



# **LOXLEY PARISH**

## **NEIGHBOURHOOD DEVELOPMENT PLAN**

—— COMMUNITY GUIDING GROWTH ——

2011 - 2031

## Appendix 2 A

Second Consultation on Pre-Submission Loxley  
15<sup>th</sup> November 2018 to 10<sup>th</sup> January 2019

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## **Extract from the Draft Minutes of Loxley Parish Council Meeting held on 13<sup>th</sup> November 2018:**

### **NDP update**

#### *NDP related correspondence*

GJ noted that he had notified both landowners affected by the amendments to the Plan.

#### *Revised plan for approval*

A revised Plan – following the formal consultation process had been circulated for approval to all Councillors. The revised Plan had taken into comments made during the consultation process and significant changes had been made, including dropping two of the sites – one on the approach to Home Farm and the other to the rear of Box Tree Cottage as well as adding a new policy on flooding.

In addition to the Plan, significant progress had been made preparing all the accompanying appendices. Councillors thanked Wendy Gadd for her significant contributions in putting together these substantial documents.

JW proposed that the revised Plan be accepted and this was seconded by DB, and was supported by GJ. KO did not participate in discussion of this (NDP) agenda item.

#### *Additional Regulation 14 NDP Pre-Submission consultation*

An additional period of consultation would now follow running from Thursday 15<sup>th</sup> November 2018 to Thursday 10<sup>th</sup> January 2019. The period was slightly longer than the normal 6 week consultation period to allow for the Christmas break. This additional consultation period was advised by SDC in light of the significant changes to the Plan.

### **Actions :**

- **JW to place Regulation 14 notification in the Stratford Herald and Grapevine**
- **GJ to place Regulation 14 notification on Noticeboard and place revised NDP plus supporting appendices on the website (NDP page)**
- **Acting Clerk to email all statutory consultees**
- **WG to continue to update appendices as comments are made, with GJ formulating responses to comments.**

**This Notice was displayed on the Village Notice Board and emailed to certain Parishioners:**

## **Loxley Neighbourhood Development Plan (NDP) Regulation 14 – Pre-submission Consultation**

Loxley Parish Council is pleased to announce that following the Regulation 14 consultation a revised **Loxley NDP** is now available for inspection at [loxleyvillage.com](http://loxleyvillage.com). Hard copies are available on request.

In light of the significant Plan revisions (*two sites have been dropped and a policy on flooding added*), SDC are now advising that a further consultation period be held. This will run over 8 weeks from :

**Thursday 15<sup>th</sup> November 2018 to Thursday 10<sup>th</sup> January 2019.**

We are inviting comments on those aspects of the Plan which have changed ie the deletion of two sites plus the addition of a flooding policy.

**There is no need to repeat comments previously submitted.**

Comments and enquiries can be sent via email to:

[loxleyparishchair@gmail.com](mailto:loxleyparishchair@gmail.com)

Or hard copies can be sent to: Greenbanks, Loxley, Warwickshire CV35 9JS

All written representations received will be considered and will form possible future modifications to the Plan prior to formal submission to Stratford-Upon-Avon District Council.

### **Extract from the Village Website:**

#### **Loxley Neighbourhood Development Plan**

A further consultation period will now be held on the revised plan which will formally run from **15th November 2018 to 10th January 2019**, inviting comments on those specific aspects of the Plan that have been amended, namely the removal of two sites (land previously identified to the south of Home Farm Drive and land to the rear of Box Tree Cottage), plus the addition of a new policy regarding flooding.

For an informal discussion about the Plan please contact the Parish Council at [loxleyparishclerk@gmail.com](mailto:loxleyparishclerk@gmail.com) or approach one of your local Councillors.

## Herald Advertisement 15<sup>th</sup> November 2018:

### **Loxley Neighbourhood Development Plan (NDP) Regulation 14 – Pre-submission Consultation**

Loxley Parish Council is pleased to announce that following the Regulation 14 consultation a revised Loxley NDP is now available for inspection at [loxleyvillage.com](http://loxleyvillage.com). Hard copies are available on request.

In light of the significant Plan revisions, SDC are now advising that a further consultation period be held. This will run over 8 weeks from:

**Thursday 15th November to Thursday 10th January 2019**

We are inviting comments on those aspects of the Plan which have changed.

**There is no need to repeat comments previously submitted.**

Comments and enquiries can be sent via email to:

**[loxleyparishchair@gmail.com](mailto:loxleyparishchair@gmail.com)**

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All written representations received will be considered and will form possible future modifications to the Plan prior to formal submission to Stratford-Upon-Avon District Council.

## Extracts from The Grapevine Newsletter Hampton Lucy, Charlecote & Loxley Parishes December 2018/January 2019 Edition:



### **News from the Parishes**



*A complete list of church services, including those at Barford, Wasperton and Sherbourne, is displayed on the notice board in your church.*



#### **Carers4Carers**

**Friday, 14 December**, 10.30am to 12 noon: Carers4Carers festive meeting at Kineton Village Hall. Come and join us for seasonal treats and chat. Anita will be on hand to offer some pampering and TLC. Please let us know in advance if you would like us to look after your loved one in our Companionship Group.

**Friday, 25 January**, 10.30am to 12 noon: Carers4Carers meeting at Kineton Village Hall. Come and join us for coffee, biscuits and supportive chat. Speaker to be confirmed. Please let us know in advance if you would like us to look after your loved one in our Companionship Group. For more details, including help with transport, please phone Gillian on 01926 640203/07947 893504.

LM

#### **Loxley Neighbourhood Development Plan**

Stratford District Council has advised that a further round of consultation should take place because of significant changes to the Plan. The revised Plan is available for inspection at [www.loxleyvillage.com](http://www.loxleyvillage.com). The consultation period will run from Thursday, 15 November, 2018 to Thursday, 10 January, 2019. Comments are invited on those aspects of the Plan which have been changed.

JWh

#### **The Prayer Book Society**

The Prayer Book Society will be holding its traditional service of hymns, readings and Collects for Advent in St Peter ad Vincula Church, Hampton Lucy, on Saturday, 1 December, at 2.30 p.m. Everybody is very welcome and is invited to join us for tea afterwards. This is a chance to reflect on some fine hymns and readings on the real meaning of Christmas, before the tinsel, lights and present-buying gets into top gear.

PB

## **List of Formal Consultees**

Akins Ltd  
ancient monuments society  
arqiva  
Birmingham International Airport  
BT Group PLC  
CABE  
Canal and River Trust  
Capital and Property Projects  
Coal Authority  
Council for British Archaeology  
Council for British Archaeology  
Cotswold Conservation Board  
Coventry Diocese DAC Secretary  
Civil Aviation Authority  
Coventry Airport  
CTC - National Cycling Charity  
CTC - National Cycling Charity  
Historic England  
Historic England  
English Heritage Parks and Gardens  
Environment Agency  
Force Crime Prevention Design Advisor  
Forestry Commission  
Garden History Society  
Georgian Group  
Glide Sport UK  
Homes and Communities Agency  
Highways Agency (Midlands)  
Inland Waterways Association  
Joint Radio company  
Kernon Countryside Consultants  
London Oxford Airport  
MBNL(Acting for Everything Everywhere)  
MBNL(Acting for Everything Everywhere)  
Ministry of Defence  
Accessible Stratford  
Mr Butler (CPRE)  
CPRE  
National Air Traffic Services  
National Grid Gas Distribution  
National Grid UK Transmission  
National Planning Casework Service  
National Trust  
National Trust  
Natural England  
Natural England  
Network Rail  
Ofcom  
Off Route Airspace  
SDC Conservation  
WCC Principle Highway Control Officer



