

Long Itchington Neighbourhood Plan

Consultation Document

1. Introduction

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012, Section 15(2). Part 5 of the Regulations states that a Consultation Statement should:

- a) Give details of the persons and bodies consulted about the proposed neighbourhood plan;
- b) Explain how they were consulted;
- c) Summarise the main issues and concerns raised by the person consulted;
- d) Describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

2. Communication and Engagement Strategy (agreed July 2015)

Long Itchington Parish Neighbourhood Plan

Communication and Engagement Strategy

Principles

- To provide a range of opportunities to engage, consult and inform **all** residents and employees within the parish about the Neighbourhood Plan.
- To ensure transparency across all aspects of the development of the Neighbourhood Plan
- To ensure that all communications are clear, jargon-free and appropriately worded for their target audience
- To keep accurate records of all communications

Methods of Communication

How	Who/Where/What	When
Posters	Noticeboards/shops/pubs/businesses	As required
Village Diary	Articles/Inserts (colour coded)	Quarterly
Questionnaires		As required
Email	PC email group	As required
Village events		Village Show/APM/Church teas/Film Night
Visits to village organisations	WI/Wednesday Club/Knit&Natter/Youth Club/Brownies/Guides/Young Farmers/Primary School etc	Before Vision Statement
Parish Council website	Minutes of meetings, copies of posters, news articles	As necessary
Social Media (Facebook, Twitter)	Notifications of meetings etc	As required
QR codes (?)	Access to final document	Possibly before referendum
Dedicated email address (?)	No – Parish Council one used, with one of the clerks managing NP emails	
Public Meetings	Parish/Neighbouring Parishes	
Media	Leamington Courier (Charlotte Griffin)	As required
Parish Council Meetings	Neighbourhood Plan to be an agenda item at each meeting – meetings open to public	First Wednesday of each month except August
NP Steering Group meetings	Meetings in public – alternate day and evening and venues	Regularly as needed

3. Overview of consultation process

	Consultation	Date(s)	Attendees/Distribution numbers/ Responses
1.	Launch Meeting plus Initial Consultation to elicit priorities for Vision Statement	3 rd October 2015 Community Centre	45 people Post-its informed the formulation of the Vision Statement
2.	Letters to /meetings with local businesses and organisations	September 2015 to June 2016	26 organisations or businesses contacted, 8 responded, meetings with 4
3.	Vision statement	July 2016	All households in the Parish, plus noticeboards.
4.	Questionnaire and Housing needs survey	Sept-Oct 2016	All households. 74% response rate. 51 business questionnaires completed. 39 Housing Need questionnaires returned to WRCC
5.	APCM updates	April 1 st 2017 (presentation) 21 st April 2018 (stall) 25 th April 2020 (cancelled due to COVID-19)	

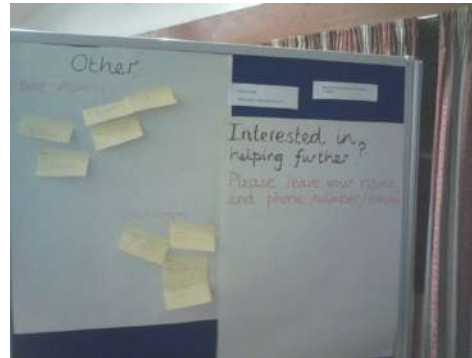
	Consultation	Date(s)	Attendees/Distribution numbers/ Responses
6.	Diary entries	<p>May 2015 – appeal for volunteers</p> <p>September 2015 – launch meeting advertised and flyer</p> <p>January 2016 – update</p> <p>May 2016 – update</p> <p>July 2016 update and Vision Statement</p> <p>September 2016 – questionnaires</p> <p>May 2017 – update</p> <p>July 2017 – notification of public meeting (26th July CC)</p> <p>May 2018 – update</p> <p>July 2018 – update and publicity for Valued landscapes photography event (plus comments on draft policies)</p> <p>September 2018 – update and call for volunteers</p> <p>March 2019 – BUAB</p> <p>May 2019 – update (SDC healthcheck)</p> <p>September 2020 – Reg 14 consultation</p> <p>November 2020 Reg 14 update</p> <p>February 2021 – update on progress</p>	All households in the parish (paper copies) plus via email and on website
7.	Website	<p>All LI Diaries</p> <p>Minutes from meetings</p> <p>Questionnaire results</p> <p>Draft policies (Reg 14)</p>	

	Consultation	Date(s)	Attendees/Distribution numbers/ Responses
8.	Photo event with draft policies	August 2018 Community Centre	20 visitors (poor weather had an impact)
9.	Steering Group Meetings Policy drafting (meetings not in public)	2015-2020 Community Centre, Green Man, Steering Group members' houses, Zoom.	Venues and times alternated to ensure maximum number of people felt able to attend. In fact only two members of the public did so. Minutes of all meetings available on PC website
10	Public meeting (questionnaire results and update on progress plus Q&A)	26 th July 2017 7.30-9pm Community Centre 12 th October 2017 Church	60+ people, issues raised
11.	Consultation – policies so far	25 th February 2019 Green Man	30 people attended Detailed feedback from one resident (comments incorporated)
12.	Green Spaces	Jan 2020 (allotments) August 2020 (Cemex)	Letters sent. No response re allotments
13.	SDC health check	May-August 2019	Comments incorporated
14.	SEA assessment	March – August 2020	EA recommendations acted upon
15.	Reg 14 (Statutory pre-submission)	5 th October – 13 th November 2020	Comments reviewed, considered and Policies amended where appropriate.

1. Initial Consultation to elicit priorities for Vision Statement

- Copy of meeting flyer distributed to all households
- Topic areas (Housing, Employment, Transport, Open Spaces, Natural Environment and Key Issues) on boards in Community Centre with post-its for people to add their concerns and priorities.
- This information was used to inform the Vision Statement (October-December 2015)





2. Letters to /meetings with local businesses and organisations

- 26 organisations or businesses contacted, 8 responded, meetings with 4

3. Vision statement

- Distributed with the Diary to all households and displayed on noticeboards and on the Parish Council website July 2016

4. Questionnaire and Housing Needs Survey

- Household, Individual and Business Surveys conducted by Researchcraft. Housing Needs Survey by WRCC. Distributed to and collected from all households and 22 businesses by volunteers from the parish. 74% response rate. These results informed and used as evidence base for NP policies.
- <http://longitchington.org.uk/wp-content/uploads/2017/06/Neighbourhood-plan-survey-2016-PDF.pdf>

5. APCM updates

- Presentations and/or opportunities for Q&A and updates on progress were given at the Annual Parish Meetings throughout the writing of the plan, apart from 2020 which was cancelled due to the COVID-19 pandemic

6. Diary entries

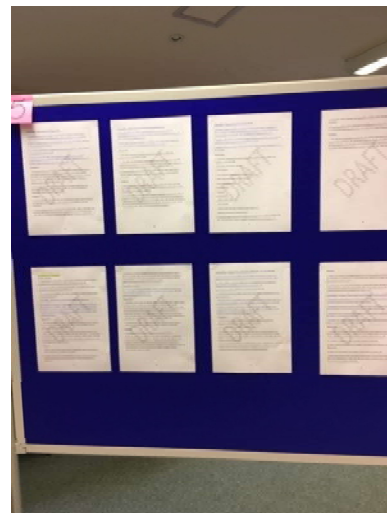
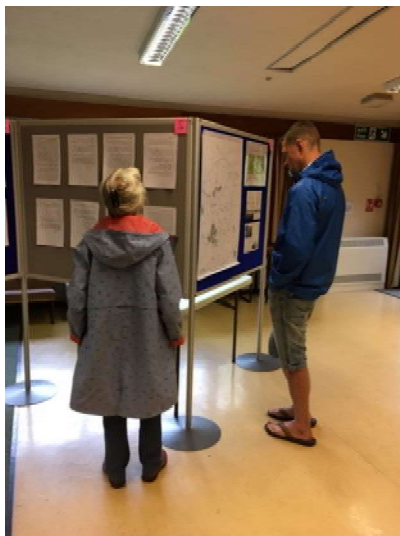
- The Diary is distributed to all households quarterly and is also on the website <https://www.longitchington.org.uk/council/parish-diary/>

7. Website

- <https://www.longitchington.org.uk/neighbourhood-plan/>
- Notices of meetings were also posted on Parish Council website

8. Photo event August 2018

- Residents were asked to submit photographs of valued landscapes for an exhibition in the Community Centre. Visitors were asked to comment why they thought each landscape was valued.
- The draft NP policies were also on display for residents to read, comment and discuss with members of the Steering Group. This informed revisions of the Draft policies



9. Steering Group meetings and Policy drafting

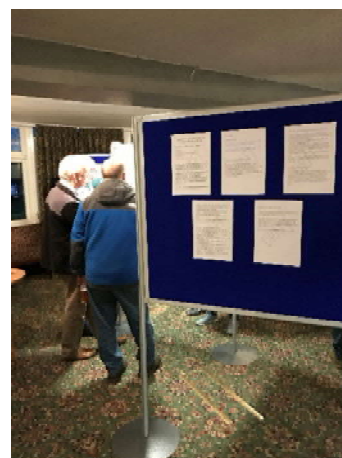
- Meetings held in public were alternated between evenings in a room in a pub in the heart of the village and daytime in the Community centre to ensure access for all residents. Meetings were publicised via the village email list (450 recipients)
- As the policies were drafted, meetings were held to go through the wording and feed back. These meetings were not held in public, but the minutes were put on the website.

