

Long Itchington Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

Rep.No.	Name	Policy/Section	Representation
LI01	<i>Resident</i>	Policy H1	Support
		Policy H2	Support
		Policy H3	Support
		Policy H4	Support. The integrity and (relative) open nature of the conservation area must be preserved at all costs
		Policy H5	Support. It is very important to preserve the few remaining bungalows as single storey dwellings. They provide an option (fast disappearing) for existing elderly villagers to move from larger 2 storey properties and yet remain in their local community.
		Policy BE1	Support.
		Policy BE2	Support. The provision of proper pavements on both sides of new roads is important and roads must also be of sufficient width to permit easy access. The Galanos development built at the turn of the millennium is a classic example of how NOT to provide ease of access.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB2	Object. Not so much an object as a concern about the lack of a definition for "small scale"
		Policy EB3	Support.
		Policy EB4	Support. It is important that ALL the conditions are met in full.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support. The history of flooding in the village, notwithstanding the improvements to flood defences around 2005, requires that proposals for new developments must be critically stress-tested for flood prevention measures even if they are outside the immediate area of Church Road and Stonebridge Lane and Whitehall Farm.
		Policy NE5	Support.
		Policy NE6	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support. It is also important to recognise that existing links are also preserved e.g. SM9 and the access from Leigh Crescent to the canal through the old garages.
		Policy SLR	Support.
LI02	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support. The policy sensibly recognizes the need for affordable housing within the context of the overall development plan
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
LI03	<i>Resident</i>	Policy H1	Support. Figure 3 refers to houses in the village but Figure 3a says housing units in the plan area, this needs clarified. Assuming it is supposed to be the area, the Housing Growth omits the conversion of Grange Barn into a dwelling in 1997 and the extant planning permission for conversion of the Grange Coach House into a dwelling. This should be corrected.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support. Where at all possible car parking areas should be made porous by using for example permeable pavers.
		Policy BE5	Support.
		Policy BE6	Support. Figure 2, Heritage Assets. If the intent in this figure is to include all listed buildings in the parish there are a few missing for example Grange Barn, Newfields, Stoneythorpe Lodge Gates, Bascote locks and three dwellings in Bascote. There may be others. On Page 24 it states that the listed buildings are identified in Figure 2 but clearly only some of them are. For completeness Figure 2 should show ALL listed buildings in the Neighbourhood Area. The base map used in Figure 1 is different to that used in Figure 7, they should be consistent.
		Policy BE7	Support.
		Policy EB1	Support. In Figure 7a the Water Margin is listed as a Chinese Takeaway, that business ceased some time ago, it is now a cafe and in Figure 8 Rhine Hill Garage is omitted. Both should be corrected.
		Policy EB2	Support. Care should be taken not to overdo the 'sanitisation' of parts of the rural area eg the old railway line where extensive clearance has for example removed many wildlife habitats. In addition, the village should try to become a destination, not just somewhere you pass through

Rep.No.	Name	Policy/Section	Representation
			going somewhere else.
		Policy EB3	Support. The plan area has few employment opportunities apart from hospitality which means most workers commute. Somehow it must be prevented from becoming a dormitory town.
		Policy EB4	Support.
		Policy EB5	We are becoming increasingly reliant on digital communications and the phone signal in many parts of the Plan Area is poor. The need to improve this should be balanced against the potential visual impact. The A423 is convenient but detracts considerable from the Plan Area's attractiveness. Perhaps the Plan should specifically look at what could be done to ensure speed limits are enforced.
		Policy NE1	Support.
		Policy NE2	Support. Access between many of these spaces requires crossing the A423. An additional controlled pedestrian crossing should be considered near LILAC field as it cannot be accessed from the Western side of the A423. In addition as the footpath is on the eastern side, the A423 has to be crossed to get to the pond and on down say Church Road. An overall plan to improve this should be considered.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy NE6	The policy should go further by insisting on solar panels for every new build.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
LI04	<i>Resident</i>	Policy H1	Object. The definition of the built up area of Long Itchington is arbitrary and hasn't been consulted on. It also excludes land previously defined as within the built up area of Long Itchington and is therefore inequitable to certain residents as it does not treat them fairly. It also excludes areas with existing residential use. The area defined as Countryside (ie outside of the built up area) is also inequitable as it includes areas of land which are definitely not countryside by the ordinary dictionary definitions (eg gardens and other residential properties) Criteria should be based on national guidelines as to whether land is Green Belt or non-Green belt. In an age of the internet the restriction to 'rural workers' is also some hundred years out of date.
		Policy H2	Object. a) The same objection to H1 in terms of built up area and countryside definition also applies to H2 a Objection to the definition of small scale as 10 units, 25 to 30 would be more appropriate. b) Small scale or multiple small scale quality developments should be structured to favour small builders who will provide local employment opportunities over a longer period of time by phasing developments rather than large housebuilders who develop questionable quality over a very short time period. Objection to d) National guidance should apply.

Rep.No.	Name	Policy/Section	Representation
		Policy H3.	Object. Objection to 35% as this would make sites uneconomic - if more houses are needed then more houses should be built by releasing more land Objection to local tenures as this is restrictive to free movement and would have prevented me moving to Long Itchington.
		Policy H4.	Object. Objection to local rules being imposed on garden developments - national guidelines should apply The objections to H1 are also applicable here.
		Policy H5	Object. Objection. Whilst a) and b) are laudable, c) is unreasonably restrictive and if there is a shortage of bungalows, then consideration should be given to releasing land for building more bungalows. It would be more appropriate to say there is a need for a retirement property type development in the village (McCarthy & Stone type developments) which would release existing stock back into the market.
		Policy BE1	Object. Objection - the same comments in H1 on the definition of the built up area and countryside apply to this question Objection - this is in conflict with other proposed policies. Any minor (site of less than 50 units) development in the village, inside or outside of the self defined built up area pale into insignificance compared to the development that will take place if the Cemex site is developed and therefore policy BE1 is wholly unreasonable as it cannot possibly be adhered to.
		Policy BE2	Objection - Long Itchington is an eclectic mix of styles and architectures ranging from the model village concrete house, to the council built estate to the modern developments over the last 10 years. The village doesn't have distinctiveness except in its diversity. What it lacks is a retirement development, executive houses (with home offices) and affordable housing ie housing types not imposed 'architectural characteristics' suitable only for a chocolate-box-picture village.

Rep.No.	Name	Policy/Section	Representation
		Policy BE3	Objection - the development bar is being set so high as to prevent development in and around the village and therefore favouring the large housebuilders with large legal and planning functions increasing costs and reducing supply. If BE 3 is needed it should apply to developments of over 50 houses and help favour small builders employing local builders.
		Policy BE4	Objection - many of these conditions are unreasonable and will add to the costs of development. Why would a property for retired people need cycle storage facilities or indeed an apartment - how would that be achieved? Objection - this makes the provision of affordable housing uneconomic.
		Policy BE5	BE5 isn't needed as guidance already exists elsewhere - this would allow the conversion of village pubs into residential units which would be detrimental to the village.
		Policy BE6	Objection - too widely drawn - "Development that fails to conserve or enhance the character or appearance of the Long Itchington village Conservation Area will not be supported." what criteria are being used? What would be allowed and what wouldn't? Leaves too much to interpretation - existing national guidance should be the starting point.
		Policy BE7	Support. BE7 - design considerations should be appropriate to the size of development and a duty on the Parish Council to provide expertise to small developers to achieve the objectives.
		Policy EB1	Object. The same objection noted in H1 to the boundaries of the built up area and the definition of countryside on figure 5 apply to EB1 Consideration should also be included of the employment over a longer period of time if small incremental development is allowed that uses small builders and phased development rather than wholesale large builder mass developments. This would include any Cemex site proposals in the future.

Rep.No.	Name	Policy/Section	Representation
		Policy EB2	EB2 Whilst having no specific objection to small scale caravan sites, this is in contradiction to other proposed policies which seek to restrict properties to local people only.
		Policy EB3	Object. The same objections to H1 and the definition of the built up envelope of the village and the defining of properties as countryside apply to EB3
		Policy EB4	Support.
		Policy EB5	Object. This is already adequately covered by existing legislation and guidelines.
		Policy NE1	Objection - this is already adequately covered by existing legislation and planning guidance.
		Policy NE2	Object. Not all green areas qualify as green spaces - some are just roadside grass verges.
		Policy NE3	Object. Too widely drawn - a revised wider policy could be applicable to phases of over 50 houses by large house builders, but for small (less than 50 houses) phased developments the proposal is too restrictive and could compromise the security of properties which would be in conflict with other proposals.
		Policy NE4	Object. National guidance and planning regulations should apply, not local rules.
		Policy NE5	Object. Should only be applicable to developments of over 50 units, otherwise national guidance / regulations to apply, not local rules.
		Policy NE6	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy C1	Support.
		Policy C2	Object. Providing community facilities should not be a condition deciding whether the Parish Council supports and application or not. Developments should be considered on their merits and not how much money the developer would 'gift' to the Parish Council. This could lead to bribery and or corruption.
		Policy SLR1	Support. Please see comments to Q57 in addition.
		Policy SLR2	Objection: The cemex site has many years useful extraction still to come and a proposal to reinstate the railway line should not be ruled out as this would massively benefit the village by reducing substantially the number of heavy articulated lorries driving through the village.
		Policy SLR3	Support.
LI05	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
LI06	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support. Important to secure support for young local people.
		Policy H4	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support. This is important in light of new developments in recent years.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support. Very important, recent development has proven that without proper protection then contamination run off is an issue.
		Policy SLR3	Support.
LI07	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support. It's unfortunate that people buy bungalows purely to build up.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.

Rep.No.	Name	Policy/Section	Representation
LI08	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy SLR1	Support.
		Policy SLR2	Support.
LI09	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
L110	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
LI11	<i>Resident</i>	Policy H1	Support. Future planning consents should take account of the large amount of housing built in recent years - far in excess of CORE STRATEGY requirements. New developments should give greater emphasis on building of bungalows.
		Policy H2	Object. This would further increase the density of housing already at a high level within a rural setting. The rural environment would see a further shift to a more urban landscape.
		Policy H3	Any developments should be part of private housing developments to ensure social cohesion.
		Policy H4	See comments previous Policy.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	There needs to be additional footpaths in the eastern area of the village to make direct connections with existing PROW's. Any new residential developments should have direct PROW created to existing ones.
		Policy SLR3	Allotment gardens should be on good quality soil suitable for growing vegetables/fruit/flowers and not poor quality soil more suitable as grazing rather than arable.
LI12	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support. Please note this should be referencing Long Itchington, not Loxley!
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support. This is very important to me.
		Policy NE2	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy NE3	Support.
		Policy NE4	Support. Flooding reduction measures have been lacking in new developments recently to the detriment of our environment.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support. We must ensure that new facilities do not disrupt the lives of nearby residents.
		Policy SLR2	Support.
		Policy SLR3	Support.
LI13	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
L114	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
LI15	<i>Resident</i>	Policy H1	Object. Too much development already! Lack of infrastructure, amenities and social problems abound already. HS2 is destroying our landscape and causing havoc with traffic. No more development please!

Rep.No.	Name	Policy/Section	Representation
		Policy H2	Object. No more back door development!!
		Policy H3	Object. No more development!
		Policy H4	Support. Only in smaller plots, not whole farms as has been the case previously, in cases of need only.
		Policy H5	Object.
		Policy BE1	Object.
		Policy BE2	It must not change our village any more!
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy SLR3	Support.
LI16	<i>Resident</i>	Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.

Rep.No.	Name	Policy/Section	Representation
LI17	<i>Resident</i>	Policy H1	Support. Any housing development should be made with regards to local housing requirements and needs of residents. Long Itchington has had extensive and large scale housing development in recent years and this should be taken into account when formulating any further development and with regard to the rural character of the local area.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
LI18	<i>Resident</i>	Policy H1	Support.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE7	Support.
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy C2	Support.
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
L119	<i>Resident</i>	Policy H1	Support. The plan provides evidence of the contribution already made by the neighbourhood area to housing supply in accordance (and beyond) the requirements set out in the Core Strategy. It is right to control expansion of the built up area in the way proposed by this policy in order to safeguard the environmental characteristics of local settlements.
		Policy H2	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support. The aim of the policy to promote and support a range of housing types to meet the various needs of people and their families is positive and reasonable to support a sustainable community.
		Policy BE1	Support. As with new housing development, control of development to restrict expansion into the surrounding countryside is important to protect the rural character of the neighbourhood area.

Rep.No.	Name	Policy/Section	Representation
		Policy BE2	Support.
		Policy BE3	Support. It is essential to take into account the wider impact of significant development on the infrastructure and natural environment of the wider neighbourhood area; to only take into account the impact of development on the immediate surroundings of the development site would, in my opinion to be too narrow.
		Policy BE4	Support.
		Policy BE5	Support. This policy appears to ensure that alternative development would be supported where it continues to meet the needs of the community and not determined by market forces alone.
		Policy BE6	Support.
		Policy BE7	Support.
		Policy EB1	Support. It is important to support economic activity that could lead to enterprise and employment opportunities.
		Policy EB2	Support. Appropriate scale tourism should be supported and may become even more important in the future, for example to support diversification of agriculture.
		Policy EB3	Support. Employment opportunities in the neighbourhood area must be supported and encouraged. This policy appears to reasonably support alternative development providing that it is in the interests of the community and not solely driven by market forces.

