

# Napton-on-the-Hill Neighbourhood Development Plan

## Consultation Statement



Napton-on-the-Hill Parish Council

October 2019

# Contents

| Section | Title  | Page |
|---------|--|------|
| 1.      | <b>Introduction</b> <ul style="list-style-type: none"> <li>• Purpose of the consultation statement</li> <li>• Overview of consultation stages</li> </ul>   | 3    |
| 2.      | <b>Neighbourhood Area Application</b> <ul style="list-style-type: none"> <li>• Background</li> <li>• Application to Stratford-on-Avon District Council</li> </ul>  | 4    |
| 3.      | <b>Initial non-statutory consultation</b> <ul style="list-style-type: none"> <li>• Napton Housing Needs Survey 2018</li> <li>• Consultation on the proposals for the former brickworks</li> <li>• Consultation on Local Green Space and Important Views</li> </ul>   | 7    |
| 4.      | <b>Statutory pre-submission consultation on the draft plan</b> <ul style="list-style-type: none"> <li>• Statutory requirements</li> <li>• Publicising details of the proposals for a neighbourhood plan</li> <li>• Consultation bodies</li> <li>• The local planning authority</li> <li>• Publicising where and when the neighbourhood plan may be inspected</li> <li>• Details of how to make representations</li> <li>• The date by which representations must be received</li> <li>• The main issues and concerns raised</li> <li>• How these issues were considered and addressed</li> </ul> | 9    |
| 5.      | <b>Conclusion</b>  | 14   |
| 6.      | <b>Appendices</b> <ol style="list-style-type: none"> <li>1. Article in Parish Magazine asking for volunteers to serve on the Steering Group and an opportunity to suggest priorities for the neighbourhood plan</li> <li>2. Consultation leaflet distributed to all households</li> <li>3. List of consultees</li> <li>4. Response Form</li> <li>5. Assessment of response from GVA</li> <li>6. Assessment of response from Stratford-on-Avon District Council</li> </ol>  | 15   |

# 1. Introduction

## Purpose of the consultation statement

- 1.1 As the qualifying body Napton-on-the-Hill Parish Council has formally submitted the Napton-on-the-Hill Neighbourhood Development Plan to Stratford-on-Avon District Council.
- 1.2 When submitting a neighbourhood plan to the relevant local planning authority the legislation requires that the qualifying body also include a number of other documents. One of these is commonly known as a consultation statement.
- 1.3 This consultation statement has therefore been prepared to fulfil the statutory obligations of the Neighbourhood Planning Regulations 2012. Part 5, Section 15(2) of the Regulations states that a consultation statement should:
  - a) contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b) explain how they were consulted;
  - c) summarise the main issues and concerns raised by the persons consulted; and
  - d) describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood plan.

## Overview of consultation stages

- 1.4 Consultation activity during the preparation of the neighbourhood plan occurred in three stages:
    - the application process to have the neighbourhood area designated;
    - initial non-statutory consultation; and
    - the statutory pre-submission consultation on the draft plan.
  - 1.5 These stages are described in more detail in the following sections.
-

## 2. Neighbourhood Area Application

### Background

- 2.1 In 2017 a number of community consultation activities were undertaken by the Parish Council to ascertain what level of support existed amongst the community for the preparation of a neighbourhood plan and the issues it could potentially address. These events are summarised below:

**Table 1 – Initial Consultation Activities**

| Date     | What                         | Purpose   | Number of attendees                         |
|----------|------------------------------|---|---|
| 15.01.17 | Article in Parish Magazine   | Announce open meeting to discuss proposed neighbourhood plan on 26 January  | Invitation to attend delivered to 400 homes |
| 26.01.17 | Open meeting at village hall | To introduce the concept of a neighbourhood plan. Representative from Stratford-on-Avon District Council planning team attended the meeting | 30  |
| 02.03.17 | Open meeting at village hall | To hear from another Parish Council who had recently completed their neighbourhood plan   | 12  |
| 21.05.17 | Annual Parish Meeting        | Seeking initial ideas about key themes/issues   | 26  |

### Key Issues

- 2.2 A copy of the article in the Parish Magazine asking for volunteers to serve on the Steering Group is attached as Appendix 1. This also invited suggestions on the priorities for the neighbourhood plan to address.
- 2.3 Analysis of the response suggested that the following was liked about the parish:
- open spaces that make it feel like a village not a town (e.g. village greens, playing fields, land behind the church, fields within built up area of the village, footpaths and views)
  - mix of housing designs and small developments
  - amenities and community services (e.g. shop, village hall, public houses and school).
- 2.4 What was not liked about Napton was:
- traffic and transport issues (e.g. inadequate bus service, parking on narrow roads, traffic speeding and poor highway maintenance)
  - the poor state of the former brickworks site

- housing issues (e.g. insufficient housing for the elderly, too many new houses built in the past 5 years)
- communications and media (e.g. poor quality mobile signal and internet)
- antisocial behaviour (e.g. off road motor bikes).

2.4 In addition to the above, regular articles were posted on the Community Facebook page and in the Parish Magazine.

### **Application to designate the neighbourhood area**

2.5 Based on the feedback from the initial consultation events the parish council decided to prepare a neighbourhood plan at its meeting on 3 April 2017.

2.6 The first stage in the statutory process was for the boundary of the neighbourhood plan, known as the neighbourhood area, to be formally designated by the local planning authority. As the appropriate ‘qualifying body’ the parish council therefore applied to Stratford-on-Avon District Council to designate the neighbourhood area.

2.7 The proposed boundary of the neighbourhood area followed the parish boundary.

2.8 The District Council formally approved the Napton Neighbourhood Area on 18 July 2017.

2.9 The boundary of the designated neighbourhood area is indicated on Map 1 overleaf.

### **Neighbourhood Plan Steering Group**

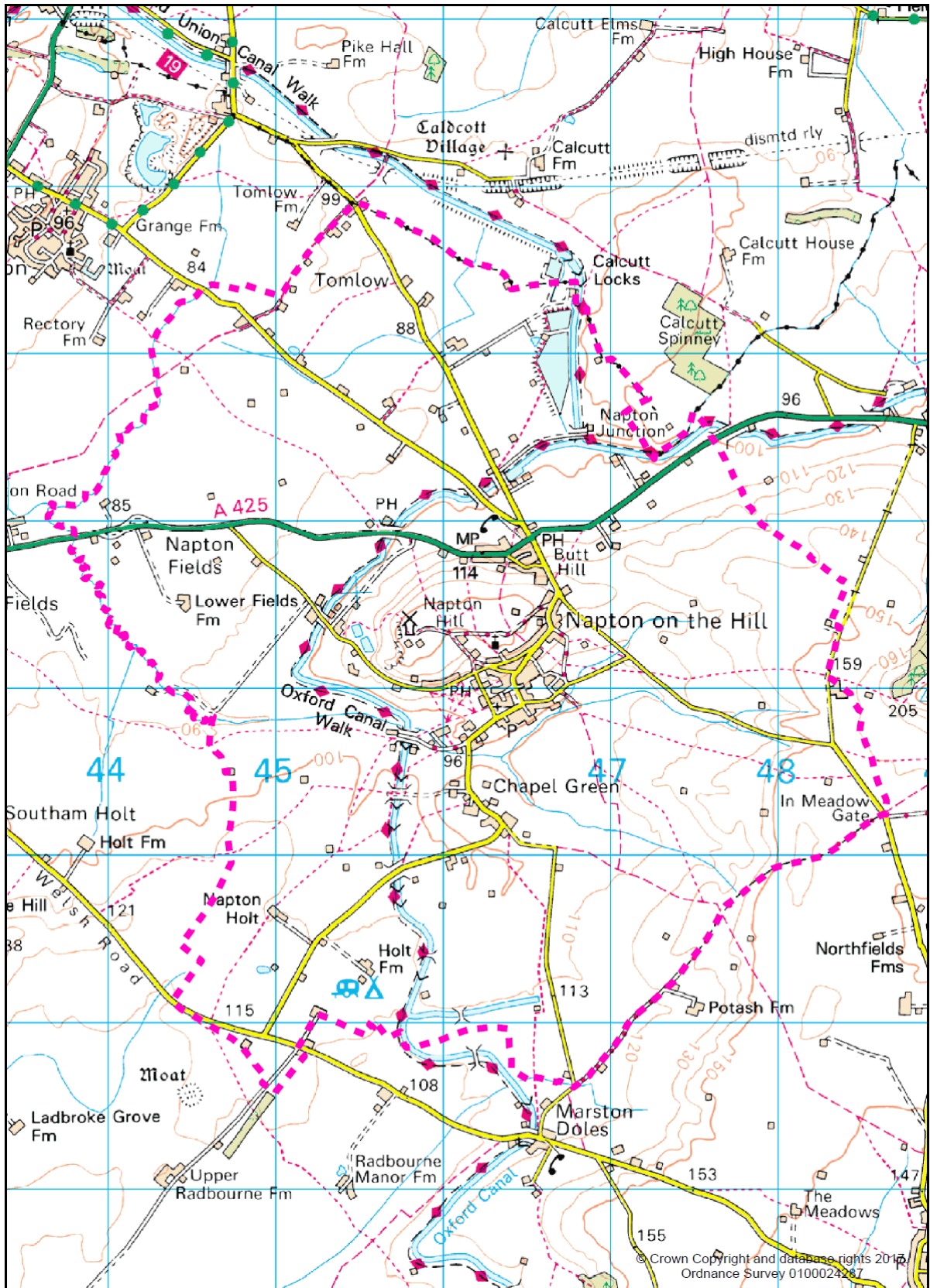
2.10 The Parish Council then set up a Neighbourhood Plan Steering Group, which comprised two Parish Councillors and a number of keen volunteers from the local community.