10. Public meeting: questionnaire results, update and Q&A

- A meeting was held on 26th July 2017 to give feedback on the questionnaire, an update on progress and the opportunity for Q&A.
- The process was repeated on 12th October 2017 in Church as a number of residents had been unable to attend the July meeting due to other commitments

11. Green Man consultation

- A meeting was held on 25th February 2019 in the Green Man Public House, publicised by email, Facebook and posters.
- The Draft policies were displayed and the full draft document was available for more detailed perusal.
- Feedback and comments were incorporated into draft policies. See minutes from 7th March 2019.



<https://www.longitchington.org.uk/wp-content/uploads/2019/04/7th-March-2019.docx>

12.Green spaces

An Independent Assessment of Green Spaces was undertaken by Avon Planning Services. <https://www.longitchington.org.uk/neighbourhood-plan/local-green-spaces/>

Other than the Parish Council, all landowners identified as a result were consulted. SDC retained their interest, saying *“Stratford on Avon District Council, as the owner of the land, objects to the land being designated as a Local Green Space.*

The reason for this view is that there is a need for the Council to retain its existing assets and the value they represent. However there is a commitment to retain the play area, and there are no current plans to seek to change the use of the land.”

13.SDC health check

- The draft policies were submitted to Stratford District Council for a health check in May 2019. Their response was received on July 17th and their comments discussed and incorporated. See minutes from 15th August 2019 <https://www.longitchington.org.uk/wp-content/uploads/2020/01/Neighbourhood-Planning-Minutes-15th-August-2019.pdf>

14.SEA assessment

- This was submitted in April 2020 and completed in July 2020. Recommendations from the EA were incorporated into the draft document. See minutes from 19th August 2020 [Neighbourhood-Planning-Minutes-19th-August-2020.pdf](https://www.longitchington.org.uk/wp-content/uploads/2020/01/Neighbourhood-Planning-Minutes-19th-August-2020.pdf) ([longitchington.org.uk](https://www.longitchington.org.uk))

15.Reg 14 (Statutory pre-submission) Consultation

This took place in October 2020 and followed SDC’s guidelines for conducting a consultation during a pandemic.

For the purposes of this document, responses have been divided into 5 groups:

Residents, Developers (similar comments), Cemex (as a major landowner in the parish), Statutory Agencies and Stratford District Council.

A summary of the comments and our responses and actions (if applicable) are included as separate documents.

The Consultation response documents (with residents' personal details redacted) are available on the LIPC website. [Regulation 14 Consultation Responses | Long Itchington Parish Council](#)

The steering group discussed and formulated their responses and actions at a series of meetings in late 2020 and early 2021.

	Consultee	Comment/recommendation	Action
	Housing Developers		
1.	Bellway Homes	<p>In summary, we consider that Policy H1 should be amended to list all of the exceptions for residential development in the open countryside that is set out in Core Strategy Policy AS.10 and Paragraph 79 of the NPPF. The Neighbourhood Plan should also consider allocating reserve sites that could be released to address the housing requirement of the emerging South Warwickshire Plan. Additionally, any reference to land in between Long Itchington and Model Village being an important element of the rural setting and potential coalescence if this land is developed should be removed from the Neighbourhood Plan (Paragraphs 2.3 to 2.5 and Policy NE1).</p> <p>We do not consider that a document dated in 2000 (<i>Village Design Statement</i>) is up to date and it also does not include any of the growth that has been delivered in the village since 2000. We consider that in order to meet the requirements of national policies and advice (Basic Condition (a)), Policy BE2 should only refer to up to date evidence.</p> <p>We seek clarity over what evidence an applicant will need to submit in addition to the technical work that will already be submitted in line with Stratford-on-Avon's Validation Criteria. Furthermore, we request that additional text is added to the policy to reference potential mitigation that may be utilised in order to mitigate a proposed development. For example, if</p>	<p>H1 amendment not needed as there are clear statements that NP is subservient to CS and NPPF. SDC advice was that our NP should align with the CS and the NPPF and not with the SAP as this is forecast to be adopted not until September 2022. SDC advice was no BUAB for MV as coalescence would be protected against.</p> <p>VDS was revisited in Questionnaire and was supported N/A Mitigation has very little impact locally</p>

	Consultee	Comment/recommendation	Action
		<p>the development will result in over capacity at the local healthcare centre, financial contributions could be provided to mitigate this impact so that it results in no adverse impact. The Preferred Options Site Allocations Plan (October – December 2020) now includes additional allocations within the catchment area of Southam College. We therefore request that reference to capacity at Southam College is removed from the Neighbourhood Plan. We therefore consider that the Neighbourhood Plan (Section 5.3 Employment and Business) should acknowledge the contribution that residential development can make to the local economy.</p> <p>In summary to our response to Policy NE1, we do not consider that the land around Viewpoint 7 should be identified as a 'valued landscape' as there is no evidence to support the proposed locations of the 'valued landscapes and views' on Figure 9. However, we consider that the development of our client's land should be able to maintain key views between the site and Long Itchington and Public Rights of Way could be provided across the site.</p>	<p>in our experience</p> <p>Done</p> <p>N/A Limited local economy and employment.</p> <p>N/A Valued landscapes are by their nature subjective.</p>
3	Gladman	<p>Gladman recommend that reference to the Core Strategy Policy CS.15 is deleted and amended to refer to the 'adopted development plan' to ensure that the LINP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004.</p> <p>Policy BE4 states that proposals should be considered against key recommendations contained in the Village Design Statement 2000. Gladman contend that this document is out-of-date, and the Parish Council should look to update the Design Statement, which is now over 20 years old, as part of the Neighbourhood Planning process.</p> <p>Gladman consider that to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations contain physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support. Gladman therefore suggest this policy is deleted.</p> <p>Gladman recommend that all references to 'planning applications must be accompanied by', 'proposals must include' or similar wording should be deleted or amended to state, 'proposals will be supported where they include...'</p>	<p>Disagree – semantics</p> <p>VDS tested in questionnaire and was supported</p> <p>Valued Landscapes are by their nature subjective</p> <p>Disagree - semantics</p>
4	Rainier Developments	[On this basis], policy NE1 of the NP is misguided in the use of the term "Valued Landscapes". It is clear that the landscape	See previous comments –

	Consultee	Comment/recommendation	Action
		surrounding the village is valued by the local community (as all landscapes are), but that does not translate into it being a valued landscape for the purposes of NPPF 170 (a). Use of the phrase “valued landscape” in this policy should be deleted forthwith.	valued landscapes are subjective
5	Newbold, Reeve and Deeley Homes	<p>In conclusion we object to the Plan on the basis that it does not align with national or local policy and we respectfully request that it be amended to include SAP site LONG.14B as a reserve site in the next draft of the Neighbourhood Plan to overcome this conflict. A copy of the SAP site plans is attached with this submission.</p> <p>In light our request that SAP site LONG.14B be included as a reserve housing site, objection is also raised to Figure 9 of the Plan. This includes two views under reference view point No 3. The more easterly of these viewpoints is from the gate at the entrance to the LONG.14B site. This is an inappropriate view to include so close to the village edge and would be incompatible with a reserve site allocation. It is not supported by the SHLAA assessment and should be removed.</p>	Disagree – it does, SDC advised alignment with CS and NPPF, not SAP.
Statutory Agencies			
6	Environment Agency	<p>We strongly recommend incorporating wording within the NDP and Policy NE4 to ensure essential maintenance access is provided to the River Itchen and for the existing flood defences.</p> <p>Any new development should have a positive effect on flood risk and the conveyance of water throughout the channel. Opportunities to reduce flood risk should be explored in all new development proposals and ensure designs are appropriately flood resistant and resilient.</p> <p>The ‘Summary Statement - Supported New Housing Development’ on page 15 should include a sentence to ensure all new development is located within Flood Zone 1 and wherever possible contribute to reducing flood risk, as well as ensuring flood risk is not increased. There should also be consideration for climate change in relation to flood risk. This is particularly prominent as Stratford-on-Avon District Council declared a Climate Emergency in July 2020.</p> <p>Policy EB3 & Policy EB4 These policies refer to change of use applications and should ensure all applications are in line with planning policy and should consider the inclusion of an additional point for ‘the proposals would not conflict with any other policies in the Plan’ as used in Policy H4.</p> <p>Paragraph 5.4. The Natural Environment Consideration of an additional Policy relating to ‘Blue and Green Infrastructure’ should be given within the Natural Environment section. We recommend emphasis on blue-green corridors as they</p>	

	Consultee	Comment/recommendation	Action
		<p>provide multiple benefits to areas including services such as flood management provision, green space, cooling local temperatures, ecological function and some amenity. All developments should create space for water by restoring floodplains and contributing towards blue-green infrastructure. Consequently, they then need to be afforded a high level of protection from encroaching developments in order to facilitate their function particularly with the need for extra capacity due to climate change.</p> <p>Policy NE4 – Flooding and Water Management The River Itchen corridor is a natural feature running through the NDP area and needs to be fully considered within this and other policies of the NDP building upon the requirements of Policy CS.4 in the Core Strategy. We would recommend strengthening the policy wording so that not only will new development not be at flood risk or increase flood risk, but that the existing flood defences will not be negatively impacted by any future development and wherever possible improved or enhanced. There is no mention within the policy regarding appropriate easements needed for the existing flood defence and watercourse. We would strongly recommend that the NDP defines a “no build zone” or easement either side of the River Itchen extending at least 8m from the top of bank and incorporating the 1 in 100 year plus climate change extent. This easement should also extend at least 8m from the toe of any flood defence structure. This will create open space and offer the opportunity to create multifunctional flood storage areas and ensure access for maintenance of both the watercourse and flood defences is maintained in the future. Without this requirement included within this policy there is a risk that encroachment onto the watercourse and/or flood defences may occur which will have a detrimental impact on the space available for water during a flood event and maintenance access. Consideration should be given to re-wording the second paragraph starting ‘any proposal that has and adverse impact...’ so that it is clearer. We support the principle however may suggest simplifying the wording similar to - ‘Any proposal that will have an adverse impact on the effectiveness of the existing flood defences along the River Itchen will not be supported.’ The policy should also include detail and reference to what works could be undertaken to further reduce flood risk in the Long Itchington NDP area. Through new development, opportunities to hold back water as well as Natural Flood Management interventions which can slow, hold back and de-synchronise the flow of water within the River Itchen catchment could be considered. Such measures could include the creation of swales, offline holding ponds and leaky dams</p>	