Rep.No.	Name	Policy/Section	Representation
		Policy EB4	Support.
		Policy EB5	Support. Improving infrastructure is important but it should be achieved without causing undue harm to the rural character of the area.
		Policy NE1	Support. What is a 'valued landscape' is somewhat subjective, but all the views identified in the Plan are important to protect the rural character of the neighbourhood area.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support. Most local people are aware of flooding risk (both foul and surface water) particularly in Long Itchington Village. It is, therefore, essential to do everything possible to manage this risk.
		Policy NE5	Support. As the village has expanded in recent years the risk of various sources of pollution has become more noticeable. It is reasonable that consideration of any relevant (i.e significant) development should take into account the potential for further increasing the harm of pollution.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.
		Policy SLR1	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy SLR2	Support.
		Policy SLR3	Support.
L120	<i>Resident</i>	Policy H1	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.
		Policy BE2	Support.
		Policy BE3	Support.
		Policy BE4	Support.
		Policy BE5	Support.
		Policy BE6	Support.
		Policy BE7	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy EB1	Support.
		Policy EB2	Support.
		Policy EB3	Support.
		Policy EB4	Support.
		Policy EB5	Support.
		Policy NE1	Support.
		Policy NE2	Support.
		Policy NE3	Support.
		Policy NE4	Support.
		Policy NE5	Support.
		Policy NE6	Support.
		Policy C1	Support.
		Policy C2	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy SLR1	Support.
		Policy SLR2	Support.
		Policy SLR3	Support.
LI21	<i>Resident</i>	Policy H1	Support. Any future development should ensure that it is sustainable and housing proposals should reflect the needs of the local community. This should be carried out to reflect the rural character of the area. It should also preserve the historical heritage of the Neighbourhood Area, enhance and protect the natural environment and ensure that the community remains cohesive, inclusive, active and vibrant. New housing proposals should always reflect the particular requirements and needs of the local residents. As Long Itchington has in recent years had extensive and large scale housing development I believe that this fact needs to be taken into account and any future development should be kept with local needs and requirements in mind.
LI22	<i>Resident</i>	Policy H1.	Support.
LI23	<i>Statutory consultee</i>	Policy H1	Support.
		Policy H3	Support.
		Policy H4	Support.
		Policy H5	Support.
		Policy BE1	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy BE2	Support.
		Policy BE3	Support.
LI24	Stratford District Council	Page 4, Section 1, Paragraphs 1.1 and 1.7	Amend to say 'Stratford on Avon District Council'.
		Page 6, Section 2	This raises an important issue, however it would also be appropriate for the point made in the last sentence of para 1.7 to be reiterated at the end of this section to make the situation clear. Add following text to the end of Section 2 <i>"It is recognised that, depending on the outcome of consultations on both documents prior to their respective adoption, amendment of this Neighbourhood Plan may be required"</i> .
		Page 6, Section 2, Paragraph 2.6	The first sentence should be deleted and amended to say "The timescales for the SAP are currently being reviewed".
		Page 6, Section 2, Paragraph 2.1 and 2.6	Suggest adding a link to the SAP website. Site Allocations Plan Stratford-on-Avon District Council
		Page 9, Figure 2, Heritage Assets Location Map	Suggest the title of the Map is amended to say 'Designated Heritage Assets Location Map' as it does not include any Non-Designated Heritage Assets.
		Page 16, Section 6, Paragraph 1.6	Amend to say 'Stratford on Avon District Council'.
		Page 16, Paragraph	It is suggested that the paragraph numbering is amended, e.g. 6.1, 6.2 otherwise there are

Rep.No.	Name	Policy/Section	Representation
		numbering	duplicates of paragraph numbering 1.2 and this creates confusion.
		Page 17, Summary Statement	There is a concern that this statement is attempting to introduce policy, however the points raised in the summary statement do not appear to have been included within the NDP policies as currently written.
		Page 17, Summary Statement	Reference should be made to the newly updated NPPF (2021). The term ' <i>permitted</i> ' should be replaced with the word ' <i>in accordance with</i> '.
		Page 17, Summary Statement	Criteria (b) This should be reworded to ' <i>is sited within the built-up area boundary of Long Itchington or on sites</i> ' to reflect that there is only one BUAB in the NDP. Criteria d (ix) This is too onerous. In some cases it may not be appropriate to insist on planting screening and it should be decided on a case upon case basis. Criteria d (x) It is unclear as to how this can be insisted upon through Planning Policy as most fencing is classed as permitted development.
		Page 17, Summary Statement	It is recognised that Long Itchington has taken a large amount of development in recent times and acknowledged that this is the reason for sites not being identified in the current NDP. However, the NDP should also acknowledge the role of the District Council and the requirement to identify reserve sites in an appropriate manner in the emerging Site Allocations Plan (SAP) that is currently being prepared.
		Page 18, Section 3, Cemex Site	Reference could also be made to the expectation that Cemex will continue to engage with the community about its future plans for the site.

Rep.No.	Name	Policy/Section	Representation
		<p>Page 19, Policy H1, Housing Supply and Development</p> <p>Page 19, Policy H1, final paragraph, Housing Supply and Development</p> <p><i>Page 21, Policy H2, Redevelopment of Previously Developed Land</i></p> <p>Page 21, Policy H2,</p>	<p>Local Needs Schemes and Rural Exception Schemes are referenced separately; whereas for Core Strategy purposes they are one and the same thing. To avoid confusion, it would be preferable to refer only to Local Needs Schemes.</p> <p>There is concern that this Policy remains more restrictive than Policy CS Policy AS.10, which lists other uses which are acceptable in countryside locations (i.e. criteria (d) to (j)).</p> <p>Reference is made to the following criteria '(a) this policy would apply to sites <u>either</u> within the Built Up Area Boundary (BUAB) <u>or</u> "satisfies the approach regarding Local Needs Schemes set out in Policy CS.15 G of the Core Strategy'. This Policy is limiting development opportunities to local need and it is onerous to require the applicant to demonstrate a local need for the redevelopment of previously developed land (unless the site is outside of the BUAB). There is no mention of market dwellings being acceptable and on what basis reference to '10 units' is justified.</p> <p>H2b) The final sentence should be removed or moved into the explanation.</p> <p>H2c) Is unnecessary and should be removed as it does not add anything to the Policy.</p> <p>H2d) If the Policy is to remain it is suggested adding '<i>and would not result in the loss of any land of high environmental value.</i>'</p> <p>Overall, the wording of this Policy as a whole is ambiguous and would benefit from revision.</p> <p>Reference to BUAB's is confusing as there is only one BUAB defined for Long Itchington itself. This should be amended.</p>

Rep.No.	Name	Policy/Section	Representation
		Redevelopment of Previously Developed Land	
		Page 21, Policy H2, paragraph 4, Redevelopment of Previously Developed Land	This needs to refer to the July 2021 version of the NPPF.
		Page 22, Policy H3, Affordable Housing	Reference should be made to a singular Built up Area Boundary. Remove ' <i>on redevelopment of</i> ' on fifth line of paragraph. Add ' <i>On-Avon</i> ' to Council name in final paragraph.
		Page 22, Policy H3, Affordable Housing	This Policy supports the provision of small-scale affordable housing (as defined in Core Strategy Policy CS.18) either on rural exception sites or as redevelopment of previously developed sites in accordance with the needs of the local community as identified through a Housing Needs Survey. The broad principle of this approach is supported, however there are some points of detail that need to be resolved. For example, there is an apparent conflict with Policy H2 (see comments above) and in any case a future local housing needs survey could potentially identify a need for local market housing (although the Policy could legitimately prioritise <u>only</u> affordable housing).
		Page 23, Point 4	Amend to say 'Stratford on Avon District Council'.
		Page 23, Policy H4, Development on Private	Clarification is sought as to what constitutes 'development'. It should be made clear that this is in relation to dwellings. The Policy as it is written currently could be interpreted in such a way

Rep.No.	Name	Policy/Section	Representation
		Garden Land	whereby small development such as a shed would need to meet the five points.
		Page 23, Policy H4, Development on Private Garden Land	H4 appears to be in the wrong place as it comes half way through the supporting text regarding Affordable Housing. This should be amended.
		Page 23, Policy H5, Housing Stock Diversity	The term 'to meet identified local needs' is used in this Policy, however criteria of how applications should be assessed against this is missing. There should be clear guidance on how local need should be identified, interpreted and provided for proposals.
		Page 23, Policy H5, Housing Stock Diversity	<p>(a) This relates to the type and tenure of housing. The broad principle is supported, as it is consistent with Core Strategy Policy CS.19. However, in the absence of specific parameters it is difficult to see how the Policy could be effectively applied in practice, and could create unhelpful uncertainty.</p> <p>(b) This encourages new housing developments to provide for sustainable and flexible working. Again, the broad principle is supported. However, as no 'appropriate standards' are defined it is difficult to see what added value this part of the Policy generates over and above Policy CS.19. Consideration should therefore be given to amending this Policy to refer to specific standards.</p> <p>(c) The principle of this is supported, however it is unclear as to how this can be controlled by Policy without being more stringent than CS Policies, NPPF and PD rights.</p>
		Page 27, Policy BE1 – New Development	Consideration should be given as to whether this Policy adds anything to the Neighbourhood Development Plan and therefore, is removed.
		Page 27, Policy BE1	There is reference to BUAB's, however there is only one BUAB for Long Itchington and this should be amended.

Rep.No.	Name	Policy/Section	Representation
		<p>Page 29, Point 3</p> <p>Page 29</p> <p>Page 29, Policy BE2, Scale, Form, Layout and Design</p> <p>Page 31, Policy BE3, Assessment of the Impact of Development on the Neighbourhood Area</p> <p>Page 32, Policy BE4, Design Standards</p>	<p>Amend to say 'Stratford on Avon District Council'</p> <p>Paragraph numbering has gone awry in the explanation.</p> <p>Reference could be made to the new emphasis on creating beautiful buildings and places in the July 2021 version of the NPPF.</p> <p>This Policy has changed from the Regulation 14 consultation version through the introduction of 'of more than one dwelling'. It is unclear as to why this change has happened. The requirements are far too onerous and not proportional in terms of demonstrating potential impacts. There is nothing to suggest what specific information the applicants would need to provide or how Officers should apply this policy.</p> <p>a) This point needs clarity. For example, how should open spaces between developments look, should they be preserved? If that is the case it would mean no new development in the village.</p> <p>e) This Policy does not seem to allow for the possibility that development might integrate better if it is not provided with a footway. It is quite restrictive. It would also only come into play through S106 obligations as it would include land outside of the development site and therefore linking to larger sites.</p> <p>f) It is not clear as to what the intention of this Policy is. Is the intention to allow reduced parking provision and if so consideration should be given as to whether this text is required? If text is to remain, remove the following text "<i>These standards are...as far as is practicable</i>" as it is not Policy and is unnecessary. It is not clear why 'secure cycle facilities' are required</p>

Rep.No.	Name	Policy/Section	Representation
			<p>through Policy – what is such a facility (would a garage, or a shed comply)? – more detail is required.</p> <p>It is not clear how small scale schemes can improve wildlife corridors on land outside of the control of the landowner/application site and as such the majority of development proposals will not be able to comply with this element of the Policy.</p>
		Page 33, Policy BE5, Alternative Use of Land and Buildings	This needs clarity. For example, how applications should be evaluated as to whether a use meets the needs of local people. Insert ‘unacceptable’ between ‘no’ and ‘detrimental’ on the first line of criterion d) as any development is bound to cause some impact on the locality. The test is whether it is harmful or not.
		Page 34, Policy BE7, Explanation point 1	This needs to refer to the July 2021 version of the NPPF.
		Page 34, Policy BE6, Conservation of Heritage Assets	This Policy includes a public benefits test in the second para but then in the penultimate para of the Policy it doesn’t – it just says “proposals that cause harm to the special architectural or historical interest of listed buildings and their settings will not be supported”. There should be a public benefits test in this para in line with the NPPF.
		Page 34, Policy BE6, Conservation of Heritage Assets	Check wording and amend from ‘ <i>conserve and enhance</i> ’ to ‘ <i>preserve and enhance</i> ’
		Page 34, Policy BE6, Conservation of Heritage Assets	This Policy requires some clarity as to what applies to designated assets and what applies to all heritage assets – ie designated and non-designated. In some instances the Policy refers to ‘heritage assets’ thus implies both designated and non-designated and in some instances it just refers to listed buildings or the conservation area.