2.11 The membership of the Steering Group is: Anna Gamble (Chair); Alun Gamble; Chris Barker; David Sykes; Hannah Slade; Jayne Holland; Jayne Warman; Jo Hancock; John Veasey; Olwen Goss; Pete Gladwin; Rachael Pelter; and Richard Woodcock.

2.12 The aim of the group was to create a neighbourhood development plan on behalf of the Parish Council that could influence and shape future development taking place in the area.

---

### Map 1 – Boundary of the Napton-on-the-Hill Neighbourhood Area



### 3. Initial Non-Statutory Consultation

- 3.1 As part of the preparation of the draft neighbourhood plan the Steering Group undertook some informal consultation with the local community to help identify the key issues.

#### Local Housing Needs Survey

- 3.2 The Parish Council commissioned Warwickshire Rural Community Council (WRCC) to conduct a local Housing Needs Survey during January 2018. The aim of the survey was to collect local housing needs information within and relating to the parish. The survey form was a standard document used in parishes across Stratford District, which was hand-delivered to every home in the parish. Additional copies were available for people not currently living in the parish but with a strong local connection.
- 3.3 Approximately 500 survey forms were distributed to local residents and 140 survey forms were returned equating to a response rate of 28%. This level of response was considered to be a good return by WRCC for a survey of this type.
- 3.4 The survey form asked whether the respondent's current home is suitable for the needs of the household.
- 3.5 The survey also asked:
- what the respondent thinks about the current mix of house types in Napton; and
  - provided an opportunity to comment on the type of housing needed or potential locations.
- 3.6 About 80 comments were submitted. The comments included:

- the harmful scale of residential development in the past
- concern about over development in the future and the subsequent loss of village identity and rural character
- a preference for small scale development
- the need to protect green spaces within the village
- the levels of traffic and car parking in the centre of the village
- a preference to locate future development on the brickyard rather than inside the main village
- the need for affordable housing for young people and those who are connected to the village
- there should be more flats and 3/4 bedroom houses to encourage young families to the village and enable those with larger properties who wish to down-size to also remain part of the community
- there is need for smaller houses that have 2 and 3 bedrooms
- developers should 'up their game' in terms of design and materials used
- lack of services and facilities to support further housing development
- limit green field developments around the periphery of the village as the rural setting is a huge asset
- the feeling of a spread out village should be retained with fields and woods mixed with housing, whilst infill should not continue
- make more use of the former brickworks site, which currently attracts anti-social behaviour
- many houses have accessibility issues due to the hill
- the village lacks diversity
- there is a need for more bungalows

- there is a need for more properties available to rent
- opportunities for self build would be welcome

3.7 These comments provided useful background information to the preparation of the draft neighbourhood plan.

3.8 A copy of the full Housing Needs Survey prepared by WRCC can be found here: <http://www.naptonparishcouncil.org.uk/neighbourhood-development-plan/>

### Consultation on the proposals for the former brickworks

3.9 An outline planning application was submitted by GVA on behalf of St. Phillips in October 2018 for up to 100 dwellings on the site of the former brickworks. As part of this proposal pre-application discussions were undertaken with relevant local stakeholders and the wider community. This included a meeting with the Parish Council on 20 February 2018. There was also a public exhibition in the village hall on 21 May. Approximately 120 people attended, of which 59 completed feedback forms.

### Consultation on potential Local Green Spaces and important views

3.10 At the Annual Parish Meeting in May 2018 members of the Steering Group displayed maps indicating potential sites for Local Green Space designation and associated material. They also showed the possible location of important views worthy of protection. The exhibition was attended by 55 people, many of whom made comment to the Steering Group representatives.



*Consultation on potential Local Green Spaces and important views*

3.11 This information was fed back to the wider Steering Group and informed the preparation of the neighbourhood plan.



## 4. Pre-Submission Consultation on the Draft Plan

### Statutory Requirements

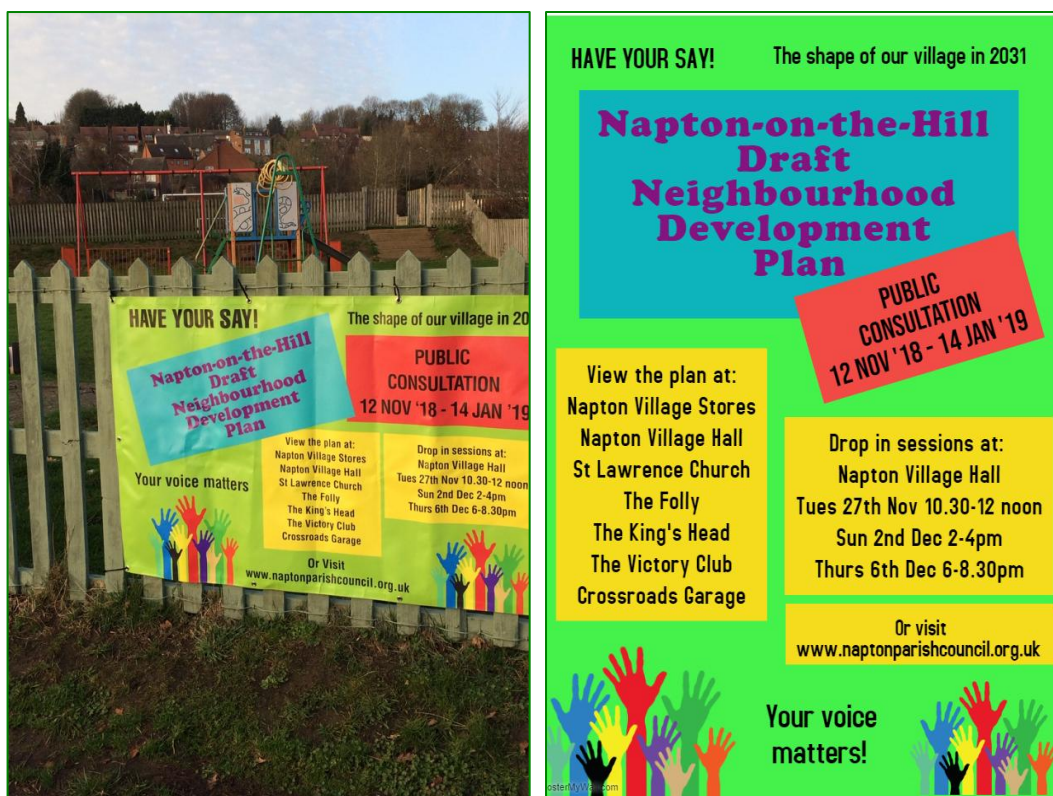
- 4.1 Part 5, Section 14 of the Neighbourhood Planning (General) Regulations 2012 requires that before the neighbourhood plan is submitted to the local planning authority the qualifying body must:
- a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area:
    1. details of the proposals for a neighbourhood development plan;
    2. details of where and when the proposals for a neighbourhood development plan may be inspected;
    3. details of how to make representations; and
    4. the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
  - b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
  - c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

### Consultation period

- 4.2 The statutory pre-submission consultation period took place between 12 November 2018 and 14 January 2019. This was 10 weeks in total to compensate for straddling the Christmas holiday period.

### Publicising details of the proposals for a neighbourhood plan

- 4.3 The draft plan was widely publicised to all those who lived, worked or had a business interest in the area.
- 4.4 A consultation leaflet was delivered by hand to every household in the parish. A copy is attached as Appendix 2.
- 4.5 In addition articles were posted on Facebook and placed in the Parish Magazine.
- 4.6 Flyers and banners were also displayed around the parish publicising the draft plan and the opportunity to comment (see photos on the next page). The location of the banners was varied throughout the consultation period to maximise coverage.



- 4.7 Letters publicising the plan were sent to:
- landowners affected by the proposals for Local Green Space designation in the draft plan; and
  - landowners known to have land within the parish.

### Consultation bodies

- 4.8 An email publicising the plan was sent to all relevant consultation bodies specified in paragraph 1 of Schedule 1 of the Neighbourhood Planning (General) Regulations 2012. The list of contacts was kindly provided by Stratford-on-Avon District Council.
- 4.9 In total 112 organisations were informed about the publication of the draft plan and invited to make comment.
- 4.10 The list of consultees contacted is attached as Appendix 3.