	Consultee	Comment/recommendation	Action
		<p>to divert water runoff, combined with strategic tree planting and other measures to enhance soil permeability. The policy should also include detail and reference to any works which could be undertaken to reduce flood risk to Long Itchington. Warwickshire County Council are promoting a scheme on the next FCERM capital programme (from 2021 – 2027) to reduce flood risk to properties in Long Itchington. Currently, within that scheme, there are opportunities to install Property Flood Resilience measures to reduce the risk of surface water flooding. We would advise contacting Warwickshire County Council for further information regarding this scheme. There is no mention of Climate Change within this policy or another specific policy solely for climate change. We would welcome inclusion of a climate change policy within the NDP due to the Climate Emergency declared in July 2020. Reference to the Development Requirements SPD, Part V: Climate Change Adaption and Mitigation should be made.</p> <p>We note the Water Framework Directive (WFD) has been mentioned in the evidence base for this policy. The River Itchen (conf R Stowe to conf R Leam - GB109054044110) is classified as having 'Moderate Ecological Status or Potential' and under the WFD there is a requirement for all waterbodies to meet 'Good Ecological Status or Potential' by 2027. The policy could be strengthened to secure water quality improvements where possible and align with Stratford-on-Avon District Council's Core Strategy 2011 to 2031, in particular Policy CS.4 Water Environment and Flood Risk. Reference to this may be more suited under Policy NE5 – Environmental Pollution. Finally, we would strongly recommend that this policy includes wording around the use of silts or voids within development proposals. The use of stilts and/or voids to mitigate the impacts of flooding and climate change is not appropriate. Areas under stilts/within voids are often used as storage spaces and have the potential to become blocked during flood events which will have a cumulative impact in terms of flood risk. Therefore, we recommend including wording within the NDP policy to discourage the use of stilts and/or voids in the design of developments at risk of flooding.</p>	
7	Canals and Rivers Trust	<p>We consider that Policy EB2 strikes an appropriate balance between supporting tourism-related development whilst emphasising the importance of ensuring that any such development does not harm the special character of the area. We consider that the policy should ensure that appropriate allowance for new development associated with and supporting the role of the canal as a visitor attraction can be made without risking harm to the character and attributes that contribute to making it such an attraction.</p>	Agree and welcome the support

	Consultee	Comment/recommendation	Action
		<p>The proposed designation (<i>of LGS 12</i>) will assist in protecting the character and setting of the canal here, along with its value as a wildlife habitat and reduce potential risks to the stability of the embankment slope that could occur as a result of building close to the toe of the embankment.</p> <p>Designation of this area (<i>LGS 15</i>) as a Local Green Space should further secure long-term protection of this landscaped buffer which helps to both soften the visual impact of the new development on the canal and to enhance and support the ecological value of the canal corridor as a wildlife habitat.</p>	
Residents			
9	Resident 1	This is a well-written and carefully thought-out plan. It provides for a realistic and credible outlook for the future of the village and surrounding area. It has my strong support.	No action required
10	Resident 2	Allotments. Existing and future allotments should be taken under "local control" as opportunities arise.	No action required
11	Resident 3	In terms of comments, I have printed and read the entire Plan and would not presume to make any material changes or suggestions.	No action required
12	Resident 4	<p>Is it worth showing the path of HS2 across the map.? It is mentioned in Para.2.4 on Page 6.</p> <p>Comment that the rural nature of the village has already been seriously damaged by recent over-development.</p> <p>Rail services. Mention Banbury station for Chiltern/Marylebone and other cross-country services. Is there a bus service to Coventry?</p> <p>P31 Last sentence cumbersome -- "prejudice its character and distinctiveness"</p>	<p>Agree – Liz Taylor contacted by RJ and HS2 route included.</p> <p>That is already stated.</p> <p>N/A</p> <p>Need to stay positive. Leave as it is.</p>
13	Resident 5	P40 The river has not been dredged for years. Could landowners be encouraged to remove dams, debris etc?	Outside scope of the plan
14	Resident 6	<p>Not all 1960/70s bungalows are suitable for elderly residents, having too large a site for ease of maintenance.</p> <p>P30 hedges should also be protected</p>	<p>Not relevant – individual needs vary</p> <p>Agree - insert</p>
15	Resident 7	Contrary to the statements in this report, there are not adequate water/sewerage supplies for the village. Much of the East end of the village has all their rainwater draining into the narrow gauge sewer of the village centre, so that when it rains heavily the sewer cannot cope and sewage bubbles up	Agree that it is a major concern, but dealing with existing

	Consultee	Comment/recommendation	Action
		<p>into the road between the Harvester and the Co-op. Therefore, provision should be made to change some of the rainwater run-off from the East end of the village or provide a large gauge sewer through the centre of the village.</p> <p>This is an important health and safety issue which has not been addressed by the plan.</p> <p>Plan is fine but current broadband provision to the village is inadequate for many business purposes, especially after 16.00 on weekdays. This is particularly relevant for those with transatlantic/international business dealings and will be aggravated by more persons working from home.</p>	<p>sewers outside scope of plan.</p> <p>Disagree – it is referenced in NE4</p> <p>Agree, is referenced in NP but outside its scope</p>
16	Resident 8	<p>Policies C1 and C2: I fully agree with the spirit behind these policies. However, the all-embracing general aspirations fall well short of specific objectives. Perhaps any new development should be used as an <u>opportunity</u> to fulfil our community objectives - if we already have a plan.</p> <p>It should be borne in mind that 'development' and 'housing' mean 'people' who become new 'villagers' and therefore form part of our community. I speak as one of very many incomers who have joined the Long Itchington community in recent years, many of whom are living in in new developments. I suggest you avoid the use of the word 'threat' (1.4), even in the context of the sentence in which it appears. In the same vein, 'influx of 625 residents' (3.13) has a derogatory connotation: it sounds like an invasion of aliens.</p>	<p>Establishing specific objectives not within scope of plan, PC will develop</p> <p>Agree and wording amended accordingly</p>
17	Resident 9	Amenities must go alongside housing	Outside the scope of the NP
18	Resident 10	<p>Page 34 Policy EB2 Reference the cycle path?</p> <p>The plan seems to emphasize the appearance of the rural environment, while a rural environment may look pleasing to the eye without actually supporting biodiversity and wildlife. This is taken up in Policy NE3, which I support, but might be emphasized on Page 41 in Policy NE1.</p> <p>Figure 1, Page 5: Long Itchington Neighbourhood Plan Area, and the Pictorial Footpath Map (Page 57), both show the public right of way designated on the Warwickshire County Public Rights of Way Definitive Map as SM9. This public right of way is obstructed by a wire fence at its eastern end as it exits the private properties onto the pasture, and is not signposted on Marton Road</p>	<p>Agree and amended</p> <p>Referred to PC for action – outside scope of plan</p>
19	Resident 11	Policy H1 should include unallocated self-build sites that are adjacent to the village boundary	SDC's advice was to leave this for the SAP

	Consultee	Comment/recommendation	Action
20	Resident 12	The Neighbourhood Plan is a comprehensive, well-reasoned and clear statement about our village which recognises the need for future developments alongside the desire to preserve and enhance our community	No action required
21	Resident 13	<p>On the whole, we support the policies set out, however as residents of one of the new developments, we are very disappointed by the wholly negative characterisation of the impact we and our neighbours have had on the village. Right from the outset (p3), the plan sets out a “them and us” attitude which is completely at odds with the stated intention (p12, para 4.1) of ensuring that the community “remains cohesive [and] inclusive”. This is typified by the contrasting use of the words “growth” in reference to 1950s expansion and “influx” with regard to more recent development (p11, para 3.13). While it is understandable that many residents would have been opposed to the relatively large scale of developments that have taken place recently, we really think the plan should reflect the village as it is now and not as it was 10 or more years ago.</p> <p>In particular, to state that newcomers are “putting significant strain on both the physical infrastructure and social fabric of the Neighbourhood Area” (p13 para 4.6), without any supporting evidence, is unfair to the many people who support local businesses and engage in village life in various ways. Not to mention that the new developments at Lilac View, Spinney Fields and Keepers Meadow have generated substantial additional precept income for the Parish Council, even though residents have to pay separately for their grass cutting, maintenance of street lights and play areas and so on.</p> <p>The Plan also states (para 3.13 again) that “integration has been more challenging recently”. Where is the evidence to support this? More challenging for whom? In what way?</p> <p>We first visited Long Itchington in the mid-2000s and were immediately drawn to the rural character, the range of amenities and the many picturesque footpaths along the canal and in the surrounding countryside. For various reasons, we were unable to move here until a couple of years ago and one of the new-build houses just happened to most suit our needs. We don’t feel that the expansion of the village to the East has had a detrimental effect on the centre of Long Itchington or on the surrounding area. The village remains an attractive place to live. It is entirely understandable that the Parish Council does not want to see further excessive urbanisation, and we’re sure many new residents would</p>	<p>Agree – wording amended</p> <p>BA contacted him, explained we are changing the wording and discuss how and why it has been more challenging.</p>

	Consultee	Comment/recommendation	Action
		support this, but we think this argument can and should be made in a more constructive way.	
22	Resident 14	I am very impressed with the quality of the document as a whole. A great deal of research and energy has been spent to produce this plan with excellent photographic support. I hope that it will always be referred to when planning applications are considered so that our lives will continue to be enhanced by our lovely surroundings.	No action required

Response to Barton Willmore's Regulation 14 Comments on behalf of Cemex

This note responds to the comments made by Barton Willmore to the Regulation 14 Consultation undertaken by Long Itchington in respect of its draft Neighbourhood Plan (NP) in October 2020.

