detail what" tourism" covers. there is already lots of marinas and caravan parks Nothing much suggested for other business except what won't be acceptable
		Policy 6	Object - mitigation is subjective would like to read what would be acceptable and what mitigation would be likely, all too vague. Napton's situation is sensitive to wind turbines and some other energy development.
		Policy 7	Support
		Policy 8	Support
		Policy 9	Object - "The Pastoral field above Quincy Meadows Development" is an agricultural field off Vicarage Road" None of the owners of these designated areas have been notified that the Parish Council intends to impose this on them. Only less than 5% of villagers responded to the Draft Plan. Hardly a mandate to do this to any of these areas. I was born in Napton and have had contact with the village all my life. There is no evidence that this field holds any special importance for villagers. Stratford Council included it in this category. It doesn't fit the criteria

Rep.No.	Name	Policy/Section	Representation
		<p>Policy 10</p> <p>Policy 11</p> <p>Policy 12</p> <p>Policy 13</p> <p>Policy 14</p> <p>Community Aspiration 1</p> <p>Community Aspiration 2</p>	<p>for a Local Green Space. There is evidence that it was a preferred site for housing in 2011/12 but the Parish Council disregarded the wishes of the community at that time and decided to put housing on Priors Marston Road. Stratford's Core Strategy and SSI are enough to protect from inappropriate development. Napton has a lot of well-maintained Green Spaces in the Village this and all the other designations are not needed</p> <p>Object - The only views which should be here are 1. 3. and 6</p> <p>Object - c) I thought building used to be here years ago not ridge and furrow d) and e) too subjective</p> <p>Object - Trees in the village have always been a problem blocking views from houses especially when I lived in the village until a few years ago. This policy should recognise this</p> <p>Support</p> <p>Support - only if mitigation is clear and decisive to the benefit of all villagers</p> <p>Object - don't think these are all realistic</p> <p>Object - Napton has enough footpaths. On another sort of accessibility. There is not the opportunity on this form to mention this process. This Plan has been written by a small number of people, put out to consultation where only 50 people responded out of over 1000 villagers. The Plan affects the lives and businesses in significant ways. The accessibility for the elderly and disabled to respond is totally inadequate. Therefore the whole plan is not representative of the views of an acceptable number of villagers</p>
NoH021	(Resident)	<p>Policy 1</p> <p>Policy 2</p>	<p>Object - These criteria ensure nothing is built in Napton in the future which is disappointing</p> <p>Object - provision is adequate at present</p> <p>Object - Doesn't seem as if they could be built anywhere in the village if they have to fit c) d) e)</p>

Rep.No.	Name	Policy/Section	Representation
		Policy 3	and f)
		Policy 4	Object - The number 80 may be too low to make it feasible to develop especially with all the other criteria quite unrealistic
		Policy 5	Object - As with previous policies the criteria in this policy excludes most development. More tourism as in caravan parks would surely exacerbate the perceived traffic problem the Parish Council keeps mentioning. Also it wasn't long ago when there was a campaign against the latest marina so maybe this policy should be more specific
		Policy 6	Object - The ideology of this policy is all very admirable but practically it doesn't explain how if this policy was supported the Parish Council could avoid a lot of wind turbines on the top of the Hill
		Policy 7	Support
		Policy 8	Support
		Policy 9	Object - I have lived in Napton for many years and brought up a family here. At no time have I heard that the agricultural field off Vicarage Rd (what this policy is calling a pastoral field above Quincy Meadow Development) holds any importance or sentimental attraction to anyone. e) does not fit in the criteria for this designation. The land adjacent to the brickworks has been improved by the current owners why would it need this protection it has a SSI. The copse does not need any protection that the planning system cannot already provide it is nothing special it just needs good management. The Land by the church is nothing special it could benefit from being fenced to tidy it up and prevent misuse by dog walkers. Lastly the sports field, it is not appropriate for the Parish Council to try to damage a parish asset in this way it should be protected by Trustees in the Village not Stratford Council
			Object - I have enjoyed the views for many years but only a few of the ones mentioned are worthy

Rep.No.	Name	Policy/Section	Representation
		Policy 10	of protection 1, 3 and 6
			Object - too subjective on d) and e) I don't agree with c)
		Policy 11	Object - Trees are a problem in the village and should not be protected
		Policy 12	Support
		Policy 13	Object - The green boxes are an eyesore round the village what mitigation is the policy proposing
		Policy 14	Object - Good idea this policy does not suggest practical answers f) is impossible to manage
		Community Aspiration 1	Object - Yes improve footpaths especially along Vicarage Rd but Napton doesn't need more. I would like to point out my disappointment at the poor consultation for this document, as an elderly person who does not use a computer I have had to sit with someone to complete this form, this is detrimental to my independence. The last Parish Plan that the Parish Council consulted on was much easier to contribute to. A questionnaire was distributed to every household to ask their views. This plan seems to contain the views of a small group of people who are on the committee or the few who attended a meeting, we are then supposed to agree or disagree. This plan does not reflect my views at all. There are probably many more people like me who couldn't get to the garage or shop to sit for ages reading the draft plan so the plan has not been accessible to people like me. Therefore it is not a representative document for a community of over 1000 people so should not be used to influence any policies that affect the lives of villagers
		Community Aspiration 2	
NoH022	(Resident)	Policy 1	Object - This is not progress for Napton this is a policy to prevent any planning particularly c)e)f) and g)
		Policy 2	Object - enough built now the policy should be to protect them as affordable for ever and not sold on