### The local planning authority

- 4.11 Although engaged throughout the early preparation process, a copy of the draft plan was formally sent to Stratford-on-Avon District Council for comment.

## Publicising where and when the plan may be inspected

- 4.12 All publicity material indicated that an electronic version of the draft plan could be inspected on the Napton Parish Council website:  
<http://www.naptonparishcouncil.org.uk/neighbourhood-development-plan/>
- 4.13 The leaflet to local residents explained that hard copies of the plan were also made available for inspection at:
- Napton Village Stores
  - Napton Village Hall
  - St Lawrence Church
  - Crossroads Garage
  - Kings Head Public House
  - The Folly
  - The Victory Club
- 4.14 Hard copies were available to borrow upon request from the Parish Clerk.
- 4.15 All publicity material explained that the Steering Group would host drop-in sessions to answer any questions about the draft plan at Napton Village Hall at the following times:
- Tuesday 27 November between 10.30am and 12.00 noon
  - Sunday 2 December between 2.00pm and 4.00pm
  - Thursday 6 December between 6.00pm and 8.30pm



*A drop-in session hosted by members of the Steering Group*

## Details of how to make representations

- 4.16 Those commenting were encouraged to use the Response Form. Electronic versions of the form were made available on the website. Hard copies were also made available at the above locations.
- 4.17 A copy of the Response Form is attached as Appendix 4.
- 4.18 The draft plan and the publicity material made it clear that any comments must be submitted in writing.
- 4.19 The draft plan and associated publicity materials also stated where completed response forms must be sent i.e.
- Email: [clerk@naptonpc.org.uk](mailto:clerk@naptonpc.org.uk); or
  - Postal address: Parish Clerk, Dog Lane Farm House, Dog Lane, Napton-on-the-Hill, Southam CV47 8LT; or
  - Delivered by hand to the designated post box in Napton Village Stores

## The date by which representations must be received

- 4.20 It was clearly stated in the plan and all the associated publicity material that the deadline for comments was 14 January 2019.

## Overall Response

- 4.21 The Steering Group received 62 responses in total, which resulted in 318 separate comments. These comprised:
- 51 responses from local residents;
  - 9 responses from government agencies, local authorities and the voluntary sector; and
  - 2 responses from landowners and developers.

## How any issues and concerns were considered

- 4.22 All of the comments and concerns raised in the 62 responses was carefully considered and addressed by the Steering Group.
- 4.23 The analysis of the responses is too large to attach as an appendix in this document. However it can be found here:  
<http://www.naptonparishcouncil.org.uk/neighbourhood-development-plan/>
- 4.24 This table lists:
- the respondent number;
  - summarises their comments including any issues or concerns;
  - provides the Steering Group's comments in response; and

- outlines the proposed action, notably whether modifications were made, or not made, to the plan in the light of the representation.

4.25 For data protection reasons the names, addresses and contact details have been omitted.

### **A summary of the main issues and concerns**

- 4.26 Of the 51 responses from local residents, 41 (80%) said they were broadly happy with the overall content of the neighbourhood plan.
- 4.27 There were 7 local residents who were strongly opposed to the plan. They made several detailed comments that were assessed and, where appropriate, the draft plan was amended accordingly. The majority of their concerns focussed around the process used for the production of the plan and the methodology adopted. A number of those who were not supportive of the plan also questioned the definition of the Built-up Area Boundary and suggested ways in which it should be amended.
- 4.28 None of the statutory agencies raised any concerns. However the Canal and Rivers Trust did comment in detail on the proposal for the former brickworks, which the Parish Council took into consideration in its conversations with Stratford-on-Avon District Council regarding the recent planning application for the site.
- 4.29 The Steering Group also considered the comments from GVA on behalf of St Philips Ltd (site owner of the former brickworks). This analysis is attached as Appendix 5.

### **Comments from the local planning authority**

- 4.30 A comprehensive and detailed response was also received from Stratford-on-Avon District Council. The analysis and response to their comments is attached as Appendix 6.
-

## 5. Conclusion

- 5.1 This Consultation Statement demonstrates that Napton-on-the-Hill Parish Council has prepared the Napton-on-the-Hill Neighbourhood Development Plan in accordance with the legal obligations set out in the Neighbourhood Planning Regulations 2012.
- 5.2 As stipulated in Part 5, Section 15(2) of the Regulations this Consultation Statement has :
- a) provided details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b) explained how they were consulted;
  - c) summarised the main issues and concerns raised by the persons consulted; and
  - d) described how these issues and concerns have been considered and, where relevant, addressed in the proposed Napton-on-the-Hill Neighbourhood Development Plan.
- 5.3 Furthermore the Parish Council believe that this consultation statement demonstrates that they have endeavoured to go beyond the minimum legal requirement. The Parish Council has made genuine and committed efforts to engage all those who live, work or have a business interest in the Napton-on-the-Hill Neighbourhood Area and provided them with every opportunity to influence the content of the Napton-on-the-Hill Neighbourhood Development Plan throughout its preparation.
-

## 6. Appendices

**Article in Parish Magazine asking for volunteers to serve on the Steering Group and an opportunity to suggest priorities for the neighbourhood plan**

# A Neighbourhood Plan for Napton?





### **What is a neighbourhood Plan?**

A neighbourhood Plan is a community led document which will help to guide the future development, regeneration and conservation of our village for the next 20 years.

Assuming it has the support of the majority of the community the Neighbourhood Plan will be part of the statutory planning framework which will give it far more weight than other documents such as parish plans and village design statements. The plan can cover a range of different issues including:-

- Housing development and supply
- Use of brownfield land
- Affordable housing
- Use of garden land
- Housing mix
- Safeguarded land
- Employment sites
- Design & character
- Environmental sustainability
- Provision for parking, pedestrians and cyclists
- Trees and hedgerows
- Community facilities

### **The story so far in Napton**

The Parish Council has organised 2 meetings to discuss the whether a Neighbourhood Plan is right for our village. Both were well attended with a generally positive approach to the idea. However, this document cannot and should not be

produced by the Parish Council. **It needs to reflect your views and it needs your involvement.** We will be able to get grants so that we can engage professional help but we still need input from the community. In order to make a final decision about whether to go ahead the Council is asking people to indicate whether they are prepared to be involved and if so how much time they are likely to be able to give. We would also like you to tell us what really matters to you about where you live. Please look at the list below, tick those boxes that apply to you and your family.

Name.....

Email address.....

Phone number.....

| Things I could help with                           | Please tick              |
|--|--------------------------|
| Project management                                 | <input type="checkbox"/> |
| Media and public relations (Facebook twitter etc.) | <input type="checkbox"/> |
| Interviewing groups and individuals                | <input type="checkbox"/> |
| Collating interview responses                      | <input type="checkbox"/> |
| Producing maps                                     | <input type="checkbox"/> |
| Planning policy work                               | <input type="checkbox"/> |
| Designing questionnaires                           | <input type="checkbox"/> |
| Delivering questionnaires                          | <input type="checkbox"/> |

| Amount of time I could give each month | Please tick |
|--|-------------|
| 2-4 hours                              |             |
| 4-6 hours                              |             |
| More than 6 hours                      |             |

Please tell us your priorities for the next 20 years

| <u>3 things I would want to stay the same in Napton</u> | <u>3 things I would want to change in Napton</u> |
|---|--|
|   |  |
|   |  |
|   |  |

Please return to any member of the Parish Council or the Clerk at Dog Lane Farm House (opposite the school). You can also hand it in at the Post Office or alternatively you can email your response to [clerk@naptonpc.org.uk](mailto:clerk@naptonpc.org.uk)

**PLEASE REPLY BY 7th APRIL**

**Appendix 2**

**Consultation leaflet sent to all households in the parish**

## How do I respond?

Please use Response Form enclosed with this flyer - also available on Napton Parish Council website

Online: download and complete Response Form from

[www.naptonparishcouncil.org.uk](http://www.naptonparishcouncil.org.uk)

Return as an attachment to the Parish Clerk

[clerk@naptonpc.org.uk](mailto:clerk@naptonpc.org.uk)

Paper: deliver completed paper response forms to Dog Lane Farm House (opposite St Lawrence School) or the designated post box in Napton Village Stores

**Please submit your Response Form  
by Mon 14<sup>th</sup> Jan 2019**

## What happens next?

The Steering Group will take into account your comments and amend as necessary before the Parish Council submits to Stratford District Council for further consultation. A referendum on the final version of the Plan will take place in 2019.



## HAVE YOUR SAY! Napton's Draft Neighbourhood Plan

Our Neighbourhood Plan will be the single most important document in shaping and protecting Napton's future for many years to come  
**PLEASE READ THE DRAFT AND HAVE YOUR SAY**

## What is the vision for Napton?

*"In 2031 Napton-on-the-Hill will be a distinct, sustainable and vibrant village that retains its rural character and overlooks the surrounding open countryside. It will contain a strong and inclusive community comprising people from all age groups and backgrounds who thrive and socially interact together."*

**Consultation Period starts 12 Nov 2018  
All comments to be received by 14 Jan 2019**

### What is in the Plan?

The draft plan contains objectives and policies on a range of issues, including the environment, housing, local services and many more ... it also contains photographs and maps with details of each area in the village and its setting in the surrounding countryside.