The letter submitted by Barton Willmore has been annotated to correspond with the following notes. Each point sets out the reasoned 'Response' to the comment and a note of the 'Action' to amend the draft NP where appropriate.

Point	Response	Action
1	The similar consultation periods for the draft NP and the SAP were coincidental. The SAP is an emerging document, not expected to be adopted until late 2022 and it would be inappropriate to incorporate the current proposals (which have been formally rejected by the Parish Council) into the NP at this stage. The reasons why no reserve sites have been identified are explained in the NP (principally the excess development already undertaken beyond that considered sustainable in the Core Strategy). Accordingly, in accordance with the wishes of local people, the NP seeks to control the scale of further housing development in order to protect the village character and rural setting of the settlements in the Neighbourhood Area. However, it is accepted that the SAP	A new NP section is to be added in the form of a statement on the status of the SAP and its relationship with the draft NP. It will confirm the Parish Council's reasoned rejection of the current SAP proposals. It will acknowledge that the NP may need to be amended to reflect the outcome of the SAP as it progresses towards formal adoption.

Point	Response	Action
	process should be referred to and its relationship with the draft NP explained.	
2	<p>The proposals in the NP must be seen in the context of the whole Core Strategy period (i.e. 2011 to 2031). The scale of new housing development undertaken in the Neighbourhood Area since its commencement to date must be taken-into-account in measuring the contribution already made to District-wide need. The excess development already undertaken above that established in the Core Strategy model for sustainable distribution across Local Service Villages is demonstrably a substantial contribution to the District-wide identified need.</p> <p>The NP acknowledges the status of the brownfield element of Cemex owned land (Core Strategy AS.11) as a potential 'windfall site' for housing, employment and other uses. If this is brought forward for development during the current Core Strategy period it would represent a very substantial further addition to the District-wide contribution from new development in the Neighbourhood Area. It is, however, acknowledged that the NP needs to be amended to clarify that proposals affecting development elsewhere in the Neighbourhood Area would not apply to redevelopment of the Cemex land included within Policy AS.11. This response is developed further in point 14 below.</p>	Amend section 5.3 of the NP to exclude redevelopment of Cemex brownfield land from NP policies affecting development elsewhere within the Neighbourhood Area.
3	<p>a) It is accepted that paragraph 4.6 of the NP requires amendment to clarify that recent growth has had a significant impact rather than putting 'strain' on the physical infrastructure and social fabric affecting Long Itchington Village. It is irrefutable that the growth in population results, for example:</p> <ul style="list-style-type: none"> - in more traffic using the local road network with greater pressure on car parking that serves local facilities and services; - a reduction in any current spare capacity that might exist in the local primary 	Amend paragraph 4.6 to clarify and elaborate on the nature of the impact placed on existing infrastructure and facilities and the challenge of a rapid growth in population to the effective integration of new residents into the community.

Point	Response	Action
	<p>school. It should be noted that not all newly built family houses are yet occupied;</p> <p>- in further pressure on the ability of the Community Centre to support local voluntary organisations considered to be at or near capacity before the major development schemes undertaken since 2011.</p> <p>None of the infrastructure or facilities mentioned have increased in capacity since 2011 and it is a logical conclusion that the rapid increase in local population has placed pressure on existing facilities. The community has always been proud of its ability to offer opportunities for new residents to become integrated and active participants but the rapid rate of growth and limited facilities has made this more challenging.</p>	
4	<p>It is not claimed that any lack of capacity at Southam College is solely as a result of recent development in Long Itchington. The point is intended to highlight that without capacity significant future sustainable development is not possible. It is acknowledged that the current draft SAP has amended the LEA's previous position and the NP will be amended accordingly. However, it is possible that this revised position might be challenged through the SAP consultation process.</p>	Amend the NP (specifically Policy BE3, Evidence, paragraph 2) to mirror the revised position regarding Southam College capacity.
5	<p>Large scale housing developments that trigger the obligation on developers to provide affordable housing are not the only option to meet housing need. There are recent examples in Long Itchington village of locally led, small scale affordable housing schemes that are an effective and more finely targeted alternative.</p>	No action proposed.
6	<p>It is not accepted that further large-scale housing development in Long Itchington is sustainable within the life of the NP/Core Strategy for the reasons referred to in point 1 above. This position, however, acknowledges the potential for redevelopment of the brownfield elements of the Cemex site.</p>	No action proposed.

Point	Response	Action
7	Cemex's position on its Stockton Road site is noted. Whilst it is accepted that Stratford District Council has proposed 'Reserve' and Self and Custom Build sites in Long Itchington, (rejected by the Parish Council) it is noted that the Stockton Road site has not been selected as a SAP option.	No action proposed.
8	It is accepted that the Policy cannot restrict redevelopment of the brownfield elements of the Cemex site as permitted in accordance with Policy AS.11 and there is no intention to do so. It is, however, strongly argued that the NP should not be required to facilitate more large-scale housing development in the light of the scale already delivered added to the potential under AS.11. Unless the community is allowed to 'control' the scale rather than 'restrict' or prevent further development there seems little point in the NP exercise and the Government's apparent commitment to 'localism'.	Amend Policy H1 and other relevant elements of the NP to ensure that development in accordance with Core Strategy policy AS.11 is supported.
9	It is correct that the Parish Council was not consulted during the preparation of the current SAP.	No action proposed.
10	It is agreed that 'live/work' could be more clearly defined. Adaptation of existing dwellings to facilitate working from home will be supported. The design of individual new homes or in small-scale developments in accordance with the policies of the NP to facilitate home working will also be supported.	Amend the NP to define 'live work' and confirm support for adaptation or new dwellings within NP policies to facilitate working from home.
11	Model Village and Long Itchington are two separate and distinct settlements. They both currently enjoy rural settings. This policy was developed following advice from Stratford District Council to ensure that incremental merging of the two settlements is avoided. It is also noted that the land surrounding Model Village to the west of the A423 is not brownfield even though it might be in the ownership of Cemex.	No action proposed.
12	As in point 2 above, it is accepted that the strategic redevelopment of the brownfield elements of the Cemex site will need to be	Amend Policy H2 of the NP to exclude its application to any redevelopment of the brownfield elements of the Cemex site.

Point	Response	Action
	considered separately in view of its potential scale and impact on the wider local area. This policy should not, therefore, apply to such a proposal.	
13	Accepted. As in point 10 above the NP should seek to define 'live/work' accommodation.	Amend the NP to define 'live work' and confirm support for adaptation or new dwellings within NP policies to facilitate working from home.
14	As previously referred to in points 2 and 12 it is accepted that the NP cannot be in contravention of Core Strategy policy AS.11. In addition to any proposal meeting the tests (a - g) set out in the policy, the section specifically referring to the Cemex site (identified as 3. Long Itchington Former Cement Works) states that "A comprehensive Masterplan must be prepared in conjunction with the owners of the site, local communities and agencies" It is contended that implicit in this requirement is that the masterplan exercise should be undertaken before any redevelopment takes place.	Amend the NP to clarify that no policy precludes the possibility of redevelopment of the Cemex site on the basis set out in Core Strategy policy AS.11.
15	It is not accepted that this policy fails to support sustainable redevelopment of previously developed land. It does however, seek to introduce a measure of control to support uses that create or maintain local (i.e. people resident in or nearby the Neighbourhood Area) employment opportunities. This will help to ensure that previously developed land helps to support the local economy rather than be redeveloped for, in most cases, housing that yields the highest financial return for land owners. The contribution to District-wide (and therefore national) housing supply within the Neighbourhood Area has already been demonstrated. It is not accepted that national policy supports only residential development at the expense of other sustainable uses that are required for healthy communities.	No action proposed.
16	It is not accepted that the Southam Cement Works is a "significant urbanising form" in this context. It is an industrial use in a rural setting (as acknowledged by its classification in Core Strategy policy	No action proposed.

Point	Response	Action
	AS.11). It is accepted that the disused chimney is highly visible but the views of the area south of Long Itchington village change depending from where they are taken (but always from publicly accessible points) so that the industrial elements of the works are not always visible. These views are also important, of course, looking away from the Cement Works towards the village as they show its rural setting.	
17	It is accepted that the views expressed here are an opinion.	No action proposed.
18	Noted.	Engagement with Cemex at the appropriate time.
19	Accepted. Improvement of access to and the extent of the footpath, cycle and bridleway network is important. Whilst proposals that help to achieve this will be supported (subject to satisfying other policies within the NP) it is still the position that proposals that have an adverse impact on the network will not be supported.	Amend SLR2 to confirm positive support for proposal contributing to improvements to the network.

In conclusion it is contended that, with the amendments noted above, the draft Neighbourhood Plan will be fit to progress to the next stage of the process towards formal adoption.

