



LOXLEY PARISH

NEIGHBOURHOOD DEVELOPMENT PLAN

—— COMMUNITY GUIDING GROWTH ——

2011 - 2031

Appendix 2

Summary of Consultation on Pre-Submission Loxley
7th June 2019

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List of Formal Consultees

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

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

Coventry and Warwickshire Partnership NHS Trust
South Warwickshire Clinical Commissioning Group
Community Forum - Stratford area
Stratford Business Forum
Strutt and Parker
Bromford Housing Group
Stonewater Housing Association
Fortis Living Housing Association
Warwickshire Rural Housing Association
Orbit Group
Waterloo Housing Group

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

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

List of Land Owners Consulted

Dr. Anita Taylor	Site A Land adjacent to Clematis Cottage, Stratford Road
Mrs Liz Hill	Site B Land between Loxley Fields and Loxley House
Mrs Anne Morgan	Site C Land to the south of Home Farm Drive
Mrs Vicki Leach	Site D Land to the rear of Box Tree Cottage, Goldicote Road
Miss Jane Darlow	Site E Land adjacent to recreation ground, Goldicote Road

Local Business & Owner of Proposed Local Green Space Consulted

Enterprise Inns	Freeholders of The Fox Inn Loxley and the adjacent field
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Consultation Letters

Formal Consultees & Local Councils, County Councillor & SDC Ward Members

Loxley Parish Council is pleased to announce that the Loxley Neighbourhood Development Plan (NDP) is now available for inspection. A copy of the NDP is available at www.loxleyvillage.com. The public consultation runs from Thursday 24 May 2018 until Thursday 5 July 2018.

Comments and enquiries should be sent to loxleyparishchair@gmail.com.

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

Kind regards
Samantha Thomas
Parish Clerk
Loxley Parish Council

Land Owners

Dear

This is written to inform you that it is proposed that land in your ownership has been identified as a potential site suitable for small scale housing in the Loxley Neighbourhood Development Plan (NDP).

However, you should be aware that while the Plan indicates the site is suitable in principle for development, as the landowner it is your decision whether and when to proceed. And while identified as 'potentially' suitable in principle, this does not guarantee either developer interest or detailed planning approval/consent.

A copy of the Pre-submission Loxley Neighbourhood Development Plan is available on www.loxleyvillage.com. The formal six week public consultation runs from 24 May 2018 to 5 July 2018.

Should you have any queries please do not hesitate to contact me.

Yours sincerely,

Glynn Jones
Chairman Loxley Parish Council
loxleyparishchair@gmail.com

Local Business & Owner of Proposed Local Green Space

The Company Secretary
Ei Group plc
3 Monkspath Hall Road
Solihull
West Midlands B90 4SJ

16 May 2018

Dear Sir or Madam

Enterprise Inns - the Fox, Loxley

This is written to inform you that it is proposed in the draft NDP that the field attached to The Fox at Loxley is designated a 'Local Green Space'. The Plan at this stage is a consultation draft only.

A copy of the Pre-submission Loxley Neighbourhood Development Plan is available on www.loxleyvillage.com. The public consultation runs from 24 May 2018 to 5 July 2018.

Should you require any further information please do not hesitate to contact me.

Yours faithfully,

Glynn Jones
Chairman Loxley Parish Council
loxleyparishchair@gmail.com

Publicity Material and Advertising Posters

Extracts from The Grapevine Newsletter Hampton Lucy, Charlecote & Loxley Parishes:

June 2018 Edition

Loxley Community Garden

On a wet and miserable 28 April, a group of enthusiastic volunteers met on Loxley recreation area to share ideas on how to allocate part of the playing field as a community garden. Spirits were not dampened by the weather and it was great to see a community turn out, keen to get involved and look at the wonderful ideas initiated by the pupils at Loxley School. This was the first step towards engaging everybody in order to generate a truly beautiful communal garden. The next steps will involve designs, funding, landscaping and planting. If you would like to be involved or have any expertise to help support this initiative, please email Julie at loxleyparishchair@gmail.com

JF

Loxley Neighbourhood Development Plan

Following many months of hard work by the NDP working group, led by Joint Chairs Jonathan Baker and Peter Morris, a draft plan for consultation with the community is now available. An electronic copy of the document can be accessed via the Parish Council website: loxleyvillage.com and a limited number of hard copies are also available from Peter Morris (Lane End, Manor Lane), Glynn Jones (Greenbanks), Justin Whitehorn (Oldborough Barn, Stratford Road), or email the Parish Clerk loxleyparishclerk@gmail.com. Residents are encouraged to make their views known through the survey, which has been distributed to every household in the Parish, as well as at a series of consultation events which will also be held to gather feedback (see website or the village notice board opposite the pub for details of the events during the six week consultation period).

GJ

St Peter ad Vincula Church, Hampton Lucy



Once again, Hampton Lucy Church is going to need significant conservation work. Repairs were completed on the tower at the west end about fifteen years ago, and the apse and stonework at the east end were beautifully restored some seven years ago. We now need to undertake repairs to the north side, where the old porch is. The roof isn't in a good state in that area and a gully has been letting in water, causing significant damage to the stonework. We really need to renew the roof over the north aisle, repair all the high level drains and rainwater goods and replace the damaged stonework, as we did for the apse. Unfortunately this is likely to be very

expensive and we are already in touch with the Heritage Lottery Fund to apply for grant funding. Without it there is no possibility of undertaking the work, which is estimated at over £300,000. However, as always, we are likely to have to find some of the money ourselves so any offers of help, ideas for fund-raising, or donations will be very welcome and gratefully received.

Rev'd DJ

July 2018 edition

Loxley Neighbourhood Development Plan – Pre-submission Consultation

Loxley parishioners are reminded that the deadline for completing your NDP survey is Thursday, 5 July. We would like to encourage as many people as possible to complete this so that the sites included in the final plan reflect the opinions of the whole community before the finalised plan is put to an official vote. Without an adopted NDP we have much less chance of influencing where development goes so please do complete yours so that the results are truly reflective. The survey can be returned on paper or completed online - follow the link from www.loxleyvillage.com on the NDP page. Any queries, contact loxleyparishchair@gmail.com

GJ

Is There Anybody Out There?

I am getting more and more despondent! There has been an absolute zero response to my appeal in last month's *Grapevine* for someone to take over the Treasurer's role from Emma. I also sent out an appeal to all my *Grapevine* e-mail contacts last week to no avail. Lots of people have told me that they want *The Grapevine* to continue but it can't do so without a Treasurer. It's a role than can easily be done from home, the payments and banking are mostly done online and it isn't onerous - but it does need doing. Emma has been very patient but she does need the break. PLEASE give it some serious thought and contact me if you can help. Contact details are on the front page.

AJW

Herald Advertisement 24th May 2018 and displayed on Village Notice Board:

**Loxley Neighbourhood Development Plan
Regulation 14 - Pre-submission Consultation**

Loxley Parish Council is pleased to announce that the **Loxley Neighbourhood Development Plan (NDP)** is now available for inspection. A copy of the NDP is available at www.loxleyvillage.com
(Hard copies can be made available on request)

The public consultation runs from
Thursday 24 May 2018 until Thursday 5 July 2018

Comments and enquiries should be sent to
loxleyparishchair@gmail.com
Greenbanks, Loxley, Warwickshire CV35 9JS

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

Flyer delivered to every house in Neighbourhood:

LOXLEY PARISH COUNCIL

NEIGHBOURHOOD DEVELOPMENT PLAN CONSULTATION EVENT

to be held at Loxley School on

Wednesday

30th May 2018

7.30 p.m. to 9 p.m.

Meeting Reports

Extract from Parish Annual Meeting Draft Minutes 16th May 2018 where Draft Consultation was launched

4) Parish Council Updates :

A) NDP – Update received from Councillors

GJ thanked Jonathan and Peter and members of the working group for all the work they have done for the NDP. We were asked to look at the development of Loxley and prepare a plan where we have influence over the design. GJ explains it's a community plan where everyone gets a vote and is able to give their views in the consultation period. There are no right or wrong views. We can revise the plan after the consultation period if necessary.

He reminded residents of the background to the plan:

- Initiated by the designation of Loxley as a LSV and requirement to identify sites to accommodate around 30 homes
- The plan was started only after an initial feasibility analysis by LPC, and ensuring there was sufficient support among local residents, and residents willing to lead the plan
- The plan has been led and developed by residents (not the PC)
- Any changes to the plan made by LPC have been closely informed by – and agreed with – the independent consultant who is a chartered town planner previously employed by Stratford DC with success in developing approved NDPs

The work already done tells us that:

- 1) There are few potentially very few viable sites in the village
- 2) All sites are compromised in some way, eg.: access and visibility problems due to the hilly nature of the village.
- 3) Sites in the plan represented the best of a relatively poor choice and came out of the initial sieving process and are the sites LPC will consult on

In the final approved plan site designation does not mean a site will be developed :

- the landowner whether and when to develop,
- the site may not ultimately be financially viable
- Designation does not guarantee planning consent.

The official consultation period will run from the 24TH May 2018 for six weeks until the 5th July 2018. The survey should ideally to be completed online, however hard copies can be completed if necessary.

GJ completed his introduction by drawing parallels with the well-known 'prisoners dilemma' (essentially a paradox in decision analysis in which individuals acting in their own self-interests do not result in the optimal outcome). He hoped that in considering the plan residents would consider carefully wider community interests based on the challenges facing a small community like Loxley where ensuring the continuing viability of facilities remained a challenge and the risks of the community becoming a 'retirement village' based on the limited choice of housing available.

Q & A Discussion

"Can you confirm what we have is the whole document as I have printed it off and the page numbers don't correspond"?

GJ checks the document and confirms is correct so maybe printer settings.

“It took a while to find the survey online”

GJ demonstrates on his i-phone where on the website you can gain access to the online survey, but encourages people to contact him should they have problems.

“Can we remind people that the Survey is anonymous”

This is confirmed by GJ – survey returns are anonymous, although written comments will be put together in separate documents the authors will remain anonymous.

“Can you confirm it is one view per person”

GJ states that the consultation plan is only one view per household to make the process manageable and this exceeds requirements and approaches adopted in other communities. It also provides a basis for ensuring that monitoring returns to ensure that individuals are not submitting multiple returns and trying to ‘game’ the system. However the final plan will be voted on by all resident eligible to vote. And anyone can submit comments to the parish council.

“Having looked at the questions they appear too narrowly defined. The parish plan is not clear on - for example: there is only 3 children from Loxley village that attend the school, where are the development actions for the school”?

GJ notes the plan takes into account these issues. Viability is key for the school, the parish council, the pub and the church. Viability will be helped by increasing the numbers in the village, we need more affordable houses for younger people/families and this is clearly shown in the demographic of the village at present and more families in the village could help boost the number of local children at the school. A key element of the plan is to increase population and the mix of homes available – which is as much as the Council can do to address the issues identified in light of its limited powers and resources.

“Why can we not have a development plan that asks landowners to have social housing as well as bigger houses”?

GJ responds to say that landowners are going to want to maximise returns and so the Council have struggled to identify a site for social housing – but should one come forward there are provisions in the plan to include it as an exceptions site. However, LPC would do all they could to help promote housing choice and a better mix but clearly do not have the ability to specify precisely what . can be built

“The strategic objective is to get 31 houses, do we need a broader range of sites, have we looked at how we achieve 31, have we got enough development opportunities”?

GJ says that we want to balance the need to protect the environment with the demands of development, we have looked at all possible sites and the ones we are left are the best options available but remain compromised in various ways.

“Are we still under obligation to find so many houses given that Wellesbourne has lots of new homes”?

Not at the moment – but housing numbers are under constant review and there remains housing pressures given the pace of growth in the County. GJ also noted that there are many benefits for the community by increasing housing numbers, in ten to fifteen years what services will still be viable if population of the village remains as it is ?

“Why is site K back in”?

GJ noted that the Council put this site back in having been excluded in response to allegations that it had not been dealt with fairly and not least because this was the view of the independent consultant. It was carefully reviewed by parish councillors and at the meeting no Councillor objected to the site being put back in the plan.

Minutes of Loxley NDP Community Consultation Event

30th May 2018, Loxley School, 7.30pm

Number present: 38 villagers plus 5 Parish Councillors

Introduction and overview

Glynn Jones, Chairman of LPC welcomed everyone to the meeting requested following the launch of the draft consultation plan at the LPC Annual Meeting in mid May.

GJ explained the background to the plan and the thinking of the PC, making the following points:

1. **Resident led:** That the development of the NDP was only initiated after gaining sufficiently broad and representative support from the community and a number of residents had stepped forward and were willing to lead the plan. The plan was not therefore developed at the instigation of the Parish Council but was developed and led by residents via the NDP working group, with support from LPC.
2. **Why now?:** The background to the plan and its formation was the designation of Loxley as a Local Service Village (LSV) reflecting strong housing pressures facing the district. The plan is an opportunity for residents to influence the form and location of development rather than leaving these decisions to the market.
3. **Poor quality of sites:** Due to geography of the village, the site appraisal process had demonstrated to the Council in a systematic way that there were no sites for development in Loxley that were not compromised in one way or another to varying degrees – particularly in respect of access. For this reason, the Plan did not represent the Councils view of which sites it was supporting / promoting, but rather all of those that could not be definitively eliminated : this left a collection of a few relatively poor sites on which the Council would take a more definitive view following the results of the consultation and survey results. However, ultimately the Council were clear that they were providing the residents with a choice – ultimately it would be up to residents to take a view.
4. **Meaning of site allocation:** Just because sites are allocated, it does not mean that they will definitely be developed for a number of reasons :
 - a) **Land for development:** the landowner may not wish to sell and ultimately the development timescale would be theirs to decide when and IF they decided to develop;
 - b) **Development economics:** no detailed site development appraisal had been undertaken – a developer would need to be convinced that a site was profitable to develop taking into account costs, values and market conditions, which ultimately may constrain sites from being developed either for periods or possibly the duration of the plan;
 - c) **Outline permission :** the plan identified a number of sites where development in PRINCIPLE could be encouraged. However, this did not meant to say that a detailed planning application would be acceptable to either LPC or SDC. An agreement to the principle of development did not guarantee the approval of any one detailed proposal. This was the difference between outline and detailed planning consent ; one did not guarantee the other.
5. **Why include site D having previously rejected it?:** The most controversial site had proved to be Site D. LPC had put this back in the plan, because – since all sites were compromised to some degree - to reject this site, the Council would felt it would also have to reject the other sites. While it had previously rejected a specific application, inclusion

in the plan was acknowledging the principle that a scheme might be made to work on this site – but not any scheme. Resubmission of the same application would lead to refusal on the same grounds. Further consideration would need to be given to access and the form and layout of development.

6. **If all the sites are poor, then why bother with a plan?** Accepting housing development enables us to tackle some longstanding issues facing the community, namely:
- a) demography of the village which is unbalanced and skewed to older people that can afford the mostly larger executive houses available, which tend to be occupied by more affluent people.
 - b) A small population also has implications for the viability of facilities – the school, the pub, the church and even the parish council.

The challenge was to get more housing AND a benefit of the NDP – as opposed to the market - is that it would leave the community with more influence to influence the location and mix of housing, including providing more modest affordable housing. This would help older residents looking to downsize but remain local and younger people struggling to find a deposit. The plan provided a logical / consistent response to these key issues faced by the village: choice of housing and viability of facilities. Over a longer period the community had been losing facilities and services – to date this had proved to be a one way direction of travel.

7. **What are the benefits of the plan?** In a nutshell, the plan helps provide a degree of certainty, it can help influence the location and potentially the mix of housing and finally, the community will receive some financial contribution via CILS.

In summary, GJ set out his and other Councillors concerns regarding the potential - on the current trajectory - for the community to end up becoming a retirement village with even fewer facilities. The plan provided LPC with a basis on which to address these issues, although clearly it had no magic wand.

He likened the current position to the ‘prisoners dilemma’ in which everyone acting in their own self-interest could result in a situation which proved to be the worst outcome for everyone. While development could bring benefits this would also require some compromises.

He then handed over to the audience for questions.

Questions from Audience

Rachel Butt

Was it correct that our target from SDC was 35 houses? Do we have to meet this target? Can houses built since 2011 be discounted?

Reply – original target was around this number, but SDC now has sufficient houses from developments in LSV’s. And yes, existing planning permissions can be deducted since 2011.

Yvonne Brocklehurst

Is the target set in stone?

Reply – there is flexibility because Loxley is at the smaller end of the thresholds for LSVs so Stratford DC in previous discussions had indicated that as a smaller village they would be prepared to look at a smaller number of houses. However, since the Core Strategy has been adopted the DC has met now met its allocation.

The issue is as much to do with our own aspirations for the village – and with no or limited development there would be little opportunity to address either the limited choice of housing in the community or halt the on-going decline in local service provision. There were some difficult choices for the community – but the Council were keen these were flagged up, although ultimately it would be the community to choose.

And also should housing pressures increase over the period of the plan, the momentum developing the current plan may be lost.

Jane Darlow (owner of Site E)

Stated that she only wanted 2 or 3 not 10 on Site E.

Reply – Acknowledged this and noted that the site appraisals had identified potential numbers that could be accommodated on a site, ultimately the landowner would determine whether and when a site would be developed. The lower number was included in the plan.

Stephen Butt

Asked about the concept of BUAB? Why had other sites not been considered in the parish?

Reply: the plan has to conform with National Planning Policy Framework (NPPF). This was clear that development needed to be focused in existing settlements where some services were located. LPC were therefore directed by SDC to focus on opportunities in the village.

Then asked about how many houses in settlement?

Reply – there were 100, which put the village at the lower end of the threshold for LSVs. It was not therefore the number of houses in the parish overall but the village that had been key.

Rachel Butt

Asked whether owners of allocated sites have indicated that they wish to sell?

Reply – Of the sites identified all landowners had been informed and wished to develop, with the possible exception of one site.

Maria Garcia

GJ had said that the Plan would give certainty and the ability to resist development on land not in the allocation. However, this was not her understanding based on discussions with SDC?

Reply – GJ asked who she had spoken to at SDC? MG had the names but was not aware of their seniority within SDC.

GJ explained that the plan was a statutory document – and unlike the parish plan or village design statement – was backed up by legislation. Planning decisions must be in accordance with the plan which has the same legal status as a local plan. While nationally there would be circumstances in which ‘other material considerations’ could be considered; as with a local plan, these will be exceptional and rarely applicable to a rural parish like Loxley. These might apply more in urban areas where there is an over-riding need to also consider strategic national interests or projects such as HS2. Outside of the BUAB, there would be some

exceptions that would be supported, including for example: social housing, rural provision eg agricultural workers occupation or redevelopment of derelict barns.

GJ asked MG, if the plan provided no protection against development why would any community go to the trouble of developing one?

Paul Jennings

Asked whether if a site was in the Plan, it was more likely to get planning permission?

Reply – ultimate inclusion of a site in the plan represented an approval in principle to bring forward a detailed application, but consent would then depend on the specific detail of the application. In Loxley, since all the sites were ‘compromised’ to some degree and had difficult access issues it could not be automatically assumed that approval in principle would lead to approval of a detailed application. The number of sites and potential homes were therefore to some extent a theoretical maximum – there remained a number of practical hurdles to overcome. In this respect LPC were concerned that even if voted positively on a number of sites might struggle to ever get developed due to difficulties with pedestrian access or viability.

Jeremy Chatwin

Asked why a couple of sites which had been left out by the Steering Group were put back in by PC?

