

## Snitterfield Neighbourhood Development Plan

### Regulation 16 Representations: By Contributor

Rep. No.	Policy	Representation	Reg.19 Request?
SNP01	Whole Document	<p>Thank you for consulting The Coal Authority on the above.</p> <p>Having reviewed your document, I confirm that we have no specific comments to make on it.</p> <p>Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.</p>	Not indicated
SNP02	<p>Policy H1</p> <p>Policy H3</p> <p>Policy H4</p> <p>Policy BE1</p> <p>Policy BE2</p> <p>Policy BE3</p> <p>Policy BE5</p> <p>Policy NE1</p>	<p>Support - With a slightly diffuse village, any development outside the normal boundary would destroy the character of the area.</p> <p>Support - Garden grapping virtually always degrades the surrounding area and should not be contemplated.</p> <p>Support - Often the only way to keep villages alive and vital.</p> <p>Support - Vital to preserve the unique nature of the village.</p> <p>Support - Too many properties become seasonal holiday lets or rarely used second homes which are of little use to maintain the village.</p> <p>Support - Sympathetic design is the essence of good village development.</p> <p>Support - The area has reasonable dark skies which should continue.</p> <p>Support - The excellent natural history to be found in the area deserves a continuing high level of protection.</p>	Not indicated

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	Policy NE2	Support - Necessary to maintain the excellent vistas within the area and the view from the Upper Avon which is the IWA's chief concern locally.	
	Policy NE4	Support - Again necessary to preserve the vistas in the area.	
	Policy NE5	Support – Most essential.	
	Policy NE7	Support - The IWA as no objection to carefully sited renewable energy systems.	
	Policy IN2	Support - Uncontrolled run-off of storm water etc into the local streams and eventually into the Avon can only lead to problems, particularly with downstream neighbours.	
	Policy SSA1	Support - Should the area be developed and the sports field relocated on green belt land, a new clubhouse should be provided even if it is also within the green belt if a close village position is not possible.	
SNP03	Policy H2	Support - Any development application should clearly show any footpaths/bridleways which cross the land, with a comment on how these will be maintained or enhanced.	Not indicated
	Policy BE1	Support - Key features to enjoy should include well maintained footpaths and bridleways.	
	Policy BE5	Support - Consideration should be given to turning off streetlights at midnight.	
	Policy BE9	Support - Any proposal must show footpaths/bridleways on the land and how these will be affected.	
	Policy NE2	Support - Developments should not rip out existing hedgerows.	
	Policy NE5	Support - Proposals must show any footpaths/bridleways across the land and how these will be maintained or enhanced.	
	Policy NE7	Support - Each case should be considered on its merits with no knee jerk reactions.	

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	Policy IN1 Policy ALW2 Policy ALW3 Policy ALW4 Policy SSA1	Support - Where possible, paths should be routed clear of roads. Support - Wherever possible, paths should be separated from roads in new estates. Support - "Quantum" should read "quantity". Support - "Quantum" should read "quantity". Support - Replacement facilities must be in place before development starts.	
SNP04	Whole Document	Thank you for the invitation to comment on the Snitterfield Neighbourhood Plan. Our previous substantive Regulation 14 comments (5 <sup>th</sup> July 2016) remain entirely relevant, that is: <i>"Historic England is supportive of both the content of the document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness through good design and the protection of locally significant buildings and landscape character including archaeological remains and important views is to be applauded, as is the earlier production of the Village Design Statement SPG which will no doubt be invaluable as a context and evidence base for the current Plan.</i> <i>Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish".</i> I hope you find these comments and advice helpful.	Not indicated
SNP05	Whole Document	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.  Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they	Not indicated

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		<p>consider our interests would be affected by the proposals made.</p> <p><b>Natural England has no further comment to make on this draft neighbourhood plan.</b></p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>	
SNP06	Whole Document	<p>Thank you for the opportunity to provide feedback to the proposed policy.</p> <p>Network Rail is the public owner and operator of Britain’s railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations – the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network.</p> <p>Network Rail has no comments.</p>	Not indicated
SNP07	<p>Policy BE8</p> <p>Policy BE10</p> <p>Policy NE1</p>	<p>Support - Change in use of agricultural land is one of the main reasons for the massive declines in bat populations in the UK in the decades following the Second World War, from which the populations have been unable to recover.</p> <p>Support - Conversions and demolitions of agricultural buildings, particularly in the 1970s contributed significantly to the massive declines in bat populations in the UK in the decades following the Second World War, from which the populations have been unable to recover. Given the value of the habitats in and around Snitterfield it is extremely important that surveys for bats should be conducted, between May and August, before permission is granted for any such developments.</p> <p>Support - Two rare species of bat (Lesser Horseshoe, Rhinolophus hipposiderus and Leisler's bat, Nyctalus leislerii) are known to roost within the parish boundaries. The Lesser Horseshoe Bat is on the edge of its range in the Midlands with only 2 roosts known and monitored by us in the whole of the County. Leisler's bat is 'rare but widespread' so that all of its roosts in England are regarded as of value.</p>	Not indicated

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	Policy NE2	Support - Two rare species of bat (Lesser Horseshoe, Rhinolophus hipposiderus and Leisler's bat, Nyctalus leislerii) are known to roost within the parish boundaries. The Lesser Horseshoe Bat is on the edge of its range in the Midlands with only 2 roosts known and monitored by us in the whole of the County. Leisler's bat is 'rare but widespread' so that all of its roosts in England are regarded as of value. In addition, the foraging areas in the vicinity of the roosts are important, as are wildlife corridors that enable them to 'commute' from roost to foraging areas. Retention of hedgerows, watercourses and ponds (including seasonal ponds) which attract the insects on which UK bats feed, is vital to their conservation.	
	Policy NE3	Support - Two rare species of bat (Lesser Horseshoe, Rhinolophus hipposiderus and Leisler's bat, Nyctalus leislerii) are known to roost within the parish boundaries. The Lesser Horseshoe Bat is on the edge of its range in the Midlands with only 2 roosts known and monitored by us in the whole of the County. Leisler's bat is 'rare but widespread' so that all of its roosts in England are regarded as of value.	
	Policy NE6	Support - Two rare species of bat (Lesser Horseshoe, Rhinolophus hipposiderus and Leisler's bat, Nyctalus leislerii) are known to roost within the parish boundaries. The Lesser Horseshoe Bat is on the edge of its range in the Midlands with only 2 roosts known and monitored by us in the whole of the County. Leisler's bat is 'rare but widespread' so that all of its roosts in England are regarded as of value. In addition, the foraging areas in the vicinity of the roosts are important, as are wildlife corridors that enable them to 'commute' from roost to foraging areas. Retention of hedgerows, watercourses and ponds (including seasonal ponds) which attract the insects on which UK bats feed, is vital to their conservation.	
	Policy NE7	Support - Wind turbines cause mortality among bats which can be mitigated by careful siting and operational controls. A report on this can be found here <a href="http://www.bats.org.uk/pages/wind_turbines.html">http://www.bats.org.uk/pages/wind_turbines.html</a>	
SNP08	Policy NE4	<p>Object</p> <p><b>Introduction</b></p> <p>Representations were made by Spitfire Properties LLP to the <u>Pre</u>-Submission NP, objecting to the designation of site 4 (Land to the rear of Appleton House) as a Local Green Space. In the Submission NP site 4 remains a</p>	Not indicated