Rep.No.	Name	Policy/Section	Representation
		Policy 3	Object - The policy should be more positive most houses overlook another or would need to fill a "gap"
		Policy 4	Wrong to put a number (80) on the units. The developer should be required to provide an independent feasibility study providing them with a profit and go with that number. How was 80 decided was there a process? It is important that the area is improved so obstacles should be kept to a minimum. eg cycle network why?
		Policy 5	Object - Not really positive. As with other policies too many exclusions not considering the character of Napton ie not over shadowing, overlooking building in gaps or views, so nowhere Napton is on a hill all building in overlooking or in a gap because the Character Assessment has mentioned them all
		Policy 6	Object - some are not appropriate for Napton even with mitigation
		Policy 7	Support
		Policy 8	Support
		Policy 9	Object - If this Plan had had a good consultation and taken the views of all village residents this policy would not be here. I am over 80 years old and have lived in Napton all my life. There is no need for the protection on these areas. existing policies are more than adequate to allow the development of the village as it has over the years. Some of the areas, the land by the church, the copse and the land off Vicarage Rd e) have never to my knowledge been seen as anything special to the community of Napton. d) has been improved by the owners why should the Council think they know better what should be done here it already has the control of an SSI. As for the sports field the Parish Council is responsible for looking after the Villages assets not devaluing them
		Policy 10	Object - Although I love this village and enjoy the views only a few are worth this protection 1. 3

Rep.No.	Name	Policy/Section	Representation
		Policy 11	and 6 also maybe 4
		Policy 12	Object - too much jargon here
		Policy 13	Object - there has been problems in the past with trees in the village blocking views this policy should address this
		Policy 14	Support
		Community Aspiration 1	Object - depends how this affects the character of the village
		Community Aspiration 2	Object – Not realistic
			Object - Napton has a continuous footpath through the village except on Vicarage Road so no more necessary I have felt excluded from this consultation, my views not important, access to the draft minimal and I have required someone with a computer to fill this in. Something so important should have been more accessible
NoH023	(Resident)	Policy 1	Object - This Plan is designed to PREVENT building in Napton. With regard to c) f) and g) Napton is built on the side of a hill, therefore most houses overshadow or overlook others, the rooflines would certainly effect views as nothing that is built can be hidden and would definitely affect gaps and open spaces. The Character Assessment is inaccurate and poorly written, it is suggestive and lacks historical understanding about how Napton has evolved positively over the years By referencing the latest Housing Needs Survey, this could be out of date this needs updating yearly to be of any use, other references as market sales should be considered also. Manipulating the market by excluding for example larger houses just makes people build extensions and the result is that more smaller houses continually need building and this effects the careful designs of housing
		Policy 2	Object - Again the Housing Needs survey needs updating yearly to be of any use, so many have been built over the last few years there should be enough for the duration of this Plan. The Parish

Rep.No.	Name	Policy/Section	Representation
		Policy 3	Council should insist that these houses remain affordable for the future and never sold off.
		Policy 4	Object - As with my comments on Policy 1 this Plan makes it impossible to build at all in the village and e) ensures non are built near the village
		Policy 5	Object - This site has been an eyesore and problem for a long time. This policy ensures the problem exists for even longer. There is no incentive for developers with the restriction of the 80 units and all the conditions some which are unrealistic i.e. the cycle network!
		Policy 6	Object - Again as with Policy 1 this ensures nothing is promoted or enhanced Napton will be mothballed. If tourism is to be encouraged the Parish Council should explain in the policy the benefit to the community of Napton.
		Policy 7	Object - There is not enough detail, this could have a negative impact on the Village especially wind turbines the mitigation possible should be explained before supporting this policy
		Policy 8	Support
		Policy 9	Support
			Object - This is the worst policy for the community of Napton! I have lived in Napton all of my almost 80 years. The Parish Council has written on their website that " A Neighbourhood Plan is a Community led document which will help to guide the future development, regeneration and consideration of our village for the next 20 years" This Neighbourhood Plan is a poor representative document. The previous Parish Plan invited views from all parishioners with an initial questionnaire. This plan contains the views of a few people compiled into a draft document which was not even distributed to each household. Villagers were expected to sit in the garage or shop to read it. This probably excluded a large section of the community, older residents like me! The Parish Council state that 50 people responded to the draft that is less than 5% of the population of Napton. Warwickshire County Council considered 140 responses 28% of the 500 survey forms for the housing needs survey as a good return. The response to this Draft Plan falls