### How does it affect me?

This plan will influence how our village looks both in 20 years' time and for generations to come - it gives us a real voice in decisions made about future developments.

### Why should I respond?

It is very important that this plan is shared and owned by the whole community. Everyone is encouraged to review and comment - your opinion matters.

### How do I access the Plan?

The draft Neighbourhood Plan can be found on line:  
[www.naptonparishcouncil.org.uk](http://www.naptonparishcouncil.org.uk)

Paper copies of the Plan will be available to view at:

|                       |              |
|-----------------------|--------------|
| Napton Village Stores | King's Head  |
| Napton Village Hall   | The Folly    |
| St Lawrence Church    | Victory Club |
| Crossroads Garage     |              |

A limited number of hard copies are also available to borrow on request from the Parish Clerk  
[clerk@naptonpc.org.uk](mailto:clerk@naptonpc.org.uk)

### What if I have any questions?

The Steering Group will host drop-in sessions at Napton Village Hall on the following dates:

|                              |               |
|------------------------------|---------------|
| Tuesday 27 <sup>th</sup> Nov | 10.30-12 noon |
| Sunday 2 <sup>nd</sup> Dec   | 2-4pm         |
| Thursday 6 <sup>th</sup> Dec | 6-8.30pm      |

## List of 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                           |
| 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                          |

---

## Response Form

### Napton-on-the-Hill Draft Neighbourhood Plan

### Response Form

Please use this form to submit your comments on  
 Napton's Draft Neighbourhood Plan  
 Deadline: Monday 14<sup>th</sup> January 2019

You can submit your response:

- via the post boxes inside Napton Village Stores or outside Dog Lane Farmhouse
- or as an attachment by email to: [clerk@naptonpc.org.uk](mailto:clerk@naptonpc.org.uk)

| Your contact details *        |  |
|-------------------------------|--|
| Name                          |  |
| Organisation (if appropriate) |  |
| Address                       |  |
| Telephone number              |  |
| Email address                 |  |

- Providing your contact details is a statutory requirement of the consultation process but these will be held in compliance with General Data Protection Regulations

|   | Yes | No |
|---|-----|----|
| Are you broadly happy with the overall content of the Neighbourhood Plan? |     |    |

*Please tick as appropriate*

Please provide specific detailed comments on the reverse of this sheet including anything that you particularly object to or support

| Page number | Paragraph or policy number | Comments |
|-------------|----------------------------|----------|
|             |                            |          |
|             |                            |          |
|             |                            |          |
|             |                            |          |
|             |                            |          |
|             |                            |          |
|             |                            |          |
|             |                            |          |
|             |                            |          |

Thank you for your comments - your feedback is appreciated

## Response to comments from GVA on behalf of St Philips Ltd regarding Former Brickworks

| Page number | Section        | Comment  | Response by Steering Group  | Modification made to the Plan  |
|-------------|----------------|--|---|--|
|             | General        | An Outline Planning Application for the delivery of up to 100 residential uses (Use Class C3) and associated supporting infrastructure, including the delivery of open space, with all matters reserved with the exception of access was submitted to Stratford District Council on 20 November 2018.  | Noted   | Update plan accordingly<br><br>However no decision on planning application by SDC at time of submission. |
|             | Paragraph 3.17 | St Philips are supportive in principle of the background analysis detailed for the proposed development site. However, would recommend that the final sentence of<br><br>Paragraph 3.17 is amended to say the following:<br><i>“A small industrial unit (CAB TECH) is located to the south west of the Brickworks, adjacent to the former employment site.”</i><br><br>St Philips, as the landowners of the site, can confirm that this portion of land is outside of the land holding for the Former Brickworks and any association with this should be removed.  | Noted   | Reference added to the plan  |
|             | Paragraph 3.18 | With regard to Paragraph 3.18, St Philips recommend that the paragraph be amended as per the text below, to ensure the details of the previous application contained within the Plan align with the information contained on the District Council’s public planning portal. <i>“The site, which is brownfield in nature, received planning permission (Planning Application Reference: 08/00410/OUT) in 2015 for the reclamation and redevelopment of the derelict site to provide a mixed use development, including 56 live/work units, 1 x managers house, 8 no. Holiday lets, 8 no. 2 bedroom open market dwellings and 2 bedroom apartments. However, this permission expired in January 2018 due to viability issues associated with delivering the proposed live/work units.”</i> | As this particular planning application has now lapsed a brief description of the scheme is sufficient. | No change required   |

| Page number | Section        | Comment   | Response by Steering Group   | Modification made to the Plan |
|-------------|----------------|---|--|-------------------------------|
|             | Paragraph 8.11 | St Philips would recommend that Paragraph 8.11 clarify that the 88 dwellings for which planning permission has been granted in the wider Parish area contribute to the requirement stipulated in the Core Strategy for “Other Rural Locations”, which equates to 750 dwellings across the Plan period. This will ensure the justification for granting permission in this location is provided and minimises the risk of future challenges for unsupported development outside of the BUAB of Napton.   | Any future applications outside of the BUAB are resisted in the Core Strategy and neighbourhood plan apart from certain circumstances, so this reference is not required.  | No change required            |
|             | Paragraph 8.12 | Added flexibility in the NDP will secure the future of the Plan and, critically ensure that it is prepared in line with the tests of soundness set out in the NDP. It is therefore suggested that Paragraph 8.12 reads as follows:<br><i>“Of the required total housing requirement over the plan period, 61 dwellings have therefore already been met leaving a net balance of no more than about 23 additional dwellings required by 2031 to be constructed within the Built-up Area Boundary. This equates to about 2 new houses each year. Notwithstanding this, the Plan recognises the recent changes to Government policy in respect of calculating housing land supply and recognises that this may result in changes to the District-wide housing requirement for the remainder of the Core Strategy plan period. Policies relating to housing within the Neighbourhood Plan will therefore afford flexibility in their wording to ensure any future increases in the requirement for Local Service Villages.”</i> | Neighbourhood plans have to meet certain basic conditions rather than the tests of soundness required for a local plan.<br><br>The emerging SAP acknowledges the capacity of the secondary school in Southam restricts future residential development in its catchment area, which includes Napton Parish. | No change required            |
|             | Policy 1       | St Philips recommend that reference is made to other sites across the Parish that are located outside of the Built-Up Area Settlement Boundary that may come forward across the plan period within the policy wording. In this instance, St Philips recommend that the following be included in Policy 1 after “The Built-Up Area Boundary is defined on Policy Map 1”:<br><br><i>“The Parish acknowledges that in some instances the requirement to bring forward land for residential uses may be located outside of the Built-Up Area Boundary to accommodate the established housing requirements for both Napton on the Hill and the wider District ...”</i>   | Sites located outside the BUAB do not contribute to the housing requirement set out in the Core Strategy for Local Service Villages (Category 2).<br><br>The former brickworks is a strategic housing allocation in the SAP to reclaim a brownfield site.  | No change required            |

| Page number | Section        | Comment   | Response by Steering Group  | Modification made to the Plan  |
|-------------|----------------|---|---|--|
|             | Paragraph 8.48 | <p>It is recommended that the Parish remove Paragraph 8.48 due to the removal of self-build plots from the Concept Masterplan for the proposed development at the Former Napton Brickworks.</p> <p>Notwithstanding this, the proposed development at the Former Brickworks site would be able to accommodate plots to support SDC's Self-Build Register, specifically the provision of self-build plots required in the Parish of Napton if a need for such dwellings were required.</p>  | The emerging SAP has allocated a site north of Dog Lane for 5 self build units. | The plan has been updated to accord with the emerging SAP.   |
|             | Paragraph 8.51 | <p>It is recommended that the following sentence be added to Paragraph 8.51:<br/> <i>"However, the Parish is aware that the full extent of the ownership boundary for the Brickworks extends to approximately 10.48 ha."</i></p>  | Noted   | Wording amended to refer to 10 hectares.   |
|             | Paragraph 8.56 | <p>In addition to Policy AS11 of the Core Strategy, St Philips consider Policy AS10 to be critical to the determination of any planning application submitted in relation to the site.</p> <p>Specifically, Point (g) states that the:<br/> <i>"redevelopment of a bad neighbour site for residential development where the current use has been the cause of prolonged environmental conflict"</i> will be supported.</p> <p>In this context, St Philips recommend that a brief summary of Policy AS10 and this point be included within the wording of Objective 2.</p> | Noted   | Reference to the need to reduce anti-social behaviour added to Policy 4.   |
|             | Paragraph 8.61 | <p>St Philips support the inclusion of the Parish's position on the proposed development site within the NDP and can confirm that the site will be forthcoming, subject to the granting of planning permission.</p> <p>In this context, St Philips are supportive of the Parish's position statement, however, would recommend that the wording be changed to <i>"up to 100 dwellings"</i> in line with the description of development submitted in support of the planning application.</p>  | Noted   | Policy 4 cross refers to the scale of housing identified in the SAP allocation, which states 'up to 80 dwellings'. |