Response to Stratford District Council's Regulation 14 Comments

This note responds to the 'Significant Comments' made by Stratford District Council (SDC) to the Regulation 14 Consultation undertaken by Long Itchington in respect of its draft Neighbourhood Plan (NP) in October 2020.

The schedule of comments approved by SDC's Cabinet in December 2020 has been numbered to correspond with the following notes. Each point sets out the reasoned 'Response' to the comment and a note of the 'Action' to amend the draft NP where appropriate.

Point	Response	Action
1	The SAP is an emerging document and it would not, therefore be appropriate to incorporate the current proposals (which are opposed by the Parish Council and uncertain) into the NP at this stage. However, it is accepted that the SAP process should be referred to and its relationship with the draft NP explained.	A new NP section is to be drafted in the form of a statement on the status of the SAP and its relationship with the draft NP. It will confirm the Parish Council's reasoned rejection of the current SAP proposals. It will acknowledge that the NP may need to be amended to reflect the outcome of the SAP as it progresses towards formal adoption.
2	The draft NP is, of necessity, a complex document though it is considered that its structure is logical. No other respondent has raised similar concerns and, without specific examples of the 'policy-related content' mentioned, it is difficult to see how this could be presented in a single plan.	No action.
3	Agreed	A statement of compliance with/ regard to the requirements of the Equality Act 2010 will be added.
4	This is covered by the comments and proposed action for point 1 above.	As noted in 1 above.
5	a) It is considered that the existing structure of the document with the detailed explanation of 'the Vision' in Section 4 is logical but it is accepted that the wording of Section 1 should be amended to emphasise inclusivity and the 'whole community' approach of the draft NP. b) The draft NP does not seek to promote less development or undermine strategic policies as it factually demonstrates the substantial development that has already taken place far exceeding that envisaged in those policies only half way through the life of the Core Strategy.	a) Amend Section 1 (and any other appropriate sections) of the draft NP to address the issues identified. Also review the tone/tense of the Vision set out in Section 4. b) No action.
6	Accepted, but as previously noted and acknowledged in this comment, significant housing to support in-migration in line with the Core Strategy has already been provided.	Review and amend the text in Paragraph 4.2 as needed to acknowledge the point about in-migration but also to be specific about meeting the changing needs of existing residents.
7	Point c) is intended to apply to any site within or outside the BUAB where development is permitted in accordance with other strategic policies. The statement of support seeks to establish a standard to be achieved if a scheme is to gain local support. Adoption of the word 'should' rather than 'must' implies that the standard is optional.	Amend point c) to clarify its application.
8	a) Criterion c) seeks to provide some numeric definition of "small scale". It is acknowledged that this is not defined in the NPPF or Core Strategy CS.15 by specific number and it is therefore agreed that the wording needs to be less prescriptive whilst indicating that 10	a) Amend criterion c) appropriately. b) Ensure Policies H2 and BE2 are consistent and clarify the application of criterion c) in respect of Core Strategy AS.11. c) No action

Point	Response	Action
	units or less would be <u>typically</u> considered to be small scale for the purpose of this policy. b) Policies H2 and BE2 also need to be made consistent and clarification that criterion c) would not apply to redevelopment of the brownfield elements of the Cemex site if this is triggered in accordance with Core Strategy Policy AS.11. c) It is contended that large scale market development is not the only way to secure affordable housing. There are already examples of successful, small scale, locally-led affordable housing schemes in Long Itchington (Russell Close and Adams Close).	
9	Accepted	Amend Criterion d) ix to require screening wherever possible.
10	Accepted	Amend Criterion d) x to encourage wildlife access wherever possible.
11	Accepted	Delete reference in Criterion d) viii to Code Level 4 and insert reference to Building Regulations and Climate Change SPD 2020 here and in Policies BE4 and NE6.
12	The issue of identification of reserve sites is dealt with in the responses to points 1 and 4 above.	As noted in point 1 above.
13	Accepted.	Amend text as suggested.
14	The position on identification of reserve sites has been explained in points 1 and 4 above. This is justified by the scale of contribution already made to meeting the additional housing needs of the District and neighbouring areas identified in the Core Strategy. It is agreed that paragraph 6 should state that it refers to only residential development and does not seek to restrict other uses that are encouraged and in Core Strategy Policy AS.10.	Amend paragraph 6 accordingly.
15	Accepted.	Amend Policy H1 to include support for Local Needs Schemes in accordance with CS.15 (G).
16	Local need might include market housing (for example bungalows or other dwelling types to support the housing stock diversity aims set out in Policy H5) in addition to affordable housing. As before (points 1 and 4 above) the area's contribution to District wide need has already been far exceeded.	Amend Policy H2 to expand on this definition of local need.
17	Policy H1 will be amended to acknowledge that Local Needs Schemes will be supported in accordance with CS.15 (G) (see point 16 above). Para 2 of the Explanation will be amended to confirm that redevelopment of brownfield land to satisfy local needs housing	Amend policy H2 to confirm local need for market or affordable housing and amend Explanation, para 2 to indicate preference for meeting local need on brownfield land wherever possible rather than greenfield development.

Point	Response	Action
	will be encouraged in preference to development on greenfield sites provided that the remaining conditions set out in the policy are met.	
18	The policy supports small scale (as defined in point 8(a) above) affordable housing schemes. The Neighbourhood Plan does not support large scale, market housing schemes that would give rise to the triggers for affordable housing provision set out in CS.18 (A). It is accepted, however, that reference should be made to support for CS.18 (C) Affordability and Tenure.	Amend policy H3 to support CS.18 (C).
19	The framework for supporting Local Needs Schemes in the Core Strategy is accepted with the exception that large scale, market housing should not be the vehicle for delivery for the reasons set out in points 1 and 4 above. The objective of this policy is, therefore, not to “add value” to CS.18 but to control the way that affordable housing is delivered in order to protect the rural character of the settlements in the area.	No action.
20	Accepted.	Amend policy H3 to acknowledge support for development of all sites within the BUAB, no exclusively redevelopment sites.
21	Para. 1 of Evidence states that the need for a mix of tenures and housing types identified in the Housing Needs Survey 2016 has been exceeded as a result of market schemes since 2011. The excess has contributed to District wide need for affordable housing. It is not possible to match the specific need of respondents to the Survey as a result of confidentiality.	No action.
22	a) This paragraph affirms the aims of CS.19 and does not seek to replace it. Reference to CS.19 can be added to the policy to confirm. b) As in a) above. c) Accessible, ground floor living should be retained if a proposal for additional, upper floor conversion is to be supported.	a) and b) amend paragraphs to refer to CS.19 c) amend the paragraph to clarify the need to retain accessible ground floor living for any proposal for conversion to be supported.
23	If conversion of bungalows is permitted without any control this could reduce housing stock diversity and local provision for people requiring accessible living. The evidence presented to support this policy clearly demonstrates demand and the need to provide options for an ageing population. This would help to secure the aims of Policy CS.19 to meet local and District needs to cater for the full range of different households. The	No action.

Point	Response	Action
	amendment proposed to para. C) in point 22 above will ensure that an option is available to a property owner in the unlikely, local event that there is no demand for a single storey bungalow.	
24	Accepted	Amend text to delete 'current at the time'.
25	It is acknowledged that the level of supporting evidence this policy would require is unreasonable for minor development proposals. It is, however, an important issue to consider the impact of proposals on local services, infrastructure, environment, drainage and flooding etc. It is, therefore, proposed that the policy should only apply to proposal for more than a single dwelling. Alterations to existing properties and minor works would be excluded.	Amend text to clarify the application of the policy.
26	a) No other respondent has commented on the dispersal of design policies causing confusion. However, it is acknowledged that the policy should refer to the design standards set out in the Summary Statement - Supported New Housing Development in Section 5.2 of the document. b) Although it is not understood why cycle storage cannot be provided for apartments or flats (e.g. in a communal area) the suggested amendment is accepted. c) The criteria are not intended to be seen as alternatives. The addition of the word 'and' as suggested will make this clear.	a) Amend policy BE4 to refer to the design standards in Section 5.2 b) Amend the policy in accordance with the suggested text. c) Amend the text accordingly.
27	Accepted, the policy should allow for the replacement of diseased or unsatisfactory non-native specimens and seek to supplement and improve the contribution trees make to the natural environment.	Amend the policy accordingly.
28	Part O of the SPD states that the parking standards "... should be taken as a starting point by applicants and the proposed scheme will be assessed accordingly." There is a wide variety of residential development within Neighbourhood Area settlements ranging from recent housing estates to groups of traditional cottages built many years before the advent of motor vehicles. Accordingly, it is acknowledged that the policy would be more sensitive if it recognises Part O as a starting point guide and requires any scheme (new housing or proposals that add bed spaces to existing properties) to be assessed having regard to the individual factors set out in the policy and para. 105 of the NPPF. This will	Amend the Summary Statement - Supported New Housing Development and Policy BE4 (f) making reference to Part O of the SPD and insert a new 'Explanation' paragraph to provide the reasons for the amended policy.