Rep.No.	Name	Policy/Section	Representation
		<p>Page 36, Policy EB1, Development of Land and Buildings for Business Use</p> <p>Page 36, Policy EB1, Development of Land and Buildings for Business Use</p> <p>Page 36, Policy EB2</p> <p>Page 37, Policy EB3, Change of Use of Employment/Business Land and Buildings</p> <p>Page 37, Policy EB3, Change of Use of Employment/Business Land and Buildings</p> <p>Page 40, Policy EB4, Change of Use of Agricultural Buildings to Commercial or</p>	<p>This Policy is very restrictive. For example, if a proposal to develop a local business and retain or increase employment also caused some harm, this Policy would indicate refusal. Consideration should be given to revised wording.</p> <p>There is reference to BUAB's, however there is only one BUAB for Long Itchington and this should be amended.</p> <p>This Policy is very restrictive and would benefit from revision.</p> <p>This point is excessively restrictive. It is wise to require a business to relocate locally, however to also require the new use to meet a local need is excessive.</p> <p>The requirement for 12 months active marketing is considerably longer than the 6 months the District expects and seems unreasonable.</p> <p>Clarification as to whether the Policy means '<u>all</u> of the following' should be met or '<u>any</u> of the following'. It will make a big difference as to how this Policy is applied.</p>

Rep.No.	Name	Policy/Section	Representation
		Residential Use	
		Page 40, Policy EB5, Infrastructure	<p>This policy is looking to support infrastructure (such as drainage, roads, footpaths etc) but only if the 4 purposes set out in the policy are met. However, these types of infrastructure are the responsibility of other service providers and cannot be controlled via 'traditional' planning policies since they have their own specific regimes for gaining consent for such works.</p> <p>In order to improve digital communications only if they do not involve structures that can be seen in the landscape or from a listed building is unrealistic and probably impossible.</p>
		Page 42, Policy NE1, Valued Landscapes and Views	<p>Again, parts of this Policy are very restrictive e.g. <i>"particularly where they relate to heritage assets, village approaches and the green spaces around and between settlements"</i>. This is everywhere except where there are buildings and curtilages. Therefore, the Policy would benefit from revision.</p>
		Page 43, Figure 9	<p>There is a distinction between valued landscapes and views which doesn't come across on this map and seems to relate to views specifically. It isn't clear how they have been identified and there is no obvious reference to an assessment being undertaken or any community involvement.</p>
		Page 45, Evidence, point 2	<p>This needs to refer to the July 2021 version of the NPPF.</p>
		Page 46, Point 3	<p>Reference to Paragraph 100 of the NPPF should be amended to say 'Paragraph 102'.</p>
		Page 46, Policy NE2, Local Green Spaces	<p>LGS4 is a roadside verge – it is unlikely that this would meet the designation criteria. Officers do not consider that the highway verge would meet criteria b) of para 102 of the NPPF in that they are not demonstrably special to the community based on the criteria listed in the paragraph.</p>

Rep.No.	Name	Policy/Section	Representation
		<p data-bbox="562 818 857 887"><i>Page 46, Policy NE2, Local Green Spaces</i></p> <p data-bbox="562 1066 786 1098"><i>Page 47, Figure 10</i></p> <p data-bbox="562 1230 857 1385"><i>Page 48, Policy NE3, paragraph2, Wildlife Habitats and Biodiversity</i></p>	<p data-bbox="880 360 2033 531">LGS6 and LGS7 – there are a number of individual parcels of land seemingly making up 2 no. LGS proposals. Clarification is sought as to which parcels are LGS6 and which are LGS7? Some land parcels appear to be highway verges and are very small (and difficult to see on the map). It is not clear how these individual parcels of land meet the designation criteria. If any were to remain, it is suggested that they are numbered a, b, c etc (similar to site 16).</p> <p data-bbox="880 571 2033 759">LGS13 – Similar to LGS6 and LGS 7, this particular ‘site’ is made up of a large number of grass verges and very small incidental spaces which are distributed over several streets. Officers do not consider that the highway verges would meet criteria b) of para 102 of the NPPF in that they are not demonstrably special to the community based on the criteria listed in the paragraph. If any were to remain, it is suggested that they are numbered a, b, c etc (similar to site 16).</p> <p data-bbox="880 850 2033 994">LGS11 – SDC as the owner of the land, objects to the land being designated as a Local Green Space. The reason for this is that there is a need for the Council to retain its existing assets and the value they represent. There is, however a commitment to retain the play area, and there are no current plans to seek to change the use of the land.</p> <p data-bbox="880 1086 2033 1193">It is very difficult to interpret all the individual parcels of land at this scale. Consideration may need to be given to a number of maps or inserts at a more appropriate scale in order to view the land parcels more clearly.</p> <p data-bbox="880 1225 2033 1329">It is not clear as to what the practicalities of setting out such precise requirements for development proposals are, particularly given permitted development rights for walls and fences.</p>

Rep.No.	Name	Policy/Section	Representation
		<i>Page 49, Explanation point 2</i>	Some of the features are shown on Figure 10 but not all of them. It is suggested having a separate map to show Local Green Spaces and a separate map to show other green infrastructure designations/features.
		<i>Page 50, Policy NE4, Flooding and Water Management</i>	This Policy goes beyond what the DM system can deliver and consideration should be given to amending the current wording. Are the run-off rates proposed proportionate to <u>all</u> development proposals?
		<i>Page 51, Policy NE5, Environmental Pollution</i>	It is not clear how every new home will demonstrate that the road network has capacity for extra traffic as the LHA does not go down to this level. This Policy should be deleted.
		<i>Page 58, Policy SLR2, Access to the Countryside</i>	Paragraph 2, this does not allow for the possibility that some harm to the list may be offset by other advantages such as renewable energy generation, new school, new playing field). It should allow the possibility of compensatory gains.
		<i>Page 59, Policy SLR3, Allotment Gardens, 2nd paragraph</i>	Reference is made to Figure 9, however this should be Figure 10.
		<i>Page 66, Appendix B</i>	Whilst it is useful to refer to the Housing Needs Survey in the NDP, given it is somewhat dated, consideration should be given as to whether it needs to be included in full as an appendix.
		<i>Page 97, Glossary</i>	The reference to NPPF 2019 should be updated to NPPF 2021.

Rep.No.	Name	Policy/Section	Representation
LI25	<i>Developer/ Housebuilder</i>	General	<p>Xxxxx write in response to the above in respect of its land interests within Long Itchington. XXx welcomes the opportunity to comment on the Draft Neighbourhood Plan (DNP) and having reviewed the document, provide comments below. With regards to the requirements of Neighbourhood Plans, Paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004, sets out that only a Neighbourhood Plan that meets each of the basic conditions can be put forward to referendum and be made. Having considered the document and associated evidence base, we wish to raise a number of objections to the DNP on the basis that it is considered this fails to meet the following basic conditions: a) Have regard to national policies and advice contained in guidance issued by the Secretary of State, d) Contribute to the achievement of sustainable development, e) Be 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>Planning Policy Context</p> <p>As advised by the NPPG on Neighbourhood Planning, Neighbourhood Plans give communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area, including the ability to choose where they want new homes, shops and offices to be built. It continues that Neighbourhood Planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area. It also provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15 or 20 years. Importantly, Neighbourhood Plans should support the delivery of strategic policies set out in the local plan. The Stratford-on-Avon Core Strategy (July 2016) is the local plan for the area and Policy CS.15 identifies the settlement hierarchy, where Long Itchington is designated as a Category 1 Local Service Village, one of 5 of the most sustainable villages within the District, capable of accommodating a meaningful level of growth both to meet the needs of the local community and those of the wider District. Policy CS.16(D) includes a strategic requirement to prepare a Site</p>

Rep.No.	Name	Policy/Section	Representation
			<p>Allocations Plan (SAP) that will identify Reserve Housing Sites providing flexibility to ensure the District can meet in full its agreed housing requirement and/or to respond to housing needs arising outside the Housing Market Area. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031, allocated in accordance with the settlement hierarchy and distribution of development set out within Policy CS.15. The SAP is currently in preparation to respond to the strategic requirement set out in Policy CS.16, with a Draft Plan identifying Reserve Sites having been published for public consultation in October 2020 and a final Submission Draft expected later this year. In addition, in view of the timing of the adoption of the Core Strategy, there is a need to respond to more recent legislation regarding self and custom house building – the District Council have therefore taken the opportunity to also make provision within the SAP to address identified needs for this type of housing within the District. It is also relevant to note that the DNP is being prepared in the context of new local plan for the area on the basis that the Core Strategy is now over 5 years old, as of July 2021. As a result, the decision has been made by the District Council, in conjunction with Warwick District Council, to initiate a review by preparing a new Joint Local Plan for South Warwickshire (SWLP). This intends to plan for future development needs for the period up to 2050. National guidance does not preclude preparation of a Neighbourhood Plan where a local plan is in the process of being updated. The NPPG advises however that whilst a draft Neighbourhood Plan is not tested against the policies in an emerging plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions. For example, up to date housing need evidence being relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. In addition, the guidance requires the local planning authority to take a proactive and positive approach, working collaboratively with a qualifying body by sharing evidence and seeking to resolve issues to ensure the neighbourhood plan has the greatest chance of success at examination. It also notes the importance of this collaborative working to ensure complementary neighbourhood and local plan policies are produced to avoid any conflicts between policies in an emerging plan, including</p>

Rep.No.	Name	Policy/Section	Representation
			<p>housing supply policies. Turning to the specific issue of housing, where a qualifying body is intending to identify and meet housing need, paragraphs 66 and 67 of the NPPF 2021 advise that strategic policy-making authorities should provide a housing requirement figure for designated neighbourhood areas which reflect the overall strategy for the pattern and scale of development. Where this is not possible, the local planning authority should provide an indicative figure, if requested to do so by the qualifying body, which will need to be tested at Examination. The indicative housing requirement figure can be derived from the authority's local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area. The NPPG also advises that neighbourhood plans should consider allocating reserve sites to ensure that emerging evidence of housing need is addressed, thereby helping to minimise potential conflicts and ensure policies are not overridden by a new local plan. The NPPG also advises on how a neighbourhood planning body should use a housing requirement that has been provided to them. Neighbourhood plans are encouraged to meet or where possible, exceed their housing requirement and they should consider providing for a sustainable choice of sites to accommodate housing to provide flexibility if circumstances change and allowing the plan to remain up to date over a longer time period. Whilst the housing requirement is not binding on the neighbourhood planning body, a failure to meet this figure would undoubtedly need to be addressed through additional allocations within the neighbourhood area being made in the subsequent local plan. Furthermore, in such circumstances, it would also undermine the ability for a neighbourhood area to benefit from the protection provided by paragraph 14 of the NPPF should the District be unable to demonstrate a 5-year deliverable housing land supply in the future. Finally, in respect of Local Green Spaces (LGS), the relevant NPPG ('Open space, sports and recreation facilities, public rights of way and local green space') advises that designating any LGS will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the LGS designation should not be used in a way that undermines this aim of plan making. This is particularly relevant in the context</p>

Rep.No.	Name	Policy/Section	Representation
		<p>Policies H1, H2 and H3, paragraph 1.1.</p> <p>Paragraph 5.2</p> <p>Paragraph 2.3</p>	<p>of the emerging SAP and SWLP, whereby the identification of potential reserve housing sites within the neighbourhood area need to be taken into consideration to ensure LGS designations do not undermine the aim of these emerging development plans. Housing and Policies H1, H2 and H3 Paragraph 1.1 of the DNP states that it recognises the need to contribute to meeting the District and neighbouring areas new housing needs, as identified in the Core Strategy. This is echoed in the Vision Statement outlined at paragraph 5.2 of the DNP, whereby 5 themes have been identified that form the framework for developing the DNP. The first of these themes relates to Housing and states that the DNP will: “Promote the provision of appropriate housing to meet the needs of all individual and families in our community. It is, however accepted that the Neighbourhood Area must also contribute to the overall housing need of the district identified in the Core Strategy”. The above now acknowledges that the neighbourhood area is required to contribute to the overall housing requirements of the District, and has been added since the Pre-Submission Draft version of the plan, presumably in response to the District Council’s comments at that stage. The District Council objected to the previous iteration of the plan on the basis that future housing development in the Neighbourhood Area could not be restricted solely to meeting the needs of the existing community, as this would be inconsistent with the provisions of the Core Strategy. Notwithstanding the above revisions to the DNP, Section 2 of the DNP sets out the Parish Council’s position regarding the SAP. Whilst it acknowledges the SAP proposes allocations for two Reserve Sites in accordance with Core Strategy CS.16(D) and one self/custom build site to meet its obligations in respect of the Self-Build and Custom Housebuilding Act 2015 and associated Regulations (2016), the DNP states at paragraph 2.3 that it considers it has discharged its obligation to help meet the needs of the district as required by the Core Strategy and therefore rejects the principle of identifying any Reserve Sites or self/custom build plots in the neighbourhood area. This firstly misinterprets the requirement of Policy CS.16 (D) to allocate Reserve Sites which is an additional requirement over and above the District’s housing requirement, in order to provide flexibility in housing land supply in circumstances where the district is unable to demonstrate a 5 year housing land supply and/or to help meet needs arising</p>

