

Claverdon Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

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CLAV.1	Sport England	General	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p>

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			<p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work.</p> <p>http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p>

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			<p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p>

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			<p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>
CLAV.2	Network Rail	General	<p>Network Rail has the following comments:</p> <p>Should the Neighbourhood Plan envisage any land or property interests (inc. rights) from Network Rail, then the Council should engage with Network Rail in respect to such interests at the earliest opportunity. The grant of any rights / property interests would be subject to all relevant Network Rail, and the wider rail industry, approval processes including the agreement of commercial terms.</p> <p>Sustainable drainage proposals should take into account the impacts upon adjacent railway infrastructure, i.e. proposals must not import a risk of flooding, pollution, soil slippage onto the existing operational railway. Sustainable drainage systems within the Local Plan area should be directed away from the railway and should not use soakaways within 30m of the railway boundary. Attenuation ponds/basins on sites adjacent to or near to the railway boundary should only be included in proposals with the agreement of Network Rail and should not be included in proposals that are adjacent to a railway cutting.</p> <p>Developments in the neighbourhood areas should be notified to Network Rail to ensure that:</p> <p>(a) Access points / rights of way belonging to Network Rail are not impacted by developments within the area.</p> <p>(b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g.</p> <ul style="list-style-type: none"> • Drainage works / water features • Encroachment of land or air-space

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			<ul style="list-style-type: none"> • Excavation works • Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues • Lighting impacting upon train drivers ability to perceive signals • Landscaping that could impact upon overhead lines or Network Rail boundary treatments • Any piling works • Any scaffolding works • Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949) • Any use of crane or plant • Any fencing works • Any demolition works • Any hard standing areas
CLAV.3	Mr. J.M. Pielow	Appendix 2; Policy CSL2	<p>I would draw your attention to one of ‘The Community Aspirations – Appendix 2’ on page 40 of the Claverdon Neighbourhood development Plan 2011-2031 regarding the Tennis club. The aspiration is that ‘the future of the club would be strengthened by the installation of lighting’.</p> <p>In this respect the main issue that was raised in the CNDP questionnaire regarding Floodlit Sport Facilities were ‘No sports floodlighting whatsoever’ and the response was 60% in favour of no sports floodlighting whatsoever.</p> <p>Secondary issues which would only become relevant if the response to the main issue was in favour of sports lighting were, Sports floodlighting but limited to 9.00 pm., response 66% in favour, and Sports lighting unlimited, 89% against. With this outcome I am wondering why an Aspiration of the village is to have tennis court</p>

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			<p>lighting when clearly 60% of the village are in favour of no sports floodlighting whatsoever?</p> <p>I would be pleased if you could clarify why this is so and take measures to remove this aspiration from the CNDP as it conflicts with the findings of the CNDP questionnaire. Ref CNP Survey results 2016 Final Report Section 4.4 page 15.</p> <p>Whilst I do understand that the desire for court lighting was for the benefit of local children, to date there has been little evidence of children using the courts regularly, particularly at weekends.</p> <p>The location of the tennis club in Claverdon is close to a number of residences that are occupied by retired residents, some quite elderly and any installation of lights would be obtrusive and not preserve or enhance the character of the area and could be at odds with the existing settlement character of the village generally.</p> <p>Claverdon is a village with no street lighting which does enable residents to enjoy the many glorious sunsets and unspoiled, by light pollution, night skies.</p> <p>In 2004 Claverdon Tennis Club applied to the Dorothea Hall Committee, who are their landlords, for permission to proceed with the installation of court lighting. After seeking the view of the village, against lights by 60% this was declined.</p> <p>A further application was made in 2014, which was also refused after consulting local residents who on this occasion were over 90% against.</p> <p>Thank you for taking the time to look into this issue for me and I look forward to your response.</p>
CLAV.4	Coal Authority	General	Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it.

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CLAV.5	Historic England	General	<p>Historic England is supportive of both the content of the document and the vision and objectives set out in it.</p> <p>We have no substantive comments to add to those conveyed in our earlier regulation 14 consultation response (please see below in italic). We are pleased to note that our comments made then have been addressed in this version of the plan.</p> <p><i>The emphasis on the conservation of local distinctiveness through good design and the protection of heritage assets and landscape character including important views is to be applauded, as is the earlier production of the Village Design Statement (now adopted into the Plan) which will no doubt be invaluable as a context and evidence base for the current Plan.</i></p> <p>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 hope you find these comments helpful.</p>
CLAV.6	Natural England	General	<p>Thank you for your consultation on the above dated 31 January 2019.</p> <p>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.</p> <p>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 consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this neighbourhood plan.</p>

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CLAV.7	Warwickshire County Council	General; Section 5.0 part 5.3; Appendix 1; Policy H3; Policy H4; Policy NE2; Policy NE5	<p>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>Financial implications of Neighbourhood Plans:</p> <p>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 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>Comments on transport matters:</p> <p>Specific comments document are:</p> <p>Section 5.3 mentions the need for traffic calming measure on the A4189 however no details of these provided. The A4189 would not be able to have physical features on it due to 'A' Class road designation and the lack of a system of street lights and these are unlikely to be supported. Furthermore, this would also conflict with the Highway and Streetscape Guidelines (Page 37) which it states street lighting is discouraged from the village. From reviewing the collisions along this section of the A4189 they would not support a Road Safety Engineering scheme.</p> <p>Page 41 in the Road Safety section mentions a series of major accidents along this road however from reviewing the Personal Injury Collisions from data provided by</p>

