

Kineton Neighbourhood Plan

SDC Comments on Submission Plan

[KPC response to those comments in red]

SDC commend all the work that has gone into the writing of the Kineton Neighbourhood Plan. The plan is easy to read, well laid out with targeted policies focussing on delivering the community's vision and objectives.

Detailed comments on policies follow, in order to assist the clarity of them and ensure they meet the basic conditions:

Introduction

Para 1.1 – The Core Strategy plan period is 2011-2031, not 2015-2031.

Change to be made in final document.

Para 1.3 – If this is referring to the adopted Parish Plan from 2003, I consider the phrase 'Village Plan' should be replaced by 'Parish Plan'.

'Village plan' to be replaced by 'parish plan' throughout final document.

History and Future

Para 3.8 – It is not clear which properties are at risk of flooding. This statement appears (on the face of it) to contradict the content of paragraph 3.14, which seems to refer to the village as not being at risk of flood.

There are approximately three residential properties which are sufficiently close to the River Dene to experience flood damage. There are several more where gardens are often flooded. The village, in totality is at low risk. The three properties could, if necessary, be identified on an additional map. The EA's fluvial flood map of the village is set out below:

Enter a postcode or place name:

Other topics for this area...

Flood Map for Planning



Map legend

Click on the map to see what Flood Zone (National Planning Policy Guidance definitions) the proposed development is in.

- Flood Map for Planning (Rivers and Sea) ⓘ
- Flood Zone 3
- Flood Zone 2
- Flood defences (Not all may be shown*)
- Areas benefiting from flood defences (Not all may be shown*)
- Main River Line ⓘ
- Main River Line
- Other national environmental organisations ⓘ
- Natural Resources Wales Area of responsibility
- Scottish Environment Protection Agency Area of responsibility

X: 433,744;Y: 251,003 at scale 1:15,000

Other maps ⓘ Data search ⓘ



Para 3.10 – As para 1.3.

Para 3.15 – This paragraph tackles the issue of commercial development. However, the Landscape Sensitivity Study has a separate ‘rating’ for the different ‘zones’ around the village for housing development. I think this these different findings/categorisations need to be addressed in the NP, especially since the emphasis of the plan is on housing matters, rather than commercial development.

Whilst the NP has not provided any evidence to contradict the findings of the Landscape Sensitivity Study, sites within the higher sensitivity zones have been advocated over lower sensitive sites/locations. I am concerned that this does not comply with the NPPF or NPPG guidance. Additionally, it could be seen as ‘flying in the face’ of the Landscape Sensitivity Study, one of the few evidence documents the NP refers to.

When considering potential sites for the allocation of housing a number of factors or material considerations were explored including, amongst others, the Landscape Sensitivity Study (LSS). Consideration of the LSS was given in the wider context rather than as a stand alone piece of evidence. Firstly, the categorisation of land within ‘high sensitivity’ has not excluded development in the past. For example a development of 8 houses off Banbury Road (Planning Ref. 14/02761/OUT) was recently granted despite it being in the ‘high sensitivity’ category of the LSS.

Secondly, it cannot set a priority listing when other matters such as traffic and infrastructure are of significant concern to local residents.

Site selection has gone through a rigorous assessment process which forms part of the evidence base to the NDP.

KPC does not believe that allocating land in an area identified as high landscape sensitivity as opposed to medium landscape sensitivity represents a fundamental conflict with the Core Strategy or the NPPF particularly where there is robust evidence to explain why the sites have been selected.

Para 3.17 – Should the bullet points be integrated into the policy?

Paragraph 3.17 could be converted to a policy entitled 'Core Principles' if this is necessary. Use of the words "significant weight" suggest that it should be rather than supporting text, which of course has less weight than a policy in the NDP.

Para 3.17(d) 2nd bullet – The justification for such a road is unclear, as is the means of providing it in terms of land ownerships and who will pay for it. Such a proposal needs to be based on robust evidence. I would expect Warwickshire County Council to have been involved in bringing it forward in terms of justification/purpose/design/implementation.

KPC has been frustrated throughout this process by a lack of engagement from the County Highway Authority. Despite two direct consultation submissions to WCC there has been no comments offered by the Highway department. The inclusion of this requirement in policies for specific developments appears later in the plan and is fully supported by residents.