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		<p>LGS and the objection still stands.</p> <p>The designation of site 4 as a LGS fails Basic Condition A of Paragraph 8, sub-paragraph (2), of Schedule 4B to the Town and Country Planning Act 1990 – <i>“having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.”</i></p> <p>Site 4 LGS is allegedly justified by a Local Green Space Site Assessment (March 2016) and “Pre-submission consultation responses – August 2016” made in response to an objection by Spitfire Properties LLP to its designation as a Local Green Space in the Pre-submission draft NP.</p> <p>Neighbourhood Plan Committee Response to Site 4 made in the “Pre-submission consultation responses – August 2016” is repeated in italics below:</p> <p><i>Site 4 being within the proposed development boundary would not be subject to GB policy and therefore LGS designation would be justified to preserve the openness of this important and valued Site within the village.</i></p> <p><i>Amenity can be enjoyed, an indeed in this case is, without public access. The LGS designation does not imply public access will be forthcoming.</i></p> <p><i>Evidence supporting the NDP has found that there is significant potential for wildlife due to suitable habitats and surveys have shown that the site is species rich. The County Council does not state that there is no significant ecological value.</i></p>	

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		<p><i>The site provides an important open setting to the surrounding/adjoining heritage assets. Views are afforded over the site towards heritage assets. It is agreed that the existing use of the site has no impact on the heritage assets this is because it is inherently open and undeveloped. The NDP does not claim the site is within the Conservation Area or that there are important archaeological remains on the site. It is not a pre-requirement for a site to have conservation status to become eligible for LGS designation.</i></p> <p><i>The site is visible from elevated views in the public domain. The site has a feeling of enclosure due to surrounding development but this does not preclude LGS designation.</i></p> <p><i>Inherent beauty is not a prerequisite for LGS designation. The characteristics of the site as whole need to be taken into account.</i></p> <p><i>Site 4 enjoys a central location within the village. It is characterised as local to the community due to its central location. For the reasons outlined in the assessment supporting the designation, Site 4 is demonstrably special to the local community and holds a particular local significance and local in character.</i></p> <p>The designation of Site 4 as a Local Green Space fails Basic Condition A for the following reasons.</p> <p><b>Planning Policy Context</b></p> <p><u>NPPF paras 76 to 78</u></p> <p>Paragraph 76 - states that local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them.</p>	

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		<p>Paragraph 77 states -</p> <p><i>The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</i></p> <ul style="list-style-type: none"> <li>• <i>where the green space is in reasonably close proximity to the community it serves;</i></li> <li>• <i>where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></li> <li>• <i>where the green area concerned is local in character and is not an extensive tract of land.</i></li> </ul> <p><u>Relevant Planning Practice Guidance</u></p> <p>Paragraph: 007 Reference ID: 37-007-20140306 Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.</p> <p>Paragraph: 009 Reference ID: 37-009-20140306. Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.</p> <p>Paragraph: 014 Reference ID: 37-014-20140306 The proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served.</p> <p>Paragraph: 015 Reference ID: 37-015-20140306 Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. ...blanket designation of open countryside adjacent to</p>	



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		<p>settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.</p> <p>Paragraph: 017 Reference ID: 37-017-20140306 Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty). Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.</p> <p><b>Green Belt</b></p> <p>PPG Paragraph: 010 Reference ID: 37-010-20140306 states: <i>“If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.”</i></p> <p>The Draft NP on page 37 addresses “additional local benefit” in broad terms: <i>“In addition to the Green Belt status of the land, Local Green Space designation is also justified due to the special qualities and important contribution they play within the physical and natural environment of the village and the social role they provide for local residents.”</i></p> <p>In the case of Site 4, the Neighbourhood Plan Committee Response provides a clue what the “additional local benefit” might entail. It states <i>“Site 4 enjoys a central location within the village. It is characterised as local to the community due to its central location.”</i> This is simply a geographical fact. As a “local benefit” it is a wholly inadequate justification.</p> <p>The Neighbourhood Plan Committee Response contradicts page 37 of the Draft NP by stating: <i>“Site 4 being</i></p>	

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		<p><i>within the proposed development boundary would not be subject to GB policy and therefore LGS designation would be justified to preserve the openness of this important and valued Site within the village.” This statement is false. The draft NP does not change Green Belt boundaries and site 4 will remain in the Green Belt despite being within the proposed village boundary. The NP quest to preserve openness by designating Site 4 as LGS, as a substitute for Green Belt policy, fails on this fact.</i></p> <p><b>Public access</b></p> <p>Draft Policy NE4 states that LGSs <i>“will be protected and where possible enhanced in order to ensure a suitable quantum of amenity space is available for the local community.”</i> Amenity land is commonly associated with public access, which implies public access is a key factor. However, the site has no public access and hence no recreational value.</p> <p>In the case of Site 4, the Neighbourhood Plan Committee Response writes: <i>“Amenity can be enjoyed, an indeed in this case is, without public access.”</i> However, this statement is unsubstantiated as there is no explanation what “amenity” site 4 gives to the local community. A central location is not an amenity.</p> <p><b>Wildlife</b></p> <p>The Local Green Space Site Assessment (March 2016) states <i>“The site has significant ecological value and includes extensive areas of grassland with trees around the periphery which are suitable habitats for a variety of wildlife. A number of farmland and woodland bird species have been recorded on the site along with fox, badger and bats....abundance of wildlife enjoyed by the large number of residents who live adjacent to the site.”</i></p>	

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		<p>The Neighbourhood Plan Committee Response writes <i>“Evidence supporting the NDP has found that there is significant potential for wildlife due to suitable habitats and surveys have shown that the site is species rich. The County Council does not state that there is no significant ecological value.”</i></p> <p>This brief, anecdotal description does not support a claim of “significant ecological value.” With reference to the NP Core Documents list, it is an unsubstantiated claim. “Evidence supporting the NDP” has not materialised. The claim is also wrong.</p> <p>Appendix 2 of the draft NP is a list of SSSI’s. Site 4 is not one of them. Appendix 3 is a list of ecosites. Site 4 is not one of them.</p> <p>An Extended Phase 1 Ecological Survey was carried out by the landowner in 2014 to accompany planning application ref 15/02013/FUL for 10 houses. It concludes <i>“Based on the intensive historical use of the site, the intensive surrounding land usage, the lack of suitable water bodies and the nature of the existing habitats, the site was considered to offer no or negligible habitat opportunities for the following protected species: Otters, Water Voles, Dormouse and White Crayfish. ....The site is considered to be of low to moderate ecological value with the main ecological value associated with the hedges and older scrub/trees. The main species that are considered an issue are birds and nesting birds and foraging bats.”</i></p> <p>Warwickshire County Council’s ecologist wrote in respect of this Extended Phase 1 Ecological Survey: <i>“Having considered the ecological survey work undertaken by Ruskins Group in support of this application and information held by the Warwickshire Biological Records Centre, Ecological Services are satisfied the development will not give rise to any significant biodiversity concerns and there are no overriding ecological reasons to recommend refusal of the application.”</i></p> <p>This 2014 ecological survey and county council analysis of this land in 2015 does not support the claim of “significant ecological value.” The draft NP and its Core Documents has no evidence to the contrary. Designation of the site on ecological grounds is therefore not justified.</p>	