Ramblers Association  
SDC Planning and Environment  
Royal Agricultural Society of England  
RSPB  
Severn Trent Water  
Sport England West Midlands  
Sport England West Midlands  
Stratford-on-Avon Gliding Club  
Stratford-on-Avon Gliding Club  
Sustrans  
Thames Water Utilities  
Thames Water Utilities  
The Design Council  
Theatres Trust  
Upper Avon Navigation Trust Ltd  
Victorian Society  
Warwickshire Badger Group  
Warwickshire Bat Group  
Warwickshire Police  
Warwickshire Police  
Warwickshire Police Road Safety  
Warks Primary Care Trust  
NHS Property Services Ltd  
Warwickshire Rural Housing Association  
Warwickshire Wildlife Trust  
Warks Wildlife Trust  
WCC - planning  
WCC Archaeology  
WCC Capital & Property Projects Officer  
WCC Extra Care Housing  
WCC NDP Liaison Officer  
WCC Flood Risk  
WCC Ecology  
WCC Forestry  
WCC Fire & Rescue Service  
WCC Gypsy & Traveller Officer  
WCC Health & Communities  
WCC Highways  
WCC Land Registry  
WCC Libraries  
WCC Rights of Way  
Wellesbourne Airfield  
Wellesbourne Airfield  
Western Power Distribution  
Woodland Trust  
Warwickshire Rural Community Council  
Warwickshire Amphibian and Reptile Team  
Stansgate Planning  
Coventry and Warwickshire Partnership NHS Trust  
South Warwickshire Clinical Commissioning Group  
Community Forum - Stratford area  
Stratford Business Forum  
Strutt and Parker

Bromford Housing Group  
Stonewater Housing Association  
Fortis Living Housing Association  
Warwickshire Rural Housing Association  
Orbit Group  
Waterloo Housing Group  
Stratford District Council

### **List of Local Councils, County Councillor & SDC Ward Members Consulted**

Alderminster Parish Council  
Charlecote Parish Meeting  
Ettington Parish Council  
Stratford-upon-Avon Town Council  
Wellesbourne & Walton PC  
County Councillor  
Lynda Organ Ward Member Bridgetown  
Penny Anne O'Donnell Ward Member Ettington  
Danny Kendall Ward Member Wellesbourne West  
Anne Parry Ward Member Wellesbourne East  
Chris Mills Ward Member Kineton  
John Fielding Ward Member Red Horse  
Stephen Gray Ward Member Brailes and Compton  
Jo Barker Ward Member Shipston South  
Chris Saint Ward Member Shipston North  
Mike Brain Ward Member Quinton  
Peter Barnes Ward Member Welford-on-Avon  
Kate Rolfe Ward Member Tiddington

### **Consultation Letter: Formal Consultees & Local Councils**

Loxley Parish Council is pleased to announce that following the Regulation 14 consultation a revised **Loxley NDP** is now available for inspection at [loxleyvillage.com](http://loxleyvillage.com). Hard copies are available on request.

In light of Plan revisions, SDC are now advising that a further consultation period be held. Key changes from the previous draft include the removal of two sites (land previously identified to the south of Home Farm Drive and land previously identified to the rear of Box Tree Cottage), while a new policy on flooding has been added. The consultation period will run over 8 weeks from : **Thursday 15<sup>th</sup> November 2018 to Thursday 10<sup>th</sup> January 2019.**

We are inviting comments on those aspects of the Plan **which have changed** ie the deletion of two sites plus the addition of a flooding policy. **There is no need to repeat comments previously submitted.** Comments and enquiries can be sent via email to: [loxleyparishchair@gmail.com](mailto:loxleyparishchair@gmail.com) Or hard copies can be sent to: Greenbanks, Loxley, Warwickshire CV35 9JS

All written representations received will be considered and will form possible future modifications to the Plan prior to formal submission to Stratford-Upon-Avon District Council.



## Pre-Submission Second Consultation Responses – November 15<sup>th</sup> 2018 to 10<sup>th</sup> January 2019

Rep Code	Full Name	Organisation represented (where applicable)	Summary of Third Party Response	NDP Responses
001	Hannah Lorna Bevins	Wood on behalf of National Grid	<p><b>Loxley Neighbourhood Plan Consultation</b></p> <p><b>SUBMISSION ON BEHALF OF NATIONAL GRID</b></p> <p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p><b><u>About National Grid</u></b></p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p><b><u>Assets in your area</u></b></p> <p>National Grid has identified the following high-pressure gas transmission pipelines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> <li>• <b>FM02 - Churchover to Wormington</b></li> </ul>	<p>Noted (that there are no implications for the National Grid).</p> <p>The general guidance in National Grid's standard NDP response regarding its high voltage electricity transmission system, key resources and contacts have been noted along with its specific comments regarding the Neighbourhood Area.</p>

			<p>• <b>FM23 - Newbold Pacey to Honeybourne</b></p> <p>From the consultation information provided, the above gas transmission pipelines do not interact with any of the proposed development sites.</p> <p><u>Gas Distribution – Low / Medium Pressure</u></p> <p>Whilst there are no implications for National Grid Gas Distribution’s Intermediate/High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, Please contact <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p> <p><u><b>Electricity distribution</b></u></p> <p>Information regarding the distribution network can be found at: <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p> <p><u><b>Key resources / contacts</b></u></p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link:  <a href="http://www2.nationalgrid.com/uk/services-/land-and-development/planning-authority/shape-files/">http://www2.nationalgrid.com/uk/services-/land-and-development/planning-authority/shape-files/</a>  Please remember to consult National Grid on any Neighbourhood Plan or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:</p> <p>Hannah Lorna Bevins Consultant Town Planner  <a href="mailto:n.grid@woodplc.com">n.grid@woodplc.com</a>  Wood E&amp;I Solutions UK Ltd. Gables House Kenilworth Road  Leamington Spa Warwickshire CV32 6JX  Spencer Jefferies Development Liaison Officer, National Grid  <a href="mailto:boxlandandacquisitions@nationalgrid.com">boxlandandacquisitions@nationalgrid.com</a>  National Grid House Warwick Technology Park Gallows Hill  Warwick CV34 6DA</p> <p>I hope the above information is useful. If you require any further information, please do not hesitate to contact me.</p>	
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002	Diane Clarke	Network Rail	Network Rail has no comments to make.	Noted
003	Peter Boland	Historic England	Thank you for the invitation to comment again on the Submission Neighbourhood Plan in relation to minor revisions to the development sites proposed and the addition of a policy on flooding. Having considered these I can confirm that Historic England has no substantive comments to add to those conveyed in our original regulation 14 consultation response of the 27 <sup>th</sup> June 2018. I hope you find this advice helpful.	We acknowledge that Historic England have no comment in regard to Loxley's Flooding policy.
004	Flood Risk Management Planning WCC	Flood Risk Management Planning WCC	FRM have reviewed the recent update and our previous comments have been incorporated, we have no further suggestions. Many thanks	We acknowledge that WCC Flood Risk Management Planning have no further comment in regard to Loxley's Flooding policy and are satisfied that their previous comments have been incorporated.
005	Dr G J Nicholson	The Inland Waterways Association	The Inland Waterways Association (Warks branch) wishes every success to the revised Loxley NDP. Dr G J Nicholson Planning Officer IWA (Warks branch)	We note the positive and encouraging comments.
006	John & Hazel Mills	Residents	<b>Loxley NDP Consultation Draft October 2018 and Appendix 2</b> Thank you to the Parish Council and NDP working group for producing such a thorough revised Consultation Draft and a very helpful Appendix 2. It was very revealing to see the comments from a large percentage of Loxley residents and to be reassured that the inclusion of The Box Tree Cottage plot was of great concern to many from different parts of Loxley and to some statutory bodies. We welcome and support the newly drawn Development Boundary and Site Allocations Map (Fig 2, page 13) which now does not include this plot in particular and removes it from the NDP. We feel that the plots A, B and C are manageable in terms of size and safety. We also welcome the newly included Flood Protection Policy which goes some way to acknowledging current problems and raising the	We acknowledge the positive and encouraging comments regarding the Development Boundary, Site Allocations and Flood Protection Policy.