Rep.No.	Name	Policy/Section	Representation
		Policies H1, H2 and H3,	<p>from outside the HMA. Secondly, the DNP ignores national policy and guidance on making provision for the District's self and custom housebuilding requirements. It is therefore considered that whilst purporting to accept that the Neighbourhood Area must contribute to overall housing need within the District, in reality the DNP is wholly in conflict with the strategic policies of the Core Strategy, does not have regard to national policies and advice in respect of self/custom housebuilding and does not therefore contribute to the achievement of sustainable development, all basic conditions. This is regrettable as national guidance recognises that one of the key benefits of Neighbourhood Planning is giving local communities the power to direct where new housing development should take place within its own area. As the District Council advised in its response to the Pre-Submission Draft, if such sites are not identified within the DNP, then the District Council will do so through the SAP – this is considered to be a missed opportunity and furthermore, the Parish Council will as a result, forgo the protection afforded to it by Paragraph 14 of the NPPF. As highlighted above, the DNP is being prepared in the context of an emerging local plan (SWLP) to replace the Core Strategy, seeking to plan for future housing needs within the District up to 2050. Whilst the NPPG confirms that Neighbourhood Plans are not obliged to make provision for longer term housing needs, it is clear that Neighbourhood Plans are encouraged to do so as providing for a sustainable choice of sites to accommodate housing will provide flexibility if circumstances change and allows the plan to remain up to date over a longer time period. Whilst it is appreciated that the DNP as drafted is opposed to new housing development in principle, no reference is made to the SWLP or its potential implications for planning within the Neighbourhood Area and as the SWLP is expected to be adopted by 2024, this is likely to render the DNP out of date in a very short time period and should therefore be rectified through the allocation of an appropriate level of housing sites. Turning to local housing needs, the DNP notably makes little if no provision, with Policies H1, H2 and H3 doing no more than repeat what is already supported within the Core Strategy. A Housing Needs Survey was undertaken by Warwickshire Rural Community Council (WRCC) published in October 2016, identifying a need for 35 homes for local people. It is however claimed at page 22 of the DNP that this identified need</p>

Rep.No.	Name	Policy/Section	Representation
		<p data-bbox="562 778 658 810">Page 22</p> <p data-bbox="562 1150 730 1182">Paragraph 2.4</p>	<p data-bbox="880 284 2036 1385">has been met, and indeed exceeded, by new housing in the Neighbourhood Area which has either been completed or under construction since 2011. However, the District Council commented on this in their response to the Pre-Submission Draft, stating that this fails to discuss the extent to which any of the need identified in the 2016 Survey may have been met, whilst highlighting that some recent development would have contributed towards meeting District-wide needs. This has not been clarified in the DNP and it is therefore considered there is a lack of clarity regarding the extent of any current local housing needs, particularly as new development that took place between 2011 and 2016 is unlikely to have met local needs identified in the subsequent survey which looks forward 5 years. Furthermore, as acknowledged by WRCC in more recent Housing Needs Surveys undertaken elsewhere in the District, it is generally accepted practice that the data obtained through housing needs surveys is only valid for five years. Evidence gathered in respect of the 2016 survey is therefore unlikely to provide a true reflection of the current local housing needs within the Neighbourhood Area, a position acknowledged within the DNP at page 22 in accepting that a new survey is required. Notwithstanding the uncertainty regarding local housing needs, the DNP has failed to either undertake a more up to date survey to help inform the preparation of the DNP or as an alternative, taken the advice of the District Council at the Pre-Submission Draft stage that in the circumstances, it may be of greater practical benefit to identify and allocate one or more sites that it may consider suitable for a Local Needs scheme. Again, this seems to be a missed opportunity to make provision to meet the local housing needs of the local community, another key benefit of preparing a Neighbourhood Plan. Finally, the DNP appears to place some reliance on the future of the Cemex site to help address any future housing needs within the Neighbourhood Area, as highlighted at paragraph 2.4. This states that the site might provide the potential for a substantial scale of new housing. However, at Section 3 of the DNP, further information is provided on this site. This confirms that whilst the site may have long-term potential, there is clearly significant uncertainty regarding the timescales, form and scale of future redevelopment of the site in view of the operational needs of the business, due to factors outside of the control of the company that owns the site. Notably, the Core Strategy makes no provision</p>

Rep.No.	Name	Policy/Section	Representation
		Policy NE2	<p>within its forecast housing land supply target up to 2031 for the site and as such, no reliance can be placed on this site contributing to local or wider District housing needs during the DNP's plan period.</p> <p>Policy NE2 – Local Green Spaces As noted above, the NPPG on Neighbourhood Planning notes the importance of collaborative working to ensure complementary neighbourhood and local plan policies are produced to avoid any conflicts between policies in an emerging plan, including housing supply policies. The NPPG guidance in respect of LGS also advises that designations need to be consistent with local planning for sustainable development in the area and should not be used in a way that undermines the aims of plan making. Whilst the Parish Council are clearly opposed to allocating sites within the DNP for new housing development, in conflict with the strategic policies of the Core Strategy, the District Council clearly intends to allocate sites in the SAP within the Neighbourhood Area. One of the two Reserve Sites within the SAP is LONG.A – East of Marton Road for approximately 18 dwellings, which is land being promoted by RSL. A Development Framework Plan appended to this statement identifies the site and confirms how the site will be accessed via the recently completed development on Cox Crescent. In reviewing the proposed LGS within the DNP, it is noted that under Policy NE2, the proposed designation LGS 10: Green and ponds at Bishops Drive and Cox Crescent, east of Marton Road, Long Itchington includes a narrow, linear stretch of land along the entire boundary between the recent development and the proposed SAP allocation. This has the potential to prevent or otherwise frustrate the delivery of LONG.A, in conflict with the strategic policies of the Core Strategy and national guidance. As such, xxx object to this proposed designation as currently drafted and consider that in order to be consistent with the NPPG, the area of designation LGS 10 should be amended to exclude land required to secure access to LONG. A or otherwise deleted to avoid conflict with local planning for sustainable development in the area. Conclusions xxx principal concerns regarding the DNP are in respect of the general approach to meeting future housing needs. The DNP confirms that it does not intend to make provision for future housing development within the plan period on the basis the Neighbourhood Area has met its obligations</p>

Rep.No.	Name	Policy/Section	Representation
			<p>in respect of the strategic policies of the Core Strategy. This reasoning is considered to be flawed and is not in general conformity with the Core Strategy, which is required to identify Reserve Housing sites that are able to deliver housing numbers over and above the housing requirement set out in policy CS.16(D). Further concern is raised in respect of the proposed designation of land under Policy NE2, and specifically LGS 10 which appears likely to have the potential to frustrate or at worst prevent the proposed allocation and future delivery of LONG.A – East of Marton Road, a Reserve Site in the emerging SAP. No acknowledgement is given to the emerging South Warwickshire Local Plan and its future housing requirements to 2050 which will potentially have implications for the Neighbourhood Plan area in view of Long Itchington’s position within the settlement hierarchy. The opportunity has been missed to plan positively to address future housing requirements by allocating a sustainable choice of reserve sites to provide flexibility and enable the plan to remain up to date for a longer period, particularly in view of the SWLP’s expected adoption in 2024. Even local housing needs appear to have been overlooked, with a lack of up to date evidence further exacerbating the ability to properly plan to help meet the needs of the local community. As a result, XXX consider that the DNP therefore fails to meet basic conditions (a), (d) and (e). We trust however that the content of this submission assists in helping address the various concerns raised, prior to the DNP being submitted for examination in order to maximise its chances of meeting the basic conditions and progress towards formally being made.</p>
LI26	<i>Developer/ Housebuilder</i>	General	<p>We write on behalf of our Client, xxxxxx and welcome the opportunity to respond to the Draft Long Itchington Neighbourhood Plan (the ‘draft Plan’) and write now in respect of CEMEX’s land interest at Southam Cement Works part of which falls within the Neighbourhood Plan area. A separate representation has been submitted for xxx the Stockton Road site. We support the reference to the CEMEX site in the emerging Neighbourhood Plan (the NP), notably in Section 3. As highlighted in the NP, the Southam Cement Works site is identified as a Large Rural Brownfield site in the Adopted Core Strategy 2016 (Policy AS.11 Large Rural Brownfield Sites). This adopted policy highlights uses that are considered to be appropriate on the site including residential,</p>

Rep.No.	Name	Policy/Section	Representation
			<p>employment, leisure, tourism and recreation. Moreover, that a comprehensive Masterplan must be prepared in conjunction with inter alia local communities and agencies. XXX are now reviewing the development options for the site and are promoting the redevelopment of the site through the emerging local plan. The regulation 18 consultation closed recently and we enclose a copy of our representations for your information. XXXX propose to work with the District Council, Parish, the community and stakeholders in developing and assessing the development proposals for the site, which we anticipate will be set out in a masterplan. We will shortly be writing to the District Council to suggest a scope of work, process of engagement and programme for the masterplanning process. We look forward to working with the Parish to bring forward the site in a holistic manner and discuss how the site can contribute to the aims and objectives of the Parish and wider community. 26231/A3/VB 2 9th September 2021. We attach for information the formal representation form in response to the NP consultation to ensure that our representations are registered as duly made.</p>
LI27	<i>Developer/ Housebuilder</i>		<p>We write on behalf of our Client, XXX and welcome the opportunity to respond to the Draft Long Itchington Neighbourhood Plan (the 'draft Plan'). We respond in respect of xx land interest at Stockton Road, Long Itchington which falls within the Neighbourhood Plan area. A separate representation has been submitted for the Southam Cement Works and the surrounding land (part of which falls within the Neighbourhood Plan Area). We commend the Parish Council in preparing a Neighbourhood Plan and appreciate all the work that it entails. The Long Itchington Neighbourhood Plan will need to demonstrate it has met the 'Basic Conditions' as set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (alongside procedural compliance matters). To meet the Basic Conditions, the neighbourhood plan must: - Have regard to national policies and advice contained in guidance issued by the Secretary of State. - Contribute to the achievement of sustainable development. - Be in general conformity with the strategic policies of the development plan for the area (in this case, the Stratford Core Strategy, 2016). - Be compatible with and not breach European Union (EU) obligations; and - Meet prescribed conditions and comply with prescribed matters (namely the plan not breaching the requirements</p>

Rep.No.	Name	Policy/Section	Representation
			<p>of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017). 26231/A3/VB 2 9th September 2021</p> <p>Overview</p> <p>Our representations are submitted with these Basic Conditions in mind. It is our position that the Neighbourhood Plan does not have sufficient or due regard to national policies (NPPF) and is not in general conformity with the strategic policies of the Core Strategy 2016 (2011-2031). Specifically, Strategic Policies CS.15 Distribution of Development and CS.16 Housing Development. The Neighbourhood Plan does not identify any housing sites and states that no large scale residential will be supported in the lifetime of the plan (i.e. to 2031). It maintains that the Village has already 'discharged its duty' through housing completions since 2011. In our view this position is not in general conformity with the strategic policies of the Core Strategy 2016 which sets the housing requirement at a district level that is a minimum target and includes a commitment to meet unmet needs in the wider housing area that may arise. The decision not to allocate housing sites, together with the restrictive nature of the policies in the Neighbourhood Plan, also fails to satisfy the Basic Conditions in that this approach does not contribute to the achievement of sustainable development. Long Itchington is a Category 1 Local Service Village and is capable of accommodating (and would benefit from) further sustainable growth beyond that already provided. It is noted that the Neighbourhood Plan maintains an objection to the district's emerging Site Allocations Plan which was subject to Reg 18 consultation in December 2020. This proposed three sites for allocation – one self-build site (SCB.5) for 21 units and the two Reserve Sites (LONG A and LONG B) for 18 units respectively. The Neighbourhood Plan maintains the Parish's resistance to these allocations. The risk here is that the Neighbourhood Plan, if made on the basis as currently drafted, would be overtaken by the emerging Site Allocations Plan. Whilst the Parish can maintain an in principle objection to any further housing allocations, it would be beneficial to engage in what would be a preferred site(s) in the event that it is established that one should be allocated in Long Itchington. CEMEX's site at Stockton Road is suitable, available and achievable and can come forward for residential development. Noting the Parish's concerns,</p>

Rep.No.	Name	Policy/Section	Representation
			<p>it is more suitable than the two Reserve Sites which relate poorly to the existing Built-Up Area Boundary. The Stockton Road site offers the Parish, and indeed the district, the opportunity to meet the Reserve Site provision on one site in a manner that is consistent with previous decisions and the pattern of development that resulted. It would represent a logical extension to the Built-Up Area Boundary providing a robust and defensible eastern boundary. Moreover, as one site it also offers the potential for more considered scheme and mitigation strategy than the two smaller sites.</p> <p>Relationship to the Core Strategy DPD</p> <p>Core Strategy Policy CS.16 Housing Development identifies a housing requirement of 14,600 additional homes in the period 2011-2031. It identifies a housing distribution based on settlement hierarchy with approximately 2,000 homes identified for Local Service Villages of which Category 1 Settlements (which includes Long Itchington) should deliver approximately 450 new homes with no more than around 25% in any individual settlement. The policy also signals the intention to prepare a Site Allocations Plan to identify Reserve Sites to provide: 'flexibility to ensure that the District can meet in full its agreed housing requirement (the share of the housing needs arising in the Coventry and Warwickshire Housing Market Area to 2031) and/or to respond to the need to meet housing need arising outside the Coventry and Warwickshire Housing Market Area (HMA). The location of any reserve sites will take account of the settlement pattern and the overall balance of distribution of development set out in Policy CS.15. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031.' 26231/A3/VB 3 9th September 2021 NPPF 2021 Para 13 states that Neighbourhood Plans should support the delivery of strategic policies contained in local plan or spatial development strategies. The housing requirement set out in the Core Strategy is a Strategic Policy and a requirement to be met across the district as a whole. However, a common theme throughout the Neighbourhood Plan is meeting / dealing with housing / employment need for Long Itchington only. The Neighbourhood Plan cites the housing delivery in recent years as evidence that it has discharged its duty to meet housing needs although there is an ongoing strategic need to meet housing requirements. Moreover, the Core Strategy</p>