Vision Statements

I note there are 9 statements listed in the plan. Whilst there are associated policies relating to certain specific visions, there are other visions which do not have relevant policies set out in the plan. Some examples of this are:

Health – the vision looks to protect and improve health facilities, but there is no policy on this.

Leisure – the vision indicates an identified need for additional playing fields etc. If there is evidence for this, there is no policy to attempt to achieve this.

Tourism – the vision states that Kineton has an opportunity to improve its potential as a base for visitors. However, there does not appear to be a policy in the plan to achieve this.

Whilst the plan concentrates specifically on housing developments – because this is the greatest concern of the residents and the most significant pressure facing the village - it seems appropriate that the community should see the vision for the village which influences those policies.

Policy IN2 Community Facilities covers the enhancement and protection of health facilities and the explanatory text refers to retaining existing facilities which promote a healthy community.

Similarly, playing fields are a community facility captured by Policy IN2 although they could be specifically referred to if deemed necessary.

Tourism in the Neighbourhood Area is limited to day trippers with some opportunity for overnight or multiple night stays in holiday accommodation. Policy D10 Heritage Assets seeks to preserve the neighbourhood areas most precious buildings and includes the famous registered battlefield

which is has significant historical importance. Earlier drafts of the NDP did consider whether to include a policy on the battlefield and in particular a new visitor centre and experience. However, this was not included in the final draft due to uncertainties over funding. The principle of any such proposal would be considered in the context of its own merits by the District and Parish Councils through the Development Management process.

Policy D6 Reuse of Rural Buildings specifically addresses the issue of new holiday lets (self catered or otherwise).

Vision Statement - Housing

The vision states that "any new housing would be in smaller developments..." - this seems incompatible with the size of allocated site 1 (Policy SSB1) and the safeguarded land. The desire for smaller sites is not unreasonable, but suggests the vision should be clarified by making specific reference to SSB1 and safeguarded land and their roles since these are exceptions to the general aim of smaller sites.

Clarification could be added to the final plan document to the effect that the vision for smaller sites and the absence of sufficient small sites to accommodate the total housing requirement has led to the need for at least one larger site.

The vision also states that "the provision of housing should meet the identified local needs of the neighbourhood area". This is inconsistent with Policy H1 which states that housing will meet District wide needs. The vision should clarify that x number of homes are for District needs and any additional homes are solely for local needs.

Clarification/rewording is needed in the final text. In effect the local needs must be satisfied in the sense of affordable housing (tenure and number) whilst the district wide need is driving the total numbers of market and affordable housing to be allocated to the village.

On this issue, the Core Strategy does not set a specific figure for the number of homes that Kington should deliver by 2013. Rather, it is a combination of the number of homes built, committed (with permission) and a proportion of the 720 homes to be identified in Stratford-upon-Avon and the MRCs as a whole. The figure of 100 seems appropriate as a contribution to District wide needs. Any homes provided above this would then be additional to the District Housing requirement and could be provided to meet local needs.

The allocation of a Strategic Reserve site in the plan is a very sensible and responsible approach by the Parish Council. It clearly shows that the future proofing of the plan has been considered. It clearly shows that the Parish Council are being proactive and positive in promoting development rather than resisting it.

Para 4.4 – Housing development in Kington during the plan period is also related to a substantial amount of in-migration from outside the District, not just to meet local housing needs.