			<p>profile of the wish to avoid increase of same with any future development.</p> <p>We still have some concerns over highway safety in reference to the new Plot B. Although not such a high-risk area, it is nevertheless a dangerous position to exit close to a blind summit. When we attended the November LPC meeting, we understood that guidance was to be taken from the local authority Highways Department on safety and splay and that the site had been reduced in size by area and property numbers. However, two of the properties are significantly large and the whole plot would still have the potential for use by several vehicles owned by the residents and services who would all use this same entrance to the plot which is just after the brow of a hill. We understood that the LPC were also concerned for this and were awaiting comments from Highways.</p> <p>Our interests are for the whole village and avoidance of over development and further initiatives which would cause a danger to residents and those passing through with the resulting increase of vehicles exiting on to a busy highway.</p>	<p>A planning application has been submitted and has received planning consent with no objections raised by either planning or WCC Highways departments.</p>
007	Katherine & Richard Coxon	Residents	<p>In response to the second consultation on the Loxley NDP, Richard and I are fully supportive of the revised NDP referred to below and in particular of the exclusion of sites D and E and the inclusion of a flooding policy.</p> <p>Thank you very much to you and your team for all of your hard work on this.</p>	<p>We acknowledge the positive and encouraging comments regarding the Site Allocations and Flood Protection Policy.</p>
008	Stephen & Rachel Butt	Residents	<p>Further to the email received notifying us of an extension to the Loxley NDP consultation period, we have reviewed Appendix 2 in detail as suggested. We note that this includes a summary of the results, detailed comments of everyone who took part (sadly not a very good response rate), the comments by businesses and service providers as well as further guidance from Stratford District Council and the actions of the LPC/working group in response to their notes on the draft plan</p>	<p>There is no specified response rate, all that is required is a simple majority.</p>

			<p>as previously submitted.</p> <p>The key changes appear to be the removal of 2 sites for proposed developments (C and D) and the inclusion of a flood policy.</p> <p>Whilst it appears to be the general will of the residents of Loxley to have a Plan (although <i>we</i> are not convinced that this doesn't simply advertise sites to prospective developers) the response rate seems nevertheless disappointingly low. We would like to know what percentage (Plan Approval) would need to be achieved following the omission of certain sites for this to be considered a viable Plan at all? At present it seems that after the removal of sites C and D approval still only rises to 57% which, when based on a participation rate of only 42%, suggests a low level of enthusiasm.</p> <p>To be frank we are not in favour of further development and given that Stratford has already achieved its quota would argue that the number of sites can and should be further reduced.</p>	<p><b><u>SDC / Housing allocations:</u></b></p> <p>Stratford District Council currently has at least a five year supply of housing against the figure of 14,600 for the Core Strategy plan period. It is important to remember that these commitments (whether for Loxley or the District as a whole) are planning permissions granted and not actual houses built. It is also important to remember that the 14,600 dwellings scheduled in the Core Strategy and the number identified for LSV4s are not a ceiling or cap. They are actually a minimum requirement. Though there are number of large-scale developments going through the planning application process at the moment, permission for them has not yet been granted. Because of that, they cannot be regarded as, or assumed to be, commitments or completions.</p> <p><b>Resisting speculative development...</b></p> <p>Throughout the term of the Core</p>
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			<p>We believe strongly that Site B should be removed, the reasons being that if Site D has been removed because it offered a lack of provision of safe access, its location was near to an accident blackspot and its designation as a local wildlife site AND if Site C has been removed because it presented a flooding risk then Site B meets all of the same negative criteria. We therefore challenge the reasons why Site B has been left in when C and D have been removed. Consider the following:</p> <ul style="list-style-type: none"> <li>• The extremely dangerous location of any proposed access to Site B</li> </ul>	<p>Strategy, Stratford District Council has to demonstrate a 5 year housing land supply (5YHLS). If this 5YHLS cannot be demonstrated, that is, these commitments are not actually being built, then the Core Strategy will be deemed to be 'out-of-date' and under the provisions of the National Planning Policy Framework paragraph 14, the presumption in favour of sustainable development would apply. A parish having a Neighbourhood Development Plan and having been seen to fully participate and contribute in the planning process at the local level puts itself in a much stronger position when trying to deal with these speculative developments.</p> <p>A planning application has been submitted for Site B and has received planning consent (with no objections raised by either planning or WCC Highways departments). In seeking planning permission,</p>
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			<p>located as it is on both the rise of the hill and on a blind bend is no better than that to Site D (we would argue worse). Why indeed has this site ever been included when it is evident that access to the site would be dangerous? Surely the LPC has a responsibility to not propose sites where there is a very meaningful risk to the safety of drivers and pedestrians?</p> <ul style="list-style-type: none"> <li>• The significant risk of accidents resulting from such dangerous access – we are only unable to say it too is not an ‘accident blackspot’ because thankfully no houses have so far been sited at such a dangerous location.</li> <li>• Site B as a current meadow/green space is home to numerous species of wildlife and ecological habitats which the NDP Biodiversity policy seeks to protect.</li> <li>• Site B as a meadow/green space currently provides drainage. Clearly a flooding policy has been added to the NDP. Site C was removed as it presented a flood risk – we would argue that the inclusion of Site B contradicts that same new flooding policy in that it would add risk, rather than improve matters.</li> <li>• Site D would always have attracted more negative comments as it provided the biggest development opportunity. This could well have distracted residents from raising their comments on site B.</li> </ul> <p>It would appear that the only difference between Site D and Site B is that:</p> <ul style="list-style-type: none"> <li>• planning permission has previously been refused on Site D. Please note that we do not yet know whether the same can’t be said for Site B – as you know an application is in progress but has not yet been approved and may well not pass</li> </ul> <p>The NDP also purports to address the villagers’ desires to preserve the present nature of the village, the rural character of the village, and to minimising impact on the open character and skylines. We believe that development at Site B would contradict all of the above, in particular</p>	<p>SDC have indicated that they have no objection on ecological grounds. However, the developer should be required to relocate the crested newts prior to development.</p> <p>This part of the village (where Site B is located) has not suffered from flooding.</p> <p>Site D is located very close to a sharp bend, is a known accident blackspot and having gone through the planning process was rejected by WCC Highways. Site B has been granted planning permission with no objections from WCC Highways.</p> <p>The development extends only as far back as Loxley Fields, the neighbouring development – hence the impact on views should</p>
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			<p>because of its location on a hill with sweeping views across neighbouring countryside.</p> <p>It might be argued that the removal of Site B would leave only 2 viable sites in the NDP, offering a total possibility for the addition of only 8 homes. We contend that this is more than sufficient for a village of the size of Loxley and more than adequately exceeds the requirement for the village to provide any development at all.</p> <p>We look forward to hearing from you in response to our request for confirmation of the percentage approval requirement for the plan to proceed and trust that you will take into consideration our points regarding the contention that Site B should also be removed.</p>	<p>be relatively limited.</p> <p>See Comment above regarding SDC/housing allocations</p> <p>Email has been sent by LPC.</p>
009	Tony Gibbon	Resident	<p>I attach my comments on the substantial changes made in the revised version of the plan submitted to SDC</p> <p>1. Objectives. The target set for the original steering group was to allocate housing sites sufficient to accommodate 35 houses. The first plan submitted provided 20 houses on 5 sites. This revision includes only 3 sites for 10 houses, a planning application for one of which has already been rejected. The other 2, on the outskirts, of the village add to ribbon development (urban sprawl) but are popular because they have no impact on current residents. So little of the original vision remains. and if there is no longer any quota to be filled then perhaps the plan is more trouble than it is worth.</p>	<p>The remaining sites have the potential to deliver 13 dwellings which still represents significant % growth and a contribution to the SDC Core Strategy's housing allocation needs. There is no minimum housing allocation requirement.</p> <p>Throughout the term of the Core Strategy, Stratford District Council has to demonstrate a 5 year housing land supply (5YHLS). If this 5YHLS cannot be demonstrated, that is, these commitments are not actually being built, then the Core</p>