Rep.No.	Name	Policy/Section	Representation
			<p>includes a provision that housing need extends beyond the District and that policy includes a commitment to respond to any unmet housing need arising outside the Coventry and Warwickshire Housing Market Area (HMA). The Neighbourhood Plan cites the Parish's own Housing Needs Survey 2016 as evidence and that certain housing needs have potentially been satisfied by recent new housing development in the area. The Survey is five years old and we would suggest out of date. It should have been updated to inform the Neighbourhood Plan preparation rather than this being deferred as a later action post the Neighbourhood Plan being 'made'. Again, in any event, it is the Core Strategy that sets the housing requirement. In our view the approach of the Neighbourhood Plan is not in general conformity with the strategic policies of the Core Strategy, or the NPPF (Para 13) and does not meet the Basic Conditions set out above. In short the Neighbourhood Plan needs to reflect wider District level objectives set out in the Adopted Core Strategy which looks to address unmet need.</p> <p>Long Itchington as a Category 1 Local Service Village</p> <p>Whilst Policy CS.16 Housing Development identifies that Category 1 Settlements (which includes Long Itchington) should deliver approximately 450 new homes with no more than around 25% in any individual settlement, this is not an arbitrary figure. It is not a case of harm automatically occurs once a Villages exceeds 25% of the 450 homes. The provision of new homes is beneficial, meeting local needs as well as supporting growth and development, demand for local services. The matter was raised in the appeal relating to the recently completed new development in the Village immediately adjacent to the Stockton Road site (APP/J3720/W/15/30090420). Policy CS.16 was emerging but was considered in the context of the above 25% provision which was agreed at the Inquiry to equate to just over 100 units per Village. The Inspector concluded "I cannot afford much weight to the view that the total increase in dwelling numbers would exceed the loose 'threshold' set out in the draft CS (and referred to above) of just over 100 dwellings. That number has already been exceeded at the DWH site, but it has not stopped the Council resolving to grant permission for a further 58 dwellings at Marton Road. Hence I find the evidence of the Council confused and unconvincing. On the one hand it seeks to rely on the draft CS</p>

Rep.No.	Name	Policy/Section	Representation
			<p>threshold, but on the other it overrides that threshold elsewhere. Indeed it is also the case that other LSVs of a lower category (and hence with fewer or relatively inferior services) also have housing commitments in significant quantities, which seems to illustrate that there is no practical implementation of the CS numbers. Suffice to say that, for the reasons given earlier, I attach limited weight to the numbers set out in the draft CS. As a result I do not find that the scale of development proposed can be ruled out on those grounds". In short the Core Strategy provision of no more than 25% per settlement had already been exceeded and the Inspector still proceeded to allow the appeal. The Neighbourhood Plan implies that the recently completed new development in the Village has placed a significant physical and social strain on the Neighbourhood Area. However, no evidence has been provided to back up any such assertions. This matter was also raised in the above appeal where the Inspector concluded that "there is no substantive evidence that the extra population would make it impossible for those residents to be welcomed into the community or for them to be unable to play an integral part within the community. New residents would also doubtless support the continuance of local services. Hence I cannot accept that the suggestion of a risk to social cohesion has been made out". 26231/A3/VB 4 9th September 2021 No further evidence has been put forward to enable a different view to be taken. Existing pubs / shops can only have benefited from the additional population. It is noted that the bus service has been reduced (as confirmed in the draft Plan) however again this will not be as a result of existing residents as, if anything, they will have increased patronage. Declining bus usage and funding is a national position and not one which is specific to Long Itchington. The Government school's website identifies 184 pupils on role at Long Itchington CofE Academy primary against a capacity of 196 – thus there remains capacity to accommodate new arrivals or those who transfer between schools' mid-year. Indeed, we would suggest that there is a need to and benefit in supporting the long term demand for school places. This information was last updated on the 6 July 2021 and thus we believe, represents an accurate position. We are aware of existing capacity issues at Southam College however this cannot be attributed solely to development at Long Itchington. We are aware that this is a matter which WCC Education are</p>

Rep.No.	Name	Policy/Section	Representation
			<p>addressing at a District wide level and indeed CEMEX have met with the County Council and the school head to discuss this matter further. All new developments will be required to make appropriate contributions to mitigate the impact of new development through CIL and / or S106 Agreements and thus there will be little / no impact on the physical infrastructure which cannot be mitigated appropriately. We therefore find no reason, why, at a local level when housing numbers are set at a minimum in the Core Strategy and there is no evidence that Long Itchington (as a Category 1 Village) cannot or should not accommodate further development, such a restrictive approach to development is proposed. Indeed, Stratford District Council, through the publication of the Site Allocations DPD and identification of sites for development, also appear to have drawn the same conclusion as us.</p> <p>The Stockton Road Opportunity</p> <p>As noted above the District is progressing the their emerging Site Allocations DPD. It is expected that the Site Allocations DPD will be subject to further consultation at the end of 2021. Submission, Examination and Adoption (if found sound) in 2022. In this respect the NPPF states: 30. Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently. The draft Site Allocations DPD proposes 3 small allocations in the village (one self-build and two reserve sites). Notwithstanding the concern that the Parish has about taking further housing development, given that on tis adoption the Site Allocations Plan will supersede the Neighbourhood Plan, there is merit in the Parish considering the site(s) they may support. By maintaining a blanket objection the Parish is then at risk of not actively and meaningfully contributing to its Village’s future. As noted above, the Reserve Site Allocations proposed by the District are, in our view, likely to undermine the Village’s Built up Area Boundary leaving it open to future planning applications and growth notably westwards on the northern side of Leamington Road (Site LONG B). Moreover undermine the linear East – West character of the village by proposing development to North East of on the northern side of Marton Road on</p>

Rep.No.	Name	Policy/Section	Representation
			<p>the route out of the Village (LONG A). These sites are expected to deliver 18 units each. Accordingly, the District has deemed 36 units to be the Reserve Site contribution of Long Itchington. Through the Site Allocations Plan, Cemex will be promoting its site along Stockton Road, as an alternative to those sites under consideration. This site is labelled as Site 7 in the Council's 2020 Strategic Housing Land Availability Assessment (SHLAA). It is one of a limited number of 'amber' sites in the village – there are no green sites. The site would be a continuation of the pattern of the 26231/A3/VB 5 9th September 2021 existing new development which has already taken place on the eastern half of the village but, importantly, would not extend the existing village envelope any further east than the existing built development. The SHLAA concluded that the site has scope for 39 dwellings and that development could be mitigated subject to appropriate treatment of the relationship to the canal. Given that CEMEX obtained outline planning consent for the land immediately to the west, it is considered that CEMEX have the ability to appropriately mitigate any impact on the canal through a treatment mirroring that which has taken place to the west and indeed that which, through this draft Plan, is seen as being fit to designate as Local Green Space. The site offers the Parish, and indeed the district, the opportunity to meet the Reserve Site provision on one site. As noted above, it would represent a logical extension to the built up area boundary providing a robust and defensible eastern Built Up Area boundary when compared to the emerging allocations. As one site it also offers the potential for more considered scheme and mitigation strategy than the two smaller sites. We attach for information the illustrative layout prepared for the Stockton Road site, together with the formal representation form.</p> <p>Conclusion</p> <p>As it currently stands, it is our view that the plan does not meet the Basic Conditions and requires significant amendment before it can be taken forward. Whilst we understand that the Parish wishes to maintain an in principle objection to any site coming forward, it would be helpful to determine whether in the event that a site is to come forward, whether the Parish wishes to influence the selection of that site and in this context the merits of CEMEX's Stockton Road site.</p>

Rep.No.	Name	Policy/Section	Representation
LI28	<i>Statutory Consultee</i>	General	An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.
LI29	<i>Developer/ Housebuilder</i>	General	<p>This submission is made on behalf of xxxx, in the context of the Long Itchington, Bascote and Bascote Heath Neighbourhood Plan (NP) submission version May 2021.</p> <p>2. THE DEVELOPMENT PLAN</p> <p>The Development Plan for the purposes of the Neighbourhood Plan is the Stratford on Avon District Core Strategy 2011-2031 (adopted in July 2016). Policy CS.15 relates to the Distribution of Development which during the period 2011-2031 will be based on a pattern of balanced dispersal, in accordance with the distinctive character and function of the wide range of sustainable locations across the District. Category D of the settlement hierarchy relates to the Local Service Villages with the scale of development that is appropriate in each village specified in Policy CS.16. The explanatory text to Policy CS.15 recognises that it is important that provision is made for some new housing in villages across the District. The approach taken to the scale of development seeks to minimise impact on their character whilst helping to sustain their future. An allowance is made for small-scale development in a wide range of smaller settlements, known as local service villages, to help meet the needs of these communities, to provide some scope for new households to move into them, and to help support the services they provide. Local Service Villages (LSVs) were sorted into categories by applying a qualitative assessment of three key services: a general store, a primary school and public transport provision, together with the existing size of the settlement. Long Itchington (along with Bishop's Itchington, Harbury, Quinton and Tiddington) is identified as a Category 1 Local Services Village (LSV) in the SOADC Core Strategy and is therefore one of the most sustainable villages for development based on the level of service provision. Policy CS.16 relates to Housing Development and identifies the need for provision of a least 14,600 additional homes throughout the District during the plan period 2011-2031 of which approximately 2,000 homes will be provided in the LSVs of which approximately</p>

Rep.No.	Name	Policy/Section	Representation
			<p>450 homes in total shall be provided in the Category 1 LSVs which includes Long Itchington. The Neighbourhood Plan (NP) specifically does not identify or allocate any sites either within or adjacent to Long Itchington for housing development and is therefore not in accordance with the Development Plan. The NP is also in conflict with paragraph 29 of the National Planning Policy Framework (NPPF) July 2021 which states that: 3 'Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.' Footnote 18 of the NPPF states that: 'Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.' The NP is not considered to be in general conformity with strategic policy CS.15 or CS.16 of the Core Strategy as no provision is made for any housing development. As such the NP is not considered to meet the basic conditions that a draft NP must meet if it is to proceed to referendum which are set out in paragraph 8(2) of Schedule B to the Town and Country Planning Act 1990.</p> <p>THE STRATFORD ON AVON EMERGING SITE ALLOCATIONS PLAN (SAP)</p> <p>The SAP Preferred Options Regulation 18 consultation took place during October to November 2020 and identified two 'reserve sites' for housing (LONG A and LONG B) at Long Itchington along with a site for self or custom build housing (SCB 5). To ensure conformity with the Core Strategy. Reserve sites are identified in all 5 Category 1 LSVs, their release, which will only occur if there is or likely to be an under supply of housing or the Council accepts that additional housing is required, falls within Tier 7a. The NP confirms that a formal response has been submitted to the SAP which rejects the principle of identifying any reserve or self/custom build sites being allocated within the NP area as development of these sites does not meet the wishes of local people consulted in the preparation of the NP. The NP considers that Long Itchington has already accepted a 'disproportionately' high number of dwellings since the commencement of the Core Strategy however, this is not a matter for the NP to determine. The adopted growth strategy for the District between 2011 and 2031 is based upon a pattern of balanced dispersal. It is for the emerging South Warwickshire Local Plan to assess and determine if this is the appropriate growth</p>

Rep.No.	Name	Policy/Section	Representation
			<p>strategy beyond 2031 not the NP which should be in general conformity with the Development Plan. In order to be considered sound the NP should identify reserve site(s) and could identify alternative site(s) if it is considered more sustainable locations are available. One such site is located off Leamington Road, adjacent to Long B which is shown outlined in red on the attached plan. Submissions have already been made on behalf of xxx to the SAP which confirm there are no major planning consideration which restrict the development of the site and provides the opportunity to strengthen and consolidate the settlement edge by rounding off the settlement to the north of Leamington Road. Any scheme brought forward on this site would be designed to respect the existing settlement and be fully integrated.</p> <p>CONCLUSION</p> <p>The NP is not considered to meet the basic conditions that a draft NP must meet if it is to proceed to referendum as it is not in general conformity with the growth strategy (based on a pattern of balanced dispersal), of the Development Plan, the Stratford on Avon District Core Strategy 2011-2031. Long Itchington, as a Category 1 Local Service Village, falls within settlement hierarchy Category D of Policy CS.15 'Distribution of Development'. Policy CS.16 'Housing Development' identifies the need for at least 14,600 additional homes of which 2,000 homes will be provided in the LSVs of which approximately 450 homes in total shall be provided in the Category 1 LSVs which includes Long Itchington. No provision is made within the NP for any housing sites.</p>
LI30	<i>Developer/ Housebuilder</i>	General	<p>General Comment</p> <p>In accordance with Section 15(d) of the Neighbourhood Planning (General) Regulation 2012, Long Itchington Parish Council has prepared a 'Basic Conditions Statement' (May 2021) to support the submission of the Neighbourhood Plan ('NP'). The Planning Practice Guidance (PPG) states that "the basic conditions statement is likely to be the main way that a qualifying body can seek to demonstrate to the independent examiner that its draft neighbourhood plan or Order meets the basic conditions.. For a number of reasons set out below, it is not considered that the Basic Conditions Statement demonstrates how the Neighbourhood Plan meets the Basic Conditions. Firstly, paragraph 3.2 of the Statement sets out 5 of the Basic Conditions but has excluded</p>