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		<p><b>Historic significance</b></p> <p>The Local Green Space Site Assessment states:</p> <p><i>“Designation as LGS would preserve the neighbouring Heritage assets and conservation area from adverse impact and preserve the openness of the site when viewed from it’s surrounds and from further afield, such as from the Wolverton Road.”</i></p> <p>The Neighbourhood Plan Committee Response writes:</p> <p><i>The site provides an important open setting to the surrounding/adjoining heritage assets. Views are afforded over the site towards heritage assets. It is agreed that the existing use of the site has no impact on the heritage assets this is because it is inherently open and undeveloped. The NDP does not claim the site is within the Conservation Area or that there are important archaeological remains on the site. It is not a pre-requirement for a site to have conservation status to become eligible for LGS designation.</i></p> <p>The site has no historic buildings and does not lie within or adjacent to the Conservation Area. The NP committee confirms <i>“existing use of the site has no impact on the heritage assets.”</i> Possible designation of Site 4 as a LGS on the grounds of heritage assets should end at this point.</p> <p>Instead, the designation of Site 4 as a LGS is no more than a tool to prevent undefined <u>future</u> development from taking place due to its alleged impact on vaguely defined heritage assets lying somewhere outside the site. Moreover, the impact of possible future development is controlled by other Development Plan policies, most notably Green Belt (Policy CS.10) and Historic Environment (Policy CS.8).</p> <p>Given there is no conservation designation or historic features on the land and no public access to observe any historic features outside the site, there is no demonstrable reason for Site 4 to be a Local Green Space on</p>	

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		<p>the grounds of its historic significance.</p> <p><b>Beauty</b></p> <p>The Neighbourhood Plan Committee Response writes:  <i>“The site is visible from elevated views in the public domain. The site has a feeling of enclosure due to surrounding development but this does not preclude LGS designation.”</i></p> <p>The Local Green Space Site Assessment adds:  <i>“Despite it being surrounded by residential development, there are glimpses of the site from viewpoints to the north of the village which creates a green backdrop to the built environment..... Despite its relatively limited views from within the majority of the village....”</i></p> <p>To be clear, the NP does not claim any special beauty of Site 4. Although the site lies within the village boundary, it is barely visible from the public domain. It is surrounded on four sides by housing. No part of the site can be seen from the public domain except glimpses from roads at the north end of the village. These roads lie 200m away, a considerable distance. The Village Character Appraisal on pages 8 and 9 of the draft NP has 22 views of the village but none are of Site 4.</p> <p>Site 4 has mature trees on its boundaries but no water features or distinctive landscape features that make it particularly beautiful. The Council’s Landscape Sensitivity Study by White Consultants (CD5.7) places Site 4 within a zone (SN01) of medium sensitivity to housing and medium/high for commercial; both are the lowest landscape category of their type at Snitterfield. The study describes SN01 as <i>“Newer housing estates have developed on the north side, and other larger dwellings to the south, in a more organic form. This zone is land locked at the back of existing dwellings on four sides. It comprises a little used area of pasture with mature trees and outgrown hedging, linking with mature back garden planting on many boundaries. Some of the</i></p>	

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		<p><i>mature trees on the site are visible from other areas of the settlement and help create a semi-rural character.”</i></p> <p>Thus Site 4 has ordinary landscape features and is subject to only limited and glimpsed views from the public domain 200m away. On these grounds, views of the site are clearly not a reason for LGS designation. Moreover, Site 4 is very much less visible from the public domain than any of the other proposed LGSs and the two proposed housing allocations SSA1 and SSA2 identified by the NP.</p> <p><b>Summary</b></p> <p>With reference to NPPF paragraph 77, designation of a Local Green Space should only be used where it is demonstrably special to a local community AND holds a particular local significance AND is local in character. The Submission Neighbourhood Plan fails to explain what makes Site 4 particularly “local”; that is, distinctive from other fields in the parish, district or county. Potential reasons for designation on grounds of public access (none), wildlife, historic significance and beauty fall away under scrutiny. Its central location in the village is no more than a geographical circumstance. Moreover, the Village Character Appraisal on pages 8 and 9 of the draft NP has 22 views of the village but none are of Site 4.</p> <p>This report demonstrably points to the opposite conclusion; that Site 4 does not qualify as a Local Green Space. The designation of Site 4 as a LGS seems to be no more than a tool to prevent future development from taking place. The NP also misunderstands that Green Belt designation of this site affords it protection already, to which LGS designation adds nothing of value.</p> <p>Due to non-conformity with paragraph 77 of the Framework and Planning Practice Guidance and breach of Basic Condition A, Site 4 should therefore be removed as a LGS designation from the Neighbourhood Plan.</p>	

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SNP09	Whole Document	<p>Thank you for consulting Sport England on the above Neighbourhood Consultation.</p> <p>Planning Policy in the <b>National Planning Policy Framework</b> identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England’s role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, ‘<b>A Sporting Future for the Playing Fields of England – Planning Policy Statement</b>’.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</a></p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below:</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood</p>	

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		<p>Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>If you need any further advice please do not hesitate to contact Sport England using the contact details below.</p>	
SNP10	<p>Pages 8-11</p> <p>p.14 - Section 5 - (Vision Statement)</p> <p>p.14 – Housing Strategic Objective</p> <p>Figure 3 (p.16) - Village Boundary</p>	<p>Not all of the viewpoints shown on the map are reflected in the photos that follow.</p> <p>It is not appropriate for development to be restricted to meeting local requirements.</p> <p>It is not appropriate for development to be restricted to meeting the needs of the neighbourhood area only.</p> <p>Amend of the proposed village boundary as follows in accordance with guidance set out in Annexe 3 of Local Plan Review:</p> <ul style="list-style-type: none"> <li>• Include the most westerly dwelling on the Bearley Road and its residential curtilage within the boundary</li> <li>• Include the rear gardens associated with dwellings on White Horse Hill</li> <li>• Include the remainder of the rear gardens of dwellings to the north of Church Lane</li> <li>• Include the residential garden of the last property to the south of The Green as you exit the village in a southwest direction</li> </ul> <p>It would be helpful to show boundary in a thicker red line to make it clearer.</p>	Not indicated



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	<p>Policy H1</p> <p>Policy H2</p> <p>Policy H4</p>	<p>The policy could usefully refer to possible exceptions under Policy H4 of the Plan.</p> <p>2nd para in Explanation – NPPF identifies other forms of development that would not be inappropriate outside the Village Boundary (see para. 89) such as replacement buildings and partial or complete redevelopment of previously developed sites.</p> <p>p.17 – states that Brownfield land is defined in Annexe 2 of the NPPF and that gardens are excluded. Brownfield land is not defined in Annexe 2 of the NPPF, Previously Developed Land is. More importantly, the PDL definition only makes it clear that gardens in built up areas are not PDL – not the same as an outright exclusion. This is important because the neighbourhood area has areas which are built up and areas that plainly aren't.</p> <p>The high-level support is noted for “small-scale affordable housing” schemes on sites outside but adjacent to the defined Village Boundary by virtue of Policy H4. This broadly aligns with counterpart policies in the Core Strategy: although the latter is more flexible in that it also allows for identified needs for local market housing to be met. This is important, because recent experience in other villages within the District indicates the importance of local market homes in generating the necessary level of cross-subsidy to make the delivery of affordable homes viable. Whilst the policy is supported in principle, it is recommended its scope be extended to encompass local market housing.</p> <p>Nevertheless, due to allocated sites SSA1 and SSA2 being of insufficient size to trigger a requirement for on-site affordable housing provision (although the Sports Club site may trigger a requirement for a financial contribution), it is apparent that in practice this Policy will provide the only pathway for delivery of new affordable housing schemes. Given this point and the fact that it does not go so far as to identify specific preferred sites, it is strongly recommended further consideration is given to how this Policy will be delivered in practice.</p> <p>For example, successful delivery will require a pro-active approach towards site canvassing and the use of an objective assessment methodology to identify one or more preferred sites for promotion through an</p>	