Reply – the working group is small and there is always the danger of accusations of bias. LPC felt especially given the small size of the community, it was important Councillors were happy the selection process and so on this basis had:

- Reviewed the work of the working group including site appraisals and the process for inclusion and exclusion
- Focused on sites that had been included by the independent consultant (appointed by the NDP working group), but then rejected by the working group
- For these sites reviewed whether they should or should not be included in the plan by LPC. After lengthy debate LPC unanimously decided to exclude two of the sites owned by Peter Gregory Hood, plus a further site on Manor Lane (where consultation had already indicated widespread local opposition), but include Site D which had been accepted by the consultant as being potentially suitable for development since the obstacles to development were no greater than any of the other sites.

Hazel Mills

She said that when the original village discussion was held in The Fox, there had been a stated preference to preserve the linear nature of the village. Why was this not now so? Inclusion of Site D was against the linear nature of the village ?

Reply – reiterated that LPC wanted to provide an opportunity to comment on all sites left following the initial sieving given the number was limited and they all had disadvantages – people may well place different weights on the advantages / disadvantages of different sites now that they are able to view this in the round (ie in relation to a much wider number of factors and relative to all development options).

Second, many on the working group appeared to have undergone a change of heart and wanted to see development in the ‘heart of the village’. Putting site D back in gave the community an opportunity to fully consider by the community at large.

Third, it was felt this was only fair to put site D back in, given that there had been a view expressed from members on the working group that the site had not been treated ‘fairly’. Councillors had discussed at length and at the relevant Council meeting and at this meeting

no Councillors objected or abstained. This included support from some Councillors who were not necessarily in favour of development on the site, but did feel it proper that the site was put to the community in the consultation plan to visibly and transparently ensure fairness.

Fourth, a few things had moved on since the original community survey. For example, it was now acknowledged that 'backfill' was not a planning concept and would need to be dropped or it would in any event be taken by the Planning Inspector on review of the plan.

Finally, in respect of the access there was some potential to alter this and improve visibility. Also things had moved on since the original application with the awarding of 'Safer Schools' designation to Loxley school - there was now a significant budget available to fund improvements in the vicinity of the school.

Hazel Mills

Why and how has Plot D had been put into the proposal given that the access to the site was proven to be dangerous because of its proximity to the bend, given recent accidents and dangers. HM quoted the minimum number of off road parking spaces which were recommended for any new house i.e. 1 per bedroom and noted that if the development were e.g. 6 @ 3 bedroomed houses, that would be 18 cars converging on the same point of entry/exit.

Reply - all sites had traffic issues and these are detailed in the response of the WCC highways Authority and published on the website. It may be possible to make access safer. HM queried how this could be achieved in that the original planning application would have given the best possible site for access? Reply – if it proved not possible to change the access arrangements then the site would receive the same response from the Highways Authority, bearing in mind the very strict standards that need to be adhered to.

Geoff Ambler

Questioned whether there might be access to Site D via Barracks Green.

Reply – unlikely due to poor visibility on the entrance to the main road.

Sarah Boyle – noted that it would also be important for people to vote on the green spaces.

Yvonne Brocklehurst

Asked why we have not adopted the SDC BUAB?

Reply – LPC and the working group were not qualified to advise on this and therefore had relied on the advice of the Planning Consultant, Neil Pearce who had been appointed by the working group and had previously worked for SDC. The BUAB included the current built up area boundary plus potential development sites. There were some differences in the views of SDC and the consultant, but in the circumstances the working group decided to follow the advice of their appointed consultant.

Should any of the development sites drop out following the community consultation then the BUAB would be redrawn. It was reiterated that the plan put forward was a consultation document only NOT the final plan which would depend on the outcome of a vote.

Emma Darlow

How could it be described as a development plan, if we ended up with no development? An open question to residents.

Jeremy Chatwin

Asked whether the plan would give us influence over development? In response to GJs question JC confirmed this related to both design and type/mix.

Reply - GJ replied that the Village Design Statement adopted in 2007 forms part of the Plan and has been updated. This had been a valuable and helpful document over the past decade and formed part of the plan. Where, at present it is Planning Guidance advisory in nature, as part of the plan, it would have statutory authority and provided LPC with the opportunity to influence the type and mix of housing. While it was not possible for any parish council to dictate precisely what housing could be developed, the plan explicitly mentioned the need for greater choice of housing / housing styles and need for smaller more modest and affordable homes – so there was some basis for challenging developers intent on developing yet more executive homes. LPC would stand firm on this issue but could make no promises, but had previously successfully challenged the decision of local planners.

GJ also confirmed that the plan included not just sites, but also wider community, transport and environmental objectives – but was primarily a land use policy document, unlike the parish plan.

M Swinbourne

What would happen if developer put in for an application for a site not in the Plan. Would a large developer be able to bring their influence to bear?

Reply – GJ reiterated that the planning decisions must be in accordance with the plan. This would enable LPC to resist large scale development. Although in Loxley sites were too small to be of interest to the major national housebuilders, nevertheless there were many developers that had been in contact with local landowners looking speculatively for sites. In the BUAB pressure would be focused on the designated development sites and planning decisions taken in accordance with the plan – this was the point of the plan.

Outside of the BUAB, there would be some exceptions that would be supported, including for example: social housing (where sites would be considered in / outside the BUAB), rural provision eg agricultural workers occupation or redevelopment of derelict barns. But these would be exceptional circumstances involving limited or even single developments, NOT large scale housing proposals.

GJ thanked everyone for attending and all their questions. Will Freeman thanked the NDP working Group for all their hard work on behalf of the village. GJ congratulated the leaders (Jonathan Baker, Peter Morris and Ian Davidson) as well as members of the working group for all their hard work. He noted that for such a small community to have got this far was a real achievement and everyone should be very proud. While ultimately everyone would have their own view, he encouraged residents to get involved and make their views known via the survey.

The meeting closed at 8.40 pm.

Consultation Letter to Householders & Response Form

Glynn Jones
Greenbanks, Loxley
Email: loxleyparishchair@gmail.com
Tel: 01789 470066

10th May 2018

Dear Loxley resident

Loxley Neighbourhood Development Plan (NDP) : consultation draft

As you may be aware, Loxley is a designated Local Service Village and is required to accommodate some of the housing pressures facing the district. In order to give local people the chance to create a planning document that guides and shapes development in our community, the Parish Council has supported the efforts of residents to develop a neighbourhood plan for Loxley.

I am now pleased to inform you that after many months of hard work by the NDP working group a draft plan for consultation is now available. An electronic copy of the document can be accessed via the Parish Council website (loxlevillage.com), on the NDP web page. A limited number of hard copies are available from either me at the above address, or Wendy Gadd at 1 Loxley Fields.

I would encourage you to complete the attached questionnaire, preferably on-line via the link on the NDP page of the village website (for which you will need to enter the unique reference code when prompted). Alternatively, you can complete the attached survey form and return to me, Wendy or Justin at the addresses noted above by Thursday 5th July 2018.

The draft plan will be launched at the forthcoming Annual Parish Council meeting (7.30pm Wednesday 16th May, Loxley School), which we hope you can attend. This meeting will provide an opportunity to raise questions, highlight issues and share perspectives. Details of any further consultation events will be circulated, but please keep an eye on the parish noticeboard (opposite the pub) or the village website where further details will be provided.

Following the consultation period, the draft plan will be amended to take on board the results from the attached questionnaire and feedback from other stakeholders gathered during the six week consultation period which will officially start on the 24th May 2018. As a statutory planning document, the plan will also be reviewed by a planning inspector. If the plan is approved, prior to adoption, the County Council will oversee a formal vote (all registered voters resident in Loxley will be eligible to take part), with a (simple) majority required for the plan to be adopted by the Council.

As a Parish Council we are urging you to get involved by reviewing the draft plan, completing the questionnaire and attending our annual meeting.

I look forward to seeing you on the 16th May.

Kind regards

Glynn Jones

Chair, Loxley Parish Council

Loxley NDP Consultation Survey Results

Distribution

Total of 153 surveys distributed to 151 households plus 2 business consultees on request (Fox Publicans & Enterprise Inns), households break down as follows:

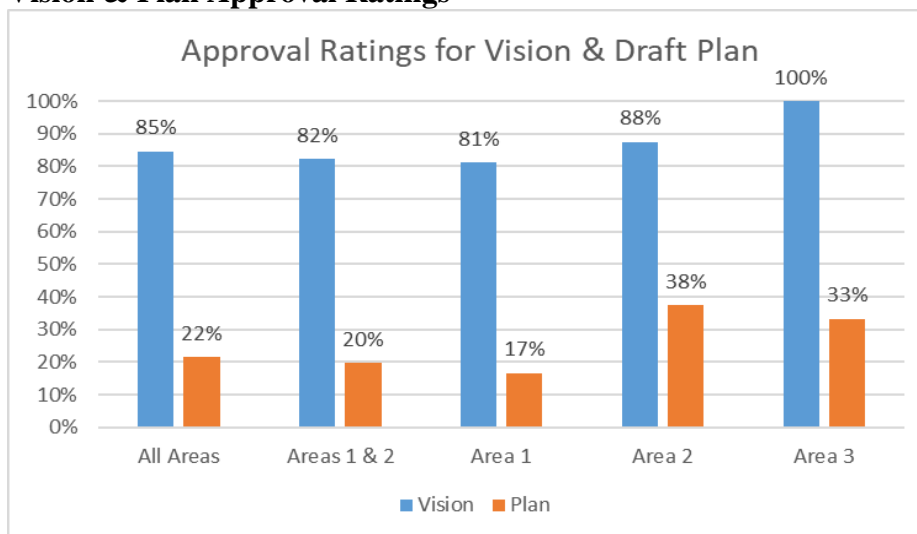
- 82 households: in the centre of the village (Area 1)
- 27 households: Stratford Rd & Loxley Bushes Ln (Area 2)
- 42 households: Loxley Park, Oldborough Drive and surrounds (Area 3)

Responses

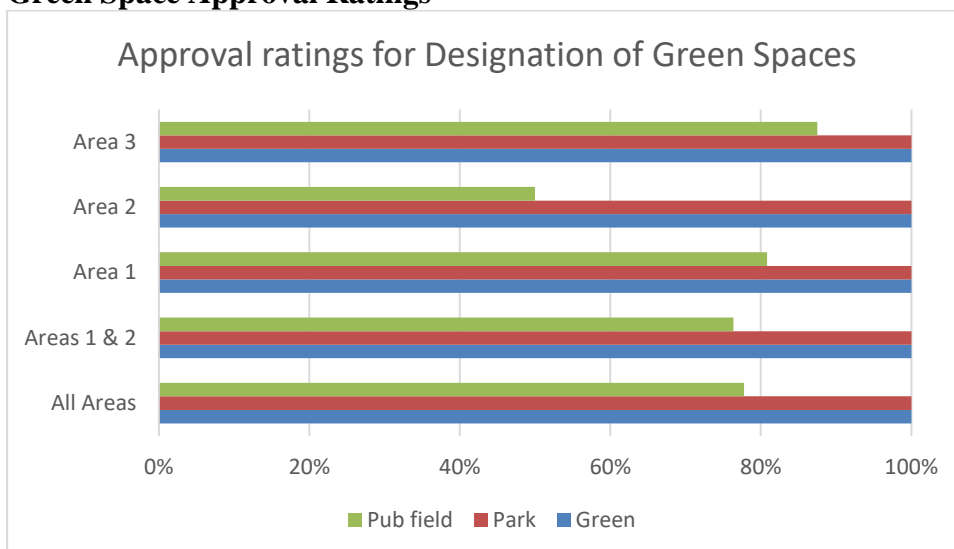
65 responses (response rate of 42%):

- 48 from Area 1 (57% response rate); 8 from Area 2 (30%); 9 from Area 3 (21%)
- 57 online responses & 8 paper responses.

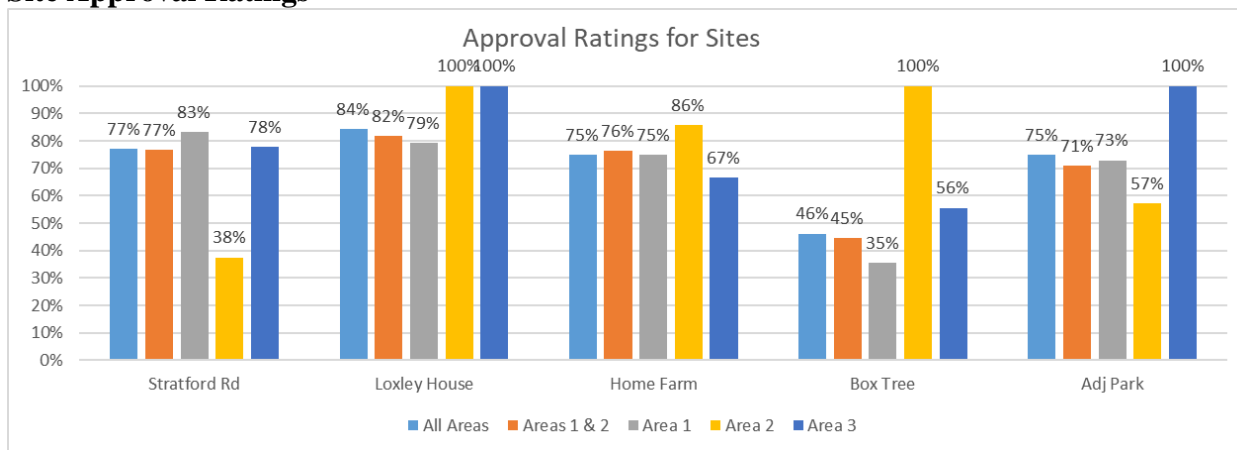
Vision & Plan Approval Ratings



Green Space Approval Ratings



Site Approval Ratings



Impact on Plan Approval of Omitting Certain Sites

	A. Stratford Rd	B. Loxley House	C. Home Farm	D. Box Tree	E. Adj to Park	Plan Approval	No. Houses
Max Houses	3	5	2	8	5		(max)
Options based on sites included:							
	Include	Include	Include	Include	Include	22%	23
	Include	Include	Include	Omit	Include	46%	15
	Include	Include	Omit	Omit	Include	57%	13
	Include	Include	Include	Omit	Omit	51%	10
	Include	Include	Omit	Omit	Omit	65%	8
	Omit	Include	Include	Omit	Include	51%	12
	Include	Omit	Include	Omit	Include	52%	10

Area	Q6 What other changes would you like to see made to the plan?
Area 1	<p>1. Make site D an additional designated green space (question 5 above), as it is Warwickshire County Council designated Local Wildlife Site. 2. Remove Site D from the NDP, as it is a Local Wildlife Site, outside the BUAB for Loxley and inconsistent with many NDP policies and paragraphs:</p> <ul style="list-style-type: none"> o H3 (a) (on “predominantly ribbon” developments); o H3 (b) (avoiding the “detrimental erosion of space between and behind buildings... to preserve the open aspect of the village and retain links with the countryside beyond”; o H3 (c) “retain existing open green spaces within Loxley where they make an important contribution”; o H3 (d) on density and scale; (f) “protect, or enhance landscape and biodiversity”; o H3 (h) “have regard to the impact on tranquillity, including dark skies”, (presumably an estate would require street lighting?) (i) “not increase the likelihood of surface water flooding within the village”; o paragraph 4.24: “a major part of the distinctive character of Loxley is the strong visual connectivity between the village and the rural landscape. The village has a mostly linear structure meaning that the majority of houses front, in a single row, onto a street and have direct rural views to the rear” (p.18 NDP). The inclusion of Site D would potentially affect the rural view of 20 houses and Loxley School, which in a village of 100 houses affects around 20% of houses plus teachers and schoolchildren. o The Loxley Village Design Statement (incorporated by reference in paragraph 4.26), which opposed “backfill”, which although not a planning term, is understood to mean houses behind houses (p.18); o H4 (d) as no lack of “safe and convenient access to the site” (p.19). o NE2, as no net gains in biodiversity are being demonstrated (p.25); o NE3 due to the likely removal of the hedgerow fronting the site (p.26); o Policy TT2 and paras 7.1-7.7 on “adequate and safe” access and the fact that nearby “the narrow, right-angled bend at the top of Manor Lane has been identified as a particular accident ‘black spot’ “(pages 32-33). <p>• In a letter dated 21 June 2016 addressed to Stratford District Council in the context of a previous application for planning permission, Loxley Parish Council previously objected to Site D on the basis that:</p> <ul style="list-style-type: none"> o “all existing hedging [would need to be] cut down”; o it would “increase the potential for vehicle conflict” and “which would be detrimental to public highway safety” especially given the lack of street lighting; o access to Site D is an “accident blackspot”; and o some of the adjacent properties have previously been subjected to surface water flooding: “any development on the site will aggravate the problem especially with the increase in impermeable surfaces”. <p>• The planning refusal for Site D dated 13 October 2016 stated:</p> <ul style="list-style-type: none"> o “being significant ‘in-depth’ development would be a harmful departure from the existing linear form of the village contrary to CS.15 Requirements 2 and 3”; o “the need to “protect the contribution the boundary trees make to public amenity” o the grassland covering the site is “designated as a Local Wildlife Site” o “improvement cannot be made to mitigate lack of adequate visibility at the proposed point of access and as such the LPA considers that the residual cumulative impact of the development would be severe”. <p>• A letter from the Highways Authority dated 7 November 2017 reinforces the access problems to Site D (referring to it as Site K): “The proximity of the adjacent properties could make it difficult to attain the necessary visibility”.</p> <p>• There is no evidence that the circumstances leading to the previous planning refusal or the Parish Council’s previous objections to the site have changed in any material respect regarding Site D.</p>

Area 1	<p>1. Remove sites D and B from the plan as they contradict the NDP. See 3.3 Ensure sensitive development which protects and enriches the landscape and built setting; Provide a safe environment for road users and pedestrians; Protect green space, the landscape and support nature conservation. These sites are too big and encroach on the green space behind several properties, are at a dangerous point for traffic movements in the village (Site D access being at a named accident “Black spot” and site B on a steep hill with frequent obstructions and blind spots). They do not comply with the NDP and residents’ statement for preferred linear development and no development behind houses. They also conflict with the Strategic objective statement at 4.1 All new development will preserve and be sensitive to the unique and distinctive character of the village. 2. Section 4.11, which refers to cul de sac development is in conflict with the rest of the NDP. This option of cul de sac has not been previously offered as a result of consultation with the residents who have shown support for NDP in Policy H3 Design and Character specifically where it says “Development proposals should comply with the following guiding principles taken from the previous Loxley Village Design Statement: a) be compatible with the distinctive character of the area, respecting the local settlement pattern which is predominantly ribbon, building styles and materials whilst taking a positive approach to innovative, contemporary designs that are sensitive to their setting; b) the detrimental erosion of space between and behind buildings will be resisted in order to preserve the open aspect of the village and retain links with the countryside beyond; c) retain existing open green spaces within Loxley where they make an important contribution to the character and local distinctiveness of the area; d) be of a density and scale that is in keeping with the character of the surrounding development and landscape; 3. Paragraph statement 4.11 is erroneous and misleading and should be removed to retain the integrity of the document and respect the wishes of the residents as summarised in previous consultations and meetings.</p>
Area 1	<p>1.Other areas of designated green areas. 2.Removal of rear of Box tree cottage land as having developmental possibility</p>
Area 1	<p>A clear rationale for the choice of sites. In the 2016 community survey a majority of respondents expressed a preference for small sites, for around 4 - 5 dwellings, on the periphery of the village to maintain its linear structure. There was also a majority against backfill sites (i.e. houses behind the houses). Sites A, B, C and E all fulfil these community preferences with site D being the notable exception. Indeed partly for these reasons the Parish Council itself objected to the recent application to develop the site. It seems perverse and inconsistent to include site D or, at the very least, why include all of it when the other sites have deliberately been kept small in line with the preferences of the community?</p>
Area 1	<p>Are the 2 graveyards protected green spaces? If not I would wish them to be so.</p>
Area 1	<p>Clearer definition of our village's development goals. Clear demonstration of how the alternate development sites contribute toward these goals, and prioritisation accordingly. Clearer demonstration of how adherence to the recommended policies will contribute toward the goals.</p>
Area 1	<p>Development should be only on a linear infill scale and at no time should backfill be allowed as this would be severely detrimental to the feel and</p>

	look of the village
Area 1	I am happy with the plan.
Area 1	I disagree with A and E I disagree with A as it has no footpath and would not be safe for families and would become an area for commuters to live, not villagers. To include A and E We would become a linear village, with A and E on the outskirts would change the dynamics of the village not just visually!!!!
Area 1	I have stated that I agree with the vision however I only agree with 90% of the vision but accept it needs to be a consensus
Area 1	Linear development only (no backfill)
Area 1	More emphasis on mix of housing and affordable housing
Area 1	No houses to be built behind homes following a road.
Area 1	Oldborough Drive to be utilised
Area 1	reduce number of houses on site E do not designate land belonging to the pub as green space , this is private land
Area 1	Regarding site D, it is the only site that has been tested with a formal planning application. The planning application was refused by Stratford District council on six grounds including access problems. Also the Parish Council then unanimously voted to object to the the application, not least on the grounds that it would be at complete odds with the wishes of the majority of the local community. Plus 30 submissions by village households the S.D.C. website objecting against site D. Site B. The objection to this site unless the wishes of the village are followed as expressed in the results of The Communities Survey carried out in 2006. Noting the preference for small sites and retaining it's linear character.
Area 1	Since we moved here the attractiveness of Loxley has already been reduced by the increase in traffic through the village. The traffic increase is likely to continue/worsen if Wellesbourne is developed further and particularly if there is a change of use of the airfield for housing. Goldicote Road is quite narrow, hilly and windy. There is a section through the village where there are three blind bends with a primary school between two of these. Furthermore there are often cars parked on Goldicote Road making driving on it even more difficult and dangerous. We therefore think sites for development with access from this section of Goldicote Road (from the junction with Stratford Road at the bottom of the hill to the bend at the junction with Manor Lane) should be removed from the plan.