| Page number | Section           | Comment   | Response by Steering Group  | Modification made to the Plan  |
|-------------|-------------------|---|---|--|
|             | Paragraph 8.61    | In addition, it is recommended that Point (d) is revised to state the following:<br><i>“d) new buildings as part of any future proposals should be located within the main area of the site and will be restricted in the eastern portion where the site’s topography steeply rises as a result of previous quarrying activities, together with the land at the top of the quarry.”</i>   | The Parish Council is aware of on-going discussions between the applicant and SDC as to the scale and distribution of development on the site in the light of emerging environmental constraints. | No change required as application is yet to be determined.                                   |
|             | Paragraph 8.61    | St Philips consider an additional point should be added to the criteria detailed in the Parish’s position statement. This should include the opportunity the site presents to improving the gateway of the village along the A425 in this location.<br><br>It is therefore recommended that Point (k) is added, as follows:<br><i>“Proposals for development should include supporting gateway features to the village in order to maintain a safe and secure access and egress from the site, together with enhancing the existing landscape setting.”</i> | Noted   | Policy 4 encourages safe access to the site off the A425.                                    |
|             | Paragraph 8.62    | St Philips would therefore recommend that the Parish continue to recognise the proposed development and the wider contribution this would make to the Parish, however, would further recommend that this the site is not included within the BUAB for the village.  | The neighbourhood plan does not now request that the BUAB be enlarged to incorporate the former brickworks site.  | Paragraph 8.62 has been deleted.   |
|             | Local Green Space | St Philips would like to support, in principle, the nomination of the land adjacent to the former Brickyard Site as a Local Green Space and recognises the contribution the site makes to the local community in terms of its historic significance, recreational value and wildlife and recreation importance.<br><br>Notwithstanding this, St Philips recommends that the land within the proposed development boundary is excluded from the proposed LGS.  | Noted   | The boundary of the Local Green Space has now been revised in the light of further evidence. |

| Page number | Section  | Comment   | Response by Steering Group  | Modification made to the Plan  |
|-------------|----------|---|---|--|
|             | Policy 9 | <p>St Philips recognise the importance of maintaining and protecting existing views into and across the Parish, and how these views and vistas are important to the character of the village. Notwithstanding this, St Philips recommend that the final paragraph contained within the policy wording be updated, as follows:</p> <p><i>“Any development proposals which may affect the views identified above should be supported by a Landscape and Visual Appraisal which demonstrates that the openness and key features of these important views can continue to be enjoyed including distant buildings, areas of landscape and the juxtaposition of the village edge, arboreal setting and the surrounding open countryside. Proposals should carefully consider the design of the development in respect of the Napton Neighbourhood Plan and the adopted District Core Strategy. Development proposals that have a harmful impact on the view will not be supported.”</i></p> | Noted. However the policy has kept with the wording endorsed by examiners in other neighbourhood plans. | No change required.  |
|             | Policy 9 | <p>St Philips further recommend that the wording to describe View 6 within the policy explanation recognises that whilst the view is an important feature of the landscape, the redevelopment of a Brownfield site, located at the foot of the escarpment for the former quarry, will ensure a number of public benefits, including:</p> <ul style="list-style-type: none"> <li>• The reclamation and remediation of a former brownfield site;</li> <li>• The removal of anti-social activities, including fly tipping and the use of scrambler type motorbikes; and</li> <li>• The removal of a current eyesore in the landscape.</li> </ul> <p>In this respect, the wording should acknowledge that there will be subtle changes to the landscape over time to further improve the surrounding environment through the delivery of new residential development and supporting open space.</p>   | Noted   | The Steering Group decided to reduce the number of important views, and this particular view has now been omitted. |



## Assessment of Response from Stratford District Council

| Page number       | Section    | Comment  | Response by Steering Group   | Modification made to the Plan  |
|-------------------|------------|--|--|--|
| Page 5 Para 1.12  |            | The Plan Period on the cover and at para 1.12 is 2018 to 2031. However, if they wish to count the dwellings granted consent and constructed since 2011 [see Table 8, p.40], then the NDP Plan period should cover the same timeframe as the Core Strategy.   | To meet the basic condition the neighbourhood plan must generally conform to the strategic policies in the Core Strategy. However there is no statutory requirement to have the same plan period. Table 8 simply establishes the number of houses approved since the start of the Core Strategy plan period, and the balance required in the neighbourhood plan to meet the strategic requirement. | No change required.  |
| Page 11 para 2.13 |            | States that the SAP will include the definition of BUABs, which is correct. However, since the NDP will include the BUAB for Napton and it is likely that the BUAB methodology criteria will change through the SAP consultation process, there is a distinct possibility that the Napton BUAB will not comply with the SAP. Therefore, it might be more appropriate for the Plan to list the methodology upon which the BUAB has been assessed. | Noted  | The submitted neighbourhood plan has now adopted the BUAB boundary as defined in the emerging SAP and lists the criteria. However in light of recent planning permissions and further discussions with officers at SDC, several minor tweaks have been made to the precise boundary. |
| Page 29 para 5.18 |            | It would be helpful if this site was mapped, to help the reader understand the context. It would also be beneficial if this paragraph could also set out exactly what need this scheme actually meets.   | Agreed   | Update if information available at time of submission.   |
| Page 35           | Key Issues | If the Local Housing Needs Surveys has identified a need for 24 new homes in the parish, this should be highlighted in the key issues table.   | Agreed   | Insert reference to housing need in Table 6.   |

| Page number        | Section     | Comment   | Response by Steering Group  | Modification made to the Plan  |
|--------------------|-------------|---|---|--|
| Page 46 para. 8.31 |             | There is insufficient explanation as to why the NDP does not make a specific allocation for the outstanding housing need.   | There is no statutory requirement to allocate land in a neighbourhood plan. Paras 8.30-8.32 explains the approach adopted in the neighbourhood plan.  | A further section has been added on the constraints to development in the village. |
|                    |             | Concern over housing needs survey being house type specific and matched to the housing supply requirements – 23 dwellings are also implied to be a maximum figure to be provided and is potentially in conflict with NPPF para 73 and 74 maintaining supply and delivery with buffer. | The housing needs survey was undertaken by WRCC at the recommendation of SDC officers. The approach adopted accords with Policy AS 10a) in the Core Strategy. The Core Strategy clearly states residential development should be ‘no more than 12% (84 dwellings) and there is no reference to a buffer required in neighbourhood plans. There is reference in the SAP to new constraints to development in the area e.g. capacity of Southam secondary school. | Plan updated in light of updated evidence available in emerging SAP.               |
| Page 46            | Policy 1    | This is an overarching Policy for residential development which seeks to reflect the CS.15 and CS.15 ‘requirements’ but is less definitive in terms of intent and definition and requires all of the criteria to be met on residential sites.   | Neighbourhood plans should not replicate what is already in the adopted local plan. The criteria based approach to residential development as set out in Policy 1 of the neighbourhood plan has been accepted in many made neighbourhood plans around the country.  | No change required.  |
| Page 46            | Policy 1 b) | How is ‘sensitive infill development’ to be defined?  | The word ‘sensitive’ is a common planning term and requires assessment by the decision maker. It appears 22 times in SDC’s Core Strategy without any precise definition provided. This exact policy wording appears in other made neighbourhood plans.  | No change required.  |

| Page number | Section     | Comment   | Response by Steering Group  | Modification made to the Plan  |
|-------------|-------------|---|---|--|
| Page 46     | Policy 1 c) | Criterion (c) requires that proposals ‘include homes that address the needs identified in the latest Housing Needs Survey for the parish.’ This is somewhat ambiguous and, in practice, unlikely to yield a significant supply of affordable housing. This point is acknowledged at para. 8.41.   | The housing need survey undertaken by WRCC used a methodology that covers all types of housing need not just affordable homes. Neighbourhood plans can influence the type of development coming forward, and this policy seeks to ensure that regard is had to the local housing need. This policy wording appears in other made plans. | Amend policy wording to say ‘has regard to the findings of the latest housing needs survey’.<br><br>If appropriate make reference to affordable homes being proposed on Brickworks site.           |
|             |             | It is inappropriate to apply this restriction as it would be contrary to the provisions of Core Strategy Policy CS.15 which does not fetter the tenure and occupancy of dwellings provided within the boundaries/physical confines of LSVs. Suggest c) is deleted. The first sentence of policy is therefore currently incorrect. “A proposal for residential development will be supported providing that all of the following criteria are met”. Furthermore given there are no housing allocations and windfall development within the established BUAB will be made up of small scale proposals, the likelihood of any schemes being of sufficient size to include local needs housing is potentially very limited. | See above. The policy does not conflict with Policy CS 15.  | No change required.  |
| Page 46     | Policy 1 d) | Rooflines that do not impact adversely on important views in Policy 10 – this is overly loose and open to wide interpretation – it needs to be more specific – is it seeking to limit heights, storeys or types of roofs/materials.   | Agreed  | Wording improved in revised policy.  |
| Page 46     | Policy 1 f) | What gaps and/or important open spaces are being referred to? How will applicants and officers determine whether they are of ‘particular significance’? This criterion is too general and ambiguous as drafted. This is a villagescape character criteria and needs to be supported by identified open spaces/ critical gaps – ideally reflect a character assessment alongside so as to assist in identifying heritage assets and non-designated heritage assets including historically important open gaps/ open areas (fields and paddocks and areas of green extending into the heart of the settlement.  | Policy wording adopted in many other made neighbourhood plans. Not all adopted local plans or neighbourhood plans define every single important gap or open space, and it is a judgement by the decision maker.   | The policy wording remains the same. However further supporting information and justification has been added to the text in Sections 4, 5 and 8 along with references in the Character Assessment. |