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	Policy H5	<p>appropriate process of public consultation. The Rural Housing Enabler may be able to assist in this process. Nevertheless, it would be very useful for the explanatory text to outline how such a process might be expected to operate in practice.</p> <p>The principles of Policy H5 (mix of market housing) are understood and supported. However, given the 5-unit threshold for the application of this Policy coupled with the background discussed above in relation to Policy H4, it does seem unlikely that it will be frequently applied. This makes it all the more important that the scope of Policy H4 is widened, as discussed above.</p>	
	Policy ECON1	<p>Consider adding at the end of the policy as a new paragraph “Where there is no reasonable prospect of a site being used for the allocated employment use, planning applications for alternative uses will be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p>	
	Policy ECON2	<p>Should make reference to Green belt policy. ECON2 b) requires clarifications as to what green infrastructure means. ECON2 a) suggests that no harm whatsoever is acceptable – this should be moderated to allow common sense to prevail.</p>	
	Policy BE3	<p>Criterion (a) – the approach reverts back to that in Policy PR.2 in the District Local Plan. While its spirit is not necessarily inconsistent with national Green Belt policy (see NPPF para 89) or Policy CS.10 in the Core Strategy, a justification for specifying 30% should be provided.</p> <p>Criterion (d) would suggest that designing schemes to accord with building lines is avoided, as these are not defined and schemes should be judged on their merits in accordance with street characteristics</p> <p>Criterion (i) forcing development to have working chimneys is not sustainable.</p> <p>Criterion (j) calls for use of blue brick but it’s not clear in what circumstances. Snitterfield is a red/orange brick village.</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		Policy SSA1 proposes development that may not accord with this policy – perhaps the policy needs to be re-worded in a more flexible way?	
	Policy BE6	2nd line – the word ‘must’ is too prescriptive and suggest it is replaced with ‘should’; 2nd para – there are no County Council adopted parking standards.	
	Policy BE7	Does not have the weighing/balance of harm/benefits.	
	Policy BE8	Should perhaps refer to ‘large’ rather than ‘significant’ to bring in line with Core Strategy Policy AS.10.  Explanation – Second paragraph – text conflates agricultural land with landscape sensitivity; the latter is covered in Policy NE5 and reference to the Landscape Sensitivity Study should be placed in the explanation to that policy.	
	Policy BE9(a)	Again it is necessary to justify 30% against the NPPF definition [as per Policy BE3(a) above]. Final sentence has been retained but we need to check whether it is reasonable, e.g. caravans and mobile homes are usually ‘lawful’ and are normally ‘dwellings’.	
	Policy BE10	Refers to ‘redundant’ buildings but conversion proposals don’t have to prove such redundancy. Traditional materials needs to be defined (permanent materials is the appropriate term). In addition to architectural merit should also include listed or of local historic interest. Also, conversion to residential when it’s the only viable use (CS AS.10 (d)).	
	Policy BE11	Second paragraph – will not be able to control new uses via policy if permitted development.	
	Policy NE3	Not sure how the requirements relating to Notable Bird Species etc. could be dealt with and assessed. Explanation of “mitigation hierarchy” required. – It is given in the text.	

Rep. No.	Policy	Representation	Reg.19 Request?
	Policy NE4	More extensive justification against NPPG criteria is needed for the LGSs identified as they are likely to come under detailed scrutiny by the Examiner.	
	Policy NE5	Second line – the landscape setting of what should be specified. Which are the ‘prominent views...’ and ‘important vistas and skylines...’ to be maintained? Should they be indicated on a map?	
	Policy IN1	Criteria b) and d) are prescriptive and inflexible and should be deleted, although it is recognised the NPPF supports high quality communications structure and seeks to meet the challenge of climate change and flooding.	
	Policy IN2	2nd para, last line – last paragraph is not very clear. This policy is much too prescriptive – why will development in FZ 2 and 3 be treated differently in Snitterfield to the rest of the country? What’s different about Snitterfield? The explanation for this policy seems to contradict the need for 8m safeguarding of the Bell Brook.	
	Policy IN3	Criterion (b) the test of ‘demonstrable’ adverse impact is far less onerous than a ‘significant’ adverse impact. This policy is too simplistic and could be used to resist new development which increases traffic volumes by a single vehicle. Generally policies should recognise that the benefits of development need to be weighed against any harm that is identified. For example would a development that positively enhanced education provision (IN4) be supported even if there was an arguable reduction in highway safety?	
	Policy ALW2	There are substantial stretches of streets in the village with no pavements – how can access to safe routes be secured? Is it being suggested that developers fund provision of pavements? The lack of pavements is part of the character and charm of The Green etc.	
	Policy ALW3	Policy ALW3 and associated Explanation needs to be carefully worded to ensure it does not conflict with Core Strategy Policy CS.24 – Tourism and Leisure Development.	