Area 1	Sites A and E do not fall within the BUAB as defined in section 4.8 of the draft Loxley NDP and therefore cannot be included in the BUAB, for these sites to be included then section 4.8 needs to be amended.
Area 1	That it follows outlines of Village Plan
Area 1	The view to the rear of Box Tree Cottage is defined in the surveyors report as being located in a Special Landscape Area but this has been omitted from the draft document, referred to as figure 3. Valued Landscapes. If the Parish Council see fit to include this land as development potential then the the field to the rear of The Fox should also be included. Both plots would be considered back fill and both are SLA sites, furthermore, part of the land to the rear of Box Tree Cottage has also been designated as a local wildlife site again, no mention in the surveyors report. This is not a balanced document in its current form and only addresses the allocation of a maximum of 23 houses with an objective of meeting a requirement of circa 30.
Area 1	There is not enough emphasis on reducing HGV traffic through Loxley or traffic slowing measures. Vehicles cut through Loxley at speed to the Banbury Rd. This should be discouraged for safety of pedestrians where there is little or no footpaths.
Area 1	Very good plan. Well done.
Area 1	Why is rear of Box Tree Cottage in Draft Plan? It never was and has recently been rejected on several grounds - nothing has changed in material form, so why is it now a potential development site? Strongly disagree.
Area 3	Any houses that are built should have low roof lines. 'Tall' new houses that have been built in recent years do not sit well in the village setting.
Area 3	Traffic and parking controls during building works

Area	Q7 Any Other Comments
Area 1	<p>1. We would like the Parish Council to issue a written statement that there has been no adverse influence by the landowners or proposed developer of Site D on the NDP process. The following extract from the Parish Council meeting of 16 January 2017 would suggest that the landowner and developer have met Parish Councillors in stark contrast with the NDP Working Group's policy of not allowing any lobbying by landowners or developers: "Box Tree Cottage Application V Leach has contacted GJ to ask whether he could talk to her Planning Consultant. GJ gave them the details of the public mtg on the 30th and the NDP contacts. V Leach has requested councillor(s) meet with her consultant on 25/1. PS suggested that it would be helpful for more than one Councillor to attend. JW to check his diary - if unable to attend with GJ, V Leach will be asked to rearrange for a date both can attend together." The proposed developer of Site D has also written to all local residents during the NDP consultation process asking for them to support the inclusion of Site D - we would suggest that this was unethical. 2. We are disappointed that the recommendations of the NDP working group were not followed to the letter and that Site D was included as a late addition during the Parish Council meeting of 13 March 2018, in the presence of the Site D landowner. 3. It is inconsistent to include only part of sites A, B, C and E in the NDP and then include the entire of site D in the NDP and this goes against the recommendations of the NDP working group to only include parts of sites to maintain the linear nature of the village. 4. We would urge the Parish Council to issue guidance on the use of drones in the Loxley area as we are within 5 km of an airfield and it is against Civil Aviation Authority guidelines to fly drones. We have seen and have video evidence of drones flying near to and over our house on two occasions and consider this dangerous, a breach of privacy and inappropriate during an NDP process.</p>
Area 1	<p>The online survey opens with a statement that Loxley is to provide for 30 dwellings by 2031. This is no longer true as SDC has met its quota and Loxley can offer a lower number. • The online survey opening question is misleading. It asks if there is agreement with the "Vision Statement". There is a whole section in the NDP 3.0 A Future Vision for Loxley. Does the question refer to this or the opening paragraph of this section on page 10 i.e. 3.1 or the points 3.1 and 3.2 under the subheading "Vision"? We cannot see a "Vision Statement". Or does it refer to the vision of the whole NDP document? • Similarly, to those not familiar with the village there is a discrepancy in what is referred to as "The Village Playing Field" as Green Space B in on line survey Question 5 and in Question 4 development site E is referred to as "Site adjacent to the park" which is in fact "The Village Playing Field" (or as is sometimes known – The Recreation Ground). They are one and the same area and should be referred to by the same name – whichever is the official name. • We believe that the reinstatement of the largest site D at the rear of Box Tree Cottage is foolhardy and unsubstantiated. It has been turned down by SDC for planning for several properties on several major counts and these objections by SDC have been made against circumstances which have not changed since 2016. Loxley village does not need a development of this potential which will exacerbate highway dangers for all at a confirmed accident black spot, impinge in the green space for 15+ properties, increase flooding risks and lose a WCC Designated Wildlife Site. This area is better in biodiversity quality than the green field site behind The Fox, for example and should be included as a fourth valuable site for the village. • Site B has similar issues to Site D and has the potential danger of becoming a bigger development than projected</p>

	by the NDP and LPC on a point in the village where there is a steep hill with a less sharp but blind bend where the road is often obstructed. It does not comply with the NDP. • Site E falls into a different category as the landowners wish to use it solely to build their own family homes for at least two generations. This can be included in the NDP and currently not open to exploitation with the possibility of development contrary to the NDP recommendations.
Area 1	Re draw village boundary as does not appear to conform to 'accepted' criteria for a village boundary
Area 1	I fully support the principle of the Parish having a Neighbourhood Development Plan for many reasons, but I think the emphasis in the Plan should be on providing potential sites for affordable homes under policy H2 - Local Housing Need which allows exceptional development for this purpose outside the Built Up Area Boundary. With so few potential sites available for affordable housing the Parish Council has a responsibility for firstly, identifying where these sites might be and, secondly, from protecting them from opportunist market developments by excluding them from the BUAB.
Area 1	So, I can only write about my one small patch. When you take away money, greed, politics; what then is left? UNSAFE ENTRANCE. Do we wait until someone dies; brother, sister, mother, father, friend. Around the busy corner on that unsafe bend. What if it was someone dear to you, my friend? WILDLIFE HAVEN. In my garden I see Goldfinches, Blue Tits, Great Tits, Blackbirds, Robins, Thrushes, Woodpeckers. I have seen Frogs, Toads, Newts, Hedgehogs. I See Dragonflies and Butterflies; The yellow Brimstone, Comma, Tortoiseshell, Painted Lady, Red Admiral, Peacock, Meadow Brown. I See the Honey bees and Bumble bees. I See Bats at dusk, I hear owls hooting. On moonlit nights with stars above. Would all these things be here if we have a field full of houses? I ask you, I Appeal to you my friend. Should this be? Will this be? Why does this have to be? When should we stop, remember who we are and make a stand. Say what is right and protect what is around us. Do it now. Say it now. Please prevent this my friend.
Area 1	All housing, including social housing, should be included in the NPD. Sites and development levels should only be included that have the full support of the land owner.
Area 1	I would like to think that serious consideration will be given to the current traffic situation, as any further large volume of traffic on the Goldicote Road, along with it being a well used rat run, will have an even more serious implication on safety in the village.
Area 1	I object to site D as it will be houses behind houses and this must not be allowed to happen as it changes the character of the village

Area 1	We are concerned that plots D&C (which were discounted as unsuitable by the NDP appointed Working Group after 18 months of public consultation) have been reinstated without explanation by Loxley Parish Council. Plot C is unsuitable as it is very small, is subject to significant annual flooding and development in this location would constitute backfill which has been established as unsuitable and contrary to the character of Loxley. Furthermore planning permission (14/02224/FUL) has already been granted for a new dwelling on Home Farm Drive and development of Plot C would constitute over development. Plot D is unsuitable as development in this location constitutes backfill which has been established as unsuitable and contrary to the character of Loxley. Furthermore it has been established that Plot D is unsuitable due to traffic, flooding and over development considerations. Recent applications to develop housing on Plot D have been unsuccessful on numerous points; and development of Plot D would significantly change the character of Loxley and impact negatively on all neighbouring properties which form the centre of the village.
Area 1	Most fields in Loxley are used for livestock and therefore any change of use would impact on this and on wildlife that exists there.
Area 1	excellent overall plan, now need to agree number and type of housing for each allocated site
Area 1	The Parish Council has followed in this instance the steering groups example in reducing the size of the larger sites because of the communities stated preference for smaller developments.
Area 1	We think the single most important factor that is likely to spoil the attractiveness of Loxley is the continued increase in traffic through the village and on Wellesbourne Road, particularly if the airfield is developed. Would it be appropriate to include this concern in the Plan (at Section 2.18)? What, if anything, can be included in the Plan to influence (restrict) development outside the parish that might increase traffic through Loxley? If not appropriate or possible, this surely strengthens the argument to restrict further building on Goldicote Road within the village plan. Sadly, the vision as stated is not our vision for Loxley, and even if it were we believe the statement in points 3.1-3.3 to be over complicated and unrealistic because: 1) The addition of so few new homes will not achieve the stated aim of securing the long-term viability of the local services i.e. the pub will not thrive because of a handful of new homes, so let's not pretend it will. 2) The stated aim of ensuring the village will be attractive and having retained it's character will not be achieved by adding more homes and more associated traffic. 3) The addition of a token few 'socially mixed' houses will not make the village more 'vibrant'. 4) The viability of the school, pub etc will just as soon be achieved by reputation to those coming in from Wellesbourne and surrounding areas who, as at present, will see Loxley as a quality village to travel to, without the addition of more houses (and more associated traffic) being built within the boundary.

Area 1	The sites allocated as green spaces are community assets. Site C, the pub field is privately owned and therefore cannot be designated as a green space, but added to policy LC1 - community assets by extending item 3 to The Fox Public House and field. This document is designed to be adopted by SDC as part of their core strategy and therefore become a statutory document. The language used is loose and open to abuse by developers and needs to be tightened up legally so as to remove loopholes which can be exploited. Policy NE1 - valued landscapes - figure 3. this is not an exhaustive list of important views or valued landscapes. It is important that the Loxley draft NDP is altered and makes this clear. Or the valued views is reviewed and all valued views are included. Policy TT1 local parking standard - one parking space per bedroom. Is this correct? this needs to be verified.
Area 1	Flooding which has impacted residents on more than one occasion has originated from the land adjacent to the park, the increase of additional permeable surfaces in this area will only add to this problem. Will the results be published for resident to read? Thank you.
Area 1	Would be nice to see the community of Loxley to have more prominence in the document with ways in which they can be supported.
Area 1	Yes- land at rear of Box Tree Cottage should be designated Green Space for exactly the same reason as field behind Fix pub. I have no wish to be anonymous! S. Birch.
Area 1	Any development should have at least 50% houses with 3 or less bedrooms to encourage young families
Area 1	As the land is owned by the brewery, surely we cannot vote as a designation of a green space, even as a benefit for the village. We are concerned with the increase of traffic coming through the village, making the corner by Manor Road and Goldicote Lane a hazard where numerous incidents have already taken place.
Area 1	Site C subject to flooding. Site D The village does not want houses behind houses or estates.
Area 1	The development of Site D would be totally against the wishes of the community.
Area 1	There must be an official survey and report produced regarding the mains drainage capacity and effect of more dwellings to avoid flooding.
Area 1	Totally disagree with the village being extended towards Stratford and past the park. Think this opens it up for a continuous line that would not provide suitable housing to meet the village needs just more larger properties. The proposed green space behind the pub is not use for general use only at the discretion of the pub. Feel this has been added in to protect peoples views!!

Area 1	We disagree with sites D & E on the grounds of poor visibility / accident blackspot on the Goldicote Road especially near the blind bend. Speed limits are not adhered to travelling in both directions up and down the hill on the Goldicote Road. Having additional vehicular access onto this road would increase the risk of accidents. Loss of wildlife habitat / grassland near the park. Increased risk of surface water flooding down the Goldicote Road. We would, therefore, ideally like Sites D & E included in the list of Green Spaces if at all possible - Thank You.
Area 2	There are precedents for backland development - Loxley Fields and Barracks Green.
Area 2	I hope that the consultation process is not too messy & that we can move smoothly to household and then a personal vote.
Area 2	The pub field does not meet criteria for local green space as it is not demonstrably special to the local community. It cannot be seen by the public, is accessible only across private land, and has been used for public events on average less than once per year.
Area 2	We strongly disagree with the proposal to develop the Stratford Road site for the following planning reasons: 1) Unsuitable greenbelt location - as edge of village it does not adhere to the NDP plan of preference for village centre development; 2) The village is characterised here by low density enveloped by open fields - this proposal compromises that; 3) Threat to linear development line - this proposal would increase the chances of further, unwanted 'back land' development and by contrary to the Village Design Statement of a preference for linear development housing lines; 4) Road safety/highways - this proposal would compromise road safety as it is in a location that is well known where drivers speed up when exiting village.
Area 3	Thank you to those of you who spent time working on the NDP

Pre-Submission Consultation Responses – July 2018

Rep Code	Full Name	Organisation represented (where applicable)	Summary of Third Party Response	NDP Responses
001	Planning Admin Team	Sports England	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence</p>	The general guidance in Sports England's standard NDP response in support of physical activity and sport has been noted.

			<p>base on which it is founded.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p>http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in</p>	
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			<p>accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p>	
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002	Hannah Lorna Bevins	Wood on behalf of National Grid	<p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>About National Grid</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage</p>	The general guidance in National Grid's standard NDP response regarding its high voltage electricity transmission system, key resources and contacts have been noted along with its specific comments regarding the Neighbourhood Area.

			<p>electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following high-pressure gas pipelines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • FM02 - Churchover to Wormington • FM23 - Newbold Pacey to Honeybourne <p>From the consultation information provided, the above overheads powerline does not interact with any of the proposed development sites.</p> <p><i>Gas Distribution – Low / Medium Pressure</i></p> <p>Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com</p> <p>Key resources / contacts</p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p> <p>The first point of contact for all works within the vicinity of gas distribution assets is Plant Protection (plantprotection@nationalgrid.com).</p> <p>Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:</p> <p>Hannah Lorna Bevins Consultant Town Planner n.grid@amecfw.com Spencer Jefferies Development Liaison Officer, National Grid</p>	
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			box.landandacquisitions@nationalgrid.com Wood E&I Solutions UK Ltd Gables House Kenilworth Road Leamington Spa Warwickshire CV32 6JX	
003	Anne Denby	Canal & River Trust	Thank you for your consultation on the Loxley Neighbourhood Development Plan. The plan area is not within close proximity to our network and therefore the Canal and River Trust have no comments to make.	Noted
004	Mark Donald	H2land	<p>We would be pleased for you to accept our comments in respect of proposed sites for allocation in the Neighbourhood Plan.</p> <p>Site A The inclusion of Site A is in our opinion inappropriate, as it lies outside and away from the built up area of the village. Most significantly it is not safe from a highway perspective. It does not have any footpath linking it to the village and cannot surely be considered as safe or appropriate to develop new homes where it is not possible to provide a paved footpath. In itself this lack of connectivity demonstrates it's not well linked to the village from a location/setting point of view, and in particular has no way of achieving safer routes to school.</p> <p>Site B This site relates well to the local area and built form of the village and would seem entirely appropriate to include a development of the order of 4-5 homes in this location. The NDP's aspirations and policies to deliver a mix of new homes would appear to be achievable in this location.</p> <p>Site C The proposed allocation of Site C seems unsuitable, given the narrow and busy lane. It is also acknowledged locally by many as having difficulty with flooding and drainage. We would suggest it would be better to remain undeveloped given the minimal contribution it would make to housing supply and rely on other sites to provide new homes in more sustainable and suitable locations.</p> <p>Site E The inclusion of this land would extend and stretch out the</p>	<p>The working group recognises that, as a small village, there are a limited number of potential sites (especially in relation to the target allocation for Local Service Villages). Each of the sites identified has shortcomings and all appear to be compromised to some degree. All sites will be subject to normal planning processes and schemes will need to demonstrate that they can satisfactorily mitigate identified issues in order to gain planning permission.</p> <p>Site A: This allocation is a small extension of an existing linear development and lies within the development boundary. The concerns raised regarding highway safety have been mitigated and addressed by policies in the plan, specifically,</p>