Noted

Vision Statement - Conservation

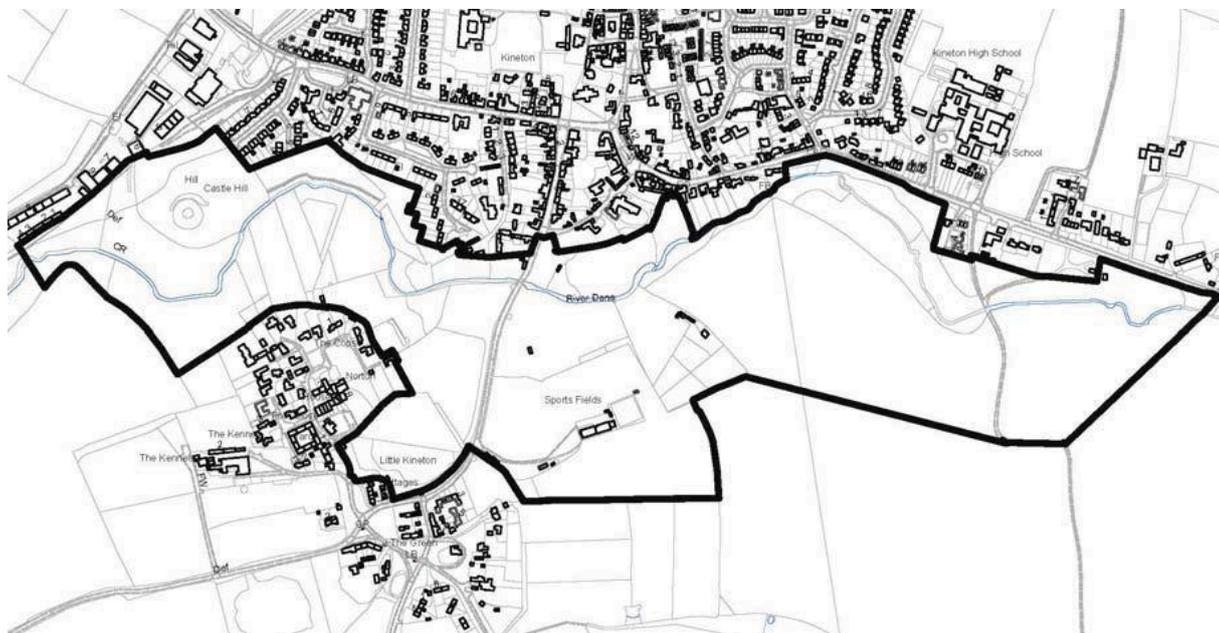
Para 4.8 – It does not appear that there are any policies within the NP which look to promote the list of proposed 'betterments' listed in this paragraph.

The following policies will assist in achieve the Conservation vision:

D1 Design and Character, D2 Responding to Local Character, D10 Heritage Assets, E6 Trees and Hedgerows and IN4 Protecting and Enhancing Existing Green Open Spaces.

Para 4.10 – It's not yet known whether the Inspector examining the Core Strategy will endorse the designation of Areas of Restraint in principle or the Kineton one in particular. Even if he doesn't there's no reason why the NP shouldn't make a case for identifying one. However, it should incorporate a plan showing a boundary in case the Core Strategy designation falls.

This can be done in the final document through a copy of the restraint map taken from the core strategy as attached below:



Proposed changes to the Proposals Map in the Stratford-on-Avon District Local Plan Review

Areas of Restraint (Policy CS.13)

Kineton Area of Restraint proposed boundary 

Not to scale  N

© Crown copyright and database rights 2013.
Ordnance Survey 100024287

Section 5.1: Housing

Policy H1 - The policy refers to 100 homes (built and with permission) in the Proposed Submission version of the Core Strategy. The Proposed Modifications Core Strategy (August 2015) currently out to consultation gives a figure of 109 homes in Kineton. Policy H1 should be revised to reflect this.

Indeed it will be but the speed of development and submission of planning applications makes this a moving feast. 17 more houses not included in the plan were consented on 23 September 2015 making the total number at October 2015 to be 116 dwellings. The final document will reflect the most up to date figure when it goes to press.

The current built-up area of Kineton (as set out in the Local Plan) excludes Little Kineton. SDC will be revising settlement boundaries through its Site Allocations Plan but has accepted that communities can take the lead in this respect by identifying such boundaries in their NDPs if they so wish. I don't make any comment about the appropriateness or otherwise of the proposed settlement boundary, other than to comment that by including Little Kineton, completions and commitments (including the proposed allocations) in Little Kineton can now be added to the figures for Kineton MRC.

Criterion d) How were these sites chosen? Where is the evidence to indicate how these sites have been reached? Was there a consultation process in respect of a large list of sites and these were the 4 most popular? Further details on this issue should be provided in order for the NP to demonstrate how this position was reached in order to meet the basic conditions test at examination.