			<p>Strategy will be deemed to be 'out-of-date' and under the provisions of the National Planning Policy Framework paragraph 14, the presumption in favour of sustainable development would apply. A parish having a Neighbourhood Development Plan and having been seen to fully participate and contribute in the planning process at the local level puts itself in a much stronger position when trying to deal with these speculative developments.</p> <p>The maps are produced by Ordnance Survey. While the maps could be amended this would incur a significant cost to rectify a minute detail which is irrelevant to the Plan.</p> <p>Only Loxley Farm is listed.</p>
		<p>2. Currency. I have compared information in the second draft NDP with data from the Defra "Magic Map" of land use, and ask you to check the following matters.</p> <ul style="list-style-type: none"> <li>- Loxley War Memorial. The NDP shows the village War Memorial in the wrong position. Do the members of the LPC (or the Working Group) know so little about their own village or pay so little attention to the detail of their plan that such an error is left uncorrected. We may forgive Defra for being 30 years out of date and still showing the Loxley War Memorial in its original position but we surely want the NDP to be accurate in this respect.</li> <li>- Listed Buildings. Again, the NDP and Defra are united in showing that there are 3 listed buildings in the village. LPC and SDC should be able to confirm whether Loxley Barn and The Shieling, now separate domiciles, remain listed buildings by virtue of their once having been</li> </ul>	

			<p>integral parts of the listed Loxley Farm. If they are, then please correct the NDP so that it accurately records 5 listed buildings.</p> <p>- Designated Wildlife Sites. Here the NDP (Annex Six of Appendix 2) and Defra differ. WCC seems to have failed in its obligation to maintain this dataset and the redacted site D is not shown by Defra as a Wildlife Site.</p> <p>3. Feedback from Appendix 2. Thank you for the additional information and clarifications given in response to feedback from villagers with regard to first edition NDP.</p> <p>- Development Boundary. The decision where to draw the black line in the "Proposed Built-Up Area Boundary 2017 - Loxley" was taken by SDC following extensive discussions by a team of planning policy officers and no-one else. Not landowners, not developers, not District Councillors, not Parish Councillors, not the residents of the village who may/may not own land they wish to propose for development. Therefore, to avoid accusations of bias, the lines drawn on the map should only move if there is strong evidence that they should do so. NB. The results of this exercise are not available on the Loxley Village website. When Yvonne Brocklehurst asked why we have not adopted the BUAB you replied – "LPC and the working group were not qualified to advise on this and therefore had relied on the advice of the Planning Consultant....The BUAB included the current built-up area boundary plus potential development sites. There were some differences in the views of SDC and the consultant, but in the circumstances the working group decided to follow the advice of their appointed consultant." In the revised NDP the 3 development sites added cause only a small proportion of the changes apparently made at the suggestion of the consultant but I cannot find a single word of explanation or justification for removing arbitrary pieces of 5 gardens or adding a large tract of land around Loxley Church.</p> <p>Will the consultant explain to us how his different decisions follow Planning Guidance Rules and Regulations more closely than those made by SDC?</p>	<p>As noted, Site D in the Plan has been withdrawn – partly due to it being a designated Local Wildlife site.</p> <p>The BUAB as defined intends to delineate the development boundary (current and proposed), plus immediately adjacent land.</p> <p>Careful consideration has been given to the alignment of the BUAB. Whilst SDC guidelines would suggest including the gardens of all houses, the NDP has sought to deliberately exclude some gardens where they are large and undeveloped and where it could lead to potential large scale development sites behind the linear character of the village.</p> <p>The NDP is entitled to propose a different BUAB to SDC where there is justification. The exclusion of large gardens is justified in order to prevent the unintended consequences of creating 'white land' on extensive</p>
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			<p>In reply to my own query about these seemingly random decisions you responded "While this (the consultant's guidance) differs from the SDC view, there is an on-going debate on the issue of the boundary." Will the consultant's guidance be published and the debate be concluded in time to figure in the consultation process?</p> <p>- Green Spaces I agree with other comments that according to the rules an LGS must qualify as " a green area which is demonstrably special to a local community". There is insufficient evidence to show that the "Pub Field" in particular meets this test and must therefore be removed.</p>	<p>developable areas within the BUAB.</p> <p>What constitutes 'social' is something of a grey area. However, very few residents have pushed back on inclusion of this site. In the questionnaire Nov/Dec 2017 over 90% were in favour of this site being designated an LGS.</p>
010	Andrew J W Parker QPM	Resident	<p>Firstly thank you for the opportunity to comment and for all the work done to date on our NDP.</p> <p>I agree with our vision and all the guiding principles contained within the document, I think it captures the very essence of Loxley.</p> <p>I am also very supportive of the desire to see the creation of low cost housing in the village.</p> <p>I note the changes to the village site allocations for housing development and whilst I am not surprised that site D has been removed I am very surprised to see that site B has been retained in its original form.</p> <p>Whilst you have asked for comments relating to the removal of sites this can not be looked at in isolation, to do so would be to ignore the whole and create clear inconsistencies which could be legally challenged.</p> <p>The rationale for removing site D is just as applicable, if not more so, for site B which is retained.</p> <p>I would like to outline why I believe site 'B' should either be removed from the NDP or modified to allow linear development (ribbon) - characteristic and in keeping with the majority of the village. The existing NDP would allow backfill at this site, which goes against</p>	<p>We acknowledge the positive and encouraging comments regarding the Vision, Guiding Principles and Site Allocations.</p> <p>The detailed objection to Site B is acknowledged though now moot as a planning application has been submitted for site B and this has received planning and WCC Highways consent.</p>

			<p>many of our guiding principles. Cul de sac development is in conflict with the rest of the NDP.</p> <p><u>The Independent evaluation</u></p> <p>This was conducted in July 2017 and at that time was named, ‘site N’. Whilst recognising the negative impact any development would have on those houses facing onto this site (loss of privacy) some key areas were overlooked or understated.</p> <p>Firstly this development would be on the apex of a hill and clearly visible from miles away. For example from my windows I can see Wellesbourne Airfield, Warwick Castle, views towards Stratford and over Charlcote and Hampton Lucy. This development could therefore be seen from all these locations and impact on the skyline of the village.</p> <p>The proposal would also change the nature of the historic development in Loxley. As you come up the hill towards the village centre development is linear with no back-fill until you get to Loxley Fields. I can see no reason to move away from linear development. The consultant suggests the site would be a natural development of Loxley Fields. This certainly isn’t the view of those residents I’ve spoken to in Loxley Fields. It is a very unnatural development which would give the area a feel of an ‘estate’ rather than the rural nature associated with Loxley.</p> <p>Thirdly the danger presented to road users by this development is understated. The apex of a hill is always a hazard with or without development. In this instance existing development already makes the road here very hazardous.</p> <p>Sight lines to the north from this site are restricted due to a steep hill and vehicles approaching the site will have little time to react to obstructions. A vehicle turning right into the site will cause a dangerous obstruction. This is exacerbated by the fact that drivers negotiating the hill are heading south and are at times blinded by the sun, particularly in winter months.</p>	
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View from the boundary of Loxley Fields/Site B


Fourthly this is a rural meadow with an abundance of wildlife. Many small mammals and birds live around and visit the meadow. There is a rookery just outside the North West corner of this site and the birds feed in the meadow. The northern edge of Loxley Fields is very damp, due to the presence of an old stream and because it is almost permanently in 'shadow'. This gives rise to lots of insects and slugs, which in turn gives rise to amphibians and hedgehogs. There are frogs, toads and newts in this area including the protected Great Crested Newt.