		<p>village beyond its natural form and this is demonstrated by the lack of current links with the village, with no footpath serving access to this land. Any built form here would significantly stand out, as it is disconnected from the village by open green space, it being situated on the far side of the playing field, meaning it will never likely be integrated into the built form of the village.</p> <p>The ability to deliver a safe highway access should be in question, as there is a bend in the road to the South where the national speed limit ends, with the site lying just inside the 30mph zone. We believe a more formal study of highway access suitability should be undertaken before considering this site further as deliverability is in doubt. We note these reservations were brought forward by the Highway Authority as part of their consultation. Furthermore, the landowner has stated they are not looking to sell this land or release it to develop more than 1 home, therefore this allocation is not deliverable.</p> <p>Site D. As promoters of this site, naturally we are in support of its inclusion. We have reviewed the policies and goals in the Plan and our scheme would in every instance meet these objectives. We will look to deliver a mix of dwellings on the site, including bungalows, detached homes and smaller semidetached family homes, engendering a socially mixed community. We propose that the homes will lie along the Western and North Western boundaries. The location is undeniably central to the core of the village, lying between the playing fields and school, close to the pub, served by footpaths from it's boundary into the village. The vehicular access designed into the scheme has suitable provision for safe access and egress which has been assessed by an independent road safety auditor at the behest of Warks County Highways team. They found the access to be appropriate and safe. We will preserve the mature established tree boundary around the site and introduce native species of hedgerows between new homes and new tree planting as part of our landscaping scheme. To the East of the land we will retain a very significant area of land on site, which will be</p>	<p>TT1 and TT2. All proposals will have to satisfy the criteria set out in those policies. If not, they will not be supported.</p> <p>Site B: Support for this allocation has been noted.</p> <p>Site C: as located in the Pre-submission Plan has been removed.</p> <p>Sites D is no longer being put forward as a site allocation following extensive public consultation and opinion.</p> <p>Site E: The boundary of the village has always been seen as Dancers Drive. This has been a longstanding view of the Parish Council and is reflected in the Village Design Statement approved by SDC over a decade ago. The site is opposite homes which run up Dancers Drive and is a short distance from what might be regarded as the centre of the Village (centred on the pub and the school). While there is no footpath that serves this site, this is also true of those houses which straddle Stratford Road, all of whom would regard</p>
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			<p>managed as open green space and this will sit directly adjacent to the existing homes allowing them to continue enjoying an open aspect. The site will not be widely visible from the public realm, with little or no built form being viewed from the main road through the village, the nearest public viewpoint, as the development is set well back into the site.</p> <p>Homes will be of high quality design, traditional in character with strong architectural features, contributing to the character of the village, and will be constructed to the latest high energy efficient standards, reducing carbon emissions and each home will include renewable energy generation, sensitively integrated into the construction.</p>	<p>themselves as an integral part of the village.</p> <p>In terms of highways access, the HA did not rule the site out, hence its inclusion. Moreover, in the event of development, the extension of the 30mph zone could be considered. Finally, while the landowner may currently state there wish to develop just one home, this view has changed during the preparation of the plan and may well change again over the much longer period that the plan is in force.</p>
005	Peter Bolland	Historic England	<p>Historic England is supportive of both the content of the document and the vision and objectives set out in it. We are pleased to note that the Plan evidence base is well informed by reference to the Warwickshire Historic Environment Record.</p> <p>The emphasis on the conservation of local distinctiveness through good design and the protection of heritage assets, archaeological remains and landscape character including green spaces and important views is to be applauded. The Village Design Statement at Appendix 1 is also commendable in its detail and will no doubt prove invaluable as a context and evidence base for the current Plan and in guiding future development.</p> <p>Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish.</p> <p>Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.</p> <p>I hope you find this advice helpful.</p>	<p>We note the positive and encouraging comments.</p>

006	Yana Burlachka	Natural England	<p>Thank you for your consultation on the above dated 20 May 2018 which was received by Natural England on 20 May 2018. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England has reviewed the Loxley Neighbourhood Development Plan and would like to make the following comments:</p> <p>We welcome Policy NE2: Biodiversity that aim to ensure that the Loxley Neighbourhood Plan promotes sustainable development by protecting key environmental assets. For the clarity, it would be beneficial to include a special wording on protection of the Loxley Church Meadow Site of Special Scientific Interest (SSSI) located within plan area to the north-east of Loxley Village.</p> <p>Additional information</p> <p>The attached annex may be of use to you; it sets out sources of environmental information and some natural environment issues you may wish to consider as you develop your neighbourhood plan or order.</p> <p>Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities</p> <p>Natural environment information sources</p> <p>The Magic1 website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient</p>	<p>Noted. We will include your suggested wording with regard to the protection of the Loxley Church Meadow Site of Special Scientific Interest (SSSI) located within plan area to the north-east of Loxley Village. Consideration will also be given to including the site on a map within the Plan. We will also confirm the locations of Local Wildlife Sites with the local planning authority.</p> <p>The annex attached with general guidance on protecting and enhancing the natural environment has been noted. Loxley's NDP policies H3, NE1, NE2 and NE3 seek to conserve, protect and/or enhance the</p>
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			<p>about obtaining soil data.</p> <p>Natural environment issues to consider</p> <p>The National Planning Policy Framework⁷ sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance⁸ sets out supporting guidance. <u>Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.</u></p> <p>1 http://magic.defra.gov.uk/ 2 http://www.nbn-nfbr.org.uk/nfbr.php 3http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx 4 https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making 5 http://magic.defra.gov.uk/ 6 http://www.landis.org.uk/index.cfm 7 https://www.gov.uk/government/publications/national-planning-policy-framework--2 8 http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/</p> <p><u>Landscape</u></p> <p>Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.</p> <p>If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p>	
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			<p><u>Wildlife habitats</u></p> <p>Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here⁹), such as Sites of Special Scientific Interest or Ancient woodland¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p> <p><u>Priority and protected species</u> You'll also want to consider whether any proposals might affect priority species (listed here¹¹) or protected species. To help you do this, Natural England has produced advice here¹² to help understand the impact of particular developments on protected species.</p> <p><u>Best and Most Versatile Agricultural Land</u></p> <p>Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land¹³.</p> <p>⁹http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx ¹⁰https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>¹¹http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx ¹²https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals ¹³http://publications.naturalengland.org.uk/publication/35012</p> <p>Improving your natural environment</p> <p>Your plan or order can offer exciting opportunities to enhance your</p>	
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			<p>local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include: <input type="checkbox"/> Providing a new footpath through the new development to link into existing rights of way.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Restoring a neglected hedgerow. <input type="checkbox"/> Creating a new pond as an attractive feature on the site. <input type="checkbox"/> Planting trees characteristic to the local area to make a positive contribution to the local landscape. <input type="checkbox"/> Using native plants in landscaping schemes for better nectar and seed sources for bees and birds. <input type="checkbox"/> Incorporating swift boxes or bat boxes into the design of new buildings. <input type="checkbox"/> Think about how lighting can be best managed to encourage wildlife. <input type="checkbox"/> Adding a green roof to new buildings. <p>You may also want to consider enhancing your local area in other ways, for example by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community. <input type="checkbox"/> Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. <input type="checkbox"/> Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this 14). <input type="checkbox"/> Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency). <input type="checkbox"/> Planting additional street trees. 	
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			<input type="checkbox"/> Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links. <input type="checkbox"/> Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).	
007	Christopher Telford	The Coal Authority	<p>Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it.</p>	Noted.
008	Megan Pashley	Gladman Developments Limited	<p>This letter provides Gladman Developments Ltd (Gladman) representations in response to the draft version of the Loxley Neighbourhood Plan (LNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.</p> <p>Gladman requests to be added to the Parish Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.</p> <p>Gladman would like to offer their assistance in the preparation of the neighbourhood plan for the submission version of the neighbourhood plan and invite the Parish Council to get in touch regarding this.</p> <p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the LNP must meet are as follows:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i></p> <p><i>(d) The making of the order contributes to the achievement of sustainable development.</i></p>	Noted. And also passed to the Parish Council.

			<p><i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i></p> <p><i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</i></p> <p>National Planning Policy Framework and Planning Practice Guidance</p> <p>The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.</p> <p>At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p>The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.</p> <p>The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> <p>Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies</p>	
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			<p>contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p> <p>Planning Practice Guidance</p> <p>It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).</p> <p>On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p> <p>On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that neighbourhood plans should not</p>	
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			<p>contain policies restricting housing development in settlements or preventing other settlements from being expanded.</p> <p>Relationship to Local Plan To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted Development Plan relevant to the preparation of the HDBNP is the Stratford-on-Avon Core Strategy, adopted on 11th July 2016.</p> <p>However, it is important to note that the Council is progressing a Site Allocations Plan (SAP) which will identify additional sites for development to supplement the strategic sites identified by the Core Strategy. The Council is currently consulting on its Initial Issues and Options consultation which ends on 9th March 2018. In light of this, it is clear that the SAP is in its infancy, as such, it is important that the HDBNP allows for flexibility and adaptability, so it can positively respond to changes in circumstance which may arise over the duration of the plan period. This degree of flexibility is required to ensure that the HDBNP 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, which states that:</p> <p><i>‘if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).’</i></p> <p>Loxley Neighbourhood Plan This section highlights the key issues that Gladman would like to raise with regards to the content of the LNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior</p>	
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		<p>to the Plan being submitted for Independent Examination.</p> <p>Policy H1 – Housing Growth Policy H1 seeks to define a settlement boundary for the village of Loxley. Outside of this defined settlement boundary, new housing will be limited to dwellings for rural workers, replacement dwellings and appropriate conversions. Gladman do not consider the use of settlement boundaries to be an effective response to future development proposals if it would act to preclude the delivery of otherwise sustainable development opportunities, as indicated in the policy. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).</p> <p>Policy H3 – Design Character Policy H3 sets out a list of 8 design criteria that all proposals for residential development will be expected to adhere to. Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites 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. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 60 of the NPPF which states that: <i>"Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles"</i>.</p>	<p>Settlement Boundary: Loxley village is the single settlement within a rural parish. The purpose of the Development Boundary is to distinguish between the extent of the built environment of the village where certain forms of development are appropriate and the surrounding countryside, where protection and enhancement are of utmost importance. Defining the Loxley village’s Development Boundary applies Government advice and the SDC Core Strategy (2016) AS.10 to:</p> <ul style="list-style-type: none"> • Define areas within which planning permission will normally be granted for new development, subject to other planning policies; • Support the best use of existing and future services within the village; and • Preserve the setting of the village by protecting the surrounding countryside from inappropriate development <p>H3 Design Character: The</p>
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			<p>Policy NE2 - Biodiversity Policy NE2 states that where appropriate all development should contribute to and enhance the natural and local environment. Paragraph 113 of the Framework refers to the need for criteria-based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status which gives appropriate weight to their importance and contributions to wider networks. The policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. We therefore suggest that the policy is revisited to ensure that it is consistent with the approach set out within the Framework.</p> <p>Policy LC2 – Designated Local Green Space Policy LC2 identifies 3 sites that are proposed as designated Local Green Space. The designation of land as Local Green Space (LGS) is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that for Green Belt land. As such, the Parish Council should ensure that the proposed designations are capable of meeting the requirements of national policy if they consider it necessary to seek LGS designation The Framework is explicit in stating at paragraph 77 that ‘Local Green Space designation will not be appropriate for most green areas or open space’. With this in mind, it is imperative that the plan-makers can clearly demonstrate that the requirements for LGS designation are met. The designation of LGS should only be used:</p> <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • Where the green area concerned is local in character and is not an 	<p>Steering Group disagrees with this comment. The aim of this policy is to preserve the character of the village whilst being broad enough at the same time to support innovative and contemporary designs which are sensitive to their setting.</p> <p>Policy NE2: Biodiversity: The policy as worded provides an overarching requirement to enhance the natural environment where possible and minimise negative impacts. Like all policies in the NDP, it sits alongside the NPPF and does not change the thrust of nature conservation as set of in the NPPF.</p> <p>Policy LC2 (LGS3): The site, along with the other two sites, was overwhelmingly supported by 91% of attendees at the public consultation.</p>
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			<p>extensive tract of land.</p> <p>Gladman have not been able to identify sufficient evidence within the policy, the supporting text or indeed the evidence base, to justify the designation of the 3 identified sites as Local Green Space. We suggest that the Parish Council take some time to produce sufficient evidence to support the inclusion of this policy.</p> <p>Without this evidence being provided, Gladman recommend the deletion of this policy.</p> <p>Conclusions</p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the LNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.</p> <p>Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>	
09	Jasbir Kaur	Strategic Planning & Development Manager Warwickshire County Council	<p>I refer to the above consultation.</p> <p>The County Council welcomes communities proposing neighbourhood Plans that shape and direct future development. The main responsibilities of the County Council are highways and public transport, education, social services, libraries and museums, recycling/waste sites and environment. The County Council's role is to deliver the services and facilities efficiently.</p> <p>Financial implications of Parish Plans</p> <p>We would like to state at the outset that the County Council cannot commit to any financial implications from any proposals emanating from Neighbourhood Plans. Therefore, Neighbourhood Plans should not identify capital or revenue schemes that rely of funding from the Council. However, we will assist communities in delivering</p>	<p>See separate sections for responses:</p> <p>The standard Warwickshire County Council comments and guidance regarding NDPs have been noted.</p>

			<p>infrastructure providing they receive any funding that may arise from S106 agreements, Community Infrastructure Levy or any other sources.</p> <p>We have the following comments to make as a guide any amendments prior to formal submission of the Plan.</p> <p>Comments on transport matters</p> <p>The County Council is satisfied that sufficient emphasis has been placed on increasing public footpaths and cycle routes. We recommend that projects, such as, car share schemes or car clubs be considered for further investigation in order to reduce car usage in the area covered by the Neighbourhood Plan.</p> <p>Our specific comments on the Plan are as follows:</p> <p>Policy TT1 – Local Parking Standard</p> <ul style="list-style-type: none"> Warwickshire is satisfied that cycle storage facilities have been given consideration alongside parking provision. Warwickshire along with many other parts of the country has sought to control the amount of parking provision within new developments in recent years. The generally low provision is to make sure that new developments are: sustainable and make best use of the land available; they do not encourage additional car trips; and trips that are to be made are done so through non-car based modes where possible. The amount of provision that new sites will be required to provide are subject to those rules and regulations as set out in 	<p>Noted.</p> <p>Regarding Local Parking Standard¹: This is a non-strategic policy in line with NPPF(2019) para 28-30. SDC's Development Requirements SPD Part F (as of 1/4/19) has not been adopted by SDC and is therefore supplementary and only taken in as material consideration. Core Strategy Policy CS.26 C Parking Standards starts by saying "Parking provision will reflect local circumstances and have</p>
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¹ Examples of made plans with local parking standards:

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

			<p>the parking standards by Stratford-on-Avon District Council's Supplementary Planning Document: Vehicle Parking Standards. Advice is also provided in Warwickshire County Council's Local Transport Plan (2011-2026).</p> <p>Policy TT2 – Highway Safety</p> <ul style="list-style-type: none"> All new developments are subject to further detail consideration and consultation with the County Council as the Highway Authority. This includes any impact to existing road networks and the safety of all road users. <p>Policy LC3 – Encouraging the Use of Public Routes</p> <ul style="list-style-type: none"> The County Council is content that walking and cycling have been given considered and reflected in the policy. It is encouraging to see that safe walking and cycling have been considered in terms of new development and Warwickshire will encourage new developments to provide these in their proposals. <p>Public Health matters Public Health Warwickshire have prepared a Neighbourhood Development Planning for Health document. The document contains evidence and guidance for promoting healthy, active communities throughout the planning and design process.</p> <p>Alongside this, Public Health England's local health tool can be used to understand the health needs of the population.</p> <p>Should the Parish Council wishes to discuss the guidance document or the local health tool further please contact Gemma McKinnon on gemmamckinnon@warwickshire.gov.uk.</p>	<p>regard to promote sustainable transport outcomes.” It is important to note that Policy TT1 is therefore not in conflict with either of these documents. The Steering Group recognises the draft district standard, acknowledge that we have taken it into account but have decided to create a local standard. Our plan is entitled to create a local standard that is appropriate to our area based on local evidence and justification in line with NPPF (2019) para 105. Loxley is a place with historical properties with no or limited parking. It is serviced by poor public transport links and therefore the car is the major form of transport. This creates parking issues and has a social impact. The provision of a local parking standard in the Plan that differs from the SDC draft SPD will not conflict with any of the Basic Conditions. Comments regarding Policies TT2 and LC3 have been noted.</p> <p>Public Health matters: This information has been passed on to the Parish Council</p> <p>Flood Risk matters: Noted.</p>
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			<p>Flood Risk Matters <i>Please see attached detailed comments about Flood Risk Management matters in Support Document Section.</i></p> <p>Ecology matters Housing allocation D within Policy H1 is located on part of a Local Wildlife Site. A designation that indicates the sites biodiversity interest is of county importance. The site was also subject to a planning application in 2016 for housing, and the ecological value of the site was one of the reasons given for the application being refused.</p> <p>Allocating this site for housing would bring the Neighbourhood Development Plan into conflict with the biodiversity aspirations of both policy CS.6 of the Stratford-on-Avon District Core Strategy and the National Planning Policy Framework. You may wish to take further advice from the District Council on this housing site.</p>	<p>The Plan will be reviewed and amended to include the policy recommendations made. See Annex 3.</p> <p>Ecology matters: This site has been removed from the site allocations put forward in the Plan.</p>
010	Daniel Hatcher	Rosconn Developments	<p>We write in response to the consultation of the Loxley Neighbourhood Plan Pre-Submission Plan (LNP) dated May 2018.</p> <p>Rosconn Developments (RD) control land to the west of Goldicote Road, Loxley Road, which is identified as a draft allocation under Policy H1 Part 2(b): Site B – Land between Loxley Fields and Loxley House (4-5 dwellings). RD fully support the proposed allocation and the purpose of this representation is to confirm the site is sustainable and otherwise unconstrained in technical terms and therefore is an available, suitable and achievable housing site.</p> <p><u>Legislation and Guidance</u></p> <p>The LNP must meet the ‘Basic Conditions’, as set out in 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. In order to meet the Basic Conditions, the making of any Neighbourhood Plan must, inter alia:</p> <ol style="list-style-type: none"> 1. Have regard to national policies and advice contained in 	<p>The comments regarding legislation and guidance and Policy H1 have been noted. Site B is now the subject of a planning permission (18/02286/FUL) for 5 houses.</p>