The sites were chosen through a rigorous site selection process involving 9 different sites. Site assessments were carried out for each site. The assessments are contained in the Core Documents list which will be provided to the examiner.

Para 5.1.4 – It is unclear what is meant by 'currently waste' in the final sentence.

It is intended to describe the land as neither greenfield (in agricultural use) nor brownfield (previously built on). The words 'currently waste' are ambiguous. Suggest the last sentence is replaced with:

"The other two sites – both located in Little Kineton - include a piece of residential garden land and an overgrown piece of land next to the sports pavilion."

Policy H2 – The terminology used in the final paragraph is not consistent with national policy. Para 17 in NPPF encourages use of brownfield land but there is not a presumption against the development of greenfield land. Also suggest that 'exceptional circumstances' is replaced with 'overriding, specific circumstances' as the former is a Green Belt test.

Noted

The policy advocates prioritising previously used land, but the NP does not actually promote any brownfield sites for future development. There appears to be contradiction here.

The plan has a desire to promote and bring forward brownfield land but in its absence and as demonstrated by SSB 1-4 the plan can accept alternative locations. At the time of writing it is not known if brownfield sites will come forward in the future. This policy will assist in the redevelopment of such sites should they come forward.

There is a concern that, as currently drafted, the Policy is not compliant with the NPPF. Para's 115 and 116 of the NPPF indicate that major developments in areas of high landscape value such as Green Belt and Areas of Outstanding Natural Beauty should be refused except in exceptional circumstances. However, such strong wording is not used when discussing the use of greenfield land.

The wording within Policy H2 can be revisited if "a general presumption" is considered too directive. However, whilst the NPPF does not specifically attach this test to greenfield land, equally it does not say that it is inappropriate to have a such a test against greenfield land in a NDP. Green Belt is not a landscape designation and is therefore not included in Para 115 or 116.

Similarly, greenfield land is not a specific landscape designation. It is effectively a land use designation like Green Belt.

Para 5.1.7 – The phrase ‘previously undeveloped land’ is a non sequitur. Suggest it is replaced with ‘greenfield land’.

Noted

This paragraph states that the development of previously undeveloped land is not supported by parish residents unless it can be demonstrated that there is no available brownfield land. It is not clear whether an urban capacity study or a ‘call for sites’ exercise has been carried out to ascertain the potential existence of such sites. Is there any evidence of a ‘sequential test’ type strategy to inform the NP?

No sequential test or call for sites has been undertaken. This paragraph is simply reporting back the views of the residents.

It is not agreed that the village would be classified as having a ‘linear’ character.

The traditional form of the village is linear. It is agreed that there have been 20th century developments which have eroded this character but large cul-de-sac estates off the main arterial routes through the village do not reflect the historical or organic growth and settlement pattern of the village.

Policy H5 – The site size threshold of 10 or more units is inconsistent with NDP Policy H3 in that it refers to the provisions of Core Strategy Policy CS.17. The threshold in Core Strategy Policy CS.17 is 11 or more dwellings in relation to Kineton. Likewise figure quoted in 5.1.8 should be less than 11 units.

Noted. The reference to any specific policy within the Core Strategy should also be considered in the context that it is only a draft policy and until the document is approved the final wording is unknown. If this is a particular issue the figure could be changed to 10 but KPC would question whether this is a conflict with the strategic vision of the Core Strategy.

Policy H6 – The inclusion of contingent or reserve sites is welcomed although it would be helpful to either have an accompanying SSB Policy or reference the expected number of homes in this policy.

The intention is to identify potential locations rather than to determine numbers. The sites were brought forward during the 2014 SDC call for sites programme. However, if the examiner considers a SSB is necessary one can be included in the final version.

As written, the purpose of the safeguarded land is to meet local housing needs should they arise by 2031. They appear to be of a scale similar to SSB1 and I would query whether this scale of contingency is necessary to meet local needs.

Due to the uncertainty surrounding the district’s housing need and the distribution of it there is no intention to specify numbers within these locations or indeed to confirm them as necessary sites. The safeguarded site could also act as a potential allocation after 2031 if there was a desire or need for this?