Rep.No.	Name	Policy/Section	Representation
			<p>well short of this and the impact and importance for villagers has considerably more consequences. Of the 50 respondents to the draft just 8 people, less than 0.8% of villagers and only 16% of respondents thought there was anything important about the agricultural land off Vicarage Rd e) what this plan calls "pastoral field above Quincy Meadow Development" hardly a mandate to include it as a Local Green Space. This area has been put in this category on the suggestion of someone at Stratford Council, hardly Community led! This field does not fit the criteria to be included. Beauty :- it is not visually attractive, it does not contribute to the character or identity of Napton where houses over the years have been built on the sides of the hill filling in the spaces. This plan has tried to link it up with other open spaces but that is contrived and subjective. Historic significance:- none Recreational value:- none of significance, the footpath and occasional sledging without permission could be said for other fields round the village. Tranquillity:- definitely not it is next to the road through the village. Richness of wildlife:- The field is grazed and almost surrounded by houses so this is not appropriate. All of the other areas do not need this classification. Other policies i.e. the Core Strategy and the SSI on d) are adequate protection. Napton has a lot of Green areas within the village and countryside all around. The copse is just a few insignificant trees in need of management. The field up by the church is nothing special either it needs fencing to prevent the abuse by dog walkers</p>
		Policy 10	Object - Only 1, 3, and 6 are good views The last paragraph excludes any development of any kind in Napton and is very subjective
		Policy 11	Object - Don't think the land at the top of Howcombe Lane in c) should be included here
		Policy 12	Object - Trees in Napton have always caused a problem this does nothing to take residents views as a high priority
		Policy 13	Object - 15 is convenient but not essential to be on this list
		Policy 14	Object - policy needs a lot of detail to protect the character of the village already been spoilt with

Rep.No.	Name	Policy/Section	Representation
		Community Aspiration 1	green boxes not being placed in inconspicuous places
		Community Aspiration 2	Object – Not realistic Object - Napton doesn't need an extended network of footpaths to maintain. As far as accessibility this Plan has been produced without consideration for the accessibility for older parishioners who do not have mobility, access to a computer or the internet so they can give their responses on this form. Neither is there a section to comment on this whole process
NoH024	(Resident; Business/work in area)	Policy 1	Object - The BUAB doesn't appear to be fit for purpose - there is no identified land available for development within it. There is limited account to the Housing Needs Survey or the previous Neighbourhood Plan - so isn't a DEVELOPMENT plan. There is no plan for allowing safe parking for residents for it to be carried out sensitively. There is much said about developing visitors to the village but no account of where they can park safely. No mention of electric charging points or bicycle storage
		Policy 2	Object - The definition of Affordable Housing is now misleading. We would all like an affordable home. I believe that there is opportunity to develop quality eco homes that local people or connected people could afford should be a priority. There appears to be satisfactory social housing in the village but there is a gap for the private family home that is affordable
		Policy 3	Object - This is not clear. We have recently gained planning permission for a self-build adjacent to the BUAB but the process was very traumatic for the family. We understood national policy and fit criteria but still were not supported by the Parish Council. The policy is very restrictive and open to personal interpretation. This policy doesn't SUPPORT self-build but restrict it! self-build and custom build will add to the individuality of the village and preserve that we don't have a large development looking the same as other villages.
		Policy 4	Object - we have lived in the village for over 20 years. The brickyard site has 'always' been on the table for development but nothing has happened. we believe that although we would appreciate

Rep.No.	Name	Policy/Section	Representation
			<p>something done to the site to tidy it up, it has now become not viable for housing development. Access is poor and it's hard to see how cycle and walking routes would work. we don't believe it would feel part of the village. It is in a developed commercial area of the village and seems reasonable to expect that this could be further developed as commercial. Noise and air pollution from the existing commercial businesses shouldn't be penalised if residential housing was done. we did like the idea of some work/life housing which seems appropriate in the canal setting</p>
		Policy 5	<p>Object - This policy is essence a 'nice idea' with no practical application. it is difficult to understand how business can be developed whilst restricting an building development or no parking allocation. Tourism is only a small aspect of business development. imaginatively working to develop the Brick Yard site would seem very sensible and appropriate. Both in tourism (canal) and industrial heritage, plus affordable work/live space</p>
		Policy 6	<p>Support - this would need to be financially viable and not just 'talk'. we have had NO support that we are building an Eco house trying to minimise carbon footprint and THIS WAS NOT SUPPORTED. We would support a policy that doesn't apply URBAN solutions to our RURAL setting.</p>
		Policy 7	<p>Support - this Policy would need to take account of utilising current and future developments in products and be sympathetic to this. we live in one of the village listed homes and love it. future government legislation may make preserving these homes un-viable</p>
		Policy 8	<p>Support - Preserving our canal heritage comes at great expense and this needs careful consideration. we would really appreciate this policy in conjunction with Policy 4 but made contemporary</p>
		Policy 9	<p>Object - we don't believe that the Parish can determine without consultation with the Landowner what happens to their land! This seems to be very divisive and not in the spirit of the community working together. We are not against a proposal for The Parish to purchase community land and preserve but feel uncomfortable having a policy that prevents landowners . It is their land and is</p>