			<p>guidance issued by the Secretary of State;</p> <ol style="list-style-type: none"> 2. Contribute to the achievement of sustainable development; and 3. Be in general conformity with the strategic policies of the development plan for the area. <p>The National Planning Policy Framework (NPPF 2012) explains that a presumption in favour of sustainable development means that Neighbourhood Plans should support the strategic development needs set out in Local Plans and plan positively to support local development. The Framework is clear that Neighbourhood Plans should be aligned with the strategic needs and priorities of the wider local area, i.e. they must be in general conformity with the strategic policies of the Local Plan. The NPPF also advises that they should not promote less development than is set out in the Local Plan or undermine its strategic policies. Neighbourhood Plans should provide a practical framework within which decisions on planning applications can be made with predictability and efficiency.</p> <p>Planning Practice Guidance (PPG) on neighbourhood planning provides that:</p> <p style="text-align: center;">“Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an order.” (Our emphasis)</p> <p><u>Policy H1: Housing Growth</u></p> <p>Firstly, RD commend the NDP Working Group for acknowledging the strategic requirement to identify sites for allocation to assist in meeting the District’s housing needs, in line with Policies CS.15 and CS.16 of the Stratford on Avon Core Strategy. We also welcome the level of</p>	
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			<p>evidence that has been undertaken to help inform decisions about where to identify suitable sites within the village which can achieve sustainable development in the context of the NPPF.</p> <p>As such, RD consider the identification of Site B (Land between Loxley Fields and Loxley House) for approximately 4-5 dwellings to be founded on a robust and proportionate evidence base. In particular, we would concur with the findings of the individual Site Assessment undertaken by Avon Planning Services in July 2017. Whilst this assesses a slightly larger site, it acknowledges that it has good potential for development in view of there being no site constraints and is well contained and related to the existing built form of the settlement. Specifically, it confirms that there are no concerns regarding Access and Highways, Topography, Flooding and Drainage, Natural Heritage or Built Heritage. Whilst it acknowledges that the site is located within the Special Landscape Area, this is true of all sites within and surrounding the village, but due to its relationship to the village, with built development on three sides, it is considered that its development can respect the wider landscape by maintaining the linear pattern of the settlement. Whilst the western boundary is indeed exposed, appropriate landscaping to this boundary can ensure that the relationship with the surrounding countryside will be respected and help the development assimilate into the built form of the settlement.</p> <p>Whilst it is noted at paragraph 4.3 of the LNP that the site assessments process highlighted the challenging development context of the settlement with no sites scoring strongly on all criteria, Site B (or 'Site N' within the Site Assessment Matrix July 2017) performed the strongest of all sites assessed, with 6 of the 7 criteria achieving a 'Green' status. The only criterion against which it did not score 'Green' was in respect of its greenfield status, thereby scoring 'Amber'. There were no other sites that scored 'Green' in this respect and in view of the identified need to allocate housing within the settlement, the loss of some greenfield land is inevitable.</p>	
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			<p>As part of RD's own site assessment, a number of surveys have already been undertaken. This includes an Extended Phase 1 Habitat Survey which has confirmed that the site is of low ecological value due to it having been intensively grazed. The poor, semi-improved grassland was not diverse in grasses or wildflowers, and was limited in extent, whilst there were no indications that the site provided suitable habitat for protected species. In Highway terms, it has been confirmed by our Highway Consultant that based on an automated traffic count, suitable visibility splays can be achieved in either direction from the proposed access point into the site. A small amount of hedgerow will need to be removed along the site frontage to achieve this but can be compensated through new planting outside the required splay. Appropriate provision can also be made within the site for car parking to be provided at or in excess of the required standards.</p> <p>In conclusion, we fully support the proposed allocation of Site B for residential use and confirm that the site is <i>deliverable</i> in NPPF terms, in that the site is:</p> <ul style="list-style-type: none"> • <i>Available</i> – RD have an agreement with the landowner to promote the site for residential use and to bring this forward; • <i>Suitable</i> – the evidence supporting the Draft NDP is robust and proportionate, confirming that the site has good potential for housing being in a sustainable location, well contained and related to the existing built form of the settlement; and • <i>Achievable</i> – there is a realistic prospect that housing will be delivered on the site within 5 years and there are no insurmountable technical, legal or other constraints that would prevent development coming forward. Development on the site is also a viable proposition in that there are no significant or abnormal costs associated with developing the site for residential purposes. <p>As such, we consider that Policy H1 and the draft LNP as a whole meets the Basic Conditions, particularly in that it:</p>	
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			<p>4. has regard to national policies and advice contained in guidance issued by the Secretary of State;</p> <p>will contribute to the achievement of sustainable development; and</p> <p>5. will be in general conformity with the strategic policies of the Stratford on Avon Core Strategy.</p>	
011	Rob Willetts	Ei Group PLC	<p>I refer to your letter of 16th May in respect of the land at the rear of the Fox Inn and your proposal that it be designated a “Local Green Space”. Please can you explain what the significance of such a designation would be.</p> <p>As far as we are concerned, the land is private and is only available for use by the Company and the Publican of the Fox itself, with no access to the general public.</p> <p>As such, we are not sure whether the designation you are suggesting is accurate.</p> <p>I look forward to hearing from you in this respect in due course.</p>	<p>The land at the rear of the Fox Inn was regarded as demonstrably special to the Loxley community through public consultation.</p> <p>The following response was made to the consultee :</p> <p><i>‘The proposed has been made as part of the draft neighbourhood development plan for Loxley which is currently being consulted on and will be amended in light of comments.</i></p> <p><i>The designation ultimately depends on the outcome of the consultation. It does not confer any right of access without the prior agreement of the landowner.</i></p> <p><i>But it may impact on your ability to put it forward as a development site - although access in any event would be a major constraint on development at this location.</i></p> <p><i>Hence the reality is that even with designation (assuming it is supported in the consultation</i></p>

				<i>process), it does not really change much - as the landowner the land remains private unless you give your permission for it to be used by the community. In the past it has been used for a couple of one off events'.</i>
012	Stuart & Charmian Birch	Residents	<p>I attended the recent Loxley NDP meeting, Wednesday 30 May, 2018, listened to all that was said, and said nothing myself. However, in retrospect, I think people need reminding of the traffic issues that already exist at the above bend, and how they will be worsened if site D is 'developed'.</p> <p>When we arrived in Loxley, 21 years ago, traffic was none existent, which is certainly not the case now! During that time our property has been struck four times by errant vehicles (& their drivers!), twice requiring serious structural repairs to our house, and we are aware of at least three road traffic accidents on said bend. That is fact. The latest incident could have caused death.</p> <p>Traffic regularly exceeds the speed limit, particularly downhill, and crosses the centre-line, particularly uphill. Indeed, some common vehicles - buses, school coach, lorries & agricultural transport - cannot negotiate the bend without crossing the centre-line, often by a large margin.</p> <p>Any 'development' of site D will produce extra traffic - two or three vehicles per household? I realise that any extra housing in the village will do likewise, but site D will be dangerous because of its limited access. No amount of hedge cutting or whatever will make it safer. Simply, an already dangerous bend will be made more dangerous!</p> <p>To consider site D for housing is inviting further accident, and possible injury. And I have not yet mentioned the proximity of the school!</p>	Noted. Following Regulation 14 consultation Site D has been removed from the Plan.

013	Hazel Mills		<p>Thank you for forwarding the feedback from the meeting held on May 30th regarding the NDP Draft Consultation.</p> <p>Whilst, I understand the complexity of recording all comments, I believe that you have omitted to include specific comments to the traffic dangers relating particularly to site D. These questions and points were raised by myself in more than one question.</p> <p>The complete stretch of the road through Loxley, I acknowledge, is subject to traffic difficulties, but the blind bend opposite The Old Post Office has seen several serious accidents because of drivers and cyclists not respecting or not noticing the dangers relating to this feature, whether entering the village from the top or negotiating the bend as they climb out of the village. Of all areas of the village, I believe that this poses the greatest danger and is witnessed as such by ourselves and all those living in its vicinity. To have a potential of any more vehicles (without taking into account the possibility of double figures of vehicles and service vehicles on a developed plot) exiting onto the road so close to the bend, it increases the danger to pedestrians, cyclists, horse riders and motorists themselves. At least one consultant has said the access does not meet legal requirements.</p> <p>The road is now on a National Cycle Route and we have an increase of cyclists who cycle down Goldicote Road at a speed which is dangerous, meaning they could not stop easily for vehicles emerging from before the bend, from Manor Lane or from houses like our own which is between the bend and the school. They often take the bend across the centre line also. Some cyclists have had a narrow escape, especially downhill, when they emerge from the corner to find a vehicle emerging from or entering a property.</p> <p>In addition, with the increased property development in Wellesbourne, we are seeing an increase in traffic using the village as a “Rat run”</p>	<p>Minutes of meeting amended to include comments made at the meeting.</p> <p>Following Regulation 14 consultation Site D has been removed from the Plan.</p>
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			<p>which will further increase the danger.</p> <p>I believe that my references to this being a unique site for traffic problems were glossed over as it being no greater than elsewhere and not represented in the FAQ's and yet a question re the exit to Site D from Barracks Green was minuted and responded to with a definite <i>"Reply – unlikely due to poor visibility on the entrance to the main road."</i></p> <p>Please could you redress this omission of contribution, by highlighting my questions and the unique traffic issues here as a true reflection of all items discussed either by adding to the FAQ's as an amendment and giving it credit in the next meeting minutes for the NDP and Parish Council.</p>	
014	Hazel & John Mills	Residents	<p>My main query/question was to ask "Why and how has Plot D had been put into the proposal given that the access to the site was proven to be dangerous because of its proximity to the bend". I elaborated with examples of accidents and dangers. I also quoted the minimum number of off road parking spaces which were recommended for any new house i.e. 1 per bedroom. I suggested that if the development were e.g. 6 @ 3 bedroomed houses, that would be 18 cars converging on the same point of entry/exit. When the response was that all sites had a traffic problem, my response was to say that the access to plot D was exceptional. In fact, it is referred to as an accident black spot in the NDP. This comment by myself appeared to be dismissed.</p> <p>When it was suggested in the meeting that there may be ways of making the access safer, I queried how this could be achieved in that the original planning application would have given the best possible site for access and as far as I could see, because of boundaries existing with neighbouring properties to the access, change would only mean moving the access nearer to the corner and this was not in the legal limit. The response was that this question could not be answered within</p>	<p>Noted. Comments regarding Site D have been taken into account. Following Regulation 14 consultation Site D has been removed from the Plan.</p>

			<p>the NDP remit.</p> <p>I cannot provide my questions verbatim, but this is the area of discussion which we raised and the danger potential is uppermost.</p>	
015	Hazel & John Mills	Residents	<p>We have completed the on-line survey. However, we are writing to you to complement our comments, because we have major concerns including and with reference to the change of plots which conflict with the NDP.</p> <p>We have attached a letter which more fully explains our concerns and are happy for this to be in the public domain. We will also deliver hard copy of this letter to you.</p> <p><input type="checkbox"/> Plot D's recent inclusion opposes the outcomes of the adopted Loxley Village Design Statement 2016 (which was the foundation of the NDP) and which reflected resident surveys.</p> <p><input type="checkbox"/> Plot D has a proposed exit for a large volume of traffic onto what the NDP describes as an accident black spot in the village. It was rejected for planning on this and other counts in 2016 by SDC and the LPC.</p> <p><input type="checkbox"/> Plots D and B present situations which conflict with the wish to retain green spaces behind existing houses.</p> <p><input type="checkbox"/> Both Plots D and B ignore the wish of residents to retain and protect environmental and ecological assets in Loxley.</p>	<p>Following Regulation 14 consultation Site D has been removed from the Plan.</p> <p>Site D has been removed from the plan. Site B is not located behind existing houses.</p> <p>Site D is part of a local wildlife site and has been removed from the plan. There are no known environmental or ecological issues which would affect Site B coming forward and in fact planning permission has now</p>

			<p>□ The larger Plots of D and B would add to flooding potential resulting from run-off water from increased hard surface.</p> <p>We do not believe that the NDP can progress with this choice of plots. We understand that if we lose plots, we cannot replace. We also understand that there is no quota now and the NDP could still progress on fewer sites and show the willingness of the village to allow development.</p> <p>Attached letter:</p> <p>Loxley NDP Consultation Draft May 2018 and on line survey The NDP Working Group have produced a document which we believe does, in essence, reflect the wishes of Loxley Residents, but with important exceptions as given below. We are extremely concerned that it is not the document, per se, but the recent change of choice of plots for potential development, which is the detrimental aspect should this version be adopted. These plot choices do not all reflect the vision in the NDP document in several respects. To reinstate a plot previously rejected, specifically the land now called Plot D (formerly K in the consultant's matrix), which is the area to the rear of Box Tree Cottage, weakens the integrity of the document and its representation of the residents' wishes. It also reflects badly on the credibility of the Parish Council in its role in the change of choice. The discrepancy is encapsulated in the conflict between these two paragraphs below. There is a rogue paragraph in the NDP which states on Page 15 at 4.11: <i>4.11 The allocations of sites b, d and e to create small cul-de-sac developments could include a mix of smaller/modest, lower cost homes, which would also assist in the ability of existing residents to downsize from larger houses which would free them up for families to move into. and thereby contribute to the strategic objective of promoting small</i></p>	<p>been granted on the site.</p> <p>Flooding Site B: Policy NE5 requires development proposals to satisfactorily address risks of fluvial and pluvial flooding otherwise they will not be supported.</p> <p>Response to Letter: Site D has been removed from the Plan's site allocations.</p> <p>Paragraph 4.11 has been amended to reflect changes to the sites selected for inclusion within the NDP.</p>
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		<p><i>scale and modest developments.</i></p> <p>This statement is in conflict with 4.4 on the same page which states:</p> <p><i>4.4. The selection process has also been informed by the community survey (in 2016), and local consultations. the local community expressed a strong preference for development on individual plots or small scale developments, with strong opposition to one large development. there was also preference for sites on the village periphery and infill sites, with a slightly negative net balance in relation to backfill sites (space behind houses).</i></p> <p>We recommend that 4.11 is removed as not representing the wishes of the majority of residents</p> <p>At the Loxley Community NDP Consultation Event on May 30th at Loxley School, our query about the favouring of plots with the potential for cul de sac development rather than the linear approach was answered by yourself as the Chair with the statement “<i>Many on the working group appeared to have undergone a change of heart and wanted to see development in “the heart of the village”.</i> The notes continue to report in answering my query, that reinstating Plot D “<i>included support from some Councillors who were not necessarily in favour of development on the site, but did feel it proper that the site was put to the community in the consultation plan to visibly and transparently ensure fairness</i>”. If there was such dissension and unease about the site, which is by far the biggest in the village, it is astounding that it has been reinstated and why the residents were not informed or involved earlier in this change of heart and from the original 5 which were shortlisted.</p> <p>At the Consultation Event, the question as to why the SDC BUAB (Built Up Area Boundary) had not been adopted was given no conclusive answer. Plot D falls outside of the SDC BUAB map and does not fall into categories which can be included at discretion of SDC. Therefore, it should not be in the NDP.</p> <p>Our specific concerns go deeper than this lack of confidence in the process to reflect residents’ choices:</p> <p>Traffic and Transport dangers overlooked reference Plot D</p>	<p>As stated – the sites selected have been informed (but not completely determined) by the community survey. There are no large development sites, no developments to the rear of existing houses and two of the three sites are located on the periphery of the village.</p>
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			<ul style="list-style-type: none"> • Whilst we agree that the route of the road through the village presents hazards at many points, there is a definite accident black spot in the blind bend opposite Manor Lane and the Old Post Office (See Policy TT2 Highway Safety on page 33). This black spot was cited by name on this page in the NDP (Ref 7.7 on page 33). Despite this, Plot D has been reinstated when it has a proposed exit within proven dangerous limits of this black spot. Development on Plot D would create a volume of traffic untenable at a site with a history of accidents and “near misses”. Planning Permission for the site was rejected on this and several other counts in 2016. The volume of traffic would constitute not only private cars but larger vehicles for oil and calor gas delivery, waste collection, utilities service and site maintenance vehicles, delivery of consumer goods and private visitors to the “estate”. There are no obvious changes to the criteria on which it was initially rejected by SDC Planning Department. • Within the Strategic Objective of the Traffic and Transport section on page 32 is 7.1 <i>“To provide a safe environment for drivers, pedestrians, schoolchildren and all residents travelling in and through Loxley”</i>. Plot D is in extreme conflict with this also because of the proximity of the school. • The choice of Plot D is ignoring the following statement 7.5 on page 33: <i>“The 2016 Community Survey revealed that the two main dislikes of residents are traffic speeding (over 90% of residents) and the increasing volume of traffic (90% of residents)”</i>. It is well known to the village that vehicles approach this bend at speed in both directions, causing them to cross the centre line endangering anyone in the vicinity. Traffic numbers are increasing for Loxley as a result of developments beyond the village. To have an exit into this black spot for this 	<p>As noted above, Site D has been excluded – one of the considerations has been access to the site.</p>
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			<p>volume of vehicles from at least 8 properties on Site D is inviting further danger and ignores the survey result.</p> <p>Conflict with “Size and Character of Developments” as in Village Design Statement and NDP</p> <ul style="list-style-type: none"> For example: Page 14 in the Housing and Built Environment Section states at 4.4: “.... <i>the local community expressed a strong preference for development on individual plots or small scale developments, with strong opposition to one large development. There was also preference for sites on the village periphery and infill sites, with a slightly negative net balance in relation to backfill sites (space behind houses)</i>”. Although “Backfill” may not be a technically acceptable term it reflects the wish for no development behind current housing. We, as village residents for 30+ years, do not reject development on the scale first promoted in the NDP and agree with statement 4.7 on page 15 “<i>This policy supports the notion of limited infill development within the defined Village Boundary where there is no adverse impact on the character of the area and where the development is sympathetic to its surroundings including neighbouring dwellings. It also seeks to resist other forms of inappropriate development in the countryside as detailed in the Village Design Statement</i>”. Plot D and to a certain extent B (formerly N in the matrix) do not conform with this statement The proposals are given on Page 12 under “Housing Allocations” for a potential of 23 properties within the village. At the meeting of May 30th, referred to above, as Chair, you assured the audience that “SDC now has sufficient houses from developments in LSV’s”. A logical conclusion is that Loxley village does not need a site of this size within the plan and can set its own total for housing. Yet this has not been offered as an 	<p>See above point.</p> <p>Site B now has planning permission for 5 dwellings.</p> <p><u>SDC / Housing allocations, p12:</u> Stratford District Council currently has at least a five year supply of housing against the figure of 14,600 for the Core Strategy plan period. It is important to remember that these commitments (whether</p>
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			<p>option.</p> <p>Housing and the Built Environment Inclusion of Plot D ignores the philosophy in the NDP of retaining green spaces behind houses. This site alone would impact on 15+ houses and remove the continuity of green space between Loxley village and the amenity of the recreation ground.</p> <ul style="list-style-type: none"> • The NDP on page 17 ref 4.24 states: <i>“a major part of the distinctive character of Loxley is the strong visual connectivity between the village and the rural landscape. The village has a mostly linear structure meaning that the majority of houses front, in single row, onto a street and have direct rural views to the rear”</i>. • Again on the same page ref. 4.26: <i>“One of the guiding principles in the Loxley Village Design Statement which is incorporated into this Plan (Appendix 1) is the fact that ‘the rural character of Loxley should be preserved and (sub)urbanisation avoided’ and that ‘sufficient space should be left between and behind buildings to preserve the ‘open aspect’ of the village and retain links with the countryside beyond’</i> • See Also Policy H3 Design and Character, especially points a) to f) on page 17 which emphasise the above and ensure development which is <i>“of a density and scale that is in keeping with the character of the surrounding development and landscape”</i> <p>Detrimental effect on the Natural Environment and Biodiversity and also flooding risks Loxley is in a Special Landscape Area, added to which, Warwickshire County Council have declared that the land to the rear of Box Tree Cottage, namely Plot D, is a Loxley Civil Parish Designated Wildlife Site and it is marked officially as such on their mapping. Historically, this is a natural meadow which supports meadowland and wildlife. In</p>	<p>for Loxley or the District as a whole) are planning permissions granted and not actual houses built. It is also important to remember that the 14,600 dwellings scheduled in the Core Strategy and the number identified for LSV4s are not a ceiling or cap. They are actually a minimum requirement. Though there are number of large-scale developments going through the planning application process at the moment, permission for them has not yet been granted. Because of that, they cannot be regarded as, or assumed to be, commitments or completions.</p> <p>Resisting speculative development... Throughout the term of the Core Strategy, Stratford District Council has to demonstrate a 5 year housing land supply (5YHLS). If this 5YHLS cannot be demonstrated, that is, these commitments are not actually being built, then the Core Strategy will be deemed to be ‘out-of-date’ and under</p>
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		<p>the years when we have lived in the village, we have witnessed it mown by hand and left untouched. The Biodiversity would be destroyed should Plot D be used for development. A token offer to create a corner with wildlife biodiversity does not replace what is removed.</p> <p>NDP ref. Policy NE2 – Biodiversity – on Page 25 states that</p> <ul style="list-style-type: none"> • <i>Existing ecological networks should be retained and new ecological habitats and networks will be encouraged.</i> • <i>Measures to improve landscape quality, scenic beauty and tranquillity and to reduce light pollution will be encouraged.</i> <p>We believe that developments of the size of Plots D and the newly named B would not be in keeping with this policy and be detrimental to the village as they would necessitate large areas of biodiversity being lost.</p> <p>Dangers of increased hard surfacing: The increase of hard surface, which large developments naturally create, further endangers the biodiversity and ecology by removing the natural water absorption to surrounding areas causing loss of available habitat and flooding at times of heavy rainfall. This would further impact on surrounding houses who already have flooding problems. We would recommend that Plot D is considered as a fourth greenfield site to be maintained in its natural state.</p> <p>In summary, we do not believe that the NDP can progress with this choice of plots. We understand that if we lose plots in the NDP, we cannot replace. We also understand that there is no quota now and the NDP could still progress on fewer sites and properties whilst still demonstrating the willingness of the village to allow some development.</p> <p>The NDP is a good reflection of the wishes of Loxley village residents, but the latest reinstatement of larger plots and discrepancies do not</p>	<p>the provisions of the National Planning Policy Framework paragraph 14, the presumption in favour of sustainable development would apply. A parish having a Neighbourhood Development Plan and having been seen to fully participate and contribute in the planning process at the local level puts itself in a much stronger position when trying to deal with these speculative developments.</p> <p>Ecology / Biodiversity impact of Plot B: permeable hard surfaces can be used to reduce water run-off and allow water absorption. Site D has been excluded, the other material planning consideration being the Wildlife designation.</p> <p>Policy NE5 seeks to minimise risks from pluvial and fluvial flooding. Developments that do not satisfy the policy's criteria will not be supported.</p> <p>As a Development Plan the NDP</p>
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			<p>correspond to the surveys in 2016 and the subsequent consultations. Therefore, the current version is flawed and inaccurate in its compliance with policies and its respect of the views of the residents. We are interested to know the outcome of the online consultation and comments therein and from independent correspondence which you receive. A copy of this letter is also being emailed to you and the Parish Council.</p>	<p>must first and foremost reflect material planning considerations, since it is ultimately backed by planning legislation.</p>
016	Tony Gibbon	Resident	<p>I refer to Figure 2 of the draft NDP which shows a version of the Village Boundary clearly incompatible with its own guidelines. The draft states in paragraph 4.8 "the Village Boundary is defined as being the limits of existing, non-agricultural, buildings.....". The District Planning Authority provided a definition of the Loxley Village built up area to the PC based on this test. If the PC thinks that this criteria has been incorrectly applied then it should argue its case with the Planners to secure a revision.</p> <p>The PC cannot simply manipulate the built up area to suit other interests as it is delineated solely with reference to existing buildings. Policy H1 applies within this area, H2 outside.</p>	<p>In defining the Village Boundary the working group has relied on the guidance provided by an independent planning consultant. While the NDP Village Boundary differs from the SDC proposed BUAB it has been carefully conceived. Part of the changes are necessary to include the site allocations within the boundary. Where the boundary has been drawn more tightly to that proposed by SDC, it has been done deliberately to exclude large gardens on the edge of the village. The NDP proposes a Village Boundary whereas SDC propose a Built-up Area Boundary. The NDP is entitled to draw its own development boundary even if this differs from the Council's own proposed boundary. This was confirmed in the recent Examiners report for the Claverdon NDP where the</p>