SDC will also be identifying reserve sites in its Site Allocations Plan and these are likely to be located in Stratford-upon-Avon and the MRCs. As such, the NDP may wish to consider whether all

or part of the safeguarded land should be allocated as a District Reserve site as opposed to solely for local needs.

Until the Core Strategy is approved it is not considered appropriate for a neighbourhood to make these decisions. The current draft Core Strategy recognises the constraints within Kineton which should render these sites unsustainable.

It seems that providing a northern link road is going to require a comprehensive approach to development on the north-western edge of the village and a much large scale of development to fund it, incorporating the safeguarded land identified in this policy and on the map.

Agreed. In the absence of any other relevant authority developing appropriate long term strategies to manage traffic flow issues the NDP is endeavouring to do that. It is envisaged that the construction of the road would be delivered directly through the development of each site (NP1, CS1, CS2 and CS3). It is not envisaged that the road will be a bespoke by pass. Moreover that a link road between these sites would be formed allowing an estate road safeguarded for future extension where necessary.

Section 5.2: Jobs

Policy J1 – Ensure the wording of the Policy is consistent with paragraph 22 of the NPPF, especially taking into account the matter of planning applications for alternative uses of land or buildings being treated on their merits having regard to market signals and the need for different land uses to support sustainable communities.

The proposed employment units contained within plan area have already been lost on these grounds.

Policy J2 – The Government has abolished the voluntary sustainability standards used by Local Planning Authorities, following the Housing Standards Review. The Government has stated that space standards, known as ‘nationally described space standards’, are to be set in the Local Plan/Core Strategy. Therefore neighbourhood plan policy may *encourage* higher standards, not *require*.

Noted

Criteria f) Not sure what this means or what is it trying to achieve.

This is simply trying to achieve an appropriate mix of materials such as red brick and plain tiles, materials that are traditional and in keeping with the rural setting of the village and thus avoiding the use of modern/contemporary materials and bright colours.

Section 5.3: Design

Policy D3 – The definition of large scale and requirement for a design code, master plan or contextual plan would seem to be set unreasonably low. This requirement is not considered to be compliant with national and local checklists for validating planning applications. Additionally, it is not understood how it is possible for any such document (regardless of title) to be able to take account of potential future development. The issue of ‘unreasonable demands’ for scale of development also relate to documents such as Transport Assessments and other environmental assessments.

Large scale is a relative term and as such this policy should be considered in that light. Integrating new developments into the smallest of the main rural centres requires careful consideration. It is envisaged that the 4 of the 5 allocated sites will come forward for dwellings in excess of 10 units. NP2 is unlikely to come forward for more than 10 and the remainder of the housing envisaged for the village will be limited to infilling. So effectively the need for a design code and master plans relates to the large site allocations which it believed to represents an appropriate and reasonable approach to developing the sites.

Policy D4 – The Code for Sustainable Homes has now been withdrawn. Strategic Objective 4 of the Core Strategy states:

“To help mitigate and adapt to climate change, all residential development will have achieved as a minimum the national standards set out in Building Regulations. From 2019, all non-residential development will have achieved water and energy efficiency BREEAM ‘Good’ standard”.

At the time of drafting the plan the Code for Sustainable Homes was subject to a government consultation about its long term value. Rewording this plan now that the code has finally been withdrawn will be appropriate.

Policy D8 – Parking standards specified seem to be too prescriptive. Also, it would be unreasonable to expect all new developments to ‘develop’ easy pedestrian and cycle routes. Some will already be located on such routes.

In a village where on-street parking is the cause of considerable problems it is not surprising that the plan is prescriptive. Similarly, experience with the design of the development currently under construction shows that logical pedestrian routes can be overlooked during planning and incur time and financial resource to introduce them later. Suggest minor rewording as follows:

“All new development must demonstrate how pedestrian and cycle links to the village centre and schools have been facilitated”.

Policy D9 – Criteria b) talks about prioritising previously developed land. However, the NP does not appear to advocate this, when you take account of the allocated sites.

At the time of drafting, the NDP had not identified and available previously developed parcels of land for allocation. If there had been they probably would have been identified and brought forward in the plan. This policy allows the promotion of such sites should they come forward during the plan period.