Rep.No.	Name	Policy/Section	Representation
		Policy 10	private. We would want definition of 'special circumstances' Object - As the village grows views will change. We don't believe that a policy can say 'that's a nice view, we don't want that to change' - it's like sitting on a beach watching the tide coming in and not wanting it to change! Other views may be opened to the village, We feel uncomfortable that this is going into a policy, however, we do appreciate these views.
		Policy 11	Object - We feel uncomfortable that this would be policy. Each planning application must be read in isolation and no precedence taken. If there is no identified building plots inside the BUAB to further restrict ANY development outside that with this policy would mean that NO development could be done. This is unrealistic for a community to grow and prosper and quickly would become affordable.
		Policy 12	Object - This is not development! or realistic! of course we would want our natural habitats to be protected as far as possible, but that is not always reality. There is no consideration to climate change and the impact this will have on our changing landscape
		Policy 13	Support - partially support ##### There is no provision for adequate safe parking for these activities. with the lack of development in the BUAB it would be difficult to replace these services at a new (possibly better) site fully compliant with current or future accessibility requirements and any climate change directives
		Policy 14	Support
		Community Aspiration 1	Support - there would be a financial requirement to support measures and we are not sure where this would come from for it to be realistic objective. We are a small village mostly situated off the main road with limited traffic only at certain peak times. Parking again is a priority.
		Community Aspiration 2	Support - We don't like the OR between a or b. We believe that we should aspire to both where practically possible. Again our concern is where finances would come from

Rep.No.	Name	Policy/Section	Representation
NoH025	(Resident)	Policy 1	Object - The Character Assessment associated with this Plan and referred to in e) is suggestive and inaccurate, there are areas of Napton not mentioned but it continually refers to "gaps and open spaces". It is written without understanding of the historical development of Napton and its real character of homes built on the sides of the hill gradually filling in the open spaces over the years following Stratford on Avon's policy of infilling. The village has roads and a canal encapsulating the village. Nothing would be built in the village by the restrictions in this policy. All building of homes or extensions would overshadow, overlook, be within a gap or space and its roofline would be visible. Almost all homes in the village do this, it is Naptons character!. The Housing Needs Survey if used should be renewed annually because it soon becomes dated , other evidence of need should be used such as market information and availability of different sized houses for sale. All the Housing Needs Survey helps with is affordable housing need, other needs change continually.
		Policy 2	Object - Napton has enough for the duration of this plan
		Policy 3	Object - As with policy 1 this policy rules out any building in the village or on the periphery most sections are subjective including e) self-build is not supported at all
		Policy 4	Object - A more proactive approach needed here if the area is to be improved. This policy does not reflect this with the specified number restriction (80) without any evidence base to say this would be a feasible proposal for a developer. Also with the unrealistic conditions
		Policy 5	Object - The same as policy 1 this policy does not SUPPORT business in this policy. It is not possible to support business without impacting neighbours' views etc., positive consideration would be more useful with suggesting how support can be given, otherwise this is just a policy with no justification. The support for tourism is misguided does Napton need more marinas and caravan parks? Campaigns in the past have objected to marinas. perhaps tourism is a too general term
		Policy 6	Object - This plan is supposed to be community led, however it seems that just 5% of the parishioners are considered to have an overriding influence with this plan so confidence on

Rep.No.	Name	Policy/Section	Representation
		Policy 7	"community led" development in the last paragraph is negligible and without clarity what percentage constitutes the community this policy should be removed.
		Policy 8	Support
		Policy 9	Support
			<p>Object - I have had an interest in Parish matters over the last 35 years more than 25 of those as a Parish Councillor in Napton. Never in all that time have I heard of any need for a policy like this. I worked hard with other councillors to provide the village with an excellent Sports facility, had this policy been on the old field, the village would now be without a school and this sports field. It needs the protection from Stratford's control by trustees from the village . The land by the church and the copse are nothing special to justify this designation. The land used as the fisheries off brickyards road d)already has an SSI on it so this is not needed. Which leaves the agricultural field off Vicarage Rd which this plan calls a pastoral field above Quincy Meadows Development e). This field is not and has never been special to the village. I have never seen any evidence to suggest that it is special. There is evidence that in the 2011/12 Housing Needs Survey that it was the preferred site by the community for housing, however the Parish Council at the time decided to disregard the community and supported housing on the outside of the village on Priors Marston Rd. The field does not fit the criteria for a Local Green Space. Beauty :- it is not an attractive area. This plan has tried to contrive a link with other open spaces but it is not feasible. Historic significance:- none Recreational value:- it has a footpath and very occasionally without permission been used to sledge, the same as other fields in the village who are not in this proposal. Tranquillity:- The field is close to a road so not quiet. Richness of wildlife:- sheep graze this field it has houses in close proximity so no more wildlife than anywhere in the village. The draft Plan identified just 8 people who thought this field was important out of 1144 parishioners that is less than 0.8%. Hardly a mandate to include it in this policy. It was someone at Stratford Council charged with checking the legality of this plan who suggested the field was given this designation therefore the Parish Council cannot claim that the plan is community led as they</p>