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			<p>the Police the amount of collisions along the A4189 is low. There have been 3 personal injury collisions over the past five years at the location. There are in excess of 101 cluster sites within the County which have had over 6 Personal Injury Collisions (PICs) in the last 5 years.</p> <p>The suggestion of a 30 mph extension is also not appropriate for this location. The extension of the 30 mph limit would not be supported as there is a change of environment at where the existing speed limit changes and as such this would not satisfy circular 01/2013 and other documentation used for the setting of speed limits. The document mentions speeding however does not supply any speed data within it.</p> <p>We would not support the installation of “Average speed cameras” in Claverdon. These are only considered for use along routes with a high number of PICs caused as a result of excess speed. There have been no collisions within the residential village extent over the past five years. The collision history at this location would not support the usage of average speed cameras.</p> <p>It further states about the use of traffic calming measures however this point has been covered above.</p> <p>The section continues to state that the A4189 junction with the Green is very dangerous and is in need of modification. However there are no Personal injury collisions at this location over the previous five years suggesting that the junction operates safely in its current form. Based upon the collision data we would not look to carry out any Road Safety engineering scheme at this location.</p> <p>The section titled Road Improvements suggests that consultation with Warwickshire County Council will take place to open the M40 Junction 16 in both directions. We are not responsible for the Motorway Network. The responsibility of the M40 is Highways England.</p>

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			<p>Public Health matters:</p> <p>Public Health Warwickshire have prepared a Neighbourhood Development Planning for Health document. The document contains evidence and guidance for promoting healthy, active communities throughout the planning and design process.</p> <p>Alongside this, Public Health England's local health tool can be used to understand the health needs of the population.</p> <p>Should the Parish Council wishes to discuss the guidance document or the local health tool further please contact Gemma McKinnon on gemmamckinnon@warwickshire.gov.uk.</p> <p>Flood Risk Matters:</p> <p><u>Policy H3</u> – You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on brownfield sites.</p> <p><u>Policy H4</u> – When building on garden land, the use of sustainable drainage systems should be considered in order to reduce flood risk.</p> <p><u>Policy NE2</u> – The adoption and maintenance of all drainage features is a key consideration to ensure the long term operation and efficiency of SuDS. As part of the planning procedure the LLFA will expect to see a maintenance schedule, at detailed design stages. All SuDS features should be monitored and cleaned regularly as a matter of importance.</p> <p>SuDS features should be at the surface and adequate treatment of flows should be provided to ensure that final flows leaving the site do not degrade the quality of</p>

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			<p>accepting water bodies. Flood attenuation areas must be located outside of flood zones and surface water outlines to ensure that the full capacity is retained. You could include a point that the Lead Local Flood Authority requires SuDS to be designed in accordance with CIRIA 753 SUDS Manual.</p> <p>Please be aware that 5 l/s is NOT the minimum possible discharge rate achievable. In relation to this, the requirements set out in the following documents should also be adhered to in all cases:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework • Paragraphs 030 - 032 of the Planning Practice Guidance (PPG) • DEFRA's Non-statutory technical standards for sustainable drainage. <p>On smaller development sites where the discharge rate is below 5 l/s, these rates are achievable through water reuse, protected orifices, and better design. Discharge rates should be set to control run off at greenfield rates for a 1% AEP (Annual Exceedance Probability) event, plus an allowance for climate change. You could refer to our standing advice document https://apps.warwickshire.gov.uk/api/documents/WCCC-1039-73)</p> <p><u>Policy NE5</u> – We support the protection of green infrastructure - this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground SuDS could be utilised in open spaces.</p> <p>You could include an additional point that encourages new developments to open up any existing culverts on a site providing more open space/green infrastructure for greater amenity and biodiversity; and the creation of new culverts should be kept to a minimum. New culverts will need consent from the LLFA and should be kept to the minimum length.</p> <p>Having checked our records, we have previously received between 2-4 records of flooding in Claverdon. You could include a copy of the Flood Zone maps, showing the levels of risk from all types of flooding (fluvial and pluvial) to provide</p>

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			supporting evidence that parts of Claverdon fall within a surface water outline and encourage development to reduce the impacts from flooding. View maps online at https://flood-warninginformation.service.gov.uk/long-term-flood-risk/map
CLAV.8	S.Reading	General; Policy H2; Appendix 2; Appendix 3	<p>Page 4, para 2.2 – Claverdon does not nor did not include Songar.</p> <p>The majority of listed buildings in the parish consist of timber-framed farmhouses & cottages dating from the 16th & 17th centuries. (not half-timbered as stated).</p> <p>Page 4, para 2.6 – What are DISCRETE year groups?</p> <p>Page 7, para 4.2 – This list does not include the recently built detached house between Bryn Arden & The Crown.</p> <p>Page 10, Policy H2 – I have made this comment on my on-line submission. Is the existing affordable housing provision at Morgan Close & Brick Kiln Close within the parish safeguarded for people identified by the 2017 Housing Needs Survey? Do current residents satisfy the criteria on Page 11, 4.14?</p> <p>Page 40, Appendix 2 – The village currently has excellent sport and recreational facilities. Whilst there is continued demand, then these should be maintained, however any enhancement of the facilities should not be permitted if the enhancement has any adverse effect on the neighbourhood. A particular example of such an enhancement would be the floodlighting of the tennis courts on the Dorothea Mitchell Hall Site. The majority of residents oppose the provision of any floodlighting at the Tennis Club.</p> <p>Page 43, Appendix3, CLAV2 – Correction: The village Green is NOT owned by Stratford District Council.</p>
CLAV.9	Highways England	General	No comment on this specific Neighbourhood Plan, but confirmed wish to be informed of any future developments.

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CLAV.10	National Grid	General	<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 customers. 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>Specific comments:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p>Key resources / contacts-National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p> <p>Electricity distribution:</p>

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			<p>The electricity distribution operator in Stratford on Avon Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure.</p>
CLAV.11	Severn Trent Water	General	No specific comments to make on this particular Plan, but wish to be kept informed where appropriate.
CLAV.12	The Inland Waterways Association	Policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1, CSL2	<p>Writes in Support of all of the following policies:</p> <p>H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1, CSL2 [but provided no comments expanding upon their support].</p> <p>Additional comments:</p> <p>The Inland Waterways Association (Warks branch) is keen to support robust and well-designed neighbourhood plans, particularly when they offer protection to the important and beautiful leisure facility, the adjacent Stratford Canal.</p>
CLAV.13	B.Hayball	Policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1, CSL2	<p>Writes in Support of all of the following policies:</p> <p>H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE4, NE5, BE1, BE2, CSL1, CSL2, but Objects to Policy NE3.</p> <p>Additional comments:</p> <p><u>Policy NE2</u> – You could mention BS 8595: "Code of practice for the selection of water reuse systems", which is an excellent starting point for such considerations. Water reuse and recycling systems can reduce demand on existing water supply infrastructure. Rainwater harvesting is also useful for this purpose, while also contributing to flood mitigation.</p>