| Page number | Section     | Comment   | Response by Steering Group   | Modification made to the Plan  |
|-------------|-------------|---|--|--|
| Page 48     | Policy 2    | Provides a framework for supporting affordable housing on rural exception sites outside the defined Built-Up Area Boundary. Criterion (d) provides that schemes will be supported where homes are 'prioritised for those with a local connection as prescribed in the allocations policies of social housing providers'. Inclusion of the policy itself is welcome, but criterion (d) should be re-drafted to better reflect current good practice and the fact that local connection criteria will be determined via a S106 Agreement, rather than the allocations policies of social housing providers. | Noted  | Reference to allocation policies of social housing providers to be deleted.                    |
|             |             | Why is it for only a 'small number' of properties and how is this defined? Is the expectation the RES's form part of the required housing supply for Napton or a freestanding separate AHS?   | Policy AS 10 in the Core Strategy says 'small-scale schemes'. Furthermore there may be 35 affordable homes built on the Brickworks site and this policy may be surplus to requirements | No change required   |
|             |             | Affordable housing schemes can be provided inside a BUAB although they would not be rural exception schemes. It might be helpful if the policy acknowledged this.   | Para 8.41 states that it is preferable that affordable homes are located within the BUAB. This policy only deals with exception sites.   | No change required   |
| Page 50     | Policy 3b)  | The draft policy in SAP Scoping Document states that sites for self-build can be adjacent to a settlement. Although this has limited weight at the moment, it would be helpful if the NDP took the same approach in order to be consistent.   | Noted. Since comments made by SDC made the emerging SAP has been published for consultation and provides a further update on policy stance.  | Policy 3 has been revised and enlarged in light of emerging SAP.                               |
| Page 50     | Policy 3a)  | The wording will need to be amended in the Reg. 16 version to state that the District Council's policy is set out in the Site Allocations Plan not the Core Strategy – assuming it is by that time. If not it will have to refer to the SAP Scoping Document.   | Noted  | Make reference to emerging SAP rather than Scoping Document throughout the neighbourhood plan. |
| Page 50     | Objective 2 | Consider including a policy regarding the proposed approach to other brownfield sites in the NP area  | There is only one very small brownfield site in the parish which does warrant a separate policy.   | No change required.  |

| Page number | Section                              | Comment   | Response by Steering Group  | Modification made to the Plan   |
|-------------|--------------------------------------|---|---|---|
| Page 51     | 8.56/8.57                            | It is possible that Napton Brickworks will be allocated in the SAP based on the provisions of Core Strategy Policy AS.11, not identified as a reserve site based on the provisions of Policy CS.16.D. The critical point is that if the site is deemed suitable for redevelopment as a brownfield site there is no justification for restricting its release by being a reserve site. On that basis, para 8.57 should be deleted.   | Noted   | Reference to proposal in the emerging SAP made throughout the document. .   |
| Page 52     | Para 8.61                            | There are no site-specific housing allocations, although para. 8.61 does identify a set of criteria against which the Parish Council will judge proposals for the redevelopment of the former Napton Brickyard site. Criterion (b) provides a similar criterion to criterion (c) in Policy 1. However, this is somewhat ambiguous in practice, and does not explain the relationship to Core Strategy Policy CS.19.   | At SDC's recommendation the draft plan provided a position statement on the possibility of the former brickworks site coming forward for consultation. Aside from being a strategic brownfield site, the Steering Group did not want to allocate it as this may have triggered the need for a SEA/HRA. It would also complicate matters with the pending planning application and proposal in the emerging SAP. | A new policy added on the brickworks site to:<br>1. Support the allocation in the emerging SAP and;<br>2. Add additional planning requirements to supplement those listed in the SAP. |
| Page 53     | Napton Brickworks Position Statement | <p>Could amend opening sentence to read: 'A proposal for the re-development of the former Brickworks site will be supported if it meets the following criteria:'.</p> <p>(i) should say something specific about improving Brickyard Lane to provide a safe and attractive walking and cycling route</p> <p>Is it appropriate to insist upon a nature reserve? A Local Nature Reserve (LNR) is a statutory designation made under Section 21 – "Establishment of nature reserves by local authorities" – of the National Parks and Access to the Countryside Act 1949 by Principal Local Authorities (i.e. District, Borough or Unitary Councils) in England, Scotland and Wales. Town and Parish Councils can only create LNRs if the Principal Local Authority has granted them the power to do this.</p> | <p>Noted</p> <p>Agreed</p> <p>Statement does not refer to LNR designation.</p>  | New policy added on brickworks site to replace the position statement in the consultation draft.  |

| Page number       | Section  | Comment  | Response by Steering Group   | Modification made to the Plan   |
|-------------------|----------|--|--|---|
| Page 53 para 8.62 |          | Napton Brickworks should not be included in the BUAB as it is too far from the village. It should be assessed as a Rural Brownfield Site against Policy AS.11  | Noted  | Reference to the site being included in the BUAB has been removed.  |
| Page 55           | Policy 4 | <p>Policy refers to business use throughout the Parish, but the character appraisal referred to in the policy only covers the village of Napton. As written, this policy appears to be giving tacit agreement to any new commercial activity/buildings within the countryside. Is this what they were envisaging? This does not accord with Core Strategy Policy AS.10.</p> <p>What is meant by ‘business and economic’? Does this include retail – if so should there be some restrictions to limit it to within the BUAB?</p> <p>Policy should prioritise development on brownfield land.</p> <p>Also the policy only refers to ‘new’ buildings – what about conversions and COU?</p> <p>Suggest deleting ‘maximise visitor spend and thereby’ from the final paragraph on p.55</p> <p>You wouldn’t normally look to improve village gateways with employment sites. The paragraph is too vague and ambiguous. This issue sits rather uncomfortably in this policy as various forms of development, not just business-related, could achieve such improvements. Might it be worth considering whether the scope of Objective 4/Policy 5 could be extended to cover environmental improvements?</p> <p>This policy is considered to be overly narrow in its range and criteria and would potentially restrict changes of use, tourism accommodation, business expansion on existing sites and small scale start ups</p> | <p>Agreed</p> <p>Agreed</p> <p>There is no other brownfield land apart from small parcel of land</p> <p>Policy refers to development which incorporates these</p> <p>Agreed</p> <p>Policy does not seek to use employment sites to improve gateways. It aims to attract visitors into the village with better signage/entrance features to raise awareness.</p> <p>Policy wording used in other made neighbourhood plans. This is the sort of features that would be welcomed as part of any new development</p> | <p>The policy has been amended to clarify distinction between area within the BUAB and the open countryside beyond. The second part on recreation and tourism should be a separate paragraph.</p> <p>See above</p> <p>No change required</p> <p>Amend a) to say “the proposals comprise development that respect ...</p> <p>Amend accordingly</p> <p>No change required</p> <p>No change required</p> |

| Page number | Section  | Comment   | Response by Steering Group   | Modification made to the Plan  |
|-------------|----------|---|--|--|
| Page 55     | Policy 4 | Would be helpful to cross reference policy AS.10 in the actual policy   | Noted. However cross references to policies in Core Strategy could be inserted in every policy.  | No change required.  |
| Page 56     | Policy 5 | <p>Presumably a proposal wouldn't be supported even if it does satisfy these criteria if it didn't meet the locational policies controlling development such as Policy 1. This should be made clear.</p> <p>This policy covers far more than the objective sets out. Each of the 7 criterion could [should?] be the subject of their own detailed policy since they are distinct and separate issues. This is the stance followed by other NDPs in this District. Suggest amending first sentence to read "... providing any potential adverse impacts on the local environment can be successfully mitigated." The final sentence should be removed as it is a statement rather than policy.</p> <p>The term 'proposal will be supported where...' Implies these are the only criteria to be assessed against. Needs to X reference other Policies in the NDP draft. Qualification is required in relation to the criteria and how it is to be assessed.</p> <p>Community led renewables or low carbon energy development will be supported – again there needs to be a qualification as to what this encompasses – NPPF compliance – are these small scale local sourcing e.g ground source heat supply, solar farms and wind power for local supply?</p> | <p>Correct. All policies in development plan documents apply to a proposal where appropriate.</p> <p>No statutory obligation to go into further detail. Just because other neighbourhood plans have done so doesn't mean this plan should do so as well. The approach adopted accepted in other made neighbourhood plans.</p> <p>All relevant policies in a plan apply and don't need to cross to every other policy that is pertinent. Development plan documents need to be read as a whole.</p> <p>Agreed</p> | <p>No change required.</p> <p>No change required.</p> <p>No change required.</p> <p>Examples inserted in the policy.</p> |