				Examiner accepted a different (tighter) boundary in the NDP to that proposed by SDC.
017	Tony Gibbon	Resident	<p>The draft NDP is confused, inconsistent, even contradictory in places, and certainly not a sensible basis for planning precedent.</p> <p>In particular the Village Boundary utilized in the document has been manipulated unceremoniously.</p> <p>I have just seen a copy of the BUAB drawn up by the SDC in accordance with planning procedures. The version in the draft NDP is vastly and unjustifiably different.</p> <p>Whatever motivates or influences the Parish Council the definition of the Built Up Area is not a matter which can be subjected to a vote. Whether a plot is within the Built Up Area or not is a matter of fact determined by its relationship to existing buildings and is not in the gift of councillors.</p> <p>Referring to Policy H1 the draft NDP states that "New infill housing development within the BUAB will be supported in principle.....". This seems to indicate that any developer submitting a suitable application for new building within the BUAB may presume that it will be allowed. There are no restrictions (other than suitability) on the type of development.</p> <p>In contrast, Policy H2 limits development outside the BUAB to affordable housing on small sites and only when stringent conditions are met.</p> <p>The draft NDP points out in many places that no additional "executive" homes are wanted and that only "affordable" housing can correct the mismatch in the housing stock and provide options for young and old.</p> <p>Any application for "suitable" new building within the BUAB</p>	<p>As noted above the working group have taken the advice of an independent planning consultant in identifying the village boundary to more accurately reflect the settlement area. The working group was advised that the area defined should include both existing and proposed development sites.</p> <p>Development within the BUAB will not be unrestricted. Infill development would be supported in principle but would still have to comply with local and national planning policies as well as other policies in this plan such as Policy H3 – Design and Character and Policy NE5 – Flooding, to name but two.</p>

			<p>seemingly already has permission virtually guaranteed. Placing the sites potentially identified for development in the NDP within the BUAB will surely give developers the right to produce many more "executive" homes. Just the opposite of the NDP's stated objectives.</p> <p>In addition to the virtue of following the correct procedure, simply accepting the SDC definition of the BUAB would place most of these sites outside the boundary and therefore subject to the restrictions of policy H2. Thus the village would be supporting and controlling the affordable housing called for in the draft NDP.</p>	
018	<p>Jonathan Baker Stuart Birch Charmian Birch Annie Ashworth Jo Beverley Hazel Mills John Mills Peter Morris Annie Rockley Marian Elliott Alan Hampton Morag Hampton Kenneth Osborne Christine Osborne Darryl Armstrong Anna Armstrong</p>	Residents	<p>I have attached a copy of a letter which was written in response to the one circulated to the community by Mark Donald of H2Land Ltd regarding 'Proposed New Homes on land off Goldicote Road, rear of Box Tree Cottage' (Site D in the draft Plan). You will have probably have received hard copies of both letters.</p> <p>I would like to submit the attached response, signed by 16 members of the community, as formal evidence for the consultation survey on the draft Loxley NDP:</p> <p style="text-align: right;">June 2018</p> <p>Dear Neighbour,</p> <p>Response to Mark Donald's letter: Neighbourhood Plan - Proposed New Homes on land off Goldicote Road, rear of Box Tree Cottage (Site D)</p> <p>It is likely that you have received the letter from the developer, Mark Donald, from <i>h2land</i> regarding the current consultation on the Loxley Neighbourhood Development Plan (LNDP). As you will have seen, he requests that you support the inclusion of Site D (land off the Goldicote Road and to the rear of Box Tree Cottage) and, in doing so, a proposed scheme for developing this site.</p> <p>We are a small group of concerned residents who feel that, while the letter raises the ethical question of a commercial company trying to influence the outcome of a formal community consultation, the letter</p>	<p>Noted.</p> <p>Concerns regarding Site D have been noted and the site has been removed from the Plan.</p>

			<p>more importantly contains a number of misleading statements that, in fairness to the consultation process, we feel need addressing. For ease of reference, we have numbered our concerns about the letter below:</p> <p>1. Eight homes on one site is not a ‘small scale’ development by Loxley standards. All the other sites being put forward as part of the Neighbourhood Development Plan were deliberately reduced in size to prohibit this scale of development. We note the Parish Council voted to include Site D and made the decision to make an exception of it by including the whole of the site. Undoubtedly a development of this size will have a major impact on the ‘feel’ and ‘character’ of the village.</p> <p>2. The benefit to the community is much exaggerated. The proposal includes 2 bungalows and 2 three bedroom homes with the other 4 presumably being larger executive style homes. There is no indication of what price range the homes will be in nor whether any of them will be ‘affordable homes’. In the LNDP, <i>Policy H2 - Local Housing Need</i> was included specifically to address the need for affordable homes in Loxley.</p> <p>3. If successful, this development will be the first ‘back-land’ (ie. houses behind houses) development in Loxley since the Loxley Village Design Statement was adopted in 2006. It will mark a critical precedent for future back-land development in the village and wider parish. There are other ‘back-land’ sites in the Parish which, if this development goes ahead, could become vulnerable to similar development.</p> <p>4. The letter makes mention of a ‘large green space’ remaining on site to minimise the impact of the development on existing homes. This ‘green space’, however, will remain part of Site D and also within the Built Up Area Boundary. This means that there would be nothing to stop it being developed in the future, especially once the precedent for development on the site has been established.</p>	
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			<p>5. The letter claims that the ‘proposed highway access is safe’ and that this ‘has been verified by an independent Road Safety Auditor’. We note that when the previous planning application for the site was made, a similar expert consultant also assessed the access as safe. The Highways Department, however, turned down the previous application because it assessed the access as unsuitable. Since then, to our knowledge, no evidence has been provided for how the access can be improved. Ultimately, the decision regarding the suitability of the access will be one for the Highways Department to make, not a paid consultant.</p> <p>6. The letter makes no mention of the impact the development will have on road safety, especially on the Goldicote Road adjacent to the proposed access as well as on the sharp bend into the village by <i>The Old Post Office</i>. This bend is a local ‘accident blackspot’ and the addition of a badly sited new road junction as well as the inevitable increase in road traffic at this location will only add to the existing problems.</p> <p>7. Stratford District Planning Department turned down the previous proposal for this site on six grounds, the problem of access being one of them. This letter makes little reference to the other grounds for the previous application being rejected nor does it seek to address them. Similarly, the letter does not seek to address the reasons why the Parish Council also turned down the previous application.</p> <p>We hope that you will appreciate the reasons why you have received this letter. We only wish to make sure that everyone in the community has access to a balanced range of information before responding to the LNDP consultation. Please note that even if you have already completed and submitted the consultation form you were provided with you are still entitled to make as many further responses you like up until the consultation ends on Thursday 5th July 2018.</p>	
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019	Anon	Resident	<p>We would like to thank the Parish Council and Neighbourhood Development Plan (NDP) working group for their hard work in tabling the NDP plan. However, we have some serious reservations about the inclusion within the NDP of Site D (land to the rear of Box Tree Cottage), a designated Local Wildlife Site (formally known as Site K). We would raise the following questions and refer you to the <i>attached material</i>:</p> <p><u>Housing Needs in Loxley - do we really need or want need 30 new houses?</u></p> <p>At the top of the NDP survey, there is a statement that Loxley needs to add circa 30 new houses by 2031, which we find misleading, as Stratford District Council would appear to have exceeded its own targets, stating on its website that “Our five year housing land supply is calculated as 6.67 years”.</p> <p>Although Loxley is deemed to be a category four service village, meaning that theoretically it would accommodate around 8% of Stratford District Council’s planned 400 houses, there are other factors, such as the lack of mains gas and regular public transport which make it difficult to accommodate more houses in Loxley.</p>	<p>Noted. Following Regulation 14 consultation Plot D has been removed from the Plan.</p> <p>Stratford District Council currently has at least a five year supply of housing against the figure of 14,600 for the Core Strategy plan period. It is important to remember that these commitments (whether for Loxley or the District as a whole) are planning permissions granted and not actual houses built. It is also important to remember that the 14,600 dwellings scheduled in the Core Strategy and the number identified for LSV4s are not a ceiling or cap. They are actually a minimum requirement. Though there are number of large-scale developments going through the planning application process at the moment, permission for them has not yet been granted. Because of that, they cannot be regarded as, or assumed to be, commitments or completions.</p>
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			<p>Moreover, the strong lack of desire in Loxley for more housing is evidenced by only 29% of respondents in the Housing Needs Survey stating that they are positively in favour of more homes (p. 12).</p> <p><u>Why the surprise inclusion of Site D in the NDP and has the decision process been influenced by the developer?</u></p> <ul style="list-style-type: none"> • The findings of the NDP working group have been disregarded with respect to Site D, hence leading to the resignation of both chairs. • Why deviate from the four recommended sites put forward by the working group (<i>Annex One</i>), when significant public money has been spent on the independent consultant? For clarity, the original four sites were labelled A-D, but the original site D is now site E in the NDP. • All working group members declared interests in sites adjacent to their own abodes and abstained from voting on them and the minutes reflect this. • At the public meeting of Wednesday, 16 May 2018, we witnessed some dissent among Parish Councillors as to whether there was unanimity in terms of the re-insertion of Site D during the previous Parish Council meeting of 13 March 2018. • The minutes and list of attendees of the Parish Council meeting on 13 March 2018 lead us to believe that the decision to reinstate Site D occurred in the presence of the landowner, perhaps for reasons of diplomacy. 	<p>The Housing Needs Survey is very dated and the views of the community have changed as indicated in the more recent survey responses undertaken as part of the NDP consultations. These responses indicate a majority in favour of development.</p> <p>Site D has been excluded from the Plan.</p>
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			<ul style="list-style-type: none"> • We believe the NDP consultation process has been compromised, however, by undue influence exerted by the developer on Loxley residents and potentially on Parish Councillors. Some examples follow. • A Site D landowner has also contacted us by telephone, text message and email on multiple occasions during the NDP consultation period. • The proposed developer for Site D has written to every household in Loxley in an attempt to persuade people to vote in favour of Site D, stating “it is sensitive to its surroundings, whilst delivering desperately needed new homes” and “We hope that you will support the scheme during the Neighbourhood Plan consultation as a solution”. • As a result, a group of 16 Loxley residents has circulated a letter expressing dissatisfaction at “a number of misleading statements” made by this “commercial company” in respect of Site D, which will have a “major impact on the ‘feel’ and ‘character’ of the village”. <p><u>Why has the full extent of Site D been included when only parts of Sites A, B, C and E are in the NDP?</u></p> <ul style="list-style-type: none"> • Our understanding is that the NDP working group recommended only including parts of sites which front the road to preserve the predominantly ribbon nature of the village. • Site D does not contribute to a linear village and by being the largest of all the sites, stands out in the consultation as the one which would potentially accommodate the largest estate of houses. • The recent written proposal circulated by the developer for eight houses on Site D is not a small-scale scheme and will go 	
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			<p>outside the existing Built Up Area Boundary for Loxley (<i>Annex Two</i>).</p> <ul style="list-style-type: none"> • Eight houses are currently proposed on Site D, but presumably the developer would wish subsequently to build more houses on the same site? • We believe it is misleading to present one site (D) which is much larger than all the others, as it gives the impression that all village development needs could be met on that individual site i.e. problem solved. <p><u>Loxley Parish Council objected to Site D in 2016 – why change its decision?</u></p> <ul style="list-style-type: none"> • In a letter dated 21 June 2016 addressed to Stratford District Council (<i>Annex Three</i>), in the context of a previous application for planning permission, Loxley Parish Council previously objected to Site D on the basis that: <ul style="list-style-type: none"> ○ “all existing hedging [would need to be] cut down”; ○ it would “increase the potential for vehicle conflict” and “which would be detrimental to public highway safety” especially given the lack of street lighting; ○ access to Site D is an “accident blackspot”; and ○ some of the adjacent properties have previously been subjected to surface water flooding: “any development on the site will aggravate the problem especially with the increase in impermeable surfaces”. • There have been no visible changes in terms of the access, safety, biodiversity or potential flooding risk of Site D in the intervening two years since the Parish Council’s letter of 21 June 2016. 	
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			<p><u>Previous rejection of Site D by planners – what has changed?</u></p> <ul style="list-style-type: none"> • The subsequent planning refusal for Site D dated 13 October 2016 stated: <ul style="list-style-type: none"> ○ “being significant ‘in-depth’ development would be a harmful departure from the existing linear form of the village contrary to CS.15 Requirements 2 and 3”; ○ “the need to “protect the contribution the boundary trees make to public amenity” ○ the grassland covering the site is “designated as a Local Wildlife Site” (<i>see attached plan supplied by Warwickshire County Council</i>) ○ “improvement cannot be made to mitigate lack of adequate visibility at the proposed point of access and as such the LPA considers that the residual cumulative impact of the development would be severe”. • A letter from the Highways Authority dated 7 November 2017 reinforces the access problems to Site D (referring to it as Site K): “The proximity of the adjacent properties could make it difficult to attain the necessary visibility”. • There is <i>no evidence</i> that the circumstances leading to the previous planning refusal have changed in any material respect regarding Site D. <p><u>Why are there contradictions between the inclusion of Site D and national planning policy and the NDP planning document itself?</u></p> <ul style="list-style-type: none"> • The inclusion of Site D is inconsistent with the following NDP policies and paragraphs: <ul style="list-style-type: none"> ○ H3 (a) (on “predominantly ribbon” developments) (p.17 NDP); ○ H3 (b) (avoiding the “detrimental erosion of space 	
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			<p>between and behind buildings... to preserve the open aspect of the village and retain links with the countryside beyond”; (p.17 NDP)</p> <ul style="list-style-type: none"> ○ H3 (c) “retain existing open green spaces within Loxley where they make an important contribution”, (p.17 NDP); ○ H3 (d) on density and scale; (f) “protect, or enhance landscape and biodiversity” (p.17 NDP); ○ H3 (h) “have regard to the impact on tranquillity, including dark skies”, (presumably an estate would require street lighting?) (i) “not increase the likelihood of surface water flooding within the village” (p.17 NDP); ○ paragraph 4.24: “a major part of the distinctive character of Loxley is the strong visual connectivity between the village and the rural landscape. The village has a mostly linear structure meaning that the majority of houses front, in a single row, onto a street and have direct rural views to the rear” (p.18 NDP). The inclusion of Site D would potentially affect the rural view of 20 houses and Loxley School as shown in <i>Annexes Four and Five</i>, which in a village of 100 houses affects around 20% of houses plus teachers and schoolchildren. ○ The Loxley Village Design Statement (incorporated by reference in paragraph 4.26), which opposed “backfill”, which although not a planning term, is understood to mean houses behind houses (p.18); ○ H4 (d) as no lack of “safe and convenient access to the site” (p.19). 	
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			<ul style="list-style-type: none"> ○ NE2, as no net gains in biodiversity are being demonstrated (p.25); ○ NE3 due to the likely removal of the hedgerow fronting the site (p.26); ○ Policy TT2 and paras 7.1-7.7 on “adequate and safe” access and the fact that nearby “the narrow, right-angled bend at the top of Manor Lane has been identified as a particular accident ‘black spot’ “(pages 32-33). <p><u>Some Site D specifics, based on our experience as adjacent landowners</u></p> <p>1. Access problems</p> <p>This point has previously been raised by the Parish Council itself. We refer you to the photographs <i>attached</i> to the Parish Council’s letter of 21 June 2016 in <i>Annex One</i>. <i>We attach two videos so that you may form your own conclusions.</i></p> <p>2. Accident Blackspot</p> <p>There are at least five recorded accidents on the blind bend at Goldicote Road and another unreported accident which we witnessed ourselves in November 2017.</p> <p>3. Local Wildlife Site and negative impact on biodiversity</p> <p>Please see <i>Annex Six</i>, a map showing Site D is a Local Wildlife Site supplied by Warwickshire County Council (shown by the green hatching).</p> <p>The inclusion of Site D would also disregard the recommendations of the National Planning Policy Framework which states that biodiversity, landscape and flooding should be given due consideration in forming an NDP.</p> <p>4. Flooding</p>	
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			<p><i>Annex Seven</i> is an Environment Agency search result. Increased tarmac due to a new development and road is likely to exacerbate the existing surface water flooding issue. The Parish Council raised this same point in its June 2016 letter about Site D.</p> <p><u>Other comments</u></p> <ul style="list-style-type: none"> • We would favour site D becoming an additional designated green space (question 5 in the NDP survey), as it is already a Local Wildlife Site • <i>Please see Annexed Material in the Support Documentation Section</i> 	
020	Rosemary Williams	Stratford-on-Avon District Council	<p>See separate document: Representation 20 – Stratford District Council Submission</p>	<p>See document below: Stratford District Council Comments</p>

Loxley Neighbourhood Development Plan
Pre-Submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General) Regulations, 2012)
Appendix 1 - Comments from Stratford-on-Avon District Council