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			<p><u>Policy NE3</u> – This policy is nowhere near ambitious enough. Given its rural location, Claverdon should/could seek to make Claverdon self-sufficient in meeting its own entire energy needs by generating all of its own energy through renewable means within the village's boundary, by 2035!! While landscape is important, energy generation through renewals is SO important for mitigating the effects of climate change that, if we don't grasp this nettle, the only landscape we will eventually be able to see may be desert!!</p> <p><u>General</u></p> <ul style="list-style-type: none"> • Section 2.3, page 4: there is no mention of bus transport services, and the location of bus stops around the village is not given. • The CNP supports the introduction of mains gas into the village. Unfortunately, this is an out of date concept, as the Government are thinking about outlawing the installation of new gas boilers, in due course. See: http://www.rationalskepticism.org/news-politics/uk-ban-gas-hobs-and-boilers-in-new-homes-in-six-years-t55840.html • On page 7, there is reference to LSV, but LSV does not appear to be defined.
CLAV.14	B.Farmer	Policies: H4, NE1, NE3, NE4, NE5, BE1, CSL2	<p>Writes in support of policies: H4, NE1, NE3, NE4, NE5, BE1, but Objects to policy CSL2.</p> <p>Additional Comments:</p> <p><u>Policy NE3</u> – Yes but note solar is quiet, but wind turbines produce LFN which carries miles and is very upsetting to some people.</p> <p><u>Policy CSL2</u> – I object to the notion that Lights at the tennis club are a community aspiration - this is not true -note that 60% voted against lights, and that Claverdon is a "dark village".</p>

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CLAV.15	C.Hanley	Policies: H1,H2,H3,H4,E1,E2,E3, E4,E5,NE1,NE2,NE3,NE4,NE5 ,BE1,BE2,CSL1,CSL2	<p>Writes in Support of all of the following policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE4, NE5, BE1, BE2, CSL1 but Objects to Policies: NE3, CSL2</p> <p>Additional comments:</p> <p><u>Policy NE3</u> – Solar farms & wind turbines would have a significant detrimental visual impact on the landscape around Claverdon.</p> <p><u>Policy NE5</u> – Light pollution is a significant problem for my interest in observation of the night skies. Claverdon does not have street lighting and long may that continue. As a consequence I would object strongly to any attempt to install flood-lighting towers at the tennis club.</p> <p><u>Policy CSL1</u> – Generally I am in support BUT NO FLOOD-LIGHTING</p> <p><u>Policy CSL2</u> – I am seriously concerned about the inclusion in the Appendix 2 - Community Aspirations regarding the mention of the installation of floodlights at the tennis club. Claverdon has no street lights and floodlights mounted on ugly poles would have a significant impact on the residents and the high poles would have a dreadful, negative aesthetic appearance impact on the area around the Dorothea Mitchell Hall. The question of floodlights at the tennis club continues to be raised every few years and the same objections will always stand. NEVER ALLOW THEM.</p>
CLAV.16	A.Rowley	Policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1, CSL2	<p>Submitted three separate representations, which have been consolidated into the following comments:</p> <p>Writes in support of all of the following policies:</p> <p>H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1</p> <p>Objects to Policy: CSL2</p>

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			<p>Additional comments:</p> <p><u>Policy H1</u> – Claverdon should remain broadly the same size as it is currently.</p> <p><u>Policy H2</u> – Claverdon is NOT suitable for significant affordable housing due to the limited public transport, shops and employment opportunities. Whilst there is a bus and train service, it is so infrequent that access to a private vehicle is necessary for everyday purposes.</p> <p><u>Policy NE1</u> – The neighbourhood plan survey appeared to have a strong bias towards floodlighting the courts of Claverdon Tennis Club. These floodlights would be seen from all points of Valued Landscape C1 and some of D1. The preservation of the landscape should not be restricted to looking out, but also how the village is viewed looking back. The village (including the tennis courts) can be seen from a distance of 21 miles, and it must not be spoilt by allowing the floodlighting of the tennis courts.</p> <p><u>Policy NE3</u> – Park Farm’s proposal for solar panels should have been approved. It would not have had any impact on the visible landscape and very few would have been affected by their implementation.</p> <p><u>Policy NE5</u> – Claverdon has a thriving bat population within the conservation area around the Dorothea Mitchell Hall. These bats would be adversely affected by the installation of floodlighting the tennis courts, as implied within the Claverdon Neighbourhood Plan Survey. Lighting in the vicinity of a bat roost, causing disturbance, could constitute an offence under the Wildlife and Countryside Act (1981) and the Conservation (Natural Habitats etc) Regulations (1994). Light pollution will be increased by the wrong development of recreational and sports amenities.</p>

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			<p><u>Policy BE1</u> – Putting floodlight stanchions on the tennis courts, next to the listed building of The Forge (see para 2.2 of the submission version of the Claverdon Neighbourhood Plan) would be in breach of BE1 - Principles of Good Design.</p> <p><u>Policy BE2</u> – The implied proposal to install floodlight stanchions on the tennis courts within a Conservation Area, and close to listed buildings: The Forge, Forge House and Tally-Ho Cottage MUST be in contravention with Policy BE2.</p> <p><u>Policy CSL2</u> – If the enhancement of sports facilities includes the provision of floodlighting on the tennis courts, within a conservation area, harming wildlife, adversely affecting the views of the village for miles around, destroying village heritage sites, and affecting adjacent neighbours then I strongly object to CSL2. The Claverdon Neighbourhood Plan Survey stated that there is currently no floodlit sports facilities in the village. Not true. Ardencote offers floodlit tennis courts. The Claverdon Neighbourhood Plan Survey clearly showed that 60% of respondents did not want any sports floodlighting WHATSOEVER! A statistic that has conveniently been overlooked. The Neighbourhood Plan Survey was ambiguous with its questions, and biased in the interpretation of the results. This must not be allowed to carry on through to the final 20 year plan. There is no logical argument for the provision of flood lighting at Claverdon Tennis Club. Better facilities are available with existing floodlit facilities locally. It would harm local wildlife, affect the rural ambience of the village and bring a poorer quality of rural village life to a large no of residents.</p>
CLAV.17	E.Rowley	Policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1, CSL2	<p>Writes in support of all of the following policies:</p> <p>H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1</p> <p>Objects to Policy CSL2</p> <p>Additional comments:</p>