The field is a habitat (within the foraging environment) of foxes, deer, rabbits, owls, hawks, buzzards, woodpeckers, hedgehogs, mice, rats, bats and squirrels.

			<p>This meadow brings wildlife into the heart of the village – something highly valued by most of Loxley’s residents.</p>  <p>Views of the meadow (Site B)</p>	
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			<p>Lastly, but importantly – a meadow at the top of the hill is excellent for drainage and any building is likely to impact adversely on that situation.</p> <p><u>The NDP</u>  Development at site ‘B’ would be contrary to many of our guiding principles and policies within the draft NDP. Below are some of those which I feel should be highlighted when considering if this site should be included in the plan (very similar to those considered in the removal of site D).</p> <ul style="list-style-type: none"> <li>• Maintaining a high quality environment that preserves and enhances biodiversity</li> <li>• Protect green space, the landscape and support nature conservation</li> <li>• Endorsing policies that have a positive effect on the environment, including those that minimise flood risk ....</li> <li>• Provide a safe environment for road users and pedestrians</li> <li>• The policy supports the notion of limited infill development .....where there is <b>no</b> adverse impact on the character of the area and where the development is sympathetic to its surroundings including neighbourhood dwellings.</li> <li>• Be compatible with the distinctive character of the area, respecting the local settlement pattern, which is predominantly ribbon...</li> <li>• The detrimental erosion of space between and behind buildings will be resisted in order to preserve the open aspect of the village and retain links with the countryside beyond.</li> <li>• Retain existing open green spaces within Loxley where they make an important contribution to the character and local distinctiveness of the area.</li> <li>• Conserve and not obstruct the enjoyment of views to and from</li> </ul>	
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			<p>higher slopes or skylines, or sweeping views across the landscape.</p> <ul style="list-style-type: none"> <li>• Have regard to the impact on tranquility, including dark skies.</li> <li>• Not increase the likelihood of surface water flooding within the village....</li> <li>• A major part of the distinctive character of Loxley is the strong visual connectivity between the village and the rural landscape. The village has a mostly linear structure meaning the majority of houses front, in a single row, onto a street and have direct rural views to the rear.</li> <li>• ‘The rural character of Loxley should be preserved and (sub) urbanisation avoided ‘</li> <li>• Where appropriate, all development should contribute to and enhance the nature and local environment by minimising impacts on biodiversity....</li> </ul>  <p>Great Spotted Woodpecker – Site B hedge</p>	
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			 <p>Great Crested Newt – Garden Pond Boundary Site B</p> <p>In summary, I can see why a developer may wish to include site ‘B’ in the NDP but not sure why the residents would want to facilitate this. The site is in a dangerous location at the top of a hill, it will be clearly visible on the Loxley skyline; it will have a negative impact on biodiversity and disrupt the habitat of a protected species – The Great Crested Newt. It will impact negatively on drainage and remove direct access to open countryside in the centre of the village. In addition, backfill will seriously impact on the privacy of residents in Loxley Fields and restrict views to open countryside. A development of this size next to Loxley Fields will give the feel of an ‘estate’ rather than a rural village.</p> <p>If the decision was to retain site B then it should be reduced to follow a linear pattern to accommodate 1-2 houses facing the road. Whilst this would still have a negative impact it would significantly reduce the impact on biodiversity, reduce the impact on the residents of Loxley Fields and provide the new homes with rural views to the rear, more in keeping with our guiding principles.</p>	<p>Each site has been assessed on its own individual merits.</p>
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			Lastly, for consistency, site B should be removed or altered as the arguments used to remove site D are very similar indeed. The inclusion of site B simply contradicts the NDP and the decision to remove site D. Submitted for consideration	
011	Alice Parker	Former Resident	<p>This is copied to you as it provides feedback on the NDP and furthers the argument for the removal of this site from the plan. Please include as part of the consultation.</p> <p>Kind regards Andy</p> <p><b>From:</b> Alice Parker <b>Subject: FW: Planning app</b> <b>Date:</b> 9 January 2019 <b>To:</b> Andy Parker</p> <p>Thank you for the opportunity to comment. This has been difficult as the consultation period has been across Christmas and New Year when many people are particularly busy or on holiday. Whilst I now live in London I grew up in Loxley and still consider the Loxley area as my natural home. The lack of affordable houses in Loxley is a real issue for young people. I became aware of this proposed development in August, I have never seen a site planning notice and from my enquiries nor has anyone else. I thought this was a legal requirement.</p> <p>These representations relate to the development proposed through the planning application <a href="#">18/02286</a>/FUL. For the avoidance of doubt, <b>I strongly object to this application</b>, on the basis of the harmful impact it would have on the existing village and the change it would cause to the character of the surrounding area.</p> <p>Access to the site is dangerous, with the topography adding to this problem. The topography poses further issues in regard to the visibility of any proposed development from outside of the village. Access and topography The entrance to the site is on a hill with a gradient of 10%. This would cause difficulty for traffic movements on both entry and</p>	The detailed objection to Site B is acknowledged though now moot as planning application has been submitted for site B and this has received planning and WCC Highways consent.