Rep. No.	Policy	Representation	Reg.19 Request?
	<p>Policy SSA1</p> <p>Policy SSA2</p>	<p>Where will existing Sports Club building be relocated to? A site should be identified and assessed against Green Belt policy. If it is to be relocated on the playing field opposite, Sport England will need to be consulted and agree to this. These issues will need to be addressed in preparing for the Examination.</p> <p>Policy SSA2 – Vehicular access to the site is very narrow and may not be acceptable. Depth of site itself does not seem to lend itself to a workable layout. It will be necessary to show at the Examination how this site can be developed as proposed.</p>	
SNP11	Policy H1	<p>Object - Chapter 6 fails Basic Conditions A, D and E of Paragraph 8, sub-paragraph (2), of Schedule 4B to the Town and Country Planning Act 1990.</p> <p>The Snitterfield Neighbourhood Plan does not meet the social needs of the community for the years 2011-2031. This is because the NP does not identify any housing needs. No up-to-date Housing Needs Survey has been undertaken.</p> <p>Reference is made on NP page 18 to a Housing Needs Survey 2014 but this is out of date. NP Page 18 goes on “Should a local housing need be identified through an up-to-date Housing Needs Survey the Parish Council will actively seek an appropriate site or sites in consultation with the public and partner organisations.</p> <p>Such an exercise could be run in parallel with a review of this Plan.” Similarly, page 10 of the “Basic Conditions Statement – Snitterfield NDP” states “There is a commitment from the Parish Council to undertake a new Housing Needs Survey to provide the necessary evidence for future local needs not met by the recent housing developments.” However, the NP itself does not identify these “recent housing developments” and how such developments might meet the housing needs of the community 2011-2031. Therefore the NP in its present form does not meet housing needs in the community for the years 2011-2031.</p> <p>A vague promise that a HNS might be undertaken in the future does not solve that flaw. The NP does not</p>	Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
	Policy NE4	<p>contribute to the achievement of sustainable development set out in paragraph 7 of the NPPF by failing the social role. This is because the NP does not address its housing needs. In which case, the NP does not provide “the supply of housing required to meet the needs of present and future generations”.</p> <p>The NP only seeks to deliver 12 market houses, via allocations SSA1 and SSA2. These will yield no affordable houses. Six parcels of land inside and outside the village boundary have been designated a Local Green Space, which means the opportunity for “limited infilling” in the village and Rural Exception Sites outside the village is highly constrained. To put this figure of 12 houses into context, Core Strategy Policy CS.16 deals with the housing requirements of Local Service Villages. For Category 3 LSVs, of which Snitterfield is one, the requirement is “approximately 450 homes in total, of which no more than around 13% should be provided in any individual settlement.”</p> <p>For Snitterfield, that equates to a requirement of approximately 59 houses. Furthermore, Core Strategy Policy CS.16 states: C. Neighbourhood Planning The Council is committed to giving local people the opportunity to influence where homes are built in their communities and encourages Parish Councils to prepare Neighbourhood Plans that identify sites to meet or exceed the housing requirements set out above. The housing chapter of the NP is not in conformity with Core Strategy Policy CS.16 because it does not meet or exceed the housing requirement for Category 3 LSVs (59 houses in the case of Snitterfield).</p> <p><b>Introduction:</b></p> <p>Representations were made by Spitfire Properties LLP to the Pre-Submission NP, objecting to the designation of site 4 (Land to the rear of Appleton House) as a Local Green Space. In the Submission NP site 4 remains a LGS and the objection still stands.</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>The designation of site 4 as a LGS fails Basic Condition A of Paragraph 8, sub-paragraph (2), of Schedule 4B to the Town and Country Planning Act 1990 – “having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.”</p> <p>Site 4 LGS is allegedly justified by a Local Green Space Site Assessment (March 2016) and “Pre-submission consultation responses – August 2016” made in response to an objection by Spitfire Properties LLP to its designation as a Local Green Space in the Pre-submission draft NP.</p> <p>Neighbourhood Plan Committee Response to Site 4 made in the “Pre-submission consultation responses – August 2016” is repeated below:</p> <p>"Site 4 being within the proposed development boundary would not be subject to GB policy and therefore LGS designation would be justified to preserve the openness of this important and valued Site within the village. Amenity can be enjoyed, an indeed in this case is, without public access. The LGS designation does not imply public access will be forthcoming.</p> <p>Evidence supporting the NDP has found that there is significant potential for wildlife due to suitable habitats and surveys have shown that the site is species rich. The County Council does not state that there is no significant ecological value.</p> <p>The site provides an important open setting to the surrounding/adjoining heritage assets. Views are afforded over the site towards heritage assets. It is agreed that the existing use of the site has no impact on the heritage assets this is because it is inherently open and undeveloped. The NDP does not claim the site is within the Conservation Area or that there are important archaeological remains on the site. It is not a pre-requirement for a site to have conservation status to become eligible for LGS designation.</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>The site is visible from elevated views in the public domain. The site has a feeling of enclosure due to surrounding development but this does not preclude LGS designation.</p> <p>Inherent beauty is not a prerequisite for LGS designation. The characteristics of the site as whole need to be taken into account.</p> <p>Site 4 enjoys a central location within the village. It is characterised as local to the community due to its central location. For the reasons outlined in the assessment supporting the designation, Site 4 is demonstrably special to the local community and holds a particular local significance and local in character."</p> <p>The designation of Site 4 as a Local Green Space fails Basic Condition A for the following reasons:</p> <p><b>Planning Policy Context:</b></p> <p><b>NPPF paras 76 to 78</b></p> <p>Paragraph 76 - states that local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them.</p> <p>Paragraph 77 states –</p> <p>The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> <li>• where the green space is in reasonably close proximity to the community it serves;</li> <li>• where the green area is demonstrably special to a local community and holds a particular local significance,</li> </ul>	



Rep. No.	Policy	Representation	Reg.19 Request?
		<p>for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <ul style="list-style-type: none"> <li>• where the green area concerned is local in character and is not an extensive tract of land.</li> </ul> <p><b>Relevant Planning Practice Guidance</b></p> <p>Paragraph: 007 Reference ID: 37-007-20140306 Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.</p> <p>Paragraph: 009 Reference ID: 37-009-20140306. Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.</p> <p>Paragraph: 014 Reference ID: 37-014-20140306 The proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served.</p> <p>Paragraph: 015 Reference ID: 37-015-20140306 Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. ...blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.</p>	

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		<p>Paragraph: 017 Reference ID: 37-017-20140306 Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty).</p> <p>Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.</p> <p><b>Green Belt</b></p> <p>PPG Paragraph: 010 Reference ID: 37-010-20140306 states: “If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.”</p> <p>The Draft NP on page 37 addresses “additional local benefit” in broad terms: “In addition to the Green Belt status of the land, Local Green Space designation is also justified due to the special qualities and important contribution they play within the physical and natural environment of the village and the social role they provide for local residents.”</p> <p>In the case of Site 4, the Neighbourhood Plan Committee Response provides a clue what the “additional local benefit” might entail. It states “Site 4 enjoys a central location within the village. It is characterised as local to the community due to its central location.” This is simply a geographical fact. As a “local benefit” it is a wholly inadequate justification.</p> <p>The Neighbourhood Plan Committee Response contradicts page 37 of the Draft NP by stating: “Site 4 being within the proposed development boundary would not be subject to GB policy and therefore LGS designation</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>would be justified to preserve the openness of this important and valued Site within the village.” This statement is false. The draft NP does not change Green Belt boundaries and site 4 will remain in the Green Belt despite being within the proposed village boundary. The NP quest to preserve openness by designating Site 4 as LGS, as a substitute for Green Belt policy, fails on this fact.</p> <p><b>Public access</b></p> <p>Draft Policy NE4 states that LGSs “will be protected and where possible enhanced in order to ensure a suitable quantum of amenity space is available for the local community.” Amenity land is commonly associated with public access, which implies public access is a key factor. However, the site has no public access and hence no recreational value.</p> <p>In the case of Site 4, the Neighbourhood Plan Committee Response writes: “Amenity can be enjoyed, an indeed in this case is, without public access.” However, this statement is unsubstantiated as there is no explanation what “amenity” site 4 gives to the local community. A central location is not an amenity.</p> <p><b>Wildlife</b></p> <p>The Local Green Space Site Assessment (March 2016) states “The site has significant ecological value and includes extensive areas of grassland with trees around the periphery which are suitable habitats for a variety of wildlife. A number of farmland and woodland bird species have been recorded on the site along with fox, badger and bats...abundance of wildlife enjoyed by the large number of residents who live adjacent to the site.”</p>	