| Page number | Section  | Comment  | Response by Steering Group                                | Modification made to the Plan  |
|-------------|----------|--|---|--|
| Page 58     | Policy 6 | <p>a) Seems to contradict itself somewhat in that it refers to preserving or enhancing designated heritage assets but then goes on to say that this includes non-designated assets the wording in the NPPF is 'conserve or enhance' and this policy should reflect this.</p> <p>The policy talks of 'non- designated heritage assets' but the NDP does not include a list of such assets. There are no sites listed or criteria set out to indicate when the policy applies and as such this reference should be removed. See Policy BE8 of Stratford-upon-Avon NDP for example of well-worded policy relating to protection of heritage assets. Not exactly in alignment with CS Policy 8 which also states that all reasonable efforts need to have been made to sustain the existing use of find reasonable alternative uses.</p> <p>b) It is not clear what the final sentence means and should be removed or clarified.</p> | <p>Agree. Typo mistake.</p> <p>Agreed</p> <p>Disagree</p> | Policy wording re-drafted in light of comments received.   |
| Page 59     | Policy 7 | Consideration needs to be given to historic assets of canal and Canals and Rivers Trust framework and canal specific strategies to ensure no conflict with objectives  | Canals and Rivers Trust support policy.                   | No change required.  |
| Page 61     | Table 9  | It is surprising that land south of Vicarage Lane and to north of recent housing development hasn't been identified as a LGS to bolster its protection.  | Agreed  | In light of comments received and outcome of a recent planning appeal, the Steering Group took the decision to designate this site as a Local Green Space. Policy 8 (now Policy 9) and supporting justification amended accordingly. |



| Page number | Section      | Comment   | Response by Steering Group  | Modification made to the Plan  |
|-------------|--------------|---|---|--|
| Page 63     | LGS Policy 8 | This policy seems to undermine the intentions of Policy 1 and is limited in terms of the intentions and objectives of Policy 1 – should this be entitled strategic green spaces and differentiate between the smaller areas of green space which contribute to the character of the village?  | The comment confuses small incidental and amenity open spaces around the village, and those open spaces that meet the criteria specified in the NPPF for Local Green Space designation. (Village Greens were deliberately omitted from such designation as they already have protection). | No change required   |
|             |              | Two of the sites (A, and D) are quite large tracts of land. Whilst site ‘A’ might be used as sporting facilities, the sports field at Ettington was not supported by the Examiner of that Plan as it was felt such facilities could be provided elsewhere. Therefore there may not be enough evidence to convince an Examiner for it to be designated.  | The guidance specifically lists playing fields as potential Local Green Space, so there is no reason why the sports fields should not be included.  | No change required   |
|             |              | Site ‘D’ is almost 10Ha in area and quite clearly is an extensive tract of land. It is also already a designated Local Wildlife Site and as such has ‘protection’. It is not considered that this site meets the criteria set out in the NPPF and should be removed. Site ‘B’ is no more special, than other parcels of similar land around the perimeter of the village and more evidence is needed on why it is of demonstrable value to the community. | Noted   | The boundary of Site D has been redrawn. Further evidence to support designation for all proposed sites has been provided. |
|             |              | The reference to ‘very special circumstances’ should be removed as it is not referred to in NPPF2 and the NDP will not be formally submitted before 24th January 2019. The paragraph should refer to LGS being ‘supported’ not ‘allowed’.   | Noted   | Changed policy wording to say ‘supported’.   |
| Page 73     | Policy 9     | This states that all development ‘which has a harmful impact on the view will not be supported’. Given that most development will cause some degree of visual harm, this creates a very restrictive policy, because the views shown in the 13 images cover virtually the whole Parish.  | Noted   | The number of important views has been reduced from 13 to 6.   |
|             |              | The final paragraph is not well worded. Consider policy NE4 of Snitterfield NDP for alternative wording.  | Policy wording drafted by examiner for Braunston Neighbourhood Plan. A nearby village which has very similar topographical characteristics.   | No change required   |

| Page number | Section   | Comment  | Response by Steering Group   | Modification made to the Plan  |
|-------------|-----------|--|--|--|
| Page 74     | Policy 10 | <p>This policy is considered to conflict with CS.10 in that it doesn't establish a presumption against unsustainable development. This could be reinforced by the Policy and set out the types of development that are suitable for open countryside locations, in particular housing</p> <p>Part c) Heritage Assets appears to slightly contradict Policy 6 which allows for harm/loss of a heritage asset if the public benefits outweigh the harm?</p> <p>Presumably a proposal wouldn't be supported even if it does satisfy these criteria if it didn't meet the locational policies controlling development such as Policy 1. This should be made clear.</p> <p>Protection of 'open countryside' is usually expressed as an 'in principle' type policy rather than a 'landscape protection' type policy.</p> | <p>Policy is not regarded as contradictory to the presumption against unsustainable development.</p> <p>Don't agree they contradict each other.</p> <p>Policy 1 relates to development within the BUAB whereas this is open countryside beyond BUAB.</p> | Policy wording now includes specific references to named SSSIs, geological sites, wildlife site. |
| Page 74     |           | c) heritage assets and sites of archaeological interest such as ridge and furrow; ridge and furrow, as a non- designated heritage asset, is not protected and its loss through ploughing cannot be controlled or stopped through the planning regime.  | Agree but ridge and furrow protected in other neighbourhood plans.   | No change required.  |
| Page 76     | Policy 11 | <p>This policy only appears to cover TPO's and trees in conservation areas and leaves vulnerable trees with public amenity value and groups of trees and woodlands not protected. Would suggest this Policy is broadened out.</p> <p>What comprises 'protected trees and hedgerows'? The only protected trees are those subject of a TPO and they can't be removed. Suggest see policy NE3 of Stratford-upon-Avon NDP for possible alternative wording.</p> <p>The policy should look to 'support' not 'permit'.</p>   | <p>The two comments from SDC appear contradictory.</p> <p>Para 8.111 explains that there are limited powers to prevent the loss of trees.</p>  | Policy slightly modified with introductory sentence following comments from Woodland Trust.      |

| Page number | Section                 | Comment   | Response by Steering Group   | Modification made to the Plan  |
|-------------|-------------------------|---|--|--|
| Page 77     | Policy 12               | <p>This policy has no force unless these are intended to be treated as assets of community value or their loss required to be justified as per CS Policy CS.22 for employment sites. Playgrounds are likely to be under the control of the PC or LPA already.</p> <p>Should the policy add that new services/facilities will need to be in accessible locations?</p> <p>The Policy could be reworded – see policy AM3 of Bidford-on-Avon NDP for possible alternative wording.</p> <p>For ease of reference it would be helpful to the reader if the listed community facilities were mapped.</p> | <p>The NPPF highlights the importance of protecting local services and facilities. They don't have to be designated as assets of community value.</p> <p>Agreed</p> <p>Noted</p> <p>Agreed</p> | <p>No change required</p> <p>Add reference to location in policy.</p> <p>Map inserted showing location of local amenities.</p> |
| Page 81     | 9 Community Aspirations | <p>It is recommended that a section be included on how CIL monies would be spent on local projects, particularly those that relate to objectives and policies in the NDP.</p>   | Noted  | <p>It was decided not include section on CIL monies as part of the neighbourhood plan.</p>                                     |
| Page 85     | Policy Map 2            | <p>It is surprising that land south of Vicarage Lane and to north of recent housing development hasn't been identified as a LGS to bolster its protection.</p> <p>Map may need revising depending upon which sites are retained/taken forward. Have smaller, more appropriate sites within the village been missed?</p>   | <p>Agreed</p> <p>Whilst recognising the value of such open spaces the neighbourhood plan must adhere to Guidance and not use too many designations to inhibit any growth.</p>                  | <p>This particular has now been designated as Local Green Space.</p>   |
| General     | Maps                    | <p>There would be benefit of having a villagescape character map which not only identifies LB's and heritage assets and locally important buildings/features but also small scale gaps and green spaces within the village to align with Policy 1 and Policy 6.</p>   | Agreed   | <p>Map inserted showing location of listed buildings and local amenities.</p>  |