Rep.No.	Name	Policy/Section	Representation
		Policy 10	have written on their website. No mention is made of the field right next to this one on Godsons Lane in either the Character assessment or this plan
		Policy 11	Object - only 1, 3, and 6 are good enough maybe remove the tree from the view at the churchyard
		Policy 12	3. 5 is spoilt by the estate on Priors Marston road. The Character Assessment says this development fits into the village which is also subjective.
		Policy 13	Object - don't agree with the field at the top of Howcombe Lane in c)
		Policy 14	Object - Villagers have problems with trees in the village which is not reflected in this policy
		Community Aspiration 1	Support
		Community Aspiration 2	Object - There is nothing to say communication with utility companies should be better thinking of the situation of the green boxes in the village could have been better placed
			Object - Sounds good but a lot not feasible
			Object - do not need more footpaths to maintain. As to accessibility this plan leaves a lot to be desired in this respect. The consultation process has been poor and not very accessible to the elderly and others without mobility or technology. The previous Parish Plan consulted with the whole village this plan it seems has been written with the contributions from about 50 people which cannot claim to be representative of villagers for such an important document
NoH026	(Business/Work in area)	Policy 1	Object
		Policy 2	Object
		Policy 3	Object
		Policy 4	Support

Rep.No.	Name	Policy/Section	Representation
		Policy 5	Support
		Policy 6	Support
		Policy 7	Object
		Policy 8	Object
		Policy 9	Object - Despicable idea that a small group of people can make decisions on privately owned land!
		Policy 10	Object
		Policy 11	Object
		Policy 12	Support
		Policy 13	Support
		Policy 14	Support
		Community Aspiration 1	Support
		Community Aspiration 2	Support
NoH027	(Business/work in area)	Policy 1	Object - This policy prevents any planning
		Policy 2	Object - no more needed
		Policy 3	Object - This prevents any in the village
		Policy 4	Object - This prevents any realistic prospect of finding a developer to improve this site
		Policy 5	Object - This [policy prevents anything

Rep.No.	Name	Policy/Section	Representation
		Policy 6	Object - Community led is too vague how many people does this refer to
		Policy 7	Support
		Policy 8	Support
		Policy 9	Object - Not necessary on any of these proposed areas most don't fit the criteria
		Policy 10	Object - only 1, 3, 4, and 6
		Policy 11	Object - to the inclusion of the field top of Howcombe lane
		Policy 12	Object - Trees and tall hedges a problem in Napton
		Policy 13	Object - don't think 15 should be in the list
		Policy 14	Object - see what a mess utilities make in the village need more control
		Community Aspiration 1	Object - good ideas but not manageable
		Community Aspiration 2	Object - no more footpaths just improve the existing ones within the village This plan not accessible lack of information not many notifications about it only found out at last minute. Must be difficult for older people in the village in winter to access this information and make a contribution to this plan. I'm sure their views and knowledge would be of value.
NoH028	Unknown	Policy 9	Object
		Policy 10	Object
		Policy 11	Object
		Policy 12	Object
		Policy 13	Support

Rep.No.	Name	Policy/Section	Representation
		Policy 14	Support
		Community Aspiration 1	Support
		Community Aspiration 2	Support
NoH029	<i>(Business/ work in area)</i>	Policy 1	Object
		Policy 2	Support
		Policy 3	Support
		Policy 4	Support
		Policy 5	Support
		Policy 6	Support
		Policy 7	Support
		Policy 8	Support
		Policy 9	Object
		Policy 10	Support
		Policy 11	Object
		Policy 12	Support
		Policy 13	Support
		Policy 14	Support

Rep.No.	Name	Policy/Section	Representation
		Community Aspiration 1	Support
		Community Aspiration 2	Support
NoH030	(Resident)	Policy 1	Object - This policy excludes all development of any kind
		Policy 2	Object - Enough in the village for now
		Policy 3	Object - This excludes any development
		Policy 4	Object - This successfully eliminates the possibility of a successful improvement to this site particularly with the number 80 units which might not be feasible what formula was used to work out that number
		Policy 5	Object - This policy also excludes any support and loosely encourages more marinas and caravans?
		Policy 6	Object - this gives the go ahead for wind turbines not confident in the PCs ability to control mitigation
		Policy 7	Support
		Policy 8	Support
		Policy 9	Object - This policy not needed. b c e don't fit criteria a an asset of the villagers PC should be looking after assets not compromising the future like this d has SSI on it
		Policy 10	Object - 1,3,4 and 6 only
		Policy 11	Object - not c field of Howcombe Lane
		Policy 12	Object - Trees often cause problems with views in the village this is not addressed in policy
		Policy 13	