Rep.No.	Name	Policy/Section	Representation
		Policy H1	<p>reference to Basic Conditions paragraph 8(2)(b) and (c) of Schedule 4B to the Town and Country Planning Act 1990. The excluded conditions relate to having special regard to listed heritage assets (b) and conservation areas (c). Long Itchington has numerous heritage assets and a conservation area therefore it is unclear why these two basic conditions have been excluded from the Basic Conditions statement. As set out in our responses to various policies within the NP, we do not consider that the plan meets basic conditions (a) and (e) and this Statement has not clearly demonstrated how the Parish Council consider that they have met these conditions either.</p> <p>Policy H1</p> <p>Further to our Regulation 14 NP consultation response, we continue to object to Policy H1 for the reasons set out below. Response to Question 9 continued on the next page X Response to Question 9 continued. A Statement on the Emerging Site Allocations Plan ('SAP') has been added to the Regulation 16 NP. The Parish Council has stated that they do not support the proposed Reserved Sites in the emerging SAP and consider that Long Itchington has already been subject to 'disproportionate' growth since the adoption of the Core Strategy. The Parish Council has also stated that the Cemex site is identified for development in the Core Strategy as a brownfield windfall site. It is currently unknown when this site will be redeveloped therefore the NP does not propose any policies to address it. Basic Condition (a) requires NPs to have regard to national policies and advice. We acknowledge that there is no legal requirement for NPs to take account of emerging plans. However, the PPG does state that "to reduce the likelihood of a neighbourhood plan becoming out of date once a new local plan (or spatial development strategy) is adopted, communities preparing a neighbourhood plan should take account of latest and up-to-date evidence of housing need" The emerging SAP has taken up-to-date housing need into consideration as well as the emerging South Warwickshire Plan ('SWP') therefore in order to meet Basic Condition (a) the NP should not be proposing to differ with the SAP as this will result in a conflict with the emerging SAP and SWP proposals. The PPG also states that where a NP is brought forward before an up-to-date Local Plan is in place, the Council and Parish Council should agree the relationship between the proposed policies and it is important that conflicts between</p>

Rep.No.	Name	Policy/Section	Representation
			<p>emerging Local Plans and NPs are resolved. The Parish Council are able to disagree with the specific sites proposed in the SAP but the NP should not be used to object to the provision of additional dwellings being directed to Long Itchington as this is based on the most recent evidence on housing need and aligns with the CS which directs growth to sustainable settlements, such as Long Itchington. If the Parish Council do not support the proposed sites identified then the NP should be considering allocating alternative reserve sites to align with the SAP and emerging evidence on housing needs to minimize conflicts. Long Itchington is identified as a Category 1 Local Service Village in the Core Strategy which are the most sustainable settlements after Stratford-upon-Avon and the Main Towns in the District. Core Policy CS.16 states that the figure allocated for Local Service Villages is an 'approximate' and the Inspectors Report for the Core Strategy (and subsequent Appeal Decisions in Long Itchington) states that the figure should not be seen as a 'cap' for housing numbers (paragraph 268). Basic Condition (e) requires NPs to be in general conformity with the strategic policies contained in the development plan for the area. Policy H1 refers to four exemptions for development outside the built-up area that will be supported. Core Strategy Policy AS.10 lists additional exceptions for residential development in the open countryside to those listed in Policy H1, including the redevelopment of a bad neighbour site or a new dwelling that is of exceptional quality and design. The latter exception is also supported in paragraph 80(e) of the NPPF. As stated in our response to the Regulation 14 NP, we do not consider that Policy H1 is in general conformity with the Stratford-on-Avon Core Strategy or the National Planning Policy Framework ('NPPF') (2021) nor has any justification been provided which demonstrates why a different approach is being taken to that set out in strategic and national policy. Therefore, we consider that as drafted the Neighbourhood Plan does not meet Basic Conditions (a) and (e). Response to Question 9 continued on the next page Response to Question 9 continued. Supporting paragraphs 2.3 to 2.5 set out additional text on the relationship between Long Itchington and Model Village to the south and the importance of maintaining a buffer between the two settlements. As stated in paragraph 2.4c there are strong barriers in regards to the canal and disused railway line which would stop any potential coalescence of Long</p>

Rep.No.	Name	Policy/Section	Representation
			<p>Itchington and Model Village if land between the two settlements were developed. The NP sets out that the evidence to support the areas of land identified as valued landscapes and views is based on the findings of Charts 38 and 39 of the Questionnaire Survey (Appendix A). Charts 38 and 39 set out what local residents consider is important to the enjoyment of the Parish environment. Charts 38 to 40 only show two answer options: 'extremely' and 'very'. In our Regulation 14 representations we queried whether residents were given any other options to select in response to the survey. No response has been given by the Parish Council to our query in their Consultation Statement (May 2021). If the only options that were given to respondents were 'extremely' and 'very', we consider that the evidence may not reflect the full range of views of community and is therefore not robust (Planning Practice Guidance (PPG)). Additionally, we wish to understand whether the statements that are listed in the charts were given to the respondents or whether they were open-ended questions where respondents have specifically written what they enjoy about the Parish the most. Again, if the answer is the former option, this evidence may not reflect the full range of views of the community as there may be other options that respondents enjoy more than those which were listed in the survey. In addition to the above, specifically in regards to the statements made in paragraphs 2.3 – 2.5 on the land between Long Itchington and Model Village as well as proposed 'Viewpoint 7' under Policy NE1, there is no evidence from Charts 38 and 40 that specifically state that this land in particular is valued by the local community. Our client, xxxx, is promoting land between Long Itchington and Model Village for residential and community use. The evidence in Appendix A supporting the statements made about our client's land in paragraphs 2.3 to 2.5 and Policy NE1 (see our separate response to this Policy below) does not specifically refer to our client's land, it purely refers to respondents views that they enjoy views of the countryside, wildlife corridors and footpaths etc. We acknowledge and support the views of the local community and consider that the residential development of the land in between Long Itchington and Model Village can be sensitively delivered. Development is already located along the eastern side of A423 so development and in addition to the disused railway 'barrier', in order to avoid coalescence, a landscaped buffer could be provided between</p>

Rep.No.	Name	Policy/Section	Representation
			any development on this land and disused railway / Model Village. We therefore consider that any reference to land between Long Itchington and Model Village being an important element of the rural setting and potential coalescence if this land is developed should be removed from the Neighbourhood Plan (Paragraphs 2.3 to 2.5 and Policy NE1). Reference to the 2019 NPPF under the evidence section (paragraph 4) should also be updated to refer to the 2021 NPPF.
		Policy BE2	<p>Policy BE2</p> <p>Policy BE2 refers to the Village Design Statement that was adopted by Stratfordon-Avon Council in January 2000. Since the adoption of this document, the village has grown and National Design Guidance has been published by the Government (July 2021). As stated in our response to the Regulation 14 NP, national policy (NPPF paragraph 31), requires that plan policies should be supported by up to date appropriate) and robust evidence. A document dated from 2000 cannot be considered up to date and it also does not include any of the growth that has been delivered in the village since 2000. We consider that in order to meet the requirements of national policies and advice (Basic Condition (a)), Policy BE2 should only refer to up to date evidence.</p>
		Policy BE3	We support the removal of reference to Southam College.
		Policy EB2	Policy EB2 supports development proposals that encourage or support the growth of the local economy from tourism. As stated in our response to the Regulation 14 NP, we support this policy. In our Regulation 14 response, we requested that the policy should acknowledge the contribution that residential development can make to the local economy as stated by the Prime Minister in both his 'Build, Build, Build' speech (June 2020) and in the foreword of the 'White Paper – Planning for the Future' consultation document (August 2020). The provision of new housing is central to supporting economic growth and job creation (NPPF Sections 1 - 6), specifically in terms of: providing an attractive place for Long Itchington's economically active population to live; helping to support the vitality and viability of Long Itchington and adjacent village and town centres

Rep.No.	Name	Policy/Section	Representation
		Policy NE1	<p>through increasing the number of residents and therefore potential customers (NPPF Section 7); providing investment into key strategic infrastructures and creating and sustaining jobs through the construction and servicing of the new dwellings.</p> <p>Policy NE1 states that development proposals should ensure that all important views of the valued landscape are maintained and safeguarded. There are two 'valued landscapes and views' shown across our client's land (Viewpoints 7). We object to Policy NE1 and proposed Viewpoint 7. We have resubmitted a Landscape Technical Note which has been produced by Bellway Homes' Landscape Consultant (IDP) following a review of Policy NE1. In terms of the landscape character our client's land around Viewpoint 7 and shown within the Promotion Document, has a strong association with Long Itchington due to topography, vegetation structure and its location close to the village centre. The existing development edge to the north of their land is prominent, and the A423 forms a distinct boundary to the east, with a mature hedgerow alongside it. To the south is the Grand Union Canal and tow path which again forms a permanent boundary, also heavily vegetated by trees and woodland to both sides and is very well screened from the surrounding area. To the west is a mature field boundary formed of large trees, unkempt hedgerow and scrub, beyond which is a large plantation of broad-leaved woodland that will further enclose our client's land and provide a barrier to the River Itchen corridor to the west. This existing landscape structure creates a well-defined and enclosed piece of land that is well related to Long Itchington. There is a public footpath (SM3) that cuts across part of our client's land, part of the Millennium Way, linking the Grand Union Canal to the south with the settlement. Views from this path offer views of the settlement edge most prominently of the northern edge of the site, as well as other filtered views of buildings within Long Itchington. In response to our Regulation 14 representations, the Parish Council has stated in the Consultation Statement (May 2021) that "valued landscapes are by their nature subjective". The PPG states that "where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence". As stated in our response to Policy H1, the NP does not</p>

Rep.No.	Name	Policy/Section	Representation
			<p>include any evidence which justifies why our client's land has been identified as a 'valued landscape' as although Charts 38 – 40 sets out what respondents enjoy the most, no respondent has specifically stated which views they value the most. From the below landscape evidence, it is considered that our client's land is not a highly sensitive or valued landscape in accordance with the guidance set out within the Guidelines for Landscape & Visual Impact Assessment (3rd Edition 2013) for assessing value. This is set out on page 84 of the guidance and is shown in the table below:</p> <p>FACTOR DESCRIPTION OF VALUE</p> <p>Landscape quality (condition) A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements.</p> <p>Scenic quality The term used to describe landscapes that appeal primarily to the senses (primarily but not wholly the visual senses).</p> <p>Rarity The presence of rare elements or features in the landscape or the presence of a rare Landscape Character Type.</p> <p>Representativeness Whether the landscape contains a particular character and/or features or elements which are considered particularly important examples.</p> <p>Conservation interests The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape as well as having value in their own right.</p> <p>Recreation value Evidence that the landscape is valued for recreational activity where experience of the landscape is important.</p> <p>Perceptual aspects A landscape may be valued for its perceptual qualities, notably wildness and/or tranquility.</p> <p>Associations Some landscapes are associated with particular people, such as artists or writers, or events in history that contribute to perceptions of the natural beauty of the area</p> <p>The landscape quality of our client's land is assessed as being low to moderate due to the limited condition of some elements. Scenic quality is reduced by the surrounding urbanising elements, and the perceptual aspects consist of grazed paddocks in close proximity to residential development alongside a busy road corridor. The recreational value is present only in the northern part of our client's land (as shown in the Promotion Document) due to the footpath route, and in conservation terms our client's land is not designated for its biodiversity value or cultural/historical interest. These factors combine to determine that this land has a broadly</p>