Suggested new text underlined deleted text ~~struckthrough~~

Page no and para	Section	Comment	NDP Responses
p.2	List of Contents	List all policies under sections 4, 5, 6, and 7.	The policies have been listed as recommended by SDC
	List of Figures	Figure 5 is missing from the Plan, but consider it should be included. This will result in LGS sites being removed from Figure 2.	List of Figures has been amended to include Figure 5
p.5	Para 2.4	The quality of the environment has been recognised in national designations through listed building status and a Site of Special Scientific Interest. <u>Furthermore</u> And a significant part of the Parish falls within a Special Landscape Area (SLA) designated in Stratford District Council's Core Strategy.	Word 'Further' has replaced 'And'.
p.5	Para 2.5	states: 'approaching 100%' - This is open to interpretation and could be construed as being biased – The evidence needs to be 'robust', therefore, exact figures should be applied	Plan to be amended. 'approaching 100%' has been replaced with '97%'
p.9	Para 3.2	"Encouraging a thriving, vibrant and viable community that delivers a high quality of life for all <u>of</u> its residents	Amended. Word change amended as recommended by SDC
	2nd bullet	housing cannot be restricted to meeting local requirements	Amended. The words 'which will also assist' have been added in front of 'in meeting local requirements' so as to reflect SDC's recommendation.
	4th bullet	should refer to Neighbourhood Plan area as a whole not just the village plan area	Amended. The word 'village' taken out.
p.12	Policy H1:	Section 1 – the policy refers to a 'village boundary' as opposed to a 'built-up area boundary'. The reasoning for this is touched upon in the explanatory text. However, for all intents and purposes, the village boundary is a built-up area boundary with three large(ish) rear gardens excluded... with no explanation on the rationale behind this decision. The exclusion of only these 3 gardens is inconsistent in how the remainder of the 'line' has been drawn (and presumably been	The wording referencing either BUAB or Village Boundary has been changed to development boundary throughout the document to ensure consistency. Where the boundary has been drawn more tightly to that proposed by SDC, it has been done deliberately to exclude large gardens on the edge

Page no and para	Section	Comment	NDP Responses
		<p>assessed/evidenced?). Paragraph 2 of policy H1 states that ‘all areas outside the village boundary are classed as countryside’. How can it be correct that 3 gardens within the village are classified as ‘countryside’?</p> <p>Site D has previously been refused planning permission due to lack of provision of a satisfactory access and because it’s a Local Wildlife Site. The former may have been resolved through discussions with County Highway Authority referred to in para 4.3, but LWS is an important factor which has not been acknowledged and needs to be rigorously addressed.</p>	<p>of the village. The NDP proposes a Village Boundary whereas SDC propose a Built-up Area Boundary. The NDP is entitled to draw its own development boundary even if this differs from the District Council’s own proposed boundary. This was confirmed in the recent Examiners report for the Claverdon NDP where the Examiner accepted a different (tighter) boundary in the NPD to that proposed by SDC.</p> <p>Site D has been excluded given that:</p> <ul style="list-style-type: none"> • it has previously been refused planning permission due to lack of provision of a satisfactory access, which at the time of drafting has not been resolved, • because of its designation as a Local Wildlife Site • its location close to an accident blackspot • Significant opposition to the development of the site on the above grounds.
		<p>Section 2 – the density figure for a number of the proposed allocations sites are very low. The Plan seems to be promoting smaller (2-bed) dwellings, and also acknowledges the need to meet sustainability standards. Together, these objectives could lead to higher density development than being promoted through Policy H1. Based on 30 dwellings per Ha, site B would allocate 7 houses (as opposed to 4-5 houses) and site D would allocate 19 houses (as opposed to 6-8 houses). The densities promoted through the NDP could encourage the large 6-bed detached dwellings that the Plan is seemingly looking to actively discourage.</p> <p>In accordance with national policy, sites should not be subject to such scale of development obligations and policy burdens that their ability to be developed, is viably threatened (NPPF,</p>	<p>The sites are smaller than those indicated in the site assessments, therefore the densities are higher based on the site allocations proposed. A density of 30 dwellings per Ha in a LSV4 village would be out of character as the existing density of the village is significantly lower than 30 dph.</p> <p>Amend to recognise issues around viability and insert approximately. As noted above the sites allocated are smaller in size than those indicated</p>

Page no and para	Section	Comment	NDP Responses
		<p>173). This needs to be considered when imposing an upward limit. Evidence needs to be demonstrated as to why this limit has been imposed. Presently, the sites assessment has a higher limit than stated in the policy and states ‘around’, therefore, not limiting development to an upward limit. Evidence needs to robustly demonstrate why these limits have been imposed, contrary to the sites assessments.</p> <p>Robust evidence and justified conclusions need to be detailed as to why these sites have been selected. When examining the sites matrix, sites C, I, G and M all have good potential for development – why have these sites not been included, i.e. ‘reasonable alternatives.’</p> <p>Section 2 states ‘New housing in the countryside will be limited to dwellings for rural workers, replacement dwellings, the appropriate conversion of existing buildings and new dwellings with Policy H2.’ The policy needs to consider Paragraph 55 of the NPPF: ‘A dwelling of exceptional design’ and Policy AS.10 part E and J.</p>	<p>in the site assessments.</p> <p>These sites have been excluded because they are judged not to be reasonable alternatives.</p> <ul style="list-style-type: none"> • The landowner of sites C, D and G has expressly stated that the sites will not be made available for development. • Site I - road access is narrow and difficult due to the high level of on street parking. Public consultation revealed major opposition to the development of this site for this reason. • Site M is landlocked and no evidence has been provided to suggest this obstacle could be overcome. The site is elevated, located on the brow of the hill. Development would have significant adverse landscape impacts. <p>Amend in line with last para. of SDC comments in this section.</p>
p.13	Figure 2:	<p>Unsure as to the PC’s decision to omit 3 gardens from the ‘village boundary’.</p> <p>Consider the LGS designations should be removed from this map and added to a bespoke map [‘new’ Figure 5, which is indicated on the contents page in any case]. The LGS sites would also need to be numbered. In the ‘Legend’ box, mention of Local Green Space designations should be deleted and reference to ‘built-up area boundary’ should be amended to ‘village boundary’ for consistency, if that is the chosen description throughout the remainder of the Plan.</p>	<p>Substitute BUA boundary with Development boundary.</p> <p>Amended. Separate Development Boundary/Site Allocation map (Figure 2) and LGS map (Figure 5) have been created to reflect SDC’s recommendation.</p>

Page no and para	Section	Comment	NDP Responses
		A public footpath runs through site A	Incorrect, the path has been moved and now runs down the western boundary of the site, so does not cause any impediment to site A.
p.14	Policy H1 Explanation Para 4.2	should ‘built-up area...’ read ‘village...’ in the last line? The NDP recognises Loxley as a Category 4 LSV. It should be noted, as the Core Strategy does, that LSV designations can be changed dependent on new development and facilities, over the plan period; therefore, altering the housing requirements (CS.15 and CS.16).	Amended. Re-worded to Development boundary. Amended. Footnote added on page 14 to reflect SDC’s comment.
p.14	Para 4.6	Sentence is incorrect-replacement dwelling at Tanglewood Cottages has been completed and at least 2 of the 3 dwellings approved under 16/03659/FUL off Goldicote Road are under construction	Amended. The planning reference number has been changed as advised.
p.14	Table	Reference to ‘minus one home’ for 12/01592/FUL does not make sense without context. Should the description of development be added to help the reader understand better? The site at Ettingley Farm is not within the village and should be removed from the table, since this site would be associated with District wide housing figures, not the village’s housing figures. The planning reference for ‘Land off Goldicote Road’ is 16/03659/FUL, not 17/02943/VARY.	Amended. Explanation added at the bottom of the table.
p.15	Para 4.8	Understand the interpretation of a ‘village boundary’ will be different to a ‘built-up area boundary’, there appears to be no reasoning or evidence to state why this interpretation is appropriate or how it has been evaluated. It appears to have the effect of artificially ‘protecting’ a small number of rear gardens from potential(?) future development. This is not consistent given that there are other ‘large’ gardens included within the ‘village boundary’ elsewhere in the village.	Replace and consistently use Development Boundary throughout the document. The Development Boundary has been amended but some large gardens (e.g. Hillside Manor and Loxley House) have been excluded for the reasons stated above.
p.15	Para 4.9	should ‘built-up areas’ read ‘village boundary’? It is considered it is unreasonable and too restrictive to state that in-	Paragraph 4.9 reworded, now ending: ‘...to be allowed only within the Development Area

Page no and para	Section	Comment	NDP Responses
		<p>fill sites are only those that ‘fall between existing houses’. That is not what the policy says.</p> <p>Policy H1 doesn’t define ‘infill’ but the explanatory text seeks to do that. It is not appropriate to restrict other forms of small-scale development within the BUAB if it is otherwise appropriate. Site C is not infill as described in para 4.9 but is a proposed allocation.</p>	<p>Boundary.’</p> <p>Site C to be excluded :</p> <ul style="list-style-type: none"> Access is via a very narrow private drive with restricted visibility at the junction. Planning guidance suggest that private drives should provide access for up to 6 homes. Given restrictions to visibility LPC believe these guidelines should be adhered to.
	Para 4.11	<p>‘The allocations of sites B, D and E to create small cul-de-sac developments’</p> <p>Although supporting text, cul-de-sacs are not always an appropriate form of development. The design of the streets should vary to suit their position on the site, within the hierarchy of routes, the character of the area and the landscape network making up the settlement. As such, supporting text should not express, or limit, development to certain design principles without a masterplan. Furthermore, NDPs should not threaten the viability of the development, it may be possible limiting the sites layout to cul-de-sacs limit the viability of the site(s).</p>	<p>Amended. The wording ‘to create small cul-de-sac developments...’ has been replaced with will ideally accommodate small developments...’.</p>
p.16	Policy H2	<p>Replace ‘permitted’ with ‘supported’ in first line.</p> <p>May want to refer in the opening text for clarity, that this policy is aimed as a rural exception site, i.e. outside the confines of the BUAB, where appropriate, and identified if there is a proven unmet local need.</p> <p>What is the Policy trying to achieve by stating; ‘an element market housing may be included...’</p> <p>Does this mean schemes will be supported if the applicant can demonstrate a sufficient uplift for the development to considered viable and have reasonable prospect of obtaining ‘competitive returns’ for the applicant(s), as defined by the</p>	<p>Amended. ‘Supported’ has replaced ‘permitted’ in Policy H2.</p> <p>Policy has been amended to include the term rural exception.</p> <p>The policy has been amended to clarify that an element of market housing may be included within the rural exception scheme.</p>

Page no and para	Section	Comment	NDP Responses
		<p>NPPF? If so, the developer has the ability to provide a level of affordable housing and then demonstrate, through a viability assessment, that a range of marketed housing is required (therefore, it is possible that large schemes could be supported as rural exception sites).</p> <p>The Policy states: Land Owners – this should be changed to Applicants. Land owners may not, and are not required, to specifically submit planning applications for determination. Therefore, planning obligations fall to the applicants.</p> <p>The Plan does not allocate any housing sites of sufficient size to attract an affordable housing requirement. Consideration should be given to allocating a smaller number (or even just one) larger housing site, with a view to securing affordable housing provision on site</p> <p>The revised NPPF does refer to the possibility of applying a lower threshold (of 5 dwellings) for mandatory affordable housing provision. It may be useful for the Parish Council to revisit this issue in the light of the new guidance and perhaps consider introducing a policy applying a lower threshold that that currently in the Core Strategy.</p>	<p>Amended. ‘Land Owners’ has been changed to ‘Applicants’.</p> <p>It has not been possible to identify a large site within the Plan suitable for affordable housing. Site B is the largest site and an planning permission has already been granted for this site. This reflects the significant highways and topographical constraints within the village, however policy H2 provides support for securing the development of affordable housing should a suitable site come forward.</p>
p.17	Para 4.17	<p>The requirements are only limited to people within the Parish or connection to. Consideration needs to consider people in the vicinity of the Parish, especially if no-one comes forward that meets the specified requirements. Further text could be incorporated to connections within the district.</p> <p>Strongly recommend that any policy references simply seek to establish the principle that preference should be given to allocations/nominations to people with a local connection in the first instance, via a S106 Agreement, but allowing flexibility to cascade beyond if there are no bidders with a qualifying local connection. This flexibility is essential, otherwise housing associations will be unable to acceptably</p>	<p>Amended. Paragraph 4.18 has been expanded to reflect SDC’s recommendation.</p> <p>Paragraph 4.18 has been amended to reflect this suggestion.</p>

Page no and para	Section	Comment	NDP Responses
		<p>mitigate risk and therefore be unwilling to develop. Setting out this approach would be preferable to including detailed local connection criteria, which may change in detail over time anyway.</p> <p>The Council's housing register and criteria needs to be measured before allocating housing to local people. The Parish Council may want to consider incorporating a phrase, along the lines of; The Parish Council will work closely with Stratford-on-Avon District Council to help ensure local housing is available to local people, where applicable.</p>	<p>Amended. Paragraph 4.18 has been expanded to reflect SDC's recommendation.</p>
p.17	Policy H3	<p>First paragraph should apply to the whole Parish (Neighbourhood Plan area). Certain specific provisions do as well, eg. (a), (e), (f), (g), (h), (i).</p> <p>Insert 'development' between 'ribbon' and 'building' in criterion (a).</p> <p>Criterion e) conserve or enhance heritage assets including listed buildings and their settings Whilst the sentiment of this policy is understood the NPPF requires the significance of an asset and the extent of any harm to be balanced against any other public benefits of development. Paras 194-196 of NPPF July 2018</p> <p>Criterion f) protect, or enhance landscape and biodiversity by incorporating landscaping consistent with Warwickshire <u>County Council</u> Landscape Guidelines</p> <p>Criterion (g) is very general, using phrases such as 'sweeping views' and needs to be more precise. Where is the evidence for this Policy to be enforced, i.e. LVIA's?</p> <p>Criterion (i) requesting an appropriate archaeological survey</p>	<p>Amended. At the end of the first paragraph, 'Loxley village and its countryside setting' has been changed to 'the Neighbourhood Plan Area'.</p> <p>Amended. 'development' inserted.</p> <p>Amended. Added 'balancing the significance of the asset and extent of any harm vis-a-vis any other public benefits of development'</p> <p>Amended. 'County Council' inserted.</p> <p>An LVIA would be prohibitively costly to produce. Further an LVIA is not essential at the plan preparation stage and would make the plan making process unviable due to the cost implications. Amended wording; 'sweeping' has been replaced with 'panoramic'.</p>

Page no and para	Section	Comment	NDP Responses
		<p>would be too onerous for all development proposals. Last part of (i) should be a separate point (j) as it covers a distinct topic.</p> <p>In the final paragraph, suggest replacing ‘be resisted’ with ‘not be supported’ for consistency of language throughout the Plan.</p>	<p>Amended. ‘and be preceded by an appropriate archaeological survey to ascertain the implications of development on below ground heritage assets’ has been removed.</p> <p>Amended. ‘be resisted’ has been replaced with ‘not be supported’</p>
p.20	Policy H5	<p>3rd line – use initial capitals for Special Landscape Area</p> <p>Not considered appropriate that the emphasis is that replacement dwellings ‘must’ comply with all 5 criteria set out in the policy [particularly given the restrictive nature of the criteria!!]...this is far too restrictive.</p> <p>Do not agree with criterion (a) which is loosely based on the type of restriction that can be seen with policies relating to new/replacement/extended dwellings within Green Belt. Loxley is not in the Green Belt and whilst it is acknowledged much of the village is located within a SLA, these ‘tests’ are not appropriate and far too restrictive.</p> <p>It is not clear why every new house must have a garage and domestic storage (as set out in criterion (b)). Again, this is far too restrictive, as a particular site may be perfectly acceptable in all other respects for a dwelling but may not have the land necessary to provide a garage.</p> <p>There is no justifiable planning reason to refuse a planning application for not providing an ancillary structure!</p> <p>Criterion (c) to be too restrictive. What if the original dwelling did not have a garage, garden maintenance and/or domestic storage? There is no requirement in law for a replacement dwelling to be constructed on a similar footprint to the original. An owner has the right to submit a revised siting for a dwelling anywhere within their lawful curtilage. Each</p>	<p>Amended.</p> <p>Amended. ‘must’ has been replaced with ‘should’.</p> <p>Amended. Criterion (a) re-worded to: ‘Not to be disproportionately large relative to the size of the plot’.</p> <p>Amended. Criterion (b) re-worded to: ‘Consider the need for- and potential to provide – garages’.</p> <p>Amended. Criterion (c) removed.</p>

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		application should be assessed on its merits and if it is concluded the new site would cause no harm to street scene, landscape character, neighbouring amenity etc, there should be no lawful reason to refuse a revised location beyond a 'similar footprint'. Overall, this policy is far too restrictive and affects an individual's 'rights and freedoms' to do what they want with their own property.	
p.20	Policy H5 – Explanation Para 4.31	The final sentence of the para purports that the policy is not intended to overly restrict people's 'freedom of expression...'it appears that this is what it is doing and therefore this sentence should be removed.	The sentence has been left in the plan because the Steering Group does not agree with the Council that the requirements contained within Policy H5 do overly restrict people's choice. Moreover, the policy provides a framework for assessing replacement dwellings with sufficient flexibility.
	Para 4.32	States that 'good quality' dwellings should not be demolished to 'meet personal preference or desire'. It is wholly inappropriate and unacceptable for the NDP to attempt to impose such restrictions. The owner of any dwelling has the right to apply to the LPA to demolish it and replace it with a new structure. Again, each case will be assessed on its own merits under the existing planning legislation. This para should therefore be deleted.	Amended. Paragraph 4.32 has been deleted.
	Para 4.33	Supports replacement dwellings that 'do not result in disproportionate replacements...' but does not provide evidence to support such a request. Whilst Policy CS.12 of the Core Strategy indicates that development proposals which cause a 'harmful effect on the distinctive character and appearance' of a SLA will be resisted and acknowledges that the 'cumulative impact' of development proposals on the quality of the landscape will be taken into account, it is not considered that Policy H5 or its explanatory text reflects the CS perspective and is far too restrictive. Para 4.33 should be deleted.	Amended. Paragraph 4.33 has been deleted.
	Para 4.35	Appears to be imposing a restriction akin to Green Belt Policy PR.2 of the previous District Local Plan. Current Green Belt	Retain but amended para. Paragraph 4.33 (previously 4.35) is now:

Page no and para	Section	Comment	NDP Responses
		<p>policy has moved away from volumetric restrictions but talks of any replacement building not being ‘materially larger’ than the original. Therefore, this para would not comply with current thinking on Green Belt. Loxley village is not within the Green Belt. Therefore, these restrictions do not, and should not, apply. There is no reasoned justification for this policy stance and therefore this para should be deleted.</p> <p>Specifying 30% is not justified; at the very least, reference to it should be toned down by saying this is a guideline and larger dwellings may be appropriate in certain cases.</p>	<p>‘To address this issue and in order to ensure that replacement dwellings are not disproportionately larger, as a guideline the Plan considers that they should be no more than 40% larger in volume and footprint than the original dwelling as it currently exists, recognizing that larger dwellings may be appropriate in certain cases but these cases would need justification.’</p>
p.21	Policy NE1 Para 5.2	<p>suggest removing ‘...skyline and...’ if reference removed from policy</p> <p>The designated valued landscapes need to be supported by robust, up-to-date, evidence (i.e. LVIAs). The valued landscapes should be in accordance with current best practice landscape character guidance as set out by National England (NE). The assessment methodology ‘An Approach to Landscape Character Assessment’, confirmed by NE in 2014, incorporates the assessment processes set out in the 2002 guidance note ‘Landscape Character Assessment Guidance for England and Scotland’.</p>	<p>Amended. ‘Skyline and’ removed</p> <p>Designated landscapes do not need to be supported by an LVIA. There are many examples of approved NDPs that have been adopted without having an LVIA. However, amended working where evidence is available on usage and value.</p>
	Para 5.3	<p>Refers to ‘...the characteristic vegetation and habitat type’...’ but it is unclear what this is. Is it referenced in a separate document, through a habitat assessment? If so, this needs to be confirmed. If this is more of a ‘general statement’ it should be deleted.</p>	<p>Amended. Para 5.3 reworded to: ‘The character of the landscape is derived from ‘natural’ factors, its geology, topography and geographic location’.</p>
p.22	Para 5.4	<p>the final sentence refers to ‘some’ valued landscapes being illustrated in Fig.3. This suggests there are others...is this correct, or is this list definitive? If the latter, suggest removing ‘Some of...’.</p>	<p>Amended. Reference to “Some of...has been removed.</p>
p.25	Policy NE2	<p>Consider removing the word ‘all’ from the first para.</p>	<p>Amended. ‘All’ has been removed.</p>
p.26	Policy NE3	<p>Trees and hedgerows can be removed without prior consent in a large number of circumstances and as such it is not possible</p>	<p>Amended. Replaced ‘retain and protect’ with ‘encourage the</p>

Page no and para	Section	Comment	NDP Responses
		to ensure their retention in development proposals. The best that can be done is to encourage their protection. Therefore, suggest replacing ‘retain and protect’ with ‘encourage the protection and retention of’ in the first para. It is unclear how the policy can insist on planting an ‘equivalent or better standard’ tree or hedge if it is removed as part of a development proposal, particularly if a 60 year old mature tree is to be replaced.	protection and retention of’ in the first para.
p.27	Policy NE4	The policy should incorporate a point about; exceptional circumstances and/or in the interests of national needs.	Amended. ‘...apart from where there are exceptional circumstances and/or it is in the interests of national needs’ has been added to the end of the second para.
p.28	Policy LC1	Suggest delete ‘ancillary’ in two places in policy as three of the assets are entirely open spaces. Suggest replacing ‘be resisted’ with ‘not be supported’ in first para for consistency of language throughout the report. Given that the policy seems to refer to buildings (plus any ancillary land associated with those buildings), is it appropriate to include sites 4 and 5 in this list, given that they are areas of land. Both the recreation ground and village green are listed as proposed LGS under Policy LC2, which would seem to be more suitable. Suggest removing sites 4 and 5 from Policy LC1.	Sites 4 and 5 have been removed, so can leave the ‘ancillary’ reference in. Amended. Replaced ‘be resisted’ with ‘not be supported’ Amended. Sites 4 and 5 have been removed.
	Figure 4	Remove sites 4 and 5 from the ‘Community Assets’ map, for the reasons described above	Amended. Sites 4 and 5 have been removed from the map.
p.30	Policy LC2 CIL	Suggest providing a separate map [Figure 5] showing the 3 no. proposed LGS sites. Therefore, it would be necessary to replace ‘Figure 2’ with ‘Figure 5’ in the first para. In para 3, replace ‘permitted’ with ‘supported’, for consistency of language throughout the Plan. May want to consider listing priorities, i.e. community assets, green spaces, which you want to use CIL Funding towards.	Amended. Figure 5 is now a separate LGS map Amended. Replaced ‘permitted’ with ‘supported’ The Steering Group has considered this and has decided not to prioritise at this stage.