Final paragraph of policy (beginning ‘the built-up areas should...’):

This appears to be a design policy, not a re-use of land policy. Is it in the correct place? Would site SSB1 conform to this ‘design’ element of the policy? It would be quite high density and would be located within a high/medium sensitive landscape on the periphery of the village...Additionally, there are no sites located close to the village centre.

It could be in either place – it is a transferrable policy. There is no reason why site SSB1 cannot conform to the design requirement. There are no sites within the current plan in the village centre but over time such sites could come forward.

Section 5.4: Environment

Policy E1 – Paragraph 112 in the NPPF applies this principle only to ‘significant development’ so it is inappropriate for it to be applied to all development proposals. It does not appear that there is a detailed assessment of agricultural land quality for the NP area in any case.

The current guidelines for Agricultural Land Classification (ALC) are set out in the Ministry of Agriculture, Fisheries and Food (MAFF) ‘Agricultural Land Classification for England and Wales: Revised Guidelines and Criteria for Grading the Quality of Agricultural Land’, October 1988 (NB, MAFF was incorporated in the Department for Environment, Food and Rural Affairs (Defra) in June 2001). The land surrounding Kineton is Class 3. The ‘best and most versatile’ agricultural land is comprises Classes 1, 2 and 3a. The 1998 MAFF data does not subdivide Class 3 into 3a and 3b.

‘Significant development’ is not defined in the NPPF.

Policy E2 – The policy requires that all large scale development should demonstrate, through the submission of a landscape led design, that they preserve the landscape, vistas.... For the avoidance of doubt in relation to what is required, the policy could be amended to refer the submission of a Landscape and Visual Impact Assessment, rather the submission of a landscape led design.

Noted

Paras 5.4.7 and 5.4.8 – Appear as policy wording, rather than an explanation to the policy. It would be better if the NDP wants to development to comply with these statements, that they were included in the policy.

Noted

Para 5.4.9 – What is the important aspect of the Kineton landscape deemed to be present in the list of sites alluded to in the first sentence? What is this paragraph attempting to say, achieve or protect?

Para 5.4.10 – It is not agreed that the LSS says that under *no circumstances* should there be any development north of Walton Fields. When you look at the Housing map associated with the LSS, a further tract of land north of the Walton Fields site has been assessed as ‘medium sensitivity’ to housing development.

Not by the author of the LSS.

Policy E3 – Using the term ‘all development...’ captures house extensions and replacement dwellings. It is considered too onerous to ask small-scale development to demonstrate this. In the second sentence types of pollution are listed, but light pollution is missing, to which you refer in the Explanation text. How would such measures be demonstrated – what is this trying to achieve?

The plan proposes that all developments regardless of scale should take regard of pollution consequences. Light is mentioned in the second sentence as shown:

All development will be required to demonstrate, through a written supporting statement, how measures to minimise the impact of pollution have been considered.

Proposals which would give rise to unacceptable levels of air, light, noise or water pollution will be resisted

Policy E5 – The policy to protect and maintain the floodplain is welcomed. The second principle policy could be amended to read ‘Where appropriate’ rather than, ‘If necessary’.

Noted and agreed.

Para 5.4.14 – Should this paragraph be included within the policy?

It seems appropriate to consider noise pollution here.

Para 5.4.19 – It is recommended that the last sentence ‘Riverside vegetation should be protected as an important natural habitat, adding to the biodiversity of the village’ would be better included in the policy if this is a principle the NDP wishes development to comply with.

Noted

Policy E6 – The policy is welcomed. Trees and hedgerows play an important multifunctional Green infrastructure role within the landscape, protecting and enhancing biodiversity, mitigating and adapting to climate change, landscape and recreation value, along with health benefits.

Para 5.4.20 – This paragraph would be better placed in the policy as a requirement for development.

Noted

Policy E7 – The policy is welcomed. It is well documented that the impacts of climate change will result in an increase the amount of flooding communities will have to tackle.

However, the last paragraph is unclear. It states that ‘proposals which do not satisfactorily demonstrate secure arrangements for the prevention of fluvial and pluvial flooding will not be supported.