Rep.No.	Name	Policy/Section	Representation
			<p>moderate landscape sensitivity and would not constitute a 'valued' landscape as protected in NPPF paragraph 174. The land to the north of Long Itchington has previously been identified as more sensitive to development as it was designated as a Special Landscape Area ('SLA') in the previous District Local Plan Review (July 2006) (Leam Valley SLA). The key reason why this land was not retained as an SLA in the adopted Core Strategy was because the neighbouring districts did not designate any SLAs which made the Leam Valley SLA limited in size, the technical considerations that supported the designated of the Leam Valley SLA have not changed. It is considered that viewpoints proposed to the north of Long Itchington (Viewpoints 1 – 4) are justified and the landscape in this area should be protected. Land to the south of Long Itchington should not be given the same protection. Policy NE1 states that "development proposals should ensure that all important views of the valued landscape...are maintained and safeguarded, particularly where they relate to heritage assets, village approaches and the green spaces around and between settlements". This definition of valued views is not supported by our analysis of the landscape setting for our client's site nor supported by the NP's evidence base. Naturally, routes along existing rights of way around the village will be enjoyed by local residents and these will be considered for any new development proposals that are brought forward on our client's land. The development of our client's land could still allow for views towards the existing village along streets and formal open space areas, and planting could be utilised to filter and/or channel views in order to respond to local constraints. The NP goes on to state that our client's land (Viewpoint 7) "forms part of the important open countryside that separates Model Village from Long Itchington village and maintains the rural setting and character of each settlement". Model Village appears as an isolated commune in landscape terms, very distinct from Long Itchington and rather at odds with the urban grain of the other local villages by way of its linear and strained layout. There are several layers of separation between Model Village and the northern parcels of our client's land through the canal and the disused railway line with strong landscape structure and topography. Any development of our client's land between the canal and disused railway line would be limited (potentially for community use) and additional landscaping could be provided</p>

Rep.No.	Name	Policy/Section	Representation
			to separate the development from Model Village. The development of our client's land would be an integral part of the settlement of Long Itchington and would not erode any perceived gap in landscape and visual terms. In summary to our response to Policy NE1, we do not consider the policy complies with Basic Condition (a) as the land does not constitute a 'valued' landscape as protected under NPPF paragraph 174 nor is there a robust evidence base to support the land around Viewpoint 7 being identified as a 'valued landscape'. However, we consider that the development of our client's land should be able to maintain key views between the site and Long Itchington and Public Rights of Way could be provided across the site.
LI31	<i>Statutory Consultee</i>	General	Would like to express their support for this Development Plan, as part of the Regulation 16 Consultation.
LI32	<i>Developer/ Housebuilder</i>	General Policy H1	<p>Paragraph 2 under 'Evidence' on page 35, page 36 and page 41 of the Regulation 16 version includes reference to the National Planning Policy Framework published in February 2019 and updated in June 2019. This now needs to be updated to take into account the publication of the revised National Planning Policy Framework published by MHCLG on 20th July 2021. In addition, references to the following paragraphs in the June 2019 version of the Framework require updating to align with the revised July 2021 Framework: • Paragraph 80 requires updating to paragraph 81; • Paragraph 81 (c) requires updating to paragraph 82 (c); • Paragraph 83 requires updating to paragraph 84; • Paragraph 91 (c) requires updating to paragraph 92 (c); • Paragraph 100 requires updating to paragraph 102; • Paragraph 127 (f) requires updating to paragraph 130 (f); and • Paragraphs 155 and 156 require updating to paragraphs 159 and 160.</p> <p>XXX reiterate our comments from the Pre-Submission draft version consultation (Regulation 14) on Policy H1. XXX object to the wording of this policy and the use of settlement boundaries as an appropriate planning tool where they would preclude otherwise sustainable development from coming forward. Indeed, the use of development limits which arbitrarily restrict suitable development on the edge of settlements does not accord with the positive approach to growth required by the Framework. The NPPF is clear that development which is considered suitable should go ahead without delay in accordance with the presumption in favour of sustainable</p>

Rep.No.	Name	Policy/Section	Representation
			<p>development. As a result, this approach is also contrary to basic condition (a). Long Itchington, Bascote & Bascote Heath Neighbourhood Plan - Submission version xxx recommend that this policy is modified and worded more flexibly to ensure compliance with paragraphs 11 and 16(b) of the NPPF and the requirement for policies to be sufficiently flexible to adapt to rapid change. In this regard, xxx submit that sustainable development proposals adjacent to the settlement boundary that are proportionate in size to Long Itchington's role as a sustainable settlement within the district should be supported and wording should be included in the policy to reflect this. Indeed, this approach was taken in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner's Report states: "...Policy GMC1 should be modified to state that "Development...shall be focused within or adjoining the settlement boundary as identified in the plan." It should be made clear that any new development should be either infill or of a minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan." Notwithstanding the above, the inclusion of the wording 'will only be permitted' should be removed from the policy wording. The Parish Council are not the decision-making authority, this power lies solely with Stratford-on-Avon District Council and it is for them to undertake decisions relating to planning applications not the Parish Council. It is suggested that Policy H1 should support development proposals adjacent to the settlement boundaries, provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development alongside according with other policies of the LIBBHNP and other development plan policies. Indeed, this may be necessary given the Council's commitment to preparing a new Local Plan alongside Warwick District Council. It is also noted that Policy H1 gives reference to Policy AS.10 of the Stratford-on-Avon District Core Strategy which was adopted in July 2016. As of July 2021, the Core Strategy is now over 5 years old and in accordance with the NPPF, the strategic policies contained within may now be considered out-of-date, it also needs to consider that the Council are working on a new South Warwickshire Local Plan and as such the Neighbourhood Plan needs to be flexible enough to take this into account.</p>

Rep.No.	Name	Policy/Section	Representation
		Policy H2	xxx support the general principle for the re-development of previously developed land in line with national guidance. However, xxxx stress that the application of settlement or Long Itchington, Bascote & Bascote Heath Neighbourhood Plan - Submission version xxxx 'built up area boundaries' are not an appropriate planning tool where they would preclude otherwise sustainable development from coming forward. The NPPF is clear that development which is considered sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. As xxx have previously suggested, it is recommended that reference to the Core Strategy Policy CS.15 is deleted and amended to refer to the 'adopted development plan' to ensure that the LIBBHNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004.
		Policy H3	xxxx support the objectives of this policy especially the provision of affordable housing on sites adjacent to the village boundary. However, the provision of this affordable housing would be most likely secured as a percentage of major residential development schemes. Due to the LIBBHNP currently restricting sustainable major residential development from coming forward adjacent to the settlement boundary of Long Itchington, this will restrict the provision of much needed affordable housing in the village. Policy H3 continues to refer to securing housing tenures through a Section 106 legal agreement. The determination of planning applications remains the sole responsibility of Stratford-on-Avon District Council and the means of securing appropriate housing tenures will be secured by the local planning authority. Therefore, this part of the policy should be deleted.
		Policy BE1	As previously stated, the use of settlement boundaries will not be supported as an appropriate planning tool where they would preclude otherwise sustainable development from coming forward. The NPPF is clear that development which is considered sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. xxx have previously raised the issue around flexibility within the Regulation 14 consultation to the neighbourhood plan and this is once again required here so that the LIBBHNP can remain responsive over the entire plan period especially with the Council's commitment to the new South Warwickshire Local Plan.

Rep.No.	Name	Policy/Section	Representation
		Policy BE3	This policy sets out that any proposal for development of more than a single dwelling should provide evidence of its impact on the Neighbourhood Area. xxx consider that this policy should be deleted from the Submission version of the Plan. It is amalgam of various issues such as landscape, highways, flood risk which are all covered by other policies within the Submission version of the neighbourhood plan or within the adopted Stratford-on-Avon Core Strategy. Explanation point 2 in support of the policy states that 'key considerations would be the impact of any development on local school capacity or access to health and other social services for existing residents'. A development's impact on local services in the village (such as education and health) will be assessed by Warwickshire County Council and the mitigation proposed in terms of financial contributions will not be judged by the Parish Council.
		Policy BE4	Policy BE4 sets out a range of design principles which development proposals should seek to meet. While the Government has shown support for development to incorporate good design principles. As previously highlighted, the NPPF is clear that the level and detail and degree of prescription with regards to design should be tailored to the circumstances in each place and should allow a suitable degree of variety. As such, the design policies should not aim to be overly prescriptive. Policies need to retain flexibility so that schemes may respond to site specifics and the character of the local area. There will not be a one size fits all solution in relation to design and sites should be considered on a site-by-site basis with consideration given to various design principles. xxx welcomes the change within the policy regarding secure cycle storage facilities. The policy makes specific reference to the Council's Development Requirements SPD, it is important however that the plan retains flexibility and this direct reference may impact upon the plans ability to do that in the case of the SPD being revised.
		Policy NE1	Figure 9 of the Submission Neighbourhood Plan identifies a number of valued landscapes or views. Xxx raise concerns regarding the policy and the landscapes and views identified. For these views to be identified for protection there should be demonstrable physical attributes that elevate its importance out of the ordinary, for example it should not seek to protect views of the open countryside due to their pleasant sense of place. Within the supporting explanation text for this policy, it is identified that these sites were chosen by local residents through surveys, xxx do not consider that this constitutes a sufficient evidence base nor is it robust enough to

Rep.No.	Name	Policy/Section	Representation
		Policy NE4	<p>support the identified landscape and views. There has been no Landscape Character Assessment been instructed by LIPC during the preparation of the neighbourhood plan to support this policy. As has been stated in xxx previous representations, Policy NE1 must allow decision makers to come to a view as to whether particular locations contain physical attributes which take it out of the ordinary rather than those based solely on community support. xxx reiterate that Policy NE1 should either be deleted or be revisited based on appropriate evidence such as a Landscape Character Assessment.</p> <p>Policy NE4 seeks to control flooding and water management within Long Itchington through accompanying information and assessment to planning applications. As with previous policies this policy makes direct reference to a policy within the Stratfordon-Avon District Core Strategy. This reference needs to be amended to allow the policy to remain flexible or the neighbourhood plan risks not being applicable for the majority of its plan period. However, a broader point with regards to the policy is that it is not within the powers of the Qualifying Body to determine planning applications, this is the sole remit of the local planning authority. In this regard, the neighbourhood plan should not set requirements for, or documents to accompany, planning applications as such and as previously stated xxxx consider that all references to 'planning applications must be accompanied by', 'proposals must include' or similar wording should be removed and replaced by support or where necessary.</p>
		Policy NE6	<p>Policy NE6 seeks for new development to contribute to environmental sustainability through the inclusion of on-site renewable or low carbon producing technologies. xxx are supportive of this policy. Carbon neutrality remains a long-term aim of the UK Government, which we are currently in a transition towards achieving. To ensure that policies in the LIBBHNP do not affect deliverability of development (and so basic condition (e)), xxx would suggest that the policy should be geared towards minimising carbon emissions in design, construction and operation or should be omitted in favour of referring to the Building Regulations 2013.</p> <p>Site Submission. Land north of Southam Road, Long Itchington. xxx are promoting 'land north of Southam Road, Long Itchington' and a Site Location Plan is included at Appendix 1 of this representation. xxxx</p>

Rep.No.	Name	Policy/Section	Representation
			<p>have recently submitted this site for residential development through the 'Call for Sites' exercise undertaken by Stratford on-Avon and Warwick district councils between May-June 2021. The site is approximately 7.29 hectares and is located to the north-east of the village comprising of agriculture fields and could accommodate a new residential development for up to 80 dwellings. The site is well located to the local road network, public transport links and local amenities including the primary school, church, supermarket and post office. The site avoids areas at risk of flooding and does not affect ecologically sensitive areas. It is proposed that the site can be safely accessed from Collingham Lane via a simple priority junction. Long Itchington is considered to be a sustainable settlement where new housing can be located to help meet the housing need for the district which are set to increase in light of the Government's White Paper consultation. In addition to new market housing, the site would deliver:</p> <ul style="list-style-type: none"> • Provision of 35% affordable housing onsite; • New areas of publicly accessible open space, including a children's play area and woodland planting; • New pedestrian connections across the site between the existing Public Rights of Way. <p>xxx would welcome the opportunity to discuss how delivery of the site can make an important contribution to the supply of market and affordable homes in the parish of Long Itchington. It offers a suitable location and scale of site and is capable of delivering numerous benefits to the community</p> <p>Summary</p> <p>xxxx recognises the Government's ongoing commitment to neighbourhood planning and the role that such plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the LIBBHNP must be consistent with national planning policy and needs to take account of up-to-date evidence. If the Plan is found not to meet the Basic Conditions at Examination, then the Plan will be unable to progress to referendum. Through this consultation response, xxx have provided comments on a number of policies being proposed through the draft Neighbourhood Plan and its supporting evidence base and have highlighted a number of areas where the proposed approach does not accord with the requirements of national policy and/or guidance and submit modifications are necessary to ensure the Plan's compliance with the basic conditions. xxx request to be added to the list of consultees and contacted about the next stages of the Neighbourhood Plan. Should the Plan be submitted for examination following the Regulation 16 consultation and the Examiner decides it is necessary to discuss these matters in a public forum, xxx respectfully</p>