Page no and para	Section	Comment	NDP Responses
		<p>Consider what requires the most funding, initially.</p> <p>Is public house field in private ownership? If so, is it appropriate to use CIL funding to maintain/upgrade it?</p>	<p>Disagree, the policy clearly states, ‘Where appropriate, CIL funds will be used to enhance designations in public (bold added for emphasis) ownership...’</p>
p.32	Policy TT1	<p>May want to consider incorporating ‘where appropriate, development must include adequate...’ instead of all development. Not all development requires off-road and accessing arrangements.</p> <p>Second and third paragraphs will be superseded by parking standards provided in Development Requirements SPD.</p>	<p>Amended. ‘where appropriate, development must include adequate...’ has replaced ‘all development’</p> <p>Regarding Local Parking Standard²: This is a non-strategic policy in line with NPPF(2019) para 28-30. SDC’s Development Requirements SPD Part F (as of 1/4/19) has not been adopted by SDC and is therefore supplementary and only taken in as material consideration. Core Strategy Policy CS.26 C Parking Standards starts by saying “Parking provision will reflect local circumstances and have regard to promote sustainable transport outcomes.” It is important to note that Policy TT1 is therefore not in conflict with either of these documents. The Steering Group recognises the draft district standard, acknowledge that we have taken it into account but have decided to create a local standard. Our plan is entitled to create a local standard that is appropriate to our area based on local evidence and justification in line with NPPF (2019) para 105. Loxley</p>

² Examples of made plans with local parking standards:

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

Page no and para	Section	Comment	NDP Responses
		<p>Paragraph 4 is considered too restrictive for validation/determination requirements. It might not be reasonably possible for some development to not exacerbate on-street parking, but, the proposal complies with, and enhances, all other policies within the development plan, i.e. affordable housing need. Therefore, the overall merits of the application are considered to outweigh the constraints. Suggest rewording as follows:</p> <p><i>Development proposals which exacerbate the current, strenuous, on-street parking within the village, will not be supported unless substantial and sufficient evidence can demonstrate why this proposal is required, effective and meets all other requirements and policy stipulations, as stipulated by the area's development plan policies.</i></p>	Amended. Paragraph 4 has been amended as recommended by SDC.
p.33	Policy TT2	<p>Suggest replacing 'be resisted' with 'not be supported' in final para for consistency of language throughout the report</p> <p>Also considered too restrictive for validation/determination requirements</p>	Amended. Replaced 'permitted' with 'supported'

Consultation Responses Supporting Documentation

The following documents are referred to in the Consultation Summary document and are attached below:

1. Representation 09 Warwickshire County Council Flood Risk Management Comment
2. Representation 019 Anon Resident Material Annexed to the Letter

Tabulated Warwickshire County Council Flood Risk Management Comments on the Loxley Neighbourhood Development Plan 2011 - 2031

WCC FRM has the following content related comments:

Page	Paragraph No.	Commencing:	Comment
9	3.2	<i>Vision Statement</i>	The stations refers to minimising flood risk and mitigating climate change; however there is no specific policy related to this in the document (see point in box below).
	3.3	<i>Goals</i>	You could develop the first point to include 'sustainable' new build homes, which includes designing and building sustainable urban drainage systems.
17		<i>Policy H3 – Design and Character</i>	<p>We would encourage retaining open green spaces. There is a point about not increasing the likelihood of surface water flooding; this needs to be developed further. Areas of Loxley are at medium-high risk of surface water flooding according to the Environment Agency data maps; it might be worth checking the flood risk online at https://flood-warning-information.service.gov.uk/long-term-flood-risk/map</p> <p>We would suggest that you add a new policy or point specifically for Drainage and Flood Management, this could include that the Lead Local Flood Authority requires the use of above grounds SuDS designed in accordance with CIRIA 753 SuDS Manual. Providing attenuation to greenfield runoff rates (inclusive of developing on brownfield land), and include that 5 l/s is NOT the minimum possible discharge rate is achievable.</p> <p>In relation to this point, the requirements set out in the following documents should also be adhered to in all cases:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework • Paragraphs 030 - 032 of the Planning Practice Guidance (PPG) • DEFRA's Non-statutory technical standards for sustainable drainage <p>The adoption and maintenance of all drainage features is a key consideration to ensure the long term operation and efficiency of SuDS. As part of the planning procedure the LLFA will expect to see a maintenance schedule, at detailed design stages. All SuDS features should be monitored and cleaned regularly as a matter of importance.</p>

Steering Group response: Page 9, 3.2: Vision Statement:

Steering Group response: Page 9, 3.3: Goals: 'Sustainable' added to first bullet point.

Steering Group response: Policy H3: Policy NE5 – Flooding added

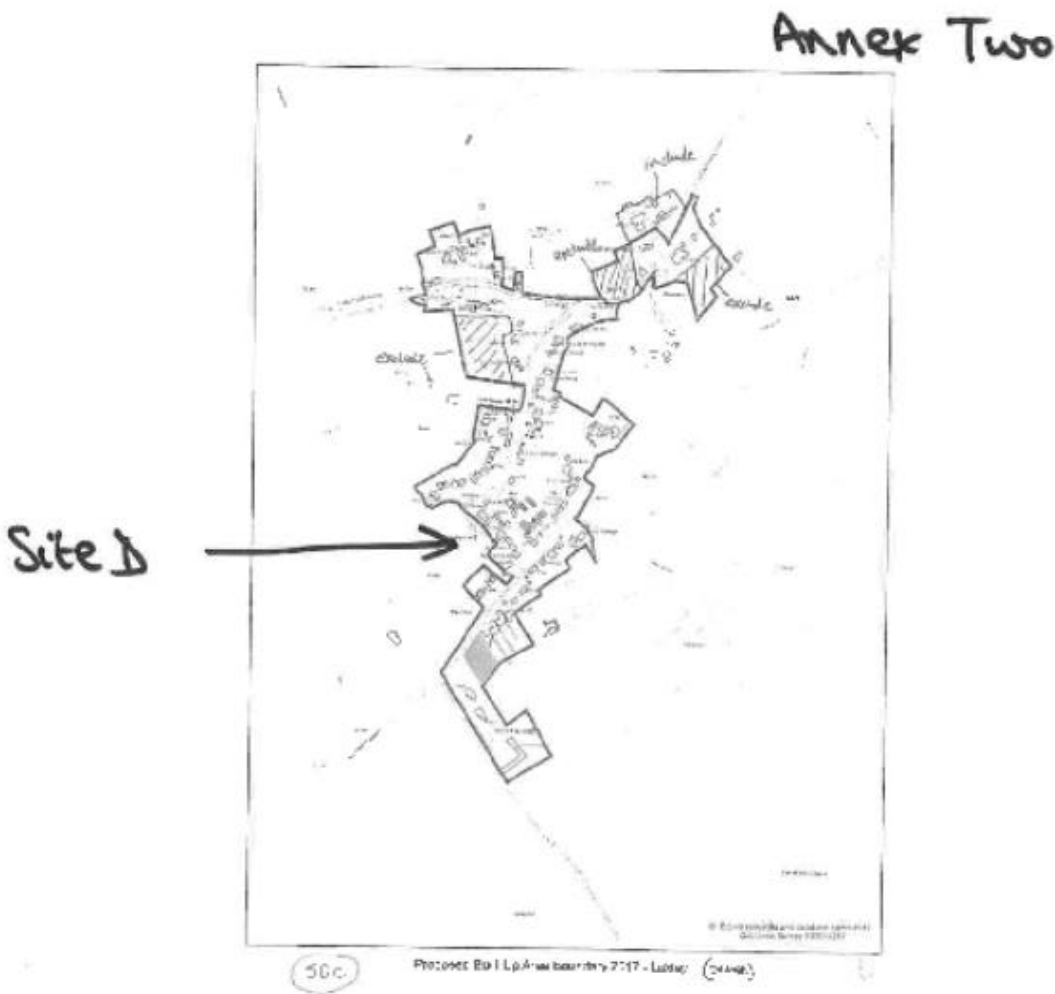
Page	Paragraph	Comment
25	<i>Policy NE2 – Biodiversity</i>	You could add a point to encourage new developments to open up any existing culverts on a site providing more open space/green infrastructure for greater amenity, biodiversity and reduced flood risk; and the creation of new culverts should be kept to a minimum.
27	5.18	There is a point about being prepared for flooding and improved resilience through low carbon neighbourhoods, but it doesn't really explain how this will happen. You could mention more about sustainable drainage and how designing SuDS into future developments is a necessity.

Steering Group response: Page 25, Policy NE2: A new second paragraph has been added with the wording as recommended by WCC Flood Management

Steering Group response: Paragraph 5.18: The words '(through for example sustainable drainage and prioritizing the design of SuDS into future developments)' has been added to the fifth bullet point.

Representation 019 Anon Resident Material Annexed to the Letter





Loxley Parish Council

Annex
Three

Mr A Young
Senior Planner
Stratford on Avon District Council
Elizabeth House
Church Street
Stratford upon Avon
Warwickshire
CV37 6HX

21 June 2016

Dear Mr Young,

Planning Application 16/01355/OUT - Land at rear of Box Tree Cottage, Loxley

The response of Loxley Parish Council to the above application is one of **objection** for the following reasons:

1 At the access, Goldicote Road is subject to a 30mph speed limit which we understand from previous applications the Highway Authority would require splays of 43 metres in both directions (measured 2.4 metres back from the carriageway). Currently, only 32 metres can be achieved to the left at best (entering the village), and this is on the basis that all existing hedging is cut down (Photo 2). It is not clear whether the required splay can be achieved to the right (leaving the village), as the existing view is blocked by hedging which again would need to be completely removed (Photo 3).

As the required visibility splays cannot be achieved at the access onto the public highway, the significant increase in vehicle trips generated by the site following the development will increase the potential for vehicle conflict, which would be detrimental to public highway safety.

Not only does the development not meet the required splay, but we would further highlight that the immediate vicinity is also an accident black spot. At least four vehicles in the recent past have failed to negotiate the bend. This has resulted in structural damage to the Old Post Office located on the corner of Goldicote Road; the most recent incident occurring this time last year. This has required the Parish Council to fund traffic calming measures in the vicinity, although there is a limit to what we have been able to achieve in the absence of street lighting – which in the view of the Parish Council is also a material consideration.

Here the Council notes that the supporting documentation contains a number of errors, including incorrect reference to street lighting¹. The village has no street lighting and there is no support from the community - or indeed any funding available - to suggest this is likely to change in the foreseeable future. This exacerbates issues of visibility, further increasing the potential for vehicle conflict.

¹ BWB. Transport and Infrastructure: Highways Statement. April 2015

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- 2 The location constitutes backfill, contrary to the Village Design Statement² which states : *'There has been limited backfilling which would negatively impact on the open character of the village'*. The policy adopted by the Council states: *'Ensure that there is no backfilling in fields behind the houses in Loxley and the current density of one house next to the road is maintained'*. The requirement to remove all adjacent hedging (not all of which is in the ownership of the applicant), would contribute to suburbanising the village, again contrary to policy set out in the Village Design Statement.

It should also be noted that Loxley is designated as a Neighbourhood Development Plan Area. The Parish Council has previously commissioned a Housing Needs Survey and the community are currently making good progress with the Plan, the next phase now looking to identify and appraise suitable housing sites. This follows the recent completion of a comprehensive survey of residents views in which 91 households responded (just over 60%). The survey supports the policies set out in the Village Design Statement (noted above). The results indicate the proposed development is at complete odds with the wishes of the local community who expressed a strong preference for:

- Development to be located in infill sites and/or the village periphery but **not** backfill sites (51% not in favour of backfill sites)
 - Several smaller developments or individual plots but **not** one large development (89% not in favour of one large development).
- 3 There have been problems of drainage on the site which have caused flooding to adjacent properties in recent years. Any development on the site will aggravate the problem especially with the increase in impermeable surfaces.

The objection is therefore based on a mix of highways, planning and community considerations. Of these the highways concerns are paramount given the splays are not met, the area is an accident black spot and there is no street lighting.

Collectively the Parish Council consider these factors provide a strong basis for rejecting this application, also the local community has expressed strong opposition to this proposal for material planning reasons and this must be given appropriate weight when determining this application.

Loxley Parish Council requests that this application be referred to the appropriate planning committee for determination.

Yours sincerely



Robert D Armstrong
Parish Clerk
Loxley Parish Council

2 Adopted by SDC as planning policy in March 2007.

Photographic evidence : visibility from the proposed development site



Photo 1: Indicating where photos 2 & 3 are taken from (2.4m in from the edge of the road at the centre of the proposed roadway.)



Photo 2: Visibility to the left from 2.4m in from the edge of the road at the centre of the proposed roadway.



Photo 3: Visibility to the right from 2.4m in from the edge of the road at the centre of the proposed roadway.



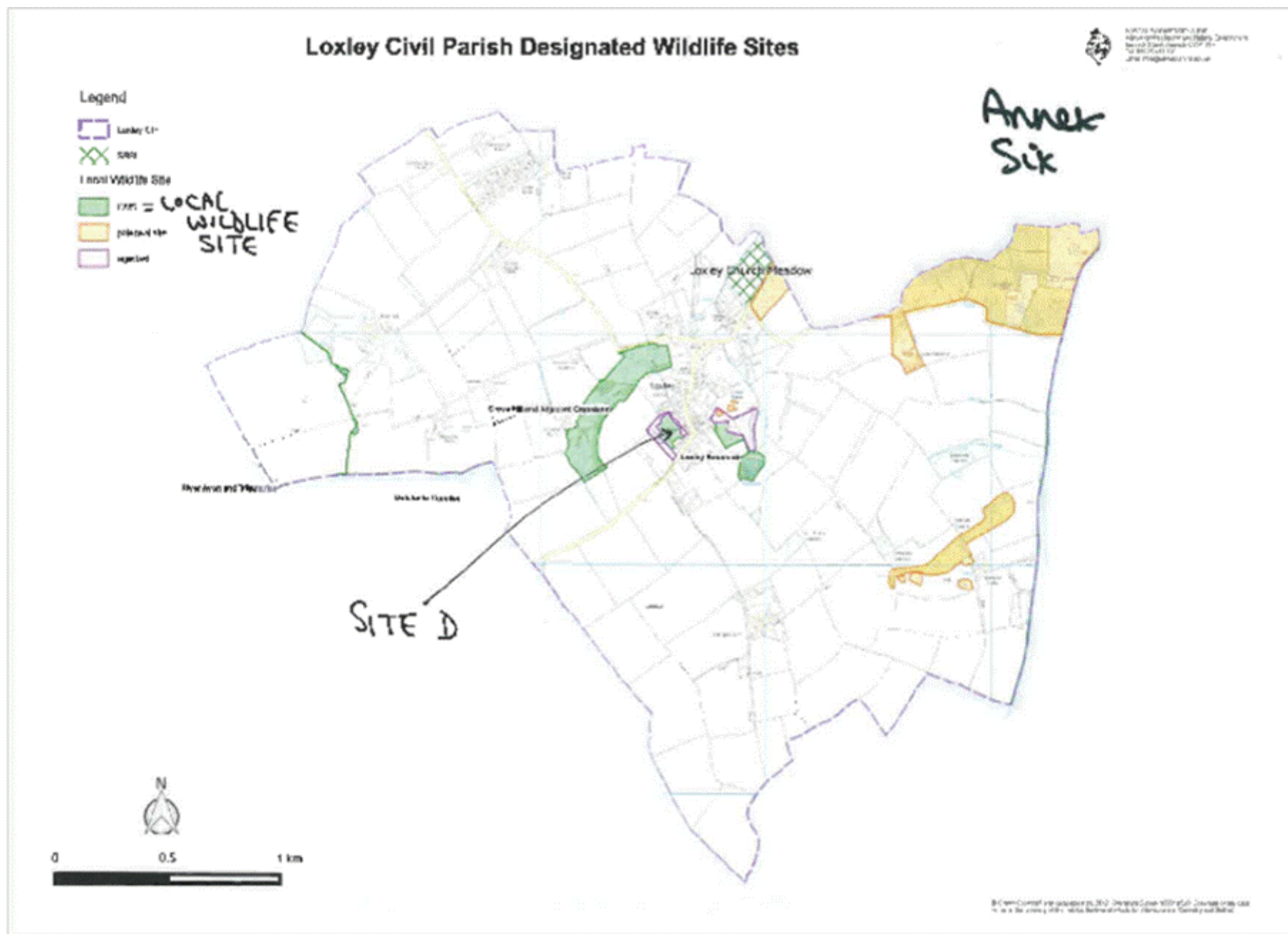
Photo 4: Visibility to left from edge of road – note front of car would be in the middle of road for driver to get this visibility (apx 32m).



Photo 5: Visibility to right from edge of road – note front of car would be in the middle of road for driver to get this visibility.







Annex Seven