| Page number       | Section              | Comment  | Response by Steering Group  | Modification made to the Plan   |
|-------------------|----------------------|--|---|---|
| Page 3            | Contents             | It would be helpful to the reader of the Plan to have all the policies and projects listed, with Policy number, title and page number. This makes it much easier to navigate through the document.   | Agreed  | Inserted policy reference page.   |
|                   | Contents Section 9   | Amend title from 'Aspirational Projects' to 'Community Aspirations' for consistency of reference later in the document.  | Agreed  | References made consistent.   |
| Page 4            | Governance           | It would be worth referencing the role of the Parish Council as the Qualifying Body.   | Not required as reference already in para 1.10.   | Para 1.7 now makes clear role of Parish Council. Para 1.9 explains it is the appropriate qualifying body. |
| Page 6            | Map 1                | It would be useful to have a key to the map and the boundary line might be better marked in a solid black line to make it clearer.   | Noted   | No change required  |
| Page 8 para 1.14  | Next Steps           | The District Council will again publicise the submitted plan for a minimum six week period and invite comments.  | Agreed  | Paragraph now deleted   |
| Page 8 para 1.14  | Next Steps           | Including conformity with national and local strategic planning policies.  | Agreed.   | Paragraph now deleted   |
| Page 8 Para. 1.15 | Next Steps           | It would be useful to clarify that planning decisions will be informed by the NDP, along with other Development Plan documents – i.e that it is not the only plan to be considered.  | Noted   | Paragraph now deleted   |
| Page 9 para. 2.2  | NPPF                 | Instead of referring to the NPPF as 'the Framework' it would be better to refer to it as the NPPF as this is the generally accepted abbreviation.  | The National Planning Policy Framework itself uses the abbreviation 'Framework' not NPPF. | No change required  |
| Page 10 para 2.7  | The Development Plan | 3 <sup>rd</sup> bullet point<br>Made neighbourhood plans prepared by town and parish councils. Replace 'Local Plans' with 'Core Strategy'.   | This paragraph was directly lifted from the SDC planning website.                         | No change required  |
| Page 10 para 2.9  |                      | Replace 'Centre' with 'Village'.   | Agreed  | Amended accordingly   |
| Page 10           | Emerging Local Plans | This heading would be more accurately titled 'Emerging Development Plan documents'<br>Also the reference to the SAP says it will identify sites for self build – this is a draft policy which could be subject to change. Also as the timetable has slipped it will no longer be adopted by end of 2019 – more likely to be summer 2020. The date specified will need to be amended in the Reg. 16 version to reflect revised timetable for producing the SAP.<br>Reference to G&TLP – suggest adding that it will allocate land based upon the identified need within the District. | Noted<br><br>Noted<br><br>Noted   | Amended accordingly<br><br>Updated references to SAP accordingly.<br><br>Amended accordingly              |

| Page number      | Section          | Comment  | Response by Steering Group  | Modification made to the Plan                            |
|------------------|------------------|--|---|--|
| Page 12          |                  | “The area was lightly wooded and mainly supported mainly grazing” delete first ‘mainly’?   | Agreed  | Amend accordingly  |
| Page 12          |                  | The second sub-heading should read ‘Churches and Chapels’ as it refers to more than St Lawrence Church.  | Agreed  | Amend accordingly  |
| Page 14          | Listed Buildings | It would be useful to have a map accompanying the list to see where the LBs are located within the village.  | Noted.  | Map showing location of listed buildings to be inserted. |
| Page 33          | Facilities       | Reference is made to a lot of infrastructure in the village – it might be helpful to show the key ones on a map to show how they are distributed within the village.       | Noted   | Map showing location of local amenities to be inserted.  |
| Page 38          | Table 7          | It would be worth cross-referencing how the vision, objectives and policies link to the key issues raised in Table 6.<br><br>Objective 8 is been missed off.               | Noted, but this could be overly complicated.  | No change required                                       |
| Page 39 para 8.2 |                  | Third bullet point –‘Local Plans’ should read ‘Development Plan Documents’.  | Government requests that they are commonly referred to as Local Plans.  | No change required                                       |
| Page 39 Para 8.5 |                  | Replace ‘Centre’ with ‘Village’.   | Agreed  | Amend accordingly  |
| Page 40, Table 8 |                  | The last four applications in first part of table should be transferred to second part as sites are outside BUAB and therefore don’t count towards LSV dwelling provision. | Noted   | Amend accordingly  |
| Page 46          | Policy 1         | Penultimate sentence – the words ‘innovative’ and ‘outstanding’ are not mutually exclusive so suggest ‘or’ is replaced with a comma.                                       | Para 79 in the new Framework states that planning policies and decisions should avoid the development of isolated homes in the countryside unless the design is of exceptional quality, in that it is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas. | Paragraph deleted from policy.                           |

| Page number            | Section                | Comment   | Response by Steering Group  | Modification made to the Plan  |
|------------------------|------------------------|---|---|--|
| Page 46                | Policy 1               | Policy 1 (e) should refer to Policy 9, not Policy 10?   | Agreed  | Now correct as new policy inserted   |
| Page 48                | Policy 2               | What is meant by 'a small number of properties' this is needs to be clarified.  | This reference conforms to Policy AS.10 in the Core Strategy which refers to "small-scale schemes".   | No change required   |
| Page 49 para 8.45      |                        | This information will need to be updated in the Reg. 16 version.  | Agreed  | Update accordingly   |
| Page 49 para 8.47      |                        | It should be made clear that this is a draft policy which could be subject to change.   | Agreed  | Update accordingly and make clear status   |
| Page 50                | Objective 2            | Replace 'Brickyard' with 'Brickworks'.  | Agreed  | Amend accordingly  |
| Page 51 Para 8.56      |                        | Replace 'Brickyard' with 'Brickworks'.  | Agreed  | Amend accordingly  |
| Page 53 Para 8.62      |                        | Replace 'Brickyard' with 'Brickworks'.  | Agreed  | Amend accordingly  |
| Page 59 para 8.84      |                        | Replace 'Brickyard' with 'Brickworks'.  | Agreed  | Amend accordingly  |
| Page 61 Para 8.91/8.92 |                        | Include explanation of the NPPF/PPG criteria for identifying LGSs rather than provide just a link, as this would assist readers' understanding.   | The NPPF criteria are already listed in paras 8.89-8.91. The link provides more detailed information if required. Furthermore the Guidance may be amended so the link will also provide up to date information. | No change required   |
| Page 61                | Table 9                | The area of the Napton Sports club has been missed off, unlike the other proposed LGSs. It is estimated at around 4.7 ha.   | Agreed  | Inserted reference to size of the site   |
| Page 65                | Policy 8               | 2nd para – replace 'allowed' with 'supported' as the Parish Council does not determine planning applications.   | Agreed  | Amended wording accordingly  |
| Page 76                | Policy 11              | 3rd line – replace 'permitted' with 'supported', again because the Parish Council does not determine planning applications.   | Agreed  | Amended wording accordingly  |
| Page 81                | Community Aspiration B | delete the linking 'or'; alternatively replace it with 'and' as they are not mutually exclusive   | Agreed  | Replace 'or' with 'and'  |
| Page 83                | Policy Maps            | It would be better to put the maps next to their relevant policy in the Plan to avoid having to keep referring to different parts of the plan and thus make it easier to read/navigate. | Agreed  | Policy Maps now inserted next to the appropriate policy.   |
| General                |                        | There is a lot of repetition of Core Strategy policy – not sure this is necessary in all instances and unduly adds to the length of the document as a whole.                            | Noted   | The references to the key policies in the Core Strategy avoid having to cross refer to the other document and make the plan more self contained. |

| Page number | Section | Comment   | Response by Steering Group  | Modification made to the Plan  |
|-------------|---------|---|---|--|
| General     |         | The use of shaded boxes is a little confusing for example Core Strategy policies are shaded grey together with other statements etc suggest Core Strategy policies are shaded a different colour. | Noted   | The colour and size of text now distinguishes Core Strategy policies.                        |
| General     |         | Capital 'D' and 'P' for Development Plan throughout.  | The Framework uses small d and p. Perhaps use capitals when specifically referring to SDC's Development Plan. | Amend accordingly.   |
| General     |         | There is a lot of information in the NDP which could be contained in an evidence document making the overall NDP more concise and easier to read.   | Noted   | Some information will go into the character assessment and consultation statement.           |
| General     |         | The positioning of the objective boxes appears to relate to the section beforehand which is unintended. Suggest repositioning under the overall heading for that section.                         | Noted   | Clarified positioning of Objective boxes.  |
| General     |         | Throughout the Plan, it refers to the village of 'Napton' not 'Napton-on-the-Hill.  | Noted   | Added reference in para 1.3 to say Napton-on-the-Hill commonly referred to as simply Napton. |
| General     |         | If NDP will not be submitted (Regulation 15) prior to 24 January 2019, the Plan must be assessed entirely against the 2018 NPPF, not the 2012 NPPF.   | Noted   | Document has already been written in accordance with latest Framework.                       |