Rep.No.	Name	Policy/Section	Representation
			request that we are provided the opportunity to discuss these matters at the hearing session(s). We hope you have found these representations informative and useful towards the preparation of the Long Itchington, Bascote & Bascote Heath Neighbourhood Plan.
LI33	<i>Developer/ Housebuilder</i>	Policy H1	On behalf of our client and the landowners of xxx (Site Ref: LONG.14B) as identified within the emerging Stratford-on-Avon Site Allocations Plan (SAP), we object to the omission of reserve housing sites within the draft Neighbourhood Plan. Policy H1 of the Plan is not fully compliant with the National Planning Policy Framework (NPPF), the Core Strategy (adopted 2016), or the emerging Site Allocations Plan (SAP). The Neighbourhood Plan should be amended to align with the emerging SAP and include reserve housing sites, and in turn therefore align with the strategic policies in the Core Strategy and the NPPF. The NPPF requires that Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies. The draft Long Itchington Neighbourhood Plan is currently at odds with the emerging Site Allocations Plan and runs the risk of the Plan either facing significant delays at examination and/or the Inspector recommending that the Plan should not be advanced to referendum. As part of the Site Allocations Plan process, the site has been thoroughly assessed by the District Council in terms of its suitability and achievability as a reserve housing site. The District Council concluded that the site is sustainably located in a favourable location for future housing, subject to various mitigation measures to ensure the deliverability of a positive scheme, which our client is committed to providing through discussions with the Parish Council. Whilst committed developments may have already provided enough homes in Long Itchington to meet this immediate requirement, the District Council nevertheless has a commitment to identify further reserve housing sites across the district. This is necessary to reflect the potential shortfall in delivery and needs which arise as set out within the criteria in Policy CS.16. This includes rectifying any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in the District, contributing to meeting any identified additional need for housing in relation to a net growth in jobs at JLR Gaydon, or contributing to meeting any identified shortfall in housing across the wider market area. This commitment is set out in Policy CS.16D of the Core Strategy. The policy requires the Council to identify reserve sites capable of accommodating up to 20% of the housing requirement to 2031, i.e. 2,920 homes. Reserve sites allow the District Council to meet its housing needs by releasing the identified sites for development by 2031 if its monitoring shows that they are required. The

Rep.No.	Name	Policy/Section	Representation
		Policy BE1	<p>benefits of identifying and releasing reserve sites is to enable the Council to retain control of and continue to manage development in the District. Reserve sites are not excluded from villages which have already met their spatial requirement. Whilst the previous commitments within Long Itchington have been provided as windfall sites, this is not a sensible strategy to continue to rely on as this has historically led to a significant amount of unplanned development in villages such as Long Itchington. Including reserve housing sites within the Neighbourhood Plan will ensure a measurable and sustainable strategy is in place and can therefore better manage the housing stock and supply in Long Itchington. In conclusion, we respectfully object to the Plan on the basis that it does not align with national or local policy and we request that it be amended to include the emerging SAP site LONG.14B as a reserve site prior to examination.</p> <p>Whilst we support this policy, we feel that The Neighbourhood Plan would be better prepared if it aligned with the Core Strategy and the emerging Site Allocations Plan from the outset, as per our response to draft Policy H1.</p>
		Policy BE3	<p>We object to this policy as it is unnecessary. The policy is poorly drafted and such matters are already covered by draft Policies BE2 and BE4. We request that this policy is deleted from the Plan.</p>
		Policy NE1	<p>In light of our request that emerging SAP site Land North of Leamington Road (Ref. LONG.14B) be included as a reserve housing site, objection is also raised to Figure 9 of the Plan. This includes two views under reference view point No 3, the more easterly of these viewpoints is from the gate at the entrance to the LONG.14B site. Whilst it is important for the village to ensure development does not encroach on to open countryside and continues to provide valued views from the village, it is considered inappropriate to include a view so close to the village edge. These viewpoints would also be incompatible with the reserve site allocation as set out within the emerging SAP. Furthermore, this viewpoint is not supported by the SHLAA assessment which has been prepared by the District Council and should subsequently be removed.</p>
LI34	<i>Statutory Consultee</i>	General	Having reviewed the Plan I can advise that the Trust has no comments to make.

Rep.No.	Name	Policy/Section	Representation
LI35	<i>Statutory Consultee</i>	SLR1	It is noted that the policy requires the replacement of sports facilities though to ensure conformity with NPPF paragraph 99b the policy should state that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
LI36	<i>Statutory Consultee</i>	Page 17, Summary Statement - Supported New Housing Development Page 20, 6.1 housing Page 21, Policy H2 – Redevelopment of Previously Developed Land	<p>In this section you mention that developments of up to 10 houses will be supported. If the development is for 10 homes or more then it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site-specific Flood Risk Assessment must be submitted to the Lead Local Flood Authority for review. 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 Greenfield and brownfield sites and also all developments will be expected to include sustainable drainage systems. In point D)i) you mention an independent hydrology assessment must be carried out. We would recommend this is changed to the words 'Flood Risk Assessment'. In point D)i) it would be good to make reference to the EA's surface water map and to steer development towards areas of low surface water flood risk.</p> <p>We support the protection of open spaces and river corridors – 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. 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 Greenfield and brownfield sites and also all developments will be expected to include sustainable drainage systems.</p> <p>In this section you mention that developments of up to 10 houses will be supported. If the development is for 10 homes or more then it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site-specific Flood Risk Assessment must be submitted to the Lead Local Flood Authority for review.</p>

Rep.No.	Name	Policy/Section	Representation
		Page 27, 6.2 The Built Environment	We support the protection of open spaces and river corridors – 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.
		Page 32 Policy BE4 – Design Standards	We support the protection of open spaces and river corridors – 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. 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 Greenfield and brownfield sites and also all developments will be expected to include sustainable drainage systems.
		Page 36, Policy EB1 – Development of Land and Buildings for Business Use	In this section you mention that proposals for the development or redevelopment of land and buildings within the Built-Up Area Boundaries will be supported. If the development is 1 hectare or more then it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site-specific Flood Risk Assessment must be submitted to the Lead Local Flood Authority for review.
		Page 42, Policy NE1 – Valued Landscapes and Views	We support the protection of open spaces and river corridors – 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.
		Page 50, Policy NE4 - Flooding and Water Management	A well written section In this section you mention the SuDS Hierarchy. You could develop this point to include what the hierarchy itself is. The preferred options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a surface water sewer. Connecting to a combined sewer system is not suitable and not favourable. In this section you mention an independent hydrology assessment must be carried out. We would recommend this is changed to the words ‘Flood Risk Assessment’. In the explanation beneath this section you could include a link WCC FRM Flooding and Sustainable Drainage – Local Guidance For Developers https://api.warwickshire.gov.uk/documents/WCCC-

Rep.No.	Name	Policy/Section	Representation
			1039-95 WCC are aware of historic flood reports in this area, in the explanation section it may be good to include dates of significant flood events experienced in Long Itchington to strengthen the policy.
LI37	<i>Statutory Consultee</i>	General	Our records do not indicate that there are any coal mining hazards present at surface or shallow depth, which may pose a risk to public safety and surface stability, within the Neighbourhood Plan area. On this basis we have no specific comments to make.
LI38	<i>Statutory Consultee</i>	General	<p>Xxxx is supportive of both the general content of the document and the vision and objectives set out in it. We commend the broad scope of the document and the good coverage afforded to the historic environment within it.</p> <p>The emphasis on the conservation of local distinctiveness through good building design that respects local character including through the identification of discrete character areas is to be applauded. In that regard the Village Design Statement will no doubt prove invaluable in providing a detailed context for developers.</p> <p>We also fully support policies for the protection of national and local heritage assets and commend the general emphasis placed upon the maintenance, conservation and enhancement of landscape character including policies for the protection of biodiversity, green space, and important views.</p> <p>Beyond those observations we have no further substantive comments to make on what xxx considers is a good example of community led planning.</p>
LI39	<i>Resident</i>	General	Having looked at the neighbourhood plan I would like to make 2 comments. Firstly I recognise the need for more affordable housing and also sheltered housing in Long Itchington but I would not welcome further development of higher priced housing that we have recently seen in our rural community. It does not feel like a village any more.

Rep.No.	Name	Policy/Section	Representation
			<p>Secondly we still have problems with water and sewage disposal during periods of heavy rain. Our pipes cannot cope with run off water and it seems to overflow in the sewage system. We are getting more flash flooding which exacerbates the problem.</p> <p>I think the parish council has produced an excellent document and I hope their plan will be supported at the District council.</p> <p>I have been personally helped by the planning process in the past .</p>
LI40	<i>Statutory Consultee</i>	General	xxxx does not have any specific comments on the Long Itchington, Bascote and Bascote Heath Neighbourhood Development Plan.
LI41	<i>Statutory Consultee</i>	General	No comments to make.
LI42	<i>Statutory Consultee</i>	General	<p>In responding to Local Plan consultations, we have regard to DfT Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies. We note that the SRN in closest proximity to the plan area is the A46 trunk road, M40 and M1 which sit outside of the neighbourhood plan area. We have considered the contents of the Neighbourhood Plan and as the plan does not introduce any new development sites or transport related policies that are likely to impact upon our network, we consider that the contents of the plan are for local determination, and we have no further comments to make.</p>
LI43	<i>Statutory Consultee</i>	General	<p>For your information we have set out some general guidelines that may be useful to you.</p> <p>Position Statement</p> <p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go</p>

Rep.No.	Name	Policy/Section	Representation
			<p>ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p> <p>Sewage Strategy Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.</p> <p>Surface Water and Sewer Flooding We expect surface water to be managed in line with the Government’s Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer. We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers. To encourage developers to consider sustainable drainage, xxx currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/</p> <p>Water Quality Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency’s Source Protection Zone 4 ST Classification: OFFICIAL PERSONAL (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles</p>

Rep.No.	Name	Policy/Section	Representation
		<p data-bbox="562 1278 857 1390">Summary Statement – Supported New Housing Development</p>	<p data-bbox="880 284 2018 347">of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p data-bbox="880 355 1055 387">Water Supply</p> <p data-bbox="880 395 2018 635">When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p data-bbox="880 643 1088 675">Water Efficiency</p> <p data-bbox="880 683 2018 1214">Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations. We recommend that in all cases you consider:</p> <ul data-bbox="880 863 2018 959" style="list-style-type: none"> • Single flush siphon toilet cistern and those with a flush volume of 4 litres. • Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. • Hand wash basin taps with low flow rates of 4 litres per minute or less. • Water butts for external use in properties with gardens. <p data-bbox="880 967 2018 1214">To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/ We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p> <p data-bbox="880 1294 2018 1390">xxxx is particularly supportive of sub-sections d – i), ii) and vii) of the summary statement. It is important the developers work with Severn Trent at the earliest opportunity to understand the risk that new development may have on the existing sewer network. We are supportive of</p>

Rep.No.	Name	Policy/Section	Representation
		<p>Policy BE4 – Design Standards</p> <p>Policy EB5 – Infrastructure</p>	<p>permeable surfaces and also encourage the inclusion of SuDS specific comment to manage surface water sustainably. Subsection vii) supports the need for water efficiency measures and will also potentially reduce the impact from rainfall events if it is captured sustainably.</p> <p>xxx is supportive of this policy. Sub-section d) - xxx acknowledge the need retain existing hedgerows and trees, however these are not the only natural features that need to be protected. We would therefore recommend that watercourses are also included as features to protect. Watercourses, including dry ditches, form a vital part of the water cycle and enable developments to discharge surface water in a sustainable way. Watercourses should be retained in open space where they provide valuable habitats and resources for wildlife, and also minimises flood risk. Sub-section g) – xxx are supportive of avoidance of large expanses of hard surfacing – unless it is permeable paving due to the impact on surface water management. We recommend that you include policy wording within this section relating to Water Efficient Design. New development will result in a need for an increase in the amount of water to be supplied across the Severn Trent region, and issues with the sustainability of some of our water sources are placing our supply resilience at risk. It is therefore vital that we reduce the amount of water used. We are supportive of the use of water efficient fittings and appliances within new properties, we encourage of the optional higher water efficiency target of 110 Litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We therefore encourage inclusion of the following policy wording: ‘Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. Developments should demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures’</p> <p>xxxx is supportive of this policy.</p>

Rep.No.	Name	Policy/Section	Representation
		<p>Policy NE2 – Local Green Space</p> <p>Policy NE3 – Wildlife Habitats and Biodiversity</p> <p>Policy NE4 – Flooding and Water Management –</p>	<p>xxx are supportive of Local Green Spaces, it is important that planning policy does not prevent flood resilience works from being carried out if required in the future. Green spaces can also be enhanced where a good SuDS, scheme that incorporates design principles to enhance biodiversity and Amenity as well as attenuation. We would therefore recommend the following policy wording is added: ‘Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.’</p> <p>xxx is supportive of this policy.</p> <p>xxxx is supportive of this policy. We would note however that the requirement for ‘independent hydrology survey’ of the sewer network will need to be with the agreement of xxx if the survey is expected of xxx assets. It is our policy that when developers contact us regarding connection of a new development that it is assessed to see if it requires more detailed hydraulic modelling. This is then funded by xxx and results fed back to developers if required. xxx has a duty to provide capacity for new development under the Water Management Act, therefore if modelling indicates that network reinforcements are required this will be investigated in more detail and a scheme raised if necessary. We are supportive of the comments regarding SuDS and water reuse and recycling. We encourage you to include policy wording to ensure that surface water is managed sustainably following the Drainage Hierarchy. We would encourage you to include the following policy wording: All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.’ Reasons for including this wording within your policies include: Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states: “Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage</p>

Rep.No.	Name	Policy/Section	Representation
			options as reasonably practicable: 1. into the ground (infiltration); 2. to a surface water body; 3. to a surface water sewer, highway drain, or another drainage system; 4. to a combined sewer.”