Point	Response	Action
	encourage appropriate parking provision for different physical circumstances and help to avoid inappropriate on-street parking or parking on public or private green space adjacent to the highway.	
29	Accepted, screening should be provided wherever possible.	Amend the policy as appropriate.
30	As this is a factual change the paragraph will be deleted. However, it is possible that the new statement may be challenged through the SAP process. It may, therefore, become appropriate to amend the NP to reflect any final statement on local school capacity.	Delete the paragraph.
31	Policy EB1 relates to the development of new business premises or the redevelopment of existing business premises for an alternative business use. Policy EB3 relates to the redevelopment of existing business premises for a non-business use (e.g. housing). These are separate issues and, whilst it is accepted that amendment of the wording of Policy EB1 would clarify this it is considered that they should remain as separate policies.	Amend the wording of Policy EB1 accordingly.
32	Accepted.	Amend the policy to support 'small scale' caravan and camping sites.
33	Accepted, evidence of a minimum of 12 months active, open marketing would be appropriate.	Amend the policy accordingly.
34	Accepted.	Amend the policy as suggested
35	Accepted, the policy requires amendment as recommended and reference to CS Policy AS.10 (d) and (k) added to ensure consistency.	Amend the policy accordingly.
36	Accepted.	Amend the policy referring to Class Q in the Town and Country Planning (GPD) (England) (Amendment) Order 2018.
37	<p>Whilst it is acknowledged that some elements of infrastructure either have their own approval regimes or may fall within permitted development this is not always the case. For example, access roads, footpaths and drainage infrastructure forming part of housing developments or large-scale renewable energy schemes. The policy seeks to support installation subject to high quality design and as low environmental impact as possible.</p> <p>It is accepted that the policy as drafted needs amendment to reflect this and to state that where control is outside 'traditional' planning policies, the standards cited are an aspiration for service providers to take into account.</p>	Amend the policy and 'Explanation' accordingly

Point	Response	Action
38	The LONG.B proposal has been rejected (see point 1 above). This valued landscape and view is, therefore, to be retained pending the outcome of the SAP process.	No action.
39	It is contended that the proposed LGS sites meet the requirements of Paragraph 100 of the NPPF:- a) All sites are in close proximity to the community they serve; and b) all sites contribute to the distribution of green spaces throughout the built up area that is demonstrably important to local people as evidenced by the results of the Questionnaire Survey; and c) All the sites are local and not extensive tracts of land. In addition, none of the sites preclude planning for future sustainable development and all are capable of enduring beyond the life of the Neighbourhood Plan. It is accepted that reference to support for Policy CS.7 would be helpful to reinforce the importance and value of green space.	Amend the policy to confirm how the proposed LGSs support policy CS.7
40	Agreed	Text will be re-formatted to avoid confusion.
41	It is disappointing to note that SDC is the only owner of proposed LGS designated land to formally raise an objection. It is understood that as a public authority it is under an obligation to maximise the value of its assets. However, it is contended that this site has little intrinsic value and any proposal to develop it in isolation is likely to be strongly resisted. SDC's position does, arguably, emphasise the importance of its proposed LGS designation as its loss would have a significant adverse impact on adjoining residential occupiers.	No action to remove the site from its LGS designation is proposed.
42	Although some parcels of land identified are adjacent to roadways they are not part of the adopted highway. Parcels are either registered village greens or in private ownership as identified from Land Registry searches in the individual assessments included in Appendix C. It is contended that it is the dispersal of many of these sites rather than their individual sizes that is important to preserve the local character and amenity to residents.	No action is proposed.
43	Accepted	Amend Policy NE2 as recommended.
44	Displaying all the proposed LGSs on this map is helpful to illustrate the dispersal of green space throughout the built-up areas of Long	Add contact details of the Parish Council to the 'Explanation' section of the policy.

Point	Response	Action
	Itchington and Model Village. Each site can be viewed on maps of a better size in the individual LGS assessments in Appendix C. It is, however, suggested that a note is added to signpost readers who wish to see plans of the sites at a larger scale to contact the Parish Council.	
45	The requirement in para 2 of the policy does not seem overly onerous and suggests a simple design feature to encourage the movement of small, wild mammals into and between private gardens and other spaces within the built-up area. This would help to achieve the over-arching objective to enhance the natural environment. It would be reasonable, however, to limit the application of the requirement to proposals that either established new boundaries or replaced existing boundaries.	Retain the requirement but add the limitation of its application as suggested.
46	The wording of this paragraph is as provided by SDC in a 'health check' of the draft Neighbourhood Plan in 2019. If a "mitigation hierarchy policy" is not a recognised planning technique then it is accepted that the first sentence of the paragraph should be deleted.	Delete the sentence referring to a "mitigation hierarchy policy".
47	As in point 46 above this policy was drafted based on wording supplied by SDC in a 'health check' on the draft NP in 2019. It was supplemented by comments made by the Environment Agency as part of the consultation on the need for a Strategic Environmental Assessment. However, if it does not meet regulatory standards, it is proposed to amend the wording so that: a) the need for a site-specific flood risk assessment will only apply to proposals 'dependent on their scale, use and location'; b) SuDS should be required proportionately depending on the scale and type of development; c) The Environment Agency comment states "All proposals for new development must demonstrate that existing flood risk will not be increased elsewhere (downstream), ideally by managing surface water on site and limiting runoff to the greenfield rate or better." It is therefore proposed to retain this standard. d) The reference to SWMP is a specific part of SDC's comments, as above. A paragraph will be added to the 'Explanation' section of the policy to briefly explain where the document can be found, its aims and relevance to this policy	a) amend the text to clarify the extent of application of this element of the policy; b) amend the text to confirm the proportionate application of this element of the policy; c) no action; d) add a paragraph to provide the explanation of SWMP and its relevance as noted.

Point	Response	Action
48	The policy should apply to any proposed development involving construction of one or more new dwellings, new business premises or intensification of use of existing premises. The application should demonstrate how the location and design of the proposal ensures the minimum environmental impact on adjoining property and local infrastructure.	Amend the text to clarify the application of the policy.
49	The figure of 10% was suggested by SDC in its 'health check' of the draft NP in 2019. If this figure is no longer appropriate it will be deleted. Instead, rather than a specific target, reference to Part V of the Development Requirements SPD as suggested will be added. Reference to Code 4 will also be deleted as per point 11 above.	Amend text accordingly and delete reference to Code 4.
50	Accepted.	Delete the final paragraph of the policy and introduce the aspiration as an addition to Explanation 3 supporting the policy.
51	It is accepted that the whole of a PROW is unlikely to be within an application site. However, it is possible that a section of a PROW may pass through the site, it may have a boundary with one or it could provide a link between two existing PROWS. In these instances, subject to the conditions mentioned, a proposal will be supported if it helps improve access to the network. It is accepted that WCC would need to support any proposal as the responsible authority for PROWS.	Add to the 'Explanation' supporting this policy referring to possible land ownership issues, the role of WRCC and the potential for s.106 contributions to help achieve the aims of the policy.

Long Itchington Neighbourhood Development Plan

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

Appendix 1 – Significant comments from Stratford-on-Avon District Council

Page number	Section	Comment
N/A <u>1</u>	General	It is noted that by a coincidence of timing the public consultation exercise on the NDP will overlap to a considerable extent with the public consultation exercise undertaken by the District Council on its Site Allocations Plan ("the SAP"). It will be up to the Parish Council to make its own representations in respect of the SAP if they wish to do so, however it is suggested that the Parish Council will take into account the latest progress on the SAP when preparing the next version of the NDP.
N/A <u>2</u>	General, Policies and Proposals map	It would be very useful for the NDP to incorporate a single, consolidated policies and proposals map. Currently, there are several important pieces of information spread across several different plans. This frustrates ease of understanding and use of the NDP as a whole. It would be preferable if all policy-related content could be displayed in a single plan (possibly supported by an inset map for Long Itchington village) to an appropriate scale or scales.
N/A <u>3</u>	General, Public Sector Equality Duty	It would be useful for the NDP to include a reference, at least in general terms, to the regard that has been had to the statutory Public Sector Equality Duty when drafting the NDP. This may be particularly useful in terms of justifying the content of Policy H5.
N/A <u>4</u>	General – omission of policy on reserve housing sites	It is noted that the NDP does not identify any 'reserve sites' within the framework envisaged by Policy CS.16 of the Core Strategy. It appears from the explanatory text that the Parish Council has relied on the 2019

Page number	Section	Comment
		<p>version of the SAP (now withdrawn) as the basis for not doing so.</p> <p>It is also noted that the NDP does not reference the proposed self/custom-build housing proposal (SCB.5 in the SAP) on land north of Collingham Lane, Long Itchington. Although a separate proposal, it gives rise to the same practical issues discussed below.</p> <p>The position has moved on with the Preferred Option version of the SAP (as explained in that document itself) and clearly, this has significant implications in particular for Southam, together with surrounding villages including Long Itchington.</p> <p>It is recognised that the SAP will need to complete the necessary statutory processes leading to adoption. There can therefore be no certainty at this stage that the current proposals (specifically insofar as they relate to Long Itchington) will necessarily be those that end up in the adopted SAP.</p> <p>However, there is an ideal opportunity for the submission version of the NDP to take into account the proposals within the SAP and, in particular, identify any specific local issues that need to be addressed or requirements that ought to be met, in relation to the proposals currently set out in the SAP. Of course, this can be done without prejudice to the Parish Council's position in respect of the SAP.</p> <p>In purely practical terms, it would be extremely useful if the District Council and its partners can be made aware of any local issues or requirements that may affect the delivery of the two reserve sites ('LONG.A' and 'LONG.B') identified in the emerging SAP: or, indeed, any alternative site or sites the Parish Council may wish to promote via the NDP.</p>
Page 4 <u>5</u>	Introduction/vision statement	<p>Whilst it is acknowledged that the vision statement is at Paragraph 4.1, the introductory text is often where the vision statement should be included. Currently, the introduction is an 'opinion' on how</p>