			<p>egress from the site. The access itself has poor visibility, particularly when vehicles can be travelling at speed down Goldicote Road and this is therefore a dangerous location for development.</p> <p>The topography of the parcel is also challenging with varying gradient from west to east. This will significantly affect the developable area of the site. The topography will also result in development on a particularly prominent parcel of land which will be visible from many vantage points due to its high level.</p> <p><b>Overlooking and loss of light.</b></p> <p>The houses situated on Loxley Fields will be overlooked by the proposed development, affecting the privacy of the existing residents, who's windows face the proposed development. Furthermore, the existing properties will experience a loss of light due to the proposed development, having a detrimental impact on the wellbeing of residents. In Autumn and Winter the existing houses on Loxley Fields will cast a long shadow over the proposed development making it dark and damp.</p> <p><b>Policy CS.12</b></p> <p>In relation to policies contained in the Core Strategy (adopted 2016), of specific relevance is the policy relating to Special Landscape Area (Policy CS.12). This policy states: The high landscape quality of the Special Landscape Areas, including their associated historic and cultural features, will be protected by resisting development proposals that would have a harmful effect on their distinctive character and appearance which make an important contribution to the image and enjoyment of the District. The cumulative impact of development proposals on the quality of the landscape will be taken into account. This parcel of land is within the Special Landscape Area. Settlements that lie within a Special Landscape Area must respect the current and historic relationship of that settlement within the landscape. For example in this case - linear development and no backfill.</p> <p>Therefore, <b>development that has a harmful effect on character and appearance should be resisted.</b> This proposed development site is</p>	
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			<p>within a village of special landscape and historic character. The topography of the village allows for extensive views both from and into the village and any further development will have a negative effect on these views, affecting the character which plays a distinctive part in the setting of the openness of the District. This area of land marks a clear departure from the denser development to the south and is important in recognising the separation of the village from the more open countryside to the north. The parcel of land is open in character and the existing use is in conformity with uses permitted in the open countryside.</p> <p>The properties in the village of Loxley at present form linear development and are close to the roadline. The proposed development would alter this and lead to development beginning to diverge away from the current settlement pattern, further altering the existing character of the village. It is therefore clear that the proposed development would not respect the current and historic relationship of the settlement within the landscape and is therefore not in conformity with policy CS.12. The Loxley Village Design Statement This has been consulted and finalised and seeks to provide guidance on future development.</p> <p>This development alongside Loxley Fields would give the appearance of an 'estate' which is totally out of character with the rest of the village. It is the open nature of Loxley which makes it distinct.</p> <p><b>Loxley Village Design Statement</b></p> <p>This document has been finalised and provides guidance on future development. In particular it states: The rural character of Loxley should be preserved and (sub) urbanisation avoided. Sufficient space should be left between and behind buildings to preserve the 'open aspect' of the village and retain links with the open countryside beyond. Preserve the landscape setting, protecting important views and settings into, out of and within the village. The statement also stresses that development if permitted should be in response to an unmet local need. There is a specific section on Infilling/Backfilling stating, ensuring</p>	
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			<p>there is no infilling/backfilling which would negatively impact on the open character the village.</p> <p>Clearly this development doesn't meet any of the above design criteria. Given that there was significant consultation in the development of this Statement - to ignore it would defeat the whole process.</p> <p><b>NDP</b></p> <p>This document is still under consultation and not yet approved. The site under consideration is still contained within the draft but may not survive the latest round of consultation. It's presence is more to do with the lack of engagement rather than any merit. Whilst the sites approved in the plan may change, the overall vision and guiding principles are unlikely to. Ninety seven per cent of respondents to the plan indicate that they value both the rural environment and access to the countryside.</p> <p>The plan states it should endorse policies that have a positive effect on the environment, including those that minimise flood risk, mitigate climate change and minimise pedestrian/vehicle conflicts. The proposed development impacts negatively in all those areas.</p> <p>Of particular relevance is <b>Policy H3 - Design and Character</b></p> <p>Development proposals should comply with the following guiding principles: Be compatible with the distinctive character of the area, respecting the local settlement pattern which is predominantly ribbon development.., The detrimental erosion of space between and behind buildings will be resisted in order to preserve the open aspect of the village and retain links with the countryside beyond; Retain existing open green spaces within Loxley where they make an important contribution the character and local distinctiveness of the area and/or contribute to reducing the likelihood of surface water flooding; Be of a density and scale that is in keeping with the character of the surrounding development and landscape. Conserve and not obstruct the enjoyment of views to and from higher slopes or skylines, or panoramic views across the landscape; have regard to tranquility, including dark skies; and Not increase the likelihood of surface water</p>	
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			<p>flooding..</p> <p>The Policy concludes - Development that is not sustainable and/or does not positively contribute to local character will not be supported. Again it must be obvious that a very cramped development, on a beautiful greenfield site, visible from miles around does not meet any of the above criteria and as the policy says - should not be supported.</p> <p><b>Biodiversity</b></p> <p>This parcel of land is rich in its biodiversity . It is flanked to the west by open land , to the north/west by a copse of trees and to the north by an orchard and gardens. There is a mature pond on the northern boundary and a stream used to run along the northern boundary of this site. The meadow has been lightly grazed in previous years although in 2018 it was left to grow and cut for hay.</p> <p>It is the home of many species of insects, mammals, birds and amphibians. These include endangered bird species, some of which are particularly abundant for example House Sparrows, Starlings and Dunnocks. Frogs, toads and newts are present including the Great Crested Newt. As far as I am aware it is the only area in Loxley where the Great Crested Newt is present and breeds.</p> <p>You could make an argument for this site to receive special protection given its biodiversity. Any development at all would have a serious detrimental impact on biodiversity and on protected species .</p> <p><b>Sustainable Development</b></p> <p>In terms of sustainable development, the village is not a sustainable location since the village does not have sufficient services. There are two bus routes through the village but the service is poor with few services running throughout the day. This will result in a reliance upon private vehicles from travel. Further, there is no shop within the village, resulting in more unsustainable travel. Whilst there is a primary school in the village, there are only 42 pupil places and recent records show this school being at 93% capacity (only 3 places). Five homes may generate more than 3 primary school aged children, and therefore the school would be over capacity and children would have to</p>	
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			<p>travel outside of the village to go to school.</p> <p>Finally as a young person, who may one day return to Loxley, there is a real danger that the open, rural aspect which we all value will be lost. There are no advantages to this development. It doesn't meet an identified need, it is not sustainable, it is in a very dangerous location, its density is not in keeping with the rest of the village, it harms biodiversity, it changes the feel and nature of Loxley, it impacts on the skyline, it would be overbearing for existing residents and importantly it would contradict existing local policy.</p> <p>I trust these representations will be taken into consideration in the determination of this application.</p>	
012	Alan & Morag Hampton	Residents	<p>Loxley NDP</p> <p>Over the festive break, Morag and I have had time to reflect on the above and comment as below.</p> <p>We note that Sites C &amp; D have been removed from the 'allocated' Sites but that surprisingly Site B remains. We are both perplexed and surprised at Site B's inclusion for a number of reasons which in our opinion are both pragmatic and rational.</p> <p><u>Road Safety</u></p> <p>The Site is located on the brow of the steep hill in to Loxley. The road itself is both narrow and incorporates a bend/blind spot. The speed limit in to the village is 30mph but cars, lorries and motorbikes regularly exceed that limit in to and out of the village. Indeed, my neighbour, Ken Osborne once clocked a car with a laser gun (supplied by the police) doing 46mph through the village when undertaking a speed awareness/safety exercise for the village.</p> <p>Not only do the above vehicles regularly pass through the village, but so do agricultural vehicles, tractors, trailers, combines (in season) as well as a plethora of road cyclists.</p> <p>Our concern is simple. Access in terms of ingress and egress onto Site B is dangerous. Not only as it stands as a meadow but the issue would be compounded and exacerbated with any development and associated</p>	<p>A planning application has been submitted for site B and this has received planning and WCC Highways consent.</p>

			<p>increase in car numbers and/or street parking. It is an accident waiting to happen.</p> <p><b><u>Housing need?</u></b></p> <p>There is absolutely no need for a greenfield site such as Site B to be developed nor is there a housing requirement that Loxley has to meet. Stratford District Council has met and fulfilled the quota with Wellesbourne and Long Marston scheme etc. Frankly, why would anyone advocate building on an unspoilt greenfield meadow site??</p> <p><b><u>The meadow (Site B)</u></b></p> <p>Site B is a beautiful meadow field comprising a natural habitat for many animals, rare birds, flora and fauna. It encapsulates so much of why we moved to the countryside for open views, aspects and nature on our doorstep.</p> <p>Site B also sits on the brow of the hill and ensures uninterrupted unspoilt views out over Warwickshire countryside. In turn the views to Loxley would be spoilt by development on the skyline.</p> <p><b><u>Conclusion</u></b></p> <p>Personally, we are of the opinion that to allocate Site B for development would be a complete travesty and a contradiction/anomaly to the Loxley NDP. Development of Site B serves to only financially benefit the owners of the Site but would have a detrimental effect and loss on our village.</p> <p>Thank you for taking the time to consider our comments,</p>	
013	Rosemary Williams	Stratford-on-Avon District Council	<p><b>See separate document:</b></p> <p><b>Representation 13 - Stratford District Council Submission</b></p>	<p><b>See Document below:</b></p> <p><b>Stratford District Council Comments</b></p>