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			<p data-bbox="1032 272 1906 304"><u>Policy H1</u> – I believe that Claverdon should remain broadly the same size.</p> <p data-bbox="1032 344 2029 520"><u>Policy H2</u> – Claverdon is UNSUITABLE for significant affordable housing. Although it has some public transport, daily trains are few and far between and the bus service is limited to one daily return service to one of 3 destinations, therefore it is unsuitable for a daily commute outside the village. Also due to the lack of a gas supply within the village heating/cooking costs can be expensive.</p> <p data-bbox="1032 560 2029 1270"><u>Policy NE1</u> – Claverdon is situated on very high ground, as such the village is visible from some distance away. To preserve the historic landscape and skyline the view INTO the village should be treated with equal respect as the view from the village. Any artificial lighting especially floodlighting WOULD be seen for many miles from Claverdon. In the neighbourhood plan survey under "Sporting Facilities" I believe that either the questions were written in a misleading way or that the analysis of the results is flawed; "The Neighbourhood Plan Survey Results 2016" states that six out of ten - 60% of residents DID NOT WANT FLOODLIGHTING AT ALL IN THE VILLAGE, it also states that 66% felt that they would like to see floodlighting but it should be limited to 9pm - HOW CAN THIS BE THE FIGURES JUST DO'NT ADD UP - In the submission version dated January 2019, Appendix 2 - Community Aspirations - it is stated that "the tennis club membership is strong", however, once again they are making a play to install floodlighting, such lighting would have a detrimental effect to the visual landscape both in the village and surrounding area. Claverdon Tennis Club is situated on one of the highest points of the village, there are important listed historic buildings adjacent to this area which would be effected by floodlighting, plus many of the adjoining properties are bungalows on much lower ground than the tennis court, and as such any lighting would be much higher than these surrounding properties and seen for a significant distance in the C1 and D1 areas (Reference figure 3).</p> <p data-bbox="1032 1310 2007 1374"><u>Policy NE3</u> – I very much support renewable energy production and was very surprised that Park Farms solar farm was not approved, considering that it was to</p>

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			<p>be sited in a secluded area and would have had little or no impact on the landscape.</p> <p><u>Policy NE5</u> – I feel that all residents have a duty to protect and encourage natural, native wildlife, insects and plant species within Claverdon in order to produce a balanced well maintained ecosystem. It is essential that pollution of any sort whether atmospheric, noise or light is avoided at all costs. The suggestion of a adding floodlighting to the tennis club courts would severely disrupt the feeding habits of many wild animals but in particular the many bats that roost within the vicinity. There are published papers concerning the habits of bats and the adverse effect of floodlighting within their environment - bats sense and monitor light intensity before exiting their roosts to feed, they will only emerge once a certain light intensity reaches a critical level, floodlighting disrupts the bats normal pattern of light and dark and can significantly shorten the bats foraging time leading to inadequate nourishment; ultimately this is likely to lead to a significant drop in bat numbers or their total demise and in consequence detrimentally alter the current ecosystem.</p> <p><u>Policy BE1</u> – I support the principles set out in BE1. I do not believe that any building work, solar panels, stanchions or lighting additions should be allowed to have a detrimental effect on the area as a whole and nothing should be added in the green belt, conservation areas or to the many listed buildings that has an impact on the street scene or skyline. The views in Claverdon and into and out of the village should be preserved at all costs.</p> <p><u>Policy BE2</u> – It is extremely important that the historic buildings, natural landscapes, ecology, conservation and green belt are protected from unsympathetic development and 'enhancement', if we are to preserve Claverdon as a village.</p>

Rep.No.	Name	Page/Section	Representation
			<p><u>Policy CSL2</u> – I agree with 87% of the residents who stated in the survey that there are enough sporting facilities in Claverdon. I do NOT believe that any of the sports facilities in the neighbourhood need enhancing, at the present they are far better and more diverse than many small towns have, let alone a village. Claverdon already has football, rugby, cricket and tennis clubs and many privately run physical exercise classes in the two village halls. An 18 hole golf course, floodlit tennis courts, squash courts, badminton, well equipped gym, two swimming pools, many exercise classes etc. are also available at the Claverdon Ardencote Hotel Leisure Centre. Plus there are a large variety of sports facilities just 3 miles away in Henley in Arden including floodlit tennis courts. I feel that it is far more important for Stratford and the Parish Council to ensure that Claverdon's natural village environment is preserved, enhanced and protected so that it is still here for future generations to appreciate and enjoy.</p>
CLAV.18	J.Freeman	Policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1, CSL2	<p>Writes in support of all of the following policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1.</p> <p>Objects to : Policy CSL2</p> <p>Additional comments:</p> <p><u>Policy H1</u> – Claverdon village does not have the facilities to expand</p> <p><u>Policy H2</u> – Affordable housing should be very limited as the retail outlet (village shop), costly domestic fuel (bottled gas, electricity or oil) and lack of regular public transport make the village unsuitable for residents living on a very limited income.</p> <p><u>Policy E1</u> – As long as any expansion is in keeping with the surrounding environment.</p>