Page number	Section	Comment
		<p>the amount of people and housing has increased in the area and taken a toll in the 'current' residents. Although this may be true, the NDP must also convey that the statement is for the whole village including future residents and residents who have just moved into the village.</p> <p>The Framework states:</p> <p><i>Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.</i></p> <p>A vision is your optimal mid to long-term goal describing what you want your neighbourhood to look like at the end of the plan period. It is often written in the future tense as a statement of what 'will be'.</p> <p><i>For example, In 2031, Sutton St.Nicholas will be a sustainable and thriving local community, with the distinctive local environment of the village and surrounding countryside robustly and successfully safeguarded with new development in place to meet requirements for housing, jobs, and local services. (Sutton St Nicholas Neighbourhood Plan, submission document).</i></p> <p>The four main points/themes can then be included after the supporting text.</p>
Page 12 6	Vision, Paragraph 4.2	<p>It must be acknowledged that future housing development in the NP area cannot be restricted solely to meeting the needs of the existing community – that would be inconsistent with the provisions of the Core Strategy regarding the basis of the District's housing requirements which includes in-migration. Having said that, it is</p>

Page number	Section	Comment
		reasonable to acknowledge that the scale of recent housing development has been substantial and that further large-scale housing development in the NP area would not be appropriate during the current plan period.
Page 14 <u>7</u>	Section 5, paragraph 2.1.	The same point as for 4.2 applies. The Summary Statement is laudable but quite prescriptive in parts. It may need to be toned down, eg. replace 'must' with 'should'. Under c) it's unclear what type/location of site is covered – it is assumed that it doesn't cover greenfield sites on the edge of Long Itchington BUAB or in open countryside but this needs to be clarified.
Page 15 <u>8</u>	Summary statement – supported new housing development	This is helpful as a summary of the proposed policy approach. However, there is concern about criterion c) which cross-references Policies H2 and BE2 and, more particularly, limits support to a " <i>small-scale scheme i.e. for less than 10 units.</i> " This limitation is not actually included in Policy H2, and in any case, there is no such limitation in Part D of Core Strategy CS.15. Those points aside, it should also be noted that any such restriction would (in the absence of any lower thresholds than those already specified in Core Strategy Policy CS.18) effectively preclude the ability to secure affordable housing. This, in turn, would appear to at odds with the theme set out at paragraph 4.2 of the NDP.
Page 15 <u>9</u>	Criterion d) ix)	This is too onerous. It may not be appropriate in some instances to insist upon planting screening. It should be on a case by case assessment.
Page 15 <u>10</u>	Criterion d x)	It is suggested that the wording is changed from 'must' to 'encourage' or 'support' as it would be difficult to enforce this.
Page 15 <u>11</u>	Criterion viii), Policy BE4 and Policy NE6	It is suggested that reference to Code Level 4 is removed as these codes have been abolished. Reference could be made solely to Building Regulations, however given new developments are required to do this anyway it may be useful to make reference to the recently adopted Climate Change SPD which encourages developers to go above and beyond the Building Regulations minimum.

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		requirements and also provides a range of options for improving energy efficiency.
Page 17 <u>12</u>	Section 5.1, Housing	There needs to be a general acknowledgement of the requirement to provide reserve housing sites in accordance with Core Strategy Policy CS.16. If such sites aren't to be identified in the NDP then the District Council has to consider doing so through the Site Allocations Plan.
Page 17 <u>13</u>	Policy H1	Delete ' main ' Reword first para "... <u>within the built-up area boundary of Long Itchington</u> , as defined..." to recognise there is only one BUAB in the NDP.
Page 17 <u>14</u>	Para 5 & 6, Policy H1	The final para – is more restrictive than CS Policy AS.10, which lists other uses which are acceptable in countryside locations. There needs to be a general acknowledgement of the requirement to provide reserve housing sites in accordance with Core Strategy Policy CS.16. If such sites aren't to be identified in the NDP then the District Council has to consider doing so through the Site Allocations Plan.
Page 17 <u>15</u>	Policy H1	Consideration is needed in respect of the Council's Local Needs Schemes (i.e. Policy CS.15) where proposals can be supported adjacent to the built-up-area boundaries.
Page 19 <u>16</u>	Policy H2	There is concern that local need is too restrictive and does not take account of District wide housing need. There is no mention of 'market' dwellings being acceptable?
Page 19 <u>17</u>	Policy H2	Local Needs Schemes, including Self-Build/Custom Build dwellings, should not be restricted to previously developed sites within the Built-Up Area Boundary. CS.15 of the Core Strategy does not require housing needs schemes to be 'solely' incorporated on previously developed land. Para 2 in the explanation acknowledges this.
Page 20 <u>18</u>	Policy H3	It is appreciated that the Policy refers to a local housing needs survey. However, it is suggested that the Policy makes reference to the set requirements

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		<p>within the SPD to reinforce the requirement for affordable housing.</p> <p>It should also be made clear as to what is deemed as small-scale affordable housing – is it the same as the Core Strategy requirement for 6 dwellings or more than 1000sq.m? If so, reference should be made to the Core Strategy, CS.18.</p>
<p>Page 20</p> <p><u>19</u></p> <p><u>20</u></p> <p><u>21</u></p>	Policy H3	<p>The inclusion of Policy H3 (Affordable Housing) is noted and welcomed. However, the following issues should be considered:</p> <ul style="list-style-type: none"> (1) In and of itself, it is unclear how this Policy will ‘add value’ to the existing framework for promoting ‘Local Need’ schemes provided by the Core Strategy. (2) Specifically in relation to sites <i>within</i> the proposed Built Up Area Boundary, it would be wrong in itself and in relation to other policies to restrict its scope purely to the <i>‘redevelopment of previously developed sites’</i>. (3) The explanatory references (and indeed reproduces in full as an appendix) the 2016 survey report, but fails to discuss the extent to which any of the need identified in that survey may already have been met by recent developments in and around the village (whilst acknowledging those developments would have contributed towards meeting District-wide needs). <p>For the above reasons, it may be of greater practical benefit for the NDP to identify and allocate any one of more sites that it may consider suitable for a Local Need scheme. The Rural Housing Enabler would be able to assist in this process.</p>

<p>Page 21</p> <p><u>22</u></p>	<p>Policy H5, Stock mix</p>	<p>The inclusion of Policy H5 (Housing Stock Diversity) is noted. This comprises three elements:</p> <ul style="list-style-type: none"> (1) Paragraph (a), which seeks to ensure the delivery of <i>“Housing development that adds to the choice of type and tenure of housing, including self-build, custom-build and live/work units available to meet the identified needs of local people”</i>. (2) Paragraph (b), which seeks to ensure <i>“..... sustainable and flexible living into house design to meet the requirements of people throughout their lives. In particular, accommodation that can be easily adapted to suit changing household needs and circumstances, including to cater for home working, people with disabilities and older residents who may need care and support.”</i> (3) Paragraph (c), which in essence seeks to retain existing bungalows as such in order to <i>“..... ensure that the choice of single storey living remains available for older people or people with restricted mobility within the Neighbourhood Area.”</i> <p>The high-level objectives of the above policy are laudable, but the following issues should be considered:</p> <ul style="list-style-type: none"> (1) It is unclear as to what ‘added value’ paragraph (a) generates relative to Core Strategy Policy CS19. Indeed, it is unclear whether it is intended to sit alongside Parts A and B of Policy CS.19 or replace them: if the latter, criterion (a) is considered to be too vague to apply in practice. (2) Similarly, paragraph (b) appears to largely duplicate Part D of Core Strategy Policy CS.19, without generating any real ‘added value’ – for example in terms of requiring
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		<p>specific standards to be achieved. This ambiguity is unhelpful.</p> <p>(3) The intent of paragraph (c) is understood. However, it would be wrong to assume that just because bungalow accommodation is retained, it would be automatically accessible too.</p>
Page 21 <u>23</u>	Policy H5	<p>Part c) is too restrictive. A policy cannot put a blanket ban on a certain type of development. It may be demonstrated that this is the only viable solution for the dwelling, especially if the bungalow has been neglected and redundant.</p> <p>Significant evidence would be required as to why it is essential that 'no' bungalows will not be converted to two storey dwellings. Furthermore, it must be noted that you would be stopping all householders in the settlement from developing/expanding their home where it might very well be in keeping with the area and conveys to all other policy requirements.....this would be exceptionally hard to defend at appeal.</p> <p>Part c) could be used as part of the Community Aspiration Policy as set out on page 24.</p>
Page 21	Policy H5	<p>criterion c) Whilst the sentiment is understood, it is not clear as to how this could be controlled by policy whilst not being more stringent than CS policies and NPPF and PD Rights.</p>
Page 25 <u>24</u>	Policy BE1	<p>The policy does not need to refer to thepermitted under the NPPF 'current at that time'.</p> <p>The NPPF is a material consideration and development will always have to conform (unless material considerations deem otherwise) to the most recent NPPF. Furthermore, the NPPF may significantly change which could conflict with any of the NDP policies in the future. At that time, an assessment would have to be made on which is the most up to date policy and/or requirement (Remember the NPPF stipulates that development</p>