## Loxley 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

Suggested new text underlined deleted text ~~struck through~~

Page number	Section	Comment	NDP Responses
General		This was publicised as a ‘focussed consultation’ in that they have mentioned changes only to the allocated sites and a new flood policy. However, it appears that there are quite a number of other differences between the two documents. Whilst many changes have been in direct response to our previous comments, additional and amended text has been added to other policies.	Other differences (changes) are all very minor. Key changes in policy and sites have been flagged.
General		The documents is entitled ‘Submission Document’ whereas in fact it is still at the pre submission stage	Amended. ‘Submission’ has been changed to ‘Pre-submission’.
Page 12	Policy H1	The village boundary is a built-up area boundary with three large(ish) rear gardens excluded... with no explanation on the rationale behind this decision. The exclusion of only these 3 gardens is inconsistent in how the remainder of the ‘line’ has been drawn (and presumably been assessed/evidenced?). Paragraph 2 of policy H1 states that ‘all areas outside the Development Boundary are classed as countryside’. It seems perverse that three gardens within the village will be classified as ‘countryside’	The wording referencing either BUAB or Village Boundary has been changed to development boundary throughout the document to ensure consistency.  Where the boundary has been drawn more tightly to that proposed by SDC, it has been done deliberately to exclude large gardens on the edge of the village. The NDP proposes a Village Boundary whereas SDC propose a Built-up Area Boundary. The NDP is entitled to draw its own development boundary even if this differs from the District Councils own proposed boundary. This was confirmed in the recent Examiners report for the Claverdon NDP where the Examiner accepted a different (tighter) boundary in the NPD to that proposed by SDC.
		In accordance with national policy, sites should not be subject to such scale of development obligations and policy burdens that their ability to be developed, is viably threatened. Although	Amended to: “*Note: Housing numbers are indicative only. Higher densities may be appropriate (for example, in order to achieve

Page number	Section	Comment	NDP Responses
		<p>paragraph 173 of the previous NPPF has been removed, the PPG provides specific guidance on how viability should be assessed and attributed, stating:</p> <p><i>Plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage.</i></p> <p>Policy H1 states:</p> <p>‘Housing numbers are indicative only. Higher densities may be more appropriate for developments of smaller dwellings.’</p> <p>Where is the evidence that higher densities may be appropriate for smaller dwellings? A developer maybe able to demonstrate, through viability, that a larger number of dwellings of three/four bedrooms can accommodate the site, meeting all other policy stipulations, and is the only viable option to deliver the allocated site. Therefore, this statement could be conceived as too restrictive.</p>	viability)’’.
Page 13	Figure 2	<p>Unsure about decision to omit 3 gardens from the ‘village boundary’ as this shows an inherent inconsistency in the methodology</p>	See comments about Policy H1 above regarding rationale for excluding these gardens.
Page 14 Para 4.2		<p>The NDP recognises Loxley as a Category 4 LSV. It should be noted, as the Core Strategy does, that LSV designations can be changed dependent on new development and facilities, over the plan period; therefore, altering the housing requirements (CS.15 and CS.16).</p>	Acknowledged in Plan to reflect SDC’s comment – see footnote on page 14.
Page 15	Para 4.8	<p>Whilst it is understood the interpretation of a ‘village boundary’ will be different to a ‘built-up area boundary’, there appears to be no reasoning or evidence to state why this interpretation is appropriate or how it has been evaluated. It seems to be a mechanism to artificially ‘protect’ a small number of rear gardens from potential future development. There is no consistency given that there are other ‘large’ gardens included</p>	See comments about Policy H1 above regarding rationale for excluding these gardens.



Page number	Section	Comment	NDP Responses
Page 15 para 4.11		<p>within the ‘village boundary’ elsewhere in the village</p> <p>Para 4.11 states ‘The allocations of sites B, D and E to create small cul-de-sac developments</p> <p>Although supporting text, cul-de-sacs are not always an appropriate form of development. The design of the streets should vary to suit their position on the site, within the hierarchy of routes, the character of the area and the landscape network making up the settlement. As such, supporting text should not express, or limit, development to certain design principles without a masterplan. Furthermore, NDPs should not threaten the viability of the development, it may be possible limiting the sites layout to cul-de-sacs limit the viability of the site(s).</p>	<p>4.11 (v17) refers to Sites B &amp; C only.</p> <p>Amended. The wording ‘to create small cul-de-sac developments...’ has been replaced with will ideally accommodate small developments...’.</p>
Page 15 para 4.12		<p>It is essential that the sites chosen and rejected have been thoroughly assessed and reasons given for their rejected or inclusion and this decision making is transparent and is published</p>	<p>See Appendix 1 (pages 21 – 37), and can also be viewed on the website (loxleyvillage.com).</p>
Page 16	Policy H2	<p>These comments were made in SDC’s previous response but does not appear to have been addressed</p> <p><i>The Plan does not allocate any housing sites of sufficient size to attract an affordable housing requirement. Consideration should be given to allocating a smaller number (or even just one) larger housing site, with a view to securing affordable housing provision on site</i></p> <p><i>The revised NPPF does refer to the possibility of applying a lower threshold (of 5 dwellings) for mandatory affordable housing provision. It may be useful for the Parish Council to revisit this issue in the light of the new guidance and perhaps consider introducing a policy applying a lower threshold that that currently in the Core Strategy. Alternatively, some of the sites could be developed as 100% affordable schemes. If so, the parish will need to explore further with housing associations whether any would be willing to act as developer.</i></p>	<p>It has not been possible to identify a sufficiently large site within the Plan to attract an affordable housing requirement. Loxley is a small village located on a hill; large well located sites with good access are not available in the village.</p> <p>Site B is the largest site and an outline application has already been submitted for this site and approved. This reflects the significant highways and topographical constraints within the village, however policy H2 provides support for securing the development of affordable housing should a suitable site come forward.</p> <p>As noted, the sites are small and Site B has already been the subject of a planning application which has been approved.</p>

Page number	Section	Comment	NDP Responses
Page 16	H2 Part C	<p>Although three sites are proposed as housing allocations, the likely scale of development in all cases falls below the applicable threshold for affordable housing provision in Core Strategy Policy CS.18. One way of addressing the above issue might be to apply a lower site size threshold for affordable housing, albeit with appropriate reasoned justification.</p> <p>For clarity, it is recommended stating that secure arrangement will made through Section 106 agreements. This will clearly convey that a legal requirement and negotiations will be sought before the site is considered acceptable for development.</p>	<p>Amended. Part C is now: “Secure arrangements through Section 106 agreements exist to ensure the housing will remain affordable and available to meet the continuing needs of local people.”</p>
Page 17	Policy H3	<p>There is new text at criterion e) and two new criterion j) and k) have been added. In relation to criterion j) it should be noted that with the removal of the largest allocated site from the Plan and the very tightly drawn ‘development boundary’, it is highly unlikely this requirement will ever be triggered and therefore is it necessary?</p> <p>Para 4.17</p> <p>The requirements are only limited to people within the Parish or connection too. Consideration needs to consider people in the vicinity of the Parish, especially if no-one comes forward that meets the specified requirements. Further text could be incorporated to connections within the district.</p> <p>The Council’s housing register and criteria needs to be measured before delegating housing to local people. The Parish Council may want to consider incorporating a phrase, along the lines of; The Parish Council will work closely with Stratford-on-Avon District Council to help ensure local housing is available to local people, where applicable.</p> <p>Part J is too restrictive. The developer may be able to demonstrate through a desktop study that there is no archaeological interest in the site area.</p>	<p>Policy has been deleted.</p> <p>Amended. Paragraph 4.18 has been expanded to reflect SDC’s recommendation.</p> <p>This is already stated in para. 4.18 which has been expanded to reflect SDC’s recommendation.</p> <p>Policy deleted.</p>