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			<p data-bbox="1032 272 2036 336"><u>Policy E3</u> – As long as any building work is discreet, does not affect local wildlife and blends in with the local environment.</p> <p data-bbox="1032 379 2036 592"><u>Policy NE1</u> – I note that the survey has a bias towards placing floodlighting on the tennis court this would definitely have a detrimental effect on the landscape not only in the village but also on the approaches due to the fact that the courts are situated on one of the highest points in Claverdon any floodlighting would be seen for miles around especially in the C1 & D1 areas as shown on the Valued Landscape diagram reference figure 3.</p> <p data-bbox="1032 635 2036 767"><u>Policy NE3</u> – As far as I am aware, Claverdon does not have any facilities for the production of renewable energy apart from a few individual houses with solar panels, due to the fuel situation in the world this does need addressing urgently. What happened to the proposed solar farm?</p> <p data-bbox="1032 810 2036 1054"><u>Policy NE5</u> – At the present time Claverdon is a quiet, unlit village that provides a good environment for generating a stable ecosystem. Nothing should be introduced into the village that disturbs the natural biodiversity of the area, this includes anything that generates noise, air pollution or bright lights. By falsely introducing a day light situation the natural feeding habits of wild nocturnal animals in particular would suffer and species may eventually die out in the area - such an occurrence would make the present ecosystem unstable.</p> <p data-bbox="1032 1098 2036 1230"><u>Policy BE1</u> – Placing any tall, unsightly, pollution, noise or light producing structure within the green belt, adjacent to historic buildings or in the conservation areas would be totally out of keeping with the village street views and contravene the Principles of Good Design Policy BE1.</p> <p data-bbox="1032 1273 2036 1374"><u>Policy BE2</u> – As per the final statement document regarding the tennis club in the Sports and Leisure Facilities section, where floodlighting the tennis courts is suggested; any added floodlights on the courts would be within the</p>

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			<p>CONSERVATION AREA and adjacent to important, listed historical buildings, including Tally-Ho Cottages, The Forge & The Forge House the addition of floodlighting would therefore breach the principles stated in Policy BE2 Heritage Assets.</p> <p><u>Policy CSL2</u> – Claverdon and the surrounding area (within a 3 to 4 mile radius) already has a substantial amount of sporting facilities including several floodlit tennis courts (one already in Claverdon at the Ardencote Leisure Centre), football, cricket, rugby, squash, badminton, dance, gym facilities, two swimming pools, exercise classes etc., it does not need more - Claverdon is a VILLAGE NOT A TOWN and majority of people who have chosen to live here support village life and wish it to remain as it is.</p>
CLAV.19	S.Reading	Policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1, CSL2	<p>Writes in support of all of the following policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE4, NE5, BE1, BE2, CSL1 but</p> <p>Objects to Policies: CSL2, NE3</p> <p>Additional comments:</p> <p><u>Policy H2</u> – Is the existing affordable housing provision at Morgan Close & Brick Kiln Close within the parish safeguarded for people identified by the 2017 Housing Needs Survey? Do current residents satisfy the criteria on Page 11, 4.14?</p> <p><u>Policy NE5</u> – In particular reduction in light pollution should be encouraged.</p> <p><u>Policy BE1</u> – I do not understand how permission was granted for the extensions & alterations at Fobello, Station Road, which appear to contradict this criteria,</p>

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			<p>resulting in a building that looks more suitable for an industrial estate & is now completely out of character with its neighbours.</p> <p><u>Policy CSL2</u> – As per the Neighbourhood Plan, the village already has excellent sport and recreational facilities. They should be maintained but not enhanced.</p>
CLAV.20	K.Holmes	Policies: H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE4, NE5, BE1, BE2, CSL1, CSL2	<p>Writes in support of all of the following policies:</p> <p>H1, H2, H3, H4, E1, E2, E3, E4, E5, NE1, NE2, NE3, NE5, BE1, BE2</p> <p>Objects to Policies: NE4, CSL1, CSL2</p> <p>Additional comments:</p> <p>Policy NE4 – Development of sports ground and recreational amenities should only take place with due regard to the nature of land and buildings. In particular developments should not proceed where there is an increase in noise, light and general disturbance to the residents and to those residents in particular who are close to the amenities. There should also be no development which would harm the wildlife and disturb the rural nature of the village. Tennis court flood lights would affect all of these areas.</p> <p>Policy NE5 – Light pollution will be increased by the wrong development of recreational and sports amenities.</p> <p>Policy CSL1 – The development of sports facilities which increase light pollution should be specifically curtailed. The surrounding urban conurbations all provide floodlit sports facilities within reasonable travelling distances. The Ardencote Club and Henley in Arden sports ground.</p> <p>CSL2 – As previous there is no logical argument for the provision of flood lighting at Claverdon Tennis Club. Better facilities are available with existing floodlit facilities</p>

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			locally. It would harm local wildlife, affect the rural ambience of the village and bring a poorer quality of rural village life to a large no of residents.
CLAV.21	Gladman Developments	General, Policy H1, NE1	<p>This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Claverdon Neighbourhood Plan (CNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation of numerous plans across the country, it is from this experience that these representations are prepared.</p> <p>Legal Requirements:</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in §8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the CNP must meet are as follows:</p> <p>(a) 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>(d) The making of the order contributes to the achievement of sustainable development.</p> <p>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</p> <p>Revised National Planning Policy Framework:</p>

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			<p data-bbox="1032 272 1995 408">On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper.</p> <p data-bbox="1032 456 2029 663">§214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Submission of the CNP ultimately occurred after this date, and the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018 and corrected in February 2019.</p> <p data-bbox="1032 703 1872 730">National Planning Policy Framework and Planning Practice Guidance:</p> <p data-bbox="1032 775 2018 983">The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.</p> <p data-bbox="1032 1031 2018 1238">At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p data-bbox="1032 1286 1984 1374">The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account of and most up-to-date evidence of housing needs in order to assist the</p>

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			<p data-bbox="1032 272 1928 336">Council in delivering sustainable development, a neighbourhood plan basic condition.</p> <p data-bbox="1032 379 2029 587">The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. §16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> <p data-bbox="1032 630 2029 874">§17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p data-bbox="1032 917 2029 1093">§18 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p> <p data-bbox="1032 1136 1375 1168">Planning Practice Guidance:</p> <p data-bbox="1032 1211 2029 1343">It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements of the wider area as confirmed in an adopted development plan. The Framework requirements have now been supplemented by the publication of Planning Practice Guidance (PPG).</p>