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		must accord with an Area's Development Plan) and therefore by stipulating in Policy that development will be supported in principle with the most up to date Framework 'could' immediately override all other policy stipulations; namely, H2 and H3.
Page 29 <u>25</u>	Policy BE3	<p>This policy is too onerous and far too broad.</p> <p>"Any proposal for development should provide evidence of its impact on the Neighbourhood Area as a whole" – this would have to include householders and small-scale schemes. This is unreasonably onerous, and unclear as to what evidence the policy is requiring to be submitted.</p> <p>As set out in the Planning Practice Guidance and the Development Management Procedure Order, not all applications require this level of information to be supported and/or validated. Furthermore, the Council's Local Planning List does not require this level of information and scrutiny.</p> <p>As worded, 'every' application would require evidence of its impact on the 'whole' neighbourhood plan area. Small developments (i.e. one dwelling, annexes, extensions, drop kerbs) do not require this level of scrutiny.</p> <p>Paragraph 31 of the Framework states :</p> <p><i>'The preparation and review of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate, focussed tightly on supporting and justifying the policies concerned, and take into account relevant market signals'.</i></p>
Page 30 <u>26</u>	Policy BE4	<p>There are a number of policies in respect of design. This creates a number of duplications and a varying degree of policy requirements. It is recommended doing 'one' detailed design policy which is concise and precise, which would ensure that there is no duplication or confusion over the specified requirements.</p>

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		<p>It may not be practical that all new dwellings can secure cycle storage (i.e. apartments). Furthermore, this wouldn't be a sufficient refusal for an application, alone. It is recommended that the policy is reworded in a positive way; i.e. new dwellings without secured cycling storage facilities will only be supported with sufficient justification and evidence.</p> <p>It is important to be clear if all the criteria apply or if they should be considered as alternatives. This can be clarified by linking the criteria with either "and" or "or" depending on whether they all apply or should be considered as alternatives. This is a frequent omission and led to the Examiner of the Lynton and Lynmouth Plan expressing doubt about the clarity and precision of the policies.</p>
Page 30 <u>27</u>	Policy BE4(d)	The wording of this bullet point is too restrictive. "Existing trees must be protected" What if the tree(s) is in poor health or is a non-native species and proposed for replacement by a native species which would offer more in terms of biodiversity gain?
Page 30 <u>28</u>	Policy BE4 (f)	It is noted that the car parking standards are different to those which are in Part O of the adopted Development Requirements SPD. If these are to be different there should be adequate and sufficient evidence to support this.
Page 30 <u>29</u>	Policy BE4(f)	Parking being screened from view will be unrealistic in most cases.
Page 30 <u>30</u>	Policy BE3, Evidence, paragraph 2.	This paragraph will need to be deleted as the text is no longer correct in relation to Southam College. Alternative text can be found in the most up to date version of the SAP Preferred Options document 2020, after Policy SAP.4.
Page 34 <u>31</u>	Policy EB1 and EB3	The two policies could be brought into one overall policy for business and employment uses. This will ensure that there is no duplication, contradictions and/or confusion (as above).
Page 34 <u>32</u>	Policy EB2	Suggest 2 nd para refers to small-scale sites only.

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Page 35 <u>33</u>	Policy EB3	Criterion b) how would this be demonstrated (i.e. 12 month marketing exercise)? This would need to set out in the policy and /or explanatory text.
Page 38 <u>34</u>	Policy EB4	<p>It is strongly recommended that the policy stipulates that the agricultural building must be demonstrated to be no longer viable and all other possible business uses must have been considered and demonstrated unviable before a C3 use is deemed acceptable, in principle. As worded, there is no requirement to demonstrate the loss of the agricultural use and any other possible alternatives. Consequently, agricultural buildings throughout the NDP area could be readily permitted to be converted.</p> <p>Furthermore, as worded in Policy AS.10, it is strongly recommended for agricultural buildings of 'traditional materials' to be deemed acceptable for conversion (if the loss and all other uses can be substantiated). Otherwise, large steel clad barns (less than 10 years old) could also be converted in principle.</p>
Page 38 <u>35</u>	Policy EB4	The policy cannot be more restrictive than CS Policy AS.10 (see Residential criterion (d) and Business criterion (k) for example).
Page 38 <u>36</u>	Policy EB4	The explanation should refer to Class Q of the GDPO.
Page 38 <u>37</u>	Policy EB5	This policy is looking to support infrastructure (such as drainage, roads, footpaths etc) but only if they meet the 4 purposes set out in the policy. However, these types of infrastructure are the responsibility of other service providers and cannot be controlled via 'traditional' planning policies since they have their own specific regimes for gaining consent for such works.
Page 40 <u>38</u>	Policy NE1	The site which is the subject of the LONG.B proposal in the SAP is identified as one of those sites subject

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		<p>to Policy NE1 – Valued Landscape and Views – by virtue of Figure 9.</p> <p>Policy NE1 does not necessarily absolutely preclude development as proposed in SAP Proposal LONG.B. It would be open to the Parish Council to challenge the proposed identification of the site as a ‘reserve site’ in the emerging SAP via the normal consultation processes associated with the preparation of the SAP itself. Nevertheless, in the absence of any challenge to LONG.B at the present time, it would be helpful for the Parish Council – when addressing the issues raised in Section 3 above – to clarify how to envisages Policy NE1 operating in relation to the development of the LONG.B site.</p>
Page 44 <u>39</u>	Green Space	<p>Careful consideration is needed to the stipulations of Para 99-101 of the Framework (2019), which sets the requirements for designating local green space(s).</p> <p>The Plan needs to make sure that allocating local green space corresponds to national policy and is capable of enduring beyond the end of the Plan period (NPPF)</p> <p>An appeal against the Blackwell NDP Hearing specified, it is essential, when allocating Local Green Space, plan-makers can clearly demonstrate that the requirements for its allocation are met in full. (Sufficient evidence is needed for all allocations)</p> <p>The Policy may need to be considered as Community Aspiration if sufficient evidence cannot be demonstrated.</p> <p>May be worth incorporating Policy CS.7 in the supporting text and how the two policies can complement each other.</p>
Page 44 <u>40</u>	Policy NE2	<p>The explanation needs to be repositioned after the policy to avoid confusion.</p>

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Page 44 <u>41</u>	Policy NE2	Reference LGS 11: Play area and open green space west of Leigh Crescent, Long Itchington Stratford on Avon District Council, as the owner of the land, objects to the land being designated as a Local Green Space. The reason for this view is that there is a need for the Council to retain its existing assets and the value they represent. However there is a commitment to retain the play area, and there are no current plans to seek to change the use of the land.
Page 44 <u>42</u>	Policy NE2	LGS4 is a roadside verge – It is not clear as to how this would meet the designation criteria.
Page 44 <u>42</u>	Policy NE2	LGS6 and LGS7 . There are a number of individual parcels of land seemingly making up 2 no. LGS proposals. Which parcels are LGS6 and which are LGS7? Some land parcels appear to be highway verges and are very small (and difficult to see on the map). It is not clear how these individual parcels of land meet the designation criteria. If any were to remain, it is recommended that they are numbered a, b, c etc (similar to site 16).
Page 44 <u>42</u>	Policy NE2	LGS13 – Similar to LGS6 and LGS 7, this particular ‘site’ is made up of a large number of grass verges and very small incidental spaces which are distributed over several streets. It is not clear as to how these parcels of land would meet the designation criteria. If any were to remain, it is recommended that they are numbered a, b, c etc (similar to site 16).
Page 44 <u>43</u>	Policy NE2	Suggest new final para: “ <u>Development that would harm the openness or special character of a Local Green Space or its significance and value to the local community will not be permitted unless there are very special circumstances which outweigh the harm to the Local Green Space</u> ”.
Page 45 <u>44</u>	Figure 10 – LGS	It is very difficult to interpret all the individual parcels of land at this scale. Consideration may need to be given to a number of maps or inserts at a more appropriate scale in order to view the land parcels more clearly.

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Page 46 45	Policy NE3 – para 2	It is not clear as to the practicalities of setting out such precise requirements for all development proposals.
Page 46 46	Policy NE3 – para 5	What is the ‘mitigation hierarchy’ policy referred to here? Where is it set out? How would it operate? It is not clear as drafted.
Page 47 47	Policy NE4	This policy is too onerous. Not all planning applications, as stipulated by the NPPF, PPG, DEFRA, CS.4 (Paragraph 1: ‘... <i>dependent on their scale, use and location</i> ’), and the Council’s Local List, require a site specific flood risk assessment (FRA) or hydrology surveys. Furthermore, SUDS systems should be ‘proportionately’ incorporated depending on the scale and type of development. As worded, developers/applicants could argue that this is an unreasonable request.
Page 47 47	Policy NE4	Para 6 – are the run-off rates proposed proportionate to <u>all</u> development proposals?
Page 47 47	Policy NE4	Final para – refers to SWMP but does not set out in the explanatory text what this is, or why it is relevant.
Page 48 48	Policy NE5	Is the policy suggesting that any planning application for new development should be accompanied by evidence to show how increased traffic generation would be dealt with? The policy is a bit confusing as drafted.
Page 48 49	Policy NE6	Renewables are “encouraged” in the CS and are strongly encouraged as part of the recently adopted Part V of the Development Requirements SPD on Climate Change Adaptation and Mitigation. It is too onerous to require on site renewables or low carbon producing technologies to meet at least 10% of the development’s energy demands, going far beyond the CS policy.
Page 51 50	Policy C2	<i>‘Proposals will be supported for the provision of a replacement community centre or alternative facilities to serve the Neighbourhood Area in a</i>

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		<p><i>format that meets the needs of the local community if it either becomes necessary or desirable during the life of this Plan.'</i></p> <p>This is an aspiration and should not be included within the context of Policy C2.</p>
Page 54 <u>51</u>	Policy SLR2	<p>Whilst SDC generally support this policy, it should be noted that there could be land ownership issues (i.e. the PROWs will not likely be within the application site or within the ownership of any prospective applicant) in which case any PROW improvements would only ever come about through S106 contributions associated with any legal agreement attached to a planning consent. Another complication would be the necessary involvement of WCC as the Authority responsible for PROWs. It is something to consider in ensuring that the policy would be workable.</p>