Page number	Section	Comment	NDP Responses
		Part G is very specific –Where is the evidence for this Policy to be enforced, i.e. LVIA’s?	The Plan illustrates the most valued landscapes and is supported by a detailed design guide. A LVIA would be prohibitively costly to produce. Further an LVIA is not essential at the plan preparation stage and would make the plan making process unviable due to the cost implications.
Page 20	Policy H5	<p>Whilst it is noted that criterion a) has been amended to remove volumetric calculation, para 4.33 still relates to a 30% volume increase... Criterion a) now relates to replacement dwellings not being ‘disproportionately large relative to the plot size’. This is too restrictive and looking to include a similar limitation to the original version. Therefore, para 4.31 where the Plan claims it is not intending to ‘overtly restrict people’s freedom of expression’ is incorrect.</p> <p>Remove reference to 30% larger footprint and volume as it is entirely inappropriate</p> <p>b) <i>consider potential for garaging</i> It is unclear what this means.</p>	<p>The NDP is entitled to create a policy which seeks to avoid replacement dwellings which are disproportionately larger than the ones they replace. The inclusion of 30% is referenced in the supporting text (Paragraph 4.33) as a guide. As SDC believe this is too restrictive It has been amended to 40%.</p> <p>Amended wording to “Consider the need for– and potential to provide - garages;”.</p>
Page 21		<p>The designated valued landscapes need to be supported by robust, up-to-date, evidence (i.e. LVIAs). The assessment methodology ‘An Approach to Landscape Character Assessment’, confirmed by Natural England in 2014, incorporates the assessment processes set out in the 2002 guidance note ‘Landscape Character Assessment Guidance for England and Scotland’.</p> <p>However it appears that the policy refers more to Important Views and therefore 2. In policy NE1 should be altered to Important Views and Figure 3 should be renamed Important Views.</p>	<p>Designated landscapes do not need to be supported by an LVIA. There are many examples of approved NDPs that have been adopted without having an LVIA. However, amended working where evidence is available on usage and value.</p> <p>Policy NE1 refers to the Special Landscape area (ie valued landscape), but amended also to refer to Important Views. The figure has been renamed as ‘Valued Landscapes’.</p>

Page number	Section	Comment	NDP Responses
Page 26	Policy NE3	Unsure how the policy can insist on planting an ‘equivalent or better standard’ tree or hedge if it is removed as part of a development proposal, particularly if a mature tree is to be replaced. How would you plant a 60 year old tree if that is the ‘equivalent’??	Amended. Replaced ‘retain and protect’ with ‘encourage the protection and retention of’ in the first para.
Page 30	CIL	May want to consider listing priorities, i.e. community assets, green spaces, which you want to use CIL Funding towards. Consider what requires the most funding, initially.	The Steering Group has considered this and has decided not to prioritise at this stage.
Page 33	Policy LC3	1st para, last line – suggest replace ‘prioritised’ with ‘incorporated’ as it is generally impractical to prioritise walking and cycling in rural settlements.	Amended. ‘Prioritised’ has been replaced by ‘incorporated’.
Page 34	Policy TT1	The fifth paragraph has been re-drafted since the last version. Unsure what the final part of the paragraph is attempting to convey. This version of the paragraph is less clear than the original. It is considered unreasonable and unsustainable, to provide a parking space per bedroom. For example, a 5 bedroom house would require 5 parking spaces even though it’s for family of 4 (2 adults, 2 children).	This is a non-strategic policy in line with NPPF(2019) para 28-30 <sup>1</sup> . SDC’s Development Requirements SPD Part F (as of 1/4/19) has not been adopted by SDC and is therefore supplementary and only taken in as material consideration. Core Strategy Policy CS.26 C Parking Standards starts by saying “Parking provision will reflect local circumstances and have regard to promote sustainable transport outcomes.” It is important to note that Policy TT1 is therefore not in conflict with either of these documents. The Steering Group recognises the draft district standard, acknowledge that we’ve taken it into account but have decided to create a local standard. Our plan is entitled to create a local standard that is appropriate to our area based on local evidence and justification in line with NPPF (2019) para 105.

<sup>1</sup> Examples of made plans with local parking standards:

- Alton NDP Hampshire (made 12/5/16) Policy TR5 Parking provision and standards p55.  
<http://www.alton.gov.uk/UserFiles/Files/Planning/Alton-Town-Council-NDP-lowres%20002%20-%20November%202015.pdf>
- Elford NDP Policy Lichfield DC(made 15/1/19) MD1 Parking Standards p.31  
<https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Neighbourhood-plans/Downloads/Elford/Elford-Neighbourhood-Plan-made-version.pdf>

Page number	Section	Comment	NDP Responses
			<p>In a small rural village with limited or no public transport opportunities and with children living at home into adulthood, it is clear that need to accommodate future car ownership of all family members is high.</p> <p>The QB maintains that this standard is entirely reasonable and justified.</p>
Page 35	Policy TT2	Considered too restrictive for validation/determination requirements	<p>The QB respectfully disagrees with SDC on this matter. The policy covers a very important aspect of village life – safety. It is not unreasonable to ask that developments demonstrate that safety is not being compromised. How this is demonstrated is a matter for the applicant and the decision maker. In some cases there will be no effect whatsoever and therefore the requirement to demonstrate will be easy/self-explanatory. In other cases the applicant may need to produce technical reports to the satisfaction of the Highway Authority.</p> <p>The Highway Authority has not objected to the inclusion of this policy.</p>
Page 31	Policy LC2	Proposed LGSs should be considered against NPPF/PPG criteria and this assessment should be published.	<p>The LGS assessments were carried out in January 2018. The NPPF was revised in February 2019. The assessment/qualifying criteria was not changed. The latest version of the NDP refers to the updated paragraphs in the 2019 NPPF.</p>

Page number	Section	Comment	NDP Responses
			The QB sees no reason to update the LGS assessments as the substantive content and conclusions would not change. The only change would be the reference to the updated paragraph in the NPPF.
Page 34	Policy TT1	Reference should be made to SDC's emerging Development Requirements SPD.	Though the guidance in the draft SPD was considered, it was felt unnecessary to reference it as Loxley was entitled to create their own parking standards (see explanation above in previous section on Policy TT1)

#### Schedule of minor comments from Stratford-on-Avon District Council

Suggested new text underlined deleted text ~~struck through~~

Page number	Section	Comment	NDP Responses
Page 2	Contents page	Whilst the policies have been added to the contents page, the page number should also be added for each policy, for ease of reference	To be amended on final draft
Page 9	3.3, 1st bullet	delete 'market' as some homes that are compliant with other policies, eg. within the BUAB in accordance with Policy H1, can serve wider needs than just Loxley.	Amended. 'Market' has been deleted.
Page 12	Policy H1	section 2 – delete 'for' in first sentence Policy AS.10 part E and I are referred to whereas parts E and J should be referred to.  Also needs to state that AS.10 is from Core Strategy.	Amended. 'For' has been deleted Amended. 'E and I' have been replaced with 'E and J'  Amended. 'from the Core Strategy' has been included.
Page 14 Para 4.4	Policy H1 Explanation	replace 'backfill' with 'backland' as this is the usual term in this context	Amended. 'Backfill' has been replaced with 'Backland'
Page 16	Policy H2	Replace 'permitted' with 'supported' in first line. The Parish Council does not determine planning applications.	Amended. 'Permitted' has been replaced with 'Supported'.

Page 18	Policy H3	<p>“g) <i>conserve and not obstruct the enjoyment of views to and from higher slopes or skylines, or panaramicviews across the landscape</i>”</p> <p>Typo should be a gap between panoramic (misspelled) and views</p>	Amended.
Page 26	Policy NE3	It is unclear how the policy can insist on planting an ‘equivalent or better standard’ tree or hedge if it is removed as part of a development proposal, particularly if a 60 year old mature tree is to be replaced	Amended. Replaced ‘retain and protect’ with ‘encourage the protection and retention of’ in the first para.
General		The Appendix [VDS] is missing from the document	Will be attached along with other supporting appendices.