Rep.No.	Name	Page/Section	Representation
			<p data-bbox="1032 272 2007 408">On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p> <p data-bbox="1032 456 2029 695">On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG, providing clarity on the measures a qualifying body should take to review the contents of a neighbourhood plan where the policy evidence base becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying body's anticipated timescales in this regard.</p> <p data-bbox="1032 743 2029 911">Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the CNP's ability to meet basic condition (a) and this will be discussed in greater detail throughout this response.</p> <p data-bbox="1032 959 1357 983">Relationship to Local Plan:</p> <p data-bbox="1032 1031 1995 1238">To meet the requirements of the Framework and Neighbourhood Plan Basic Conditions, neighbourhood plans should conform to the strategic policy requirements set out in the adopted Development Plan. That relevant to the preparation of the CNP is the Stratford-on-Avon District Core Strategy which, for now, consists of the Core Strategy DPD only. The Core Strategy determined that Stratford would be required to deliver 14,600 homes between 2011 and 2031.</p> <p data-bbox="1032 1286 1984 1374">To meet the requirements of the Framework the Council is reviewing the Site Allocations and has recently consulted on the 2018 Draft SHLAA document. It is therefore important that the CNP provides flexibility to ensure that the policies</p>

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			<p>contained in the CNP are not overridden upon the adoption of any future component of the development plan; as section 38(5) of the Planning and Compulsory Purchase Act 2004 states:</p> <p><i>'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'</i></p> <p>Claverdon Neighbourhood Plan:</p> <p>This section highlights the key issues that Gladman would like to raise with regards to the content of the CNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of modifications to the plan to ensure compliance with the basic conditions.</p> <p><u>Policy H1 – Development Strategy</u></p> <p>Policy H1 identifies a Village Boundary for Claverdon and states that land outside of this defined area, will be treated as open countryside and Green Belt, where development will be carefully controlled.</p> <p>Gladman object to the use of settlement boundaries if these preclude otherwise sustainable development from coming forward. The Framework is clear that sustainable development should proceed. Use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).</p>

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			<p>As currently drafted, this is considered to be an overly restrictive approach and provides no flexibility to reflect the circumstances upon which the CNP is being prepared. Greater flexibility is required in this policy and Gladman suggest that additional sites adjacent to the settlement boundary should be considered as appropriate.</p> <p><u>Policy NE1 – Valued Landscapes</u></p> <p>Gladman are concerned with the intention of this policy to protect numerous valued landscapes, important skylines and views in the neighbourhood area. This policy identifies 9 ‘Valued Landscapes’, where the plan makers would not support development proposals adversely affecting them. Gladman suggests that this is a subjective issue and the policy does not provide support for a decision maker to apply the policy predictably and with confidence. Having considered the Landscape Appraisal supporting this consultation we do not consider this evidence to be sufficient to justify the protection of the number of views identified.</p> <p>We consider that for a landscape to be identified for protection there should be a demonstrable physical attribute that elevates a view’s importance out of the ordinary. It is not justified to seek to protect nice views of open countryside. Gladman note the key views identified cover extensive areas of the neighbourhood plan area and this could be seen to be an attempt to impose an almost blanket restriction towards development in much of the neighbourhood area.</p> <p>To support this policy Gladman suggest that the evidence would have to demonstrate the physical attributes of the views identified that elevate them above simply being a nice view of open countryside. An area’s pleasant sense of openness to the open countryside cannot on their own amount to a landscape which should be protected.</p> <p><u>Conclusions</u></p>

Rep.No.	Name	Page/Section	Representation
			<p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the CNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with basic condition (a). The plan does not conform to national policy and guidance. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>
CLAV.22	M.Key - Claverdon Parish Council	General	<p>There is a factual error in the Plan, as follows:</p> <p>Page 47 – Site Reference - CLAV 6:</p> <ul style="list-style-type: none"> • Under “Public Access” – the reference to a public footpath is incorrect and should read “right of way”. • In “Summary and Suitability for Designation as a Local Green Space” the field has not been donated to the school. The school have been granted short term access by the Charity who own it, until May 2019. • Its suitability for designation as a Local Green Space is also because there are covenants on the field to restrict its use to that of a sports field or recreation field only.
CLAV.23	Mrs L.E. Pielow	Appendix 2 , CSL2	<p>I would draw your attention to one of ‘The Community Aspirations – Appendix 2’ on page 40 of the Claverdon Neighbourhood development Plan 2011-2031 regarding the Tennis club. The aspiration is that ‘the future of the club would be strengthened by the installation of lighting’.</p>

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			<p>In this respect the main issue that was raised in the CNDP questionnaire regarding Floodlit Sport Facilities were 'No sports floodlighting whatsoever' and the response was 60% in favour of no sports floodlighting whatsoever.</p> <p>Secondary issues which would only become relevant if the response to the main issue was in favour of sports lighting were, Sports floodlighting but limited to 9.00 pm., response 66% in favour, and Sports lighting unlimited, 89% against. With this outcome I am wondering why an Aspiration of the village is to have tennis court lighting when clearly 60% of the village are in favour of no sports floodlighting whatsoever?</p> <p>I would be pleased if you could clarify why this is so and take measures to remove this aspiration from the CNDP as it conflicts with the findings of the CNDP questionnaire. Ref CNP Survey results 2016 Final Report Section 4.4 page 15.</p> <p>Whilst I do understand that the desire for court lighting was for the benefit of local children, to date there has been little evidence of children using the courts regularly, particularly at weekends.</p> <p>The location of the tennis club in Claverdon is close to a number of residences that are occupied by retired residents, some quite elderly and any installation of lights would be obtrusive and not preserve or enhance the character of the area and could be at odds with the existing settlement character of the village generally.</p> <p>Claverdon is a village with no street lighting which does enable residents to enjoy the many glorious sunsets and unspoiled, by light pollution, night skies.</p> <p>In 2004 Claverdon Tennis Club applied to the Dorothea Hall Committee, who are their landlords, for permission to proceed with the installation of court lighting. After seeking the view of the village, against lights by 60% this was declined.</p>