Rep.No.	Name	Policy/Section	Representation
		Policy 14	Support
		Community Aspiration 1	Object - more control needed by PC over utilities and electronic communications. Does the policy mention where mast can and can be put?
		Community Aspiration 2	Object – not feasible
			Object - no more footpaths just improve existing ones This plan has not been accessible considering its importance. Only written using the views of about 50 less than 5% of parishioners. not representative of the village. Is there a percentage required before the plan is valid as a document?
NoH031	<i>(Resident & business/work in area))</i>	Policy 1	Object - Unrealistic. There is no development land within the draft BUAB. SDC own policy states that such land MUST be included within any BUAB- without such land it's simply a big line drawn around the village gardens
		Policy 2	Object - Too strict a guideline - each case needs to be looked at individually
		Policy 3	Object - No land has been identified. Every piece of land put forward in the SAP was not supported, in each case finding some fault. This goes unnecessarily far to make finding a plot as good as impossible. If such considerations need to be taken into account, then some suitable sites MUST be put forward by those proposing these limitations.
		Policy 4	Object - This is a former industrial site and should stay as such. All surrounding buildings are industrial. There is a shortage of industrial warehouse type buildings in the area. We know as we have been looking for the past 5 years to purchase a suitable unit. If residential properties are built they would not be part of the community. If some residential is to be built then it should be work-live units.
		Policy 5	Object - As a business person, these multiple conditions [a to g] very much narrow down the possibility of actually achieving what the question is about- ie promote local businesses.

Rep.No.	Name	Policy/Section	Representation
			Seemingly they are saying; we'd like more business but only if it doesn't in the least bit impinge on our village!
		Policy 6	Support
		Policy 7	Support - The trouble with having listed buildings that cannot be improved, leads eventually to their unsuitability for every day families to live in them. There has to be a level of realism attached to these fine aspersions.
		Policy 8	Object - Again the conditions all but contradict the proposal as to make any development all but an impossibility. These conditions put forward, when taken together as a whole, all but ensure that there'll be no development.
		Policy 9	Object - Really cannot see why, living in the countryside as we do, that we should have objections to these parcels of land being developed. We are not looking at a city or urban landscape where one needs to protect small parcels of land within the housing areas, we live 2 minutes from rolling green pastures. Why do people feel that this village shouldn't be further developed as it has been throughout its long history? Are we to pickle it in aspic in the 2020's... and if so, why?
		Policy 10	Object - As per last question; we live in the middle of the countryside with great views all around the village. Some of the views listed here are worth safeguarding, but there are too many of them, and some with little to no merit.
		Policy 11	Object - The draft BUAB must have some land within its boundaries otherwise I'm not sure at all where any one could ever build within a 3 miles radius of the village.
		Policy 12	Object - Whilst agreeing with protected trees, I'd say that they are already adequately covered by other means. Hedgerow should be encouraged but as they can be replanted, I believe that overall the emphasis should be on promoting further planting and not trying to keep in many cases poorly maintained hedgerow simply because it's been there a few years. Quality not

Rep.No.	Name	Policy/Section	Representation
		Policy 13 Policy 14 Community Aspiration 1 Community Aspiration 2	quantity is important too. Support - Whilst supporting these objectives and businesses, it is important to recognise that as businesses they have to be viable! and not just cake decorations! Support - Pls Let's not object to mobile phone masts again. Support Object - Not sure why this is a question of supporting (a) or (b) -- shouldn't we be supporting both?
NoH032	(Resident)	Policy 1 Policy 2 Policy 3 Policy 4 Policy 5 Policy 6 Policy 7 Policy 8 Policy 9	Object Object Object Object Object Object Support Support Object - In addition to my previous comments I would like to point out that none of the owners of these designated sites were officially informed that this was being proposed. This cannot be the correct way to do things

Rep.No.	Name	Policy/Section	Representation
		Policy 10	Object
		Policy 11	Object
		Policy 12	Object
		Policy 13	Support
		Policy 14	Object
		Community Aspiration 1	Object
		Community Aspiration 2	Object
NoH033	(Resident)	Policy 2	Support - properties often need to be 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
		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 increasingly 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,

Rep.No.	Name	Policy/Section	Representation
			<p>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 Crump - 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 Rock - Cllr Rock gave an update from the SDC climate change task and finish group:- ➤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.</p>

Rep.No.	Name	Policy/Section	Representation
		Policy 7	<p># 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. 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 8	<p>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.</p>
		Policy 9	<p>Somehow extra funds need to found (£106?) for canal towpath repairs - especially between the A425 and the Folly Inn.</p> <p># 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</p>

Rep.No.	Name	Policy/Section	Representation
		Policy 12	biodiversity - and not to spaces that look green and pleasant. Needs changing
		Policy 13	Support - # needs more TPO's as some large mature trees have 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 in protecting playing</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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 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>

Rep.No.	Name	Policy/Section	Representation
			<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 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>

Rep.No.	Name	Policy/Section	Representation
			<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 your 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>We would encourage you to include a policy which ensures that developers follow the drainage hierarchy which is included within Planning Practice Guidance Paragraph 80,</p> <p style="padding-left: 40px;">“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.”