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		<p>The Neighbourhood Plan Committee Response writes “Evidence supporting the NDP has found that there is significant potential for wildlife due to suitable habitats and surveys have shown that the site is species rich. The County Council does not state that there is no significant ecological value.”</p> <p>This brief, anecdotal description does not support a claim of “significant ecological value.” With reference to the NP Core Documents list, it is an unsubstantiated claim. “Evidence supporting the NDP” has not materialised. The claim is also wrong.</p> <p>Appendix 2 of the draft NP is a list of SSSI’s. Site 4 is not one of them. Appendix 3 is a list of ecosites. Site 4 is not one of them.</p> <p>An Extended Phase 1 Ecological Survey was carried out by the landowner in 2014 to accompany planning application ref 15/02013/FUL for 10 houses. It concludes “Based on the intensive historical use of the site, the intensive surrounding land usage, the lack of suitable water bodies and the nature of the existing habitats, the site was considered to offer no or negligible habitat opportunities for the following protected species: Otters, Water Voles, Dormouse and White Crayfish. ....The site is considered to be of low to moderate ecological value with the main ecological value associated with the hedges and older scrub/trees. The main species that are considered an issue are birds and nesting birds and foraging bats.”</p> <p>Warwickshire County Council’s ecologist wrote in respect of this Extended Phase 1 Ecological Survey: “Having considered the ecological survey work undertaken by Ruskins Group in support of this application and information held by the Warwickshire Biological Records Centre, Ecological Services are satisfied the development will not give rise to any significant biodiversity concerns and there are no overriding ecological reasons to recommend refusal of the application.”</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>This 2014 ecological survey and county council analysis of this land in 2015 does not support the claim of “significant ecological value.” The draft NP and its Core Documents has no evidence to the contrary. Designation of the site on ecological grounds is therefore not justified.</p> <p><b>Historic significance</b></p> <p>The Local Green Space Site Assessment states:  <i>“Designation as LGS would preserve the neighbouring Heritage assets and conservation area from adverse impact and preserve the openness of the site when viewed from it’s surrounds and from further afield, such as from the Wolverton Road.”</i></p> <p>The Neighbourhood Plan Committee Response writes:  <i>The site provides an important open setting to the surrounding/adjoining heritage assets. Views are afforded over the site towards heritage assets. It is agreed that the existing use of the site has no impact on the heritage assets this is because it is inherently open and undeveloped. The NDP does not claim the site is within the Conservation Area or that there are important archaeological remains on the site. It is not a pre-requirement for a site to have conservation status to become eligible for LGS designation.</i></p> <p>The site has no historic buildings and does not lie within or adjacent to the Conservation Area. The NP committee confirms “existing use of the site has no impact on the heritage assets.” Possible designation of Site 4 as a LGS on the grounds of heritage assets should end at this point.</p> <p>Instead, the designation of Site 4 as a LGS is no more than a tool to prevent undefined future development from taking place due to its alleged impact on vaguely defined heritage assets lying somewhere outside the site. Moreover, the impact of possible future development is controlled by other Development Plan policies,</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>most notably Green Belt (Policy CS.10) and Historic Environment (Policy CS.8).</p> <p>Given there is no conservation designation or historic features on the land and no public access to observe any historic features outside the site, there is no demonstrable reason for Site 4 to be a Local Green Space on the grounds of its historic significance.</p> <p><b>Beauty</b></p> <p>The Neighbourhood Plan Committee Response writes:</p> <p><i>“The site is visible from elevated views in the public domain. The site has a feeling of enclosure due to surrounding development but this does not preclude LGS designation.”</i></p> <p>The Local Green Space Site Assessment adds:</p> <p><i>“Despite it being surrounded by residential development, there are glimpses of the site from viewpoints to the north of the village which creates a green backdrop to the built environment..... Despite its relatively limited views from within the majority of the village...”</i></p> <p>To be clear, the NP does not claim any special beauty of Site 4. Although the site lies within the village boundary, it is barely visible from the public domain. It is surrounded on four sides by housing. No part of the site can be seen from the public domain except glimpses from roads at the north end of the village. These roads lie 200m away, a considerable distance. The Village Character Appraisal on pages 8 and 9 of the draft NP has 22 views of the village but none are of Site 4.</p>	

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		<p>Site 4 has mature trees on its boundaries but no water features or distinctive landscape features that make it particularly beautiful. The Council’s Landscape Sensitivity Study by White Consultants (CD5.7) places Site 4 within a zone (SN01) of medium sensitivity to housing and medium/high for commercial; both are the lowest landscape category of their type at Snitterfield. The study describes SN01 as “Newer housing estates have developed on the north side, and other larger dwellings to the south, in a more organic form. This zone is land locked at the back of existing dwellings on four sides. It comprises a little used area of pasture with mature trees and outgrown hedging, linking with mature back garden planting on many boundaries. Some of the mature trees on the site are visible from other areas of the settlement and help create a semi-rural character.”</p> <p>Thus Site 4 has ordinary landscape features and is subject to only limited and glimpsed views from the public domain 200m away. On these grounds, views of the site are clearly not a reason for LGS designation. Moreover, Site 4 is very much less visible from the public domain than any of the other proposed LGSs and the two proposed housing allocations SSA1 and SSA2 identified by the NP.</p> <p><b>Summary</b></p> <p>With reference to NPPF paragraph 77, designation of a Local Green Space should only be used where it is demonstrably special to a local community AND holds a particular local significance AND is local in character.</p> <p>The Submission Neighbourhood Plan fails to explain what makes Site 4 particularly “local”; that is, distinctive from other fields in the parish, district or county. Potential reasons for designation on grounds of public access (none), wildlife, historic significance and beauty fall away under scrutiny. Its central location in the village is no more than a geographical circumstance. Moreover, the Village Character Appraisal on pages 8 and 9 of the draft NP has 22 views of the village but none are of Site 4.</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
	Policy SSA1	<p>This report demonstrably points to the opposite conclusion; that Site 4 does not qualify as a Local Green Space. The designation of Site 4 as a LGS seems to be no more than a tool to prevent future development from taking place. The NP also misunderstands that Green Belt designation of this site affords it protection already, to which LGS designation adds nothing of value.</p> <p>Due to non-conformity with paragraph 77 of the Framework and Planning Practice Guidance and breach of Basic Condition A, Site 4 should therefore be removed as a LGS designation from the Neighbourhood Plan.</p> <p>Fails Basic Conditions A, D and E of Paragraph 8, sub-paragraph (2), of Schedule 4B to the Town and Country Planning Act 1990.</p> <p>Policy SSA1 relates to limited housing developments, with this site proposed to be redeveloped wholly with housing (up to 9 houses). The policy states “Development will only be supported if there is an adequate mechanism in place to secure appropriate replacement sports facilities in a suitable location.” The Explanation reads: “In order to retain this vital asset and enhance facilities for users and safeguard the provision for future generations, the re-use of the existing brownfield site for housing development, bounded by the existing Tennis Courts, to the east, Bowling Green to the south and Wolverton Road to the west, could provide essential funds to invest in a new clubhouse building.... Any scheme will be subject to a viability appraisal to ensure the delivery of the new sports facilities.”</p> <p>This proposed allocation SSA1 fails to comply with Core Strategy Policy CS.25 - Healthy Communities, which states It is expected that existing community facilities, such as shops, pubs, medical and leisure, will be retained unless it can be demonstrated that one or more of the following criteria is satisfied:</p> <ol style="list-style-type: none"> <li>1. there is no realistic prospect of the facility continuing for commercial and/or operational reasons on that</li> </ol>	