Rep.No.	Name	Page/Section	Representation
			<p>A further application was made in 2014, which was also refused after consulting local residents who on this occasion were over 90% against.</p> <p>Thank you for taking the time to look into this issue for me and I look forward to your response.</p>
CLAV.24	Stratford-on-Avon District Council	<p>Page 4, para 2.1</p> <p>Page 5, para 3.3</p> <p>Page 5, para 3.5</p> <p>Page 6, Strategic Objectives</p> <p>Page 7, para 4.2 and associated Table</p> <p>Page 7, para 4.3</p> <p>Page 7, para 4.3</p>	<p>Replace "Stratford District of" with "<u>District of Stratford-on-Avon within</u>" on the first line of the paragraph.</p> <p>First line – amend to 'Stratford-upon-Avon District Council'</p> <p>Tenth bullet point – begin with: "<u>Encouraging an</u> entrepreneurial approach..."; Fifteenth bullet point – amend as follows: "Seek <u>Seeking</u> to protect..."</p> <p>The objective seeks (amongst other things) 'on-going improvements to flood defences'. However, it does not state where, or why. There are no rivers or watercourses running through, or close to the village of Claverdon. As such, the requirement for flood defences requires clarification and justification.</p> <p>Dwelling provision in Policy CS.16 of the Core Strategy relates to the settlement of Claverdon as a Local Service Village not the Parish as a whole. On that basis, the figures in the Table do not accurately reflect the provision made in the LSV itself. Having said that, there is no requirement that each Category 3 LSV should provide around 59 homes, particularly those washed over by Green Belt – as para 4.4 explains.</p> <p>Suggest adding "...and section 13 of the NPPF" to the end of the first sentence in order to be consistent when quoting associated policy from different sources.</p> <p>The associated bullet points do not quote Policy CS.10 or the NPPF accurately. With something as critical as Green Belt policy, the NDP</p>

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			should reflect assessment criteria accurately to avoid misinterpretation or miss-use.
		Page 8, Policy H1	Suggest adding the following text to the end of the first paragraph of the policy: "...other policies in this Plan, <u>CS.10 of the Core Strategy and section 13 of the NPPF</u> "
		Page 8, Policy H1	The built-up area of Claverdon is washed over by Green Belt as well as the rest of the Parish so reference to the Green Belt in second paragraph is unnecessary.
		Page 8, Policy H1 [Explanatory text]	<p>The Reg.14 version NDP had a paragraph [4.12] that outlined how the proposed settlement boundary for the village of Claverdon has been conceived. This has now been deleted from the Reg.16 version Plan, which means there is no reasoning or explanation as to the existence or current alignment of the settlement boundary.</p> <p>The District Council raised concerns via the Reg.14 consultation over issues of inconsistency when the PC were considering what land uses should be included within or remain outside the proposed settlement boundary. Many of the District Council's comments have been accepted and the boundary appears much more 'defendable' as a concept since it is more consistent in its interpretation.</p> <p>However, one or two anomalies remain, particularly given there is no explanatory text on the matter of interpretation. In the Reg.14 version Figure 2 the large residential garden associated with the most southerly dwelling known as 'Beechwood Ridge' had not been included within the boundary which was inconsistent with all other gardens in the village. To overcome including what is perceived as a 'large garden' within the boundary, the entire property has now been removed which means it is the only dwelling in the village which has a shared boundary with another residential property to be located outside the settlement boundary. It is not clear how this has been/can be justified.</p>

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			<p>Additionally, part of a garden associated with a dwelling off Henley Road has also been left outside the settlement boundary for no obvious reason. These anomalies should be rectified and explanatory text should be re-instated to confirm how the alignment of the settlement boundary has been settled upon.</p>
		Page 9, Figure 2	<p>The property 'Beechwood Ridge' has been excluded in its entirety, as has part of a residential garden associated with a dwelling off Henley Road. It is suggested these two properties are included within the proposed settlement boundary, in their entirety, for consistency of approach.</p>
		Page 10, Policy H2	<p>The inclusion of this Policy is welcomed in principle, since this is the only way in which new affordable housing is likely to be developed. However, having regard to the advice at para. 77 of the NPPF (July 2018), certain changes should be made to the wording of the Policy to bring it into closer alignment with Core Strategy Policies CS.15 (G), CS.10 (criterion a) and AS.10 (criterion (a)). The policy would appear to go beyond the intent of these policies in allowing an element of housing <i>over and above</i> that required purely to meet identified local needs.</p>
		Page 10, Policy H2	<p>It is noted that the Policy only applies to development beyond, but reasonably adjacent too, the defined Village Boundary of Claverdon. This would have the effect of excluding schemes on the edge of, say, that part of Norton Lindsey within the parish of Claverdon where rural housing schemes have successfully been developed in the past. If the local community specifically wish to exclude this possibility then this decision would be respected, but it would be useful for this to be explicitly noted.</p>
		Page 10, Policy H2	<p>Final paragraph - It would normally be anticipated that any financial appraisal would be prepared by a scheme promoter (not necessarily a land owner), discussed and agreed with the Parish Council beforehand, and then submitted to the District Council for independent review.</p>

Rep.No.	Name	Page/Section	Representation
			<p>"4.14 It is clear from the findings of the 2017 Survey that there is an identified local housing need that presently remains unmet. It is the aim of this Plan to promote a community-led housing scheme that responds effectively to the identified need, or need identified as a result of any subsequent similar Survey. The Parish Council will therefore seek to identify one or more suitable sites for a scheme on the edge of Claverdon village that could provide both affordable and local market housing and work with a promoter and Registered Provider to bring forward a suitable scheme. This will involve preparing and consulting on both a detailed design and layout for such scheme as well as a package of measures to ensure successful delivery of the scheme.</p> <p>4.15 It is expected that the occupancy of any homes (whether affordable or market) will be restricted in the first instance to households with a qualifying local connection to Claverdon parish, in line with standard arrangements operated by Stratford-on-Avon District Council, and set out in a planning obligation (S106 Agreement)."</p>
		Page 11, Policy H3	Criterion e) it is suggested adding 'or features' after 'land' in order to cover ecology, etc.
		Page 13, Policy E1	Criterion e) covers a different issue to the other points covered by this policy and should be a separate paragraph at the end of the policy; criterion f) repeats the first part of criterion b); within criterion f), suggest the wording from "Planning applications for..." should also be a separate paragraph within the policy.
		Page 13, Paragraph 5.1	The terminology used in this sentence is incorrect and should read: "...but did not identify any land within Claverdon parish for such development or any very special <u>exceptional</u> circumstances <u>to amend the boundary of the</u> for the release of Green Belt land for employment opportunities."