Rep.No.	Name	Policy/Section	Representation
			<p>The inclusion of the following policy wording is recommended:</p> <p><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>We would encourage you to go further in your policy wording regarding 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. We therefore encourage you to include the following policy</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. We want 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. We are supportive of the principles of blue - green corridors and making space for water. To enable planning policy to support this approach, we would recommend that the following wording is included within your 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>

Rep.No.	Name	Policy/Section	Representation
NoH037	<i>(Natural England)</i>		Natural England does not have any specific comments on this draft neighbourhood plan.
NoH038	<i>(Highways England)</i>	General	<p>In relation to the Napton-on-the-Hill Neighbourhood Development Plan, our 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>We note 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, we do not expect 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	<i>(National Grid)</i>	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> <p>National Grid has identified that it has no record of such assets within the proximity of sites planned for allocation within the Neighbourhood Plan.</p>

Rep.No.	Name	Policy/Section	Representation
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. 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 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>

Rep.No.	Name	Policy/Section	Representation
			<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.</p> <p>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 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> <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>

Rep.No.	Name	Policy/Section	Representation
			<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></p> <p>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 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>

Rep.No.	Name	Policy/Section	Representation
		Policy 1, 2 & 3	<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>‘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>

Rep.No.	Name	Policy/Section	Representation
			<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 result in the loss of bungalows will be resisted except in exceptional circumstances.'</p> <p>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.</p> <p>Policy 5 has been rewritten from the earlier draft and is new to the public. The policy is splits in</p>
		Policy 4	
		Policy 5	

Rep.No.	Name	Policy/Section	Representation
		Policy 6	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.
		Policy 8	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 farm adjacent to the village. Both might be found to be promoted by this wording which I am sure would not gain approval from 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.
		Policy 9	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 canal and river trust objectives. Such considerations are not presently mentioned. I pointed this out in my first submission.
		Policy 10	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 14	The reduction in the number of views and the selection I find satisfactory. The photograph of View 6 does not match the map 120° vista – I would agree with the arrows on the map - from Dannells Hill to the Dassett Hills. A more panoramic 120° 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.'

Rep.No.	Name	Policy/Section	Representation
		Community Aspiration 1	I maintain my earlier comments from reg14.
		Community Aspiration 2	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.
		SEA Screening	<p>I maintain and reinforce my earlier comments from reg14 re Banbury. See Aspiration 1 above.</p> <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 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 availed at the time', I would have thought the maps should be updated as this is 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>

Rep.No.	Name	Policy/Section	Representation
			<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:</p> <p>DOC A – NRSecA Reg 16 Response</p> <p>DOC B - NRSecB Response to Responses NDP App7</p> <p>DOC C1 – NRSecC1 Brickworks Questionnaire</p> <p>DOC C2 – NRSecC2 Brickworks Consultation Data</p> <p>DOC C3 – NRSecC3 Brickworks Survey Numerical</p> <p>DOC C4 – NRSecC4 Brickworks Survey Report</p> <p>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 England considers that the Plan takes an exemplary approach to</i></p>

Rep.No.	Name	Policy/Section	Representation
			<p><i>the historic environment.</i></p> <p><i>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”.</i></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</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 utilized 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
		<p>Protecting the character and setting of the village</p> <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>
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 currently written in, it is a pre-defined view of what the community might, or</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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 full comments on the first draft are attached to this email as: Neighbourhood Draft Plan Final.pdf</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 a 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. Two questions that needs to be asked are: why were all of the 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</p>

Rep.No.	Name	Policy/Section	Representation
		Policy 1	<p>the letterboxes to give them a real chance to comment? 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>
		Policy 2	<p>a) 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</p> <p>b) As it stands, this statement is at odds with a) as no potential land either exists or has been identified as existing</p> <p>c) Comment on b) applies</p> <p>d) Needs to include a reference future housing needs surveys – this is a dynamic demand</p> <p>e) f) g) h) & i) Comment on b) applies</p> <p>Object –</p> <p>f) Affordable Housing is a defined term. The definition needs to recognise that</p> <p>g) there may be requirements for "Local Market Housing" as defined in comments</p>