Rep. No.	Policy	Representation	Reg.19 Request?
		<p>site;</p> <ol style="list-style-type: none"> <li>2. the land and/or property has been actively marketed or otherwise made available for a similar or alternative type of facility that would be of benefit to the community;</li> <li>3. the facility can be provided effectively in an alternative manner or on a different site in accordance with the wishes of the local community; and</li> <li>4. there are overriding environmental benefits in the use of the site being discontinued.</li> </ol> <p>In all instances the potential to mitigate within the local area the loss of a community facility will be considered alongside any proposal for development on the site of the existing facility. The explanation to Policy SSA1 acknowledges “The Sports Club is seen as a desirable and essential part of the Community.”</p> <p>However, Policy SSA1 does not identify the location of land for the replacement clubhouse building and its associated access and parking. There has been no marketing of the existing sports club nor evidence it cannot be used as a community building for the duration of the Neighbourhood Plan (2011-2031).</p> <p>There is no mechanism in place for delivery of a sports club elsewhere in the village. Given Snitterfield is constrained by the Green Belt (among other constraints), the policy must identify this land for the new clubhouse otherwise SSA1 is not a deliverable housing site (PPG Paragraph: 005 Reference ID: 41-005-20140306). Furthermore, Core Strategy Policy CS.25 and NPPF paragraph 70 bullets 2 and 4 are in breach and so the policy fails the Basic Conditions.</p>	
SNP12	Policy H1	<p>Object - The proposed village boundary has been drawn even more tightly than the historic version from 2002. In the original version (for example) the land to the rear of Pigeon Green House and adjacent properties was included in the boundary. The land is clearly garden / amenity land and has been for many years. It is now to be classed as "open countryside in the Green Belt" with all the restrictions that such a classification places on the individual owner's property rights. It is clear, as many other examples within the village demonstrate,</p>	Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
	Policy H2	<p>that this is a ploy to prevent sustainable development coming forward. As the Neighbourhood DEVELOPMENT Plan is supposed to be about future DEVELOPMENT and maintaining the vitality and viability of village services, it makes little sense to put the village in a strait jacket preventing all future development. This is undoubtedly the case as all traditional infill plots have been developed already.</p> <p>Object - Vacant and redundant land should also be included in this category. The NPPF seeks to put such land to viable economic use where it can be demonstrated that there is no economic alternative and where sustainable development can provided the most productive future use of the site. The new village boundary should be modified to include such areas of land and therefore allow some flexibility and opportunity for the village to adapt to its future housing need. The boundary as currently proposed does exactly the opposite and actively constricts possible future development.</p>	
	Policy H3	<p>Object - In principle H3 is sound, however the village boundary has been drawn so tightly as to deliberately exclude many areas of garden being used in such a way. As all existing infill plots have already been developed, this policy, in conjunction with the proposed village boundary, is redundant. If H3 is to serve any useful purpose in future, the village boundary should be drawn to reflect all current and historic land uses and should accurately demarcate garden and other uses from open countryside / farmland. This, in conjunction with the aforementioned vacant and redundant land, would provide a more flexible village boundary, accurately demarcated from the true open countryside. At present, the proposed boundary is entirely arbitrary and does not recognise this distinction in land-use terms.</p>	
	Policy H4	<p>Object - The principle of affordable housing provision is admirable, however it must be recognised that due to financial and budgetary constraints (likely to continue into the foreseeable), very few rural exception sites come forward and the trend for such sites has been downward in recent times. The downward trend is likely to continue. The most successful affordable housing is produced and provided by inclusion on mixed sites,</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
		<p>where market housing cross-subsidises the construction of identical quality affordable housing as part of the development. The policy should be modified to encourage small scale development on the edge of the village boundary, preferably on vacant/redundant/brownfield land, to include affordable housing on developments of over five dwellings in accordance with adopted policy CS16/17. This is likely to provide the only route for delivery of affordable housing in the future and will help the village develop accordingly in an evolutionary manner, much as it has done over centuries.</p>	
	Policy H5	<p>Support subject to previous comments concerning the village boundary being addressed. Identifying possible future sites, that are compliant and realistically address future need, would be advantageous - as has been the case with other NPs.</p>	
	Policy BE1	<p>Object - i) should be removed as this could adequately be covered by a planning condition and places unnecessary up-front costs on the applicant.</p>	
	Policy BE2	<p>Support - b) should be modified to include vacant / redundant land with no other viable use.</p>	
	Policy BE8	<p>Support - Alternative viable uses of poor-quality agricultural land to provide sustainable development should also be supported.</p>	
	Policy BE9	<p>Object - e) should be omitted. This is not necessary and places additional cost on the applicant.</p>	
	Policy NE4	<p>Object - 4) Should be excluded and identified for future sustainable development in line with other potential areas such as the land to the rear of Jago Lane, Pigeon Green - another highly sustainable location with all services connected and an existing access.</p>	

Rep. No.	Policy	Representation	Reg.19 Request?
	Policy IN2	Object - It is not the responsibility of developers to maintain Bell Brook. The last paragraph should be omitted.	
	Policy IN4	Support - This policy pre-supposes that a reasonable quantity of family housing is going to be built in the coming years - something that appears to be actively discouraged by the NP as currently drafted.	
	Policy ALW1	Support - This is a valid aspiration, but relies on new families and young people being allowed to move into the village - with the exception of two new miniscule sites currently identified, this is not going to happen as the NP is too restrictive and does not identify any other possible future sites, choosing instead to rely on non-existent infill plots to meet future need and retain viability.	
	Policy SSA1	Object - The sports club should be enhanced and improved and the land retained for this historic use. CIL and 106 payments from other more suitable housing sites within and around the village (such as the land to the rear of Appleton House and Jago Lane for example) would provide the necessary funds to pay for such improvements. Once this sports club land is lost to housing, there will be no incentive for replacement facilities to be provided - far better to retain and improve the existing facilities.	
	Policy SSA2	Support - The two identified sites would not provide enough housing going forward through the life of the plan to even match the historic build rate for the village - let alone address the NPPF requirement to "significantly boost" the supply of housing. The NP and village boundary as currently drafted represent a Neighbourhood NO DEVELOPMENT Plan and actively discourage sustainable development. It should be re-drafted to take a more proactive view of future development which will help support and enhance existing services, including keeping the school and nursery full and enabling young people to move into and stay in the village.	
SNP13	Whole Document	Thank you for your email but as Snitterfield is not in the Thames Water catchment area, we have no comments to make.	Not indicated