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		Page 13, Paragraph 5.2	This is incorrect and not policy compliant as worded. It is suggested amending to read: "As a consequence of this, only applications for commercial use will be considered for the Neighbourhood Area, providing the openness of the Green Belt is preserved <u>it meets Green Belt policy.</u> "
		Page 15, Policy E2	It is not clear where this policy would apply, given that new employment buildings are not listed within paragraph 89 of the NPPF as 'appropriate' forms of development in the Green Belt.
		Page 15, Policy E3	It is unclear whether live-work units are unacceptable outside the village boundary. Policy CS.22 (8 th para) in the Core Strategy states that this is the case. It is important that the NDP confirms this or justifies a different approach.
		Page 16, Policy E5	Criterion d) does not flow from introductory sentence "New or enhanced telecommunications development will be supported subject to the following factors:" Suggest amending to " <u>Consideration</u> of the potential for sharing existing masts, buildings and other structures..."
		Page 18, Paragraph 6.2	Suggest inserting "[at Appendix 1]" between "(VDS)" and "has been..." on the second line, for completeness.
		Page 18, Policy NE1	The first paragraph of the policy refers to 'historic landscape features', but does not explain what they are nor does it list them. Could/should they be listed and also mapped?
		Page 18, Policy NE1	'Important skylines' are notoriously difficult to define and control are not included in figure 3 as stated. It is suggested the final paragraph of the policy be amended to remove "and important skylines". Views are shown in photographs on pages 19-22.
		Page 19, Figure 3	This is a confusing figure. The angles and the shading do not match - does this mean only the shaded area is the element of the landscape

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			which is valued? For example, in view B1 the shaded area is much smaller than the 2 arms of the angle.
		Page 23, Policy NE2	In the penultimate paragraph of the policy, the correct terminology and acronym is 'Sustainable Drainage Systems' since the word "urban" has been dropped as such systems apply equally in rural areas, too. The correct acronym is "SuDs".
		Page 24, Policy NE4	Following an evaluation of the proposed LGS designations against the criteria set out in paragraph 77 of the NPPF, the LPA remain to have concerns over site CLAV5 [site CLAV9 from the Reg.14 version] remaining in the Neighbourhood Plan, due to it not meeting the strict assessment criteria as set out in para 77 of the NPPF. This decision is explained in more detail in comments relating to Appendix 3 – LGS Assessments later in this schedule.
		Page 24, Policy NE4	Penultimate paragraph of the policy: It is inappropriate to mention 'openness' in this context as it is not one of the criteria for Local Green Space designation. Recommend first sentence of the paragraph be amended to read: "Development that would harm the openness or special character..."
		Page 26, Figure 4	Remove site LGS 5 from the map. [see above comment].
		Page 27, Policy NE5	Paragraph 6.18 is policy wording, not explanatory text. Including it in the explanation gives it no weight. The policy itself does not cover preserving or conserving trees and only covers new tree planting. Is this an omission?
		Page 28, Policy BE1	Concern is raised that the requirement for 'all' development proposals to take account of the VDS is too onerous and does not take into account development that can be carried out under permitted development rights. There is no criteria specifically relating to materials within the policy, but is referred to within the Explanatory text.

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		Page 28, Policy BE1	The policy should refer to Appendix 1 – Village Design Principles. However, it is unclear how these design principles have been derived and what relationship they have with the VDS – this needs to be clarified in the text.
		Page 28, Policy BE1	Criterion a) should be amended to read: “ <u>Retention or provision of space appropriate gaps</u> between buildings...”. This is due to the fact that the term ‘space’ is considered too vague and would need to be defined or clarified.
		Page 28, Policy BE1	Criterion c) should be amended by removing the words “...and shape...” since this wording is too vague and open to different interpretation. The policy already refers to ‘building form’ which adequately covers design without referring to ‘shape’.
		Page 29, Policy BE2	It is considered that the first paragraph promotes a different test of ‘harm’ to that outlined in the NPPF. To ensure it complies with national policy, it is suggested ‘harm to the’ is inserted between ‘the’ and ‘significance’; again in order to comply with terminology within the NPPF, it is suggested ‘preserve’ should be replaced with ‘conserve’ in the second paragraph; since there are two Conservation Areas in Claverdon, therefore add ‘s’ to ‘Area’ on third line of second paragraph.
		Page 29, Policy BE2	Last paragraph – remove “and Scheduled Ancient Monuments” as there are none within the neighbourhood area.
		Page 33, Appendix 2	It is unclear how these have been identified and what is expected – this should be clarified in some explanatory text.
		Page 42 – 47, Appendix 3	<u>General comment:</u> Whilst text within the individual assessments at Appendix 3 attempt to provide justification for designating sites as LGS, concern is raised that the assessments do not cover all aspects of the relevant paragraphs of the NPPF satisfactorily. In fact, the assessments

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		Page 46, LGS site CLAV5	<p>do not make mention of the NPPF at all. The issue of whether the area is 'local in character' and is not an 'extensive tract of land' has not been covered at all, which is critical in LGS analysis. Therefore, concern is raised that 'evidence' as drafted in Appendix 3 is not sufficient.</p> <p>CLAV5 [Previously 'CLAV9' in Reg.14 Plan]: The site is privately owned woodland. In the opinion of officers, the site is not in reasonably close proximity of the community, the land could not be classified as 'local' in character and would be classified as an extensive tract of land. There are no public footpaths running through the woodland. A public footpath skirts along the south and east edges of the wood and as such, there is no 'general' public access to the site. Justification for the inclusion of this field relates to it being used year round by walkers, but based on footpath maps this can't be the case. The site itself may be of some historic significance but it is not clear how it could be classified as demonstrably special to the community in overall terms. Since LGS designation should only be used when all the assessment criteria in the NPPF are met, the conclusion is that based on the evidence submitted, this site does not meet para 77 of NPPF.</p>