Rep.No.	Name	Policy/Section	Representation
		Policy 3	<p>h) for Policy 1 above. It is important for the community that its future sustainability</p> <p>i) includes providing low cost housing for starter buyers on limited means as well</p> <p>j) as suitable housing for downsizing for the elderly</p> <p>k) Or located in an expanded BUAB, if community support is forthcoming</p> <p>l) As well as any future Housing Needs Survey that is carried out</p> <p>m) Yes</p> <p>n) This is badly written. It needs to be clarified so that it is equally inclusive for Local Market & Affordable House [Housing Association Development]</p>
		Policy 4	<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>
		Policy 5	<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>

Rep.No.	Name	Policy/Section	Representation
			<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>
		Policy 6	
		Policy 7	Support - Comments made in Q17 would provide a very suitable solution for Policy 6 to be met in full
		Policy 8	
		Policy 9	Support
		Policy 10	Support
		Policy 11	Support
			Support
		Policy 12	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 13	
		Policy 14	Support

Rep.No.	Name	Policy/Section	Representation
		Community Aspiration 1	Support
		Community Aspiration 2	Support
			Support
			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	<i>(St Philips Ltd – Napton Brickworks)</i>	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</p>

Rep.No.	Name	Policy/Section	Representation
		General	<p>in full in the accompanying letter to Stratford upon Avon District Council</p> <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 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</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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 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. 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.

Rep.No.	Name	Policy/Section	Representation
			<ul style="list-style-type: none"> • 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 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:- <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'). • 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 reclamation and remediation of a former brownfield site, the removal of anti-social activities and the removal of a current

Rep.No.	Name	Policy/Section	Representation
			<p>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 walking and cycling route along Brickyard Lane to/from Napton-on-the-Hill. This could improve the viability of</i></p>

Rep.No.	Name	Policy/Section	Representation
			<p><i>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><i>Policy 4 – Site of the former Napton Brickworks</i></p>

Rep.No.	Name	Policy/Section	Representation
			<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 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</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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>17. The first part of Policy 4 goes on to say that the Parish supports the allocation of the Site providing that development:</p>

Rep.No.	Name	Policy/Section	Representation
			<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 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>

Rep.No.	Name	Policy/Section	Representation
			<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 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>

Rep.No.	Name	Policy/Section	Representation
			<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> <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>

Rep.No.	Name	Policy/Section	Representation
			<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 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>

Rep.No.	Name	Policy/Section	Representation
			<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> <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;

Rep.No.	Name	Policy/Section	Representation
			<p>d) confirmation that the NNP recognises that the CAB TECH land lies outside the Site boundary;</p> <p>e) the removal of reference to self-build plots from Policy 4; and</p> <p>f) the removal of View 6 from the NNP.</p> <p>St Philips objects to:</p> <p>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;</p> <p>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;</p> <p>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> <p>St Philips proposes that:</p> <p>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;</p> <p>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</p> <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> <p style="padding-left: 40px;">- 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);</p>

Rep.No.	Name	Policy/Section	Representation
			<p>- Core Strategy Policy AS.10 (criterion (g)) further supports its redevelopment;</p> <p>- 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> <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 following basic conditions, in that it does <u>not</u>:</p> <ul style="list-style-type: none"> • 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><u>Policy H1</u></p>
		Policy H1	

Rep.No.	Name	Policy/Section	Representation
			<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:</p> <p style="text-align: center;">“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>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</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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. 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. 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>

Rep.No.	Name	Policy/Section	Representation
			<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> <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</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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> <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</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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 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 style="text-align: center;">“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</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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 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</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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 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 style="text-align: center;"><u>"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) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan." (our emphasis) (Paragraph: 019 Reference ID: 37-019-20140306)</u></p>

Rep.No.	Name	Policy/Section	Representation
			<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>:</p> <ul style="list-style-type: none"> • 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>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 meantime there are any queries or you require further information, please do not hesitate to contact me.</p> <p>Please also see:</p> <p>3325-01Z Site Plan</p> <p>3325-02 Site Plan in Context</p>

Rep.No.	Name	Policy/Section	Representation
			3325-021 Location Plan
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>

Rep.No.	Name	Policy/Section	Representation
			<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>

Rep.No.	Name	Policy/Section	Representation
			<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-build sites should be included (only once they have received appropriate consent and a</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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 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</p>

Rep.No.	Name	Policy/Section	Representation
			<p>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	<i>Stratford District Council</i>	General	There is too much repetition throughout the document and text copied from the Core Strategy which in some cases is unnecessary.
		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.
		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:

Rep.No.	Name	Policy/Section	Representation
			https://www.stratford.gov.uk/planning-building/site-allocations-plan.cfm
		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.
		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.
		General	There doesn't appear to be a policy for new dwellings in the countryside such as rural workers dwellings etc.
		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.
		Page 4	It would be helpful if a list of Maps and Figures were included.
		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 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.

Rep.No.	Name	Policy/Section	Representation

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