Rep. No.	Policy	Representation		Reg.19 Request?
SNP14	<p data-bbox="241 268 472 300">Whole Document</p> <p data-bbox="241 459 472 539">Policy IN1 - Explanatory text</p>	<p data-bbox="504 268 1946 391">As a general comment this is a clear a coherent document and those involved in its development should be congratulated. We do not have any substantive comments and we trust our observations are seen in this context.</p>	<p data-bbox="1234 448 1375 480"><b>Comment</b></p> <p data-bbox="1234 491 1946 560">This is strictly not true as WCC is not responsible for the oversight of flooding from reservoirs.</p> <p data-bbox="1234 608 1946 794">Just for clarity, WCC suggest addition for the word 'maintenance'....such that the opening sentence reads 'Neither WCC nor Stratford District Council (SDC) have responsibility for the maintenance of the Bearley Brook.'</p> <p data-bbox="1234 842 1946 991">WCC would not agree with this statement and it does seem to conflict with Policy INC2 – Drainage and Flooding (p42). Above ground features such as ponds are preferred to underground storage of water.</p>	Not indicated
SNP15	Whole Document	<p data-bbox="504 1082 1946 1225">The County Council welcomes communities proposing Neighbourhood Plans that shape and direct future development. The main responsibilities of the County Council are highways and public transport, education, social services, libraries and museums, recycling/ waste sites and environment. The County Council's role is to deliver the services and facilities efficiently.</p> <p data-bbox="504 1278 1122 1310"><b>Financial implications of Neighbourhood Plans</b></p> <p data-bbox="504 1321 1946 1385">We would like to state at the outset that the County Council cannot commit to any financial implications from any proposals emanating from Neighbourhood Plans. Therefore, Neighbourhood Plans should not identify</p>		Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
	Policy BE6	<p>capital or revenue schemes that rely of funding from the Council. However, we will assist communities in delivering infrastructure providing they receive any funding that may arise from S106 agreements, Community Infrastructure Levy or any other sources.</p> <p>We have the following comments to make as a guide any amendments prior to formal submission of the Plan.</p> <p><b>Comments on transport matters</b></p> <p><b>Road safety matters</b></p> <p>Should the Neighbourhood Plan proposals require any changes to the highway i.e. speed limits, traffic calming measures they will need to meet the relevant criteria and any required consultation. In addition, funding to achieve these should be provided by the proposed development.</p> <p>Warwickshire County Council supports the emphasis has been placed on increasing public footpaths and cycle routes. We recommend that projects, such as, car share schemes or car clubs be considered for further investigation in order to reduce car usage in the area covered by the Neighbourhood Plan.</p> <ul style="list-style-type: none"> <li>• Consideration is given for new developments to include cycle storage spaces.</li> <li>• Warwickshire along with many other parts of the country has sought to control the amount of parking provision within new developments in recent years. The generally low provision is to make sure that new developments are: sustainable and make best use of the land available; they do not encourage additional car trips; and trips that are to be made are done so through non-car based modes where possible.</li> <li>• The County Council supports new developments providing adequate amounts of parking subject to the criteria set out in the Local Transport Plan (2011-2026) and the parking standards as set by Stratford-on-Avon District Council’s Supplementary Planning Document.</li> <li>• Any new developments will be subject to the County Council’s approval. This includes car ports and any impact to existing road networks or the addition of any new routes or accesses.</li> </ul>	

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	<p>Policy H3(d)</p> <p>Policy IN1(d)</p> <p>Policy IN3(a-e)</p> <p>Policy ALW2</p>	<ul style="list-style-type: none"> <li>• As above, we would note that parking standards contained within neighbourhood plans are subject to those set by district councils, in this case Stratford-on-Avon. Therefore, the parking standards set out in the Snitterfield Neighbourhood Development Plan will be subject to those set out by the Stratford-on-Avon District Council's Supplementary Planning Document.</li> <li>• Any new developments will be subject to the County Council's approval. This includes any impact to existing road networks or the addition of any new routes or accesses.</li> <li>• Whilst we support using construction materials which aid in reducing the risk of flooding occurring, we would require further information before commenting.</li> <li>• The County Council supports proposals that may improve the bus service which would in turn reduce the number of trips made by the private car.</li> <li>• Warwickshire supports the proposals in the Neighbourhood Plan in principle, subject to both planning and transport planning criteria being met. This includes any impact to existing road networks or the addition of any new routes or accesses.</li> <li>• As stated above in the response to Policy BE6, parking standards are set by Stratford-on-Avon District Council's Supplementary Planning Document.</li> <li>• We note that cycling and walking feature quite prominently in the document and that any new development will be encouraged to provide these in their proposals. We support this emphasis.</li> <li>• Any improvements to accessibility which affect the public highway will be subject to County Council approval.</li> </ul>	
SNP16	Policy BE3	<p>We are pleased to see the introduction of bullet point (b), which prevents extensions encroaching into our 8m Main River byelaw distance. However, as previously raised, we are concerned by the wording of bullet point (a) i.e. that allows a 30% increase in the volume of replacement dwellings as this could potentially result in an increase in built development within the floodplain. Many existing properties are located in the floodplain of the Main River Bell Brook (and its tributaries) which flows through the centre of the village and measures should be taken to restore and improve the floodplain and not add to the flood risk. If this is to be left in, we</p>	Not indicated

Rep. No.	Policy	Representation	Reg.19 Request?
	Policy BE9	<p>would recommend a caveat that it should only be acceptable in Flood Zone 3 if there was land within Flood Zone 1 within the site boundary to allow for floodplain compensation.</p> <p>Every opportunity should be taken to position replacement dwellings in areas of lowest flood risk following the Sequential approach to site layout. You may also wish to consider a Policy to ensure the creation of basements or ground floor self-contained houses/apartments in flood risk areas is not permitted as these are particularly vulnerable to flood risk.</p>	
	Policy BE11	<p>We support this Policy providing the empty home to be utilised are not located in an area at risk of flooding. As above, the redevelopment of single-storey dwellings and basement dwellings is not appropriate in flood risk areas.</p>	
	Policy NE2	<p>We would like to see this Policy developed further to include the following requirements:</p> <ul style="list-style-type: none"> <li>• Opportunities should be taken to reinstate natural river channels.</li> <li>• Culverted watercourses should be opened up where feasible.</li> <li>• Existing open watercourses should not be culverted.</li> </ul>	
	Policy IN2	<p>In the explanation section, it should be made clearer that the riparian roles and responsibilities applies to all watercourses including Main Rivers e.g. Bell Brook. Our Living on the Edge explains this in more detail. The Sentence <i>“The LLFA and the EA have been made statutory consultees for major planning applications, i.e. ten or more properties, sites over half a hectare, and for non-major applications the LPA remains responsible”</i> is incorrect. The Environment Agency (EA) is a statutory consultee to LPAs on all planning applications within Flood Zones 2 and 3. The EA is also a statutory consultee for applications for prior approval and for change of use applications where there is an increase in vulnerability of the end use. LLFAs are statutory consultees on planning applications for major development in relation to surface water drainage under Schedule 4 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This came into force on 15 April 2015.</p>	



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	Specific Site Allocations (p.47)	<p>We consider the Policy meets the requirements of Policy CS.4 of Stratford-on-Avon District Council's Core Strategy. We are pleased to note that you have included our recommendation of the 8m easement from the top of bank of the Main River Bell Brook. You should also consider the inclusion of a minimum easement of 5m from ordinary watercourses in this policy. We are pleased to see the inclusion of the fifth paragraph requiring that a contribution towards future maintenance of the Bell Brook FAS is provided.</p> <p>We support Policy SSA1 (Snitterfield Sports Club) and SSA2 (Land adjacent to Telephone Exchange, Bearley Road) as both sites are brownfield and are located in Flood Zone 1 (low risk).</p>	