It is unclear what is meant by demonstrate ‘secure arrangements for the prevention of fluvial and pluvial flooding or how would this be complied with. The policy principle should be amended to provide a clearer understanding of what it required and how it should be complied with.

Development proposals are increasingly being presented with onsite foul water treatment plants to avoid the expense associated with connection to the main infrastructure. These systems have the potential to increase the water flows off the site. In addition storm water (surface and highway) is often directed to the River Dene. The NDP endeavours to limit the flooding consequences from such developments without being too prescriptive whilst encouraging water recycling.

Policy E7 Explanation – The explanatory text should provide an understanding and justification of the policy. This is missing. There should be an explanation of why the policy is required and definition of any terms used. For example, it would be helpful to provide an explanation about what are considered suitable and sustainable means of drainage. What type of alternative drainage might be appropriate?

Comments as above

Para 5.4.23 – This includes a reference to ‘water ponds’ which is somewhat obscure. Is this a reference to surface water flooding and how does it relate to the explanation of the policy?

It is a better term than “puddle”. If the roadway is properly drained (to prevent “ponding”) then more storm water will be reaching the same infrastructure that this policy is endeavouring to deal with.

Policy E8 – The policy is welcomed. The Submission Core Strategy Policy CS.4 Section D Water Quality states that ‘development will not be permitted where proposals would have a negative impact on water quality, either directly through pollution of surface water or ground water, or indirectly through the overloading of Wastewater Treatment Works. Prior to any potential development, consultation must be held with Severn Trent Water or Thames Water as appropriate to ensure that the required wastewater infrastructure is in place in sufficient time.’ Under the Flood and Water Management Act (2010), new development will no longer have the automatic right to connect surface water drainage to the sewers.

And in these circumstances what are the alternatives open to a developer?

Section 5.5: Infrastructure

Policy IN1 – The basis of 5 or more dwellings is unclear – in some respects the criteria specified are applicable to even one dwelling.

Noted

Policy principle a) – The policy could be strengthened further by requiring that the arrangements for the whole life management and maintenance of proposed SUDs are put in place. Applicants should ensure that the design of SUDs supports the findings and recommendations of the Warwickshire Surface Water Management Plan, the Warwickshire Sustainable Urban Drainage Manual and the District Council’s Strategic Flood Risk Assessment.

This wording can be included into the final draft.

Policy principle b) – This requirement appears somewhat onerous on both the applicant and Severn Trent Water. Whilst the District Council’s Water Cycle 2014 highlight a capacity issue at the Kineton Wastewater Treatment Works, it should be noted that under the provisions in the Flood and Water Management Act, water companies such as Severn Trent Water have legal duty to provide the infrastructure required to accommodate development. Thus, Severn Trent Water has to provide the necessary infrastructure, providing the infrastructure may have timing implications for larger sites coming forward. This is because as the required upgrades/improvement to the relevant infrastructure may have to be factored into Severn Trent Water five yearly planning cycles; known as Asset Management Plan (AMP).

The requirement is to protect the existing members of the community. If it is the statutory requirement of STW to provide these services and they cannot be delivered within 5 years then the development should not commence until the capacity is available.

Policy principle d) – The Government’s Housing Standards Review has abolished voluntary sustainability standards prescribed by Local Planning Authorities, such as the Code for Sustainable Homes. Energy efficiency standards are no longer set out by planning, but will be covered by Building Control. Building Regulations will provide the standards for energy efficiency as set out in the Government’s Zero Carbon Homes Policy.

Noted

Policy IN3 – Applying the principle set out in first part of this policy to all developments seems unreasonable.

A single large 5 bedroom house could generate as many vehicle movements as a two or three small 2 bedroom houses therefore it might not be unreasonable given the desire to minimise traffic

flow into and through the village. This could apply to replacement dwellings or significant extensions to an existing small property.

Policy IN4 – Local Green Spaces have not been designated in the NP so it's unclear how this policy will/can be applied. Paragraph 5.5.17 refers to green areas – are they the same thing? This requires clarification.

Noted

Policy IN5 – The justification for such a road is unclear, as is the means of providing it in terms of land ownerships and who will pay for it. Such a proposal needs to be based on robust evidence. I would expect Warwickshire County Council to have been involved in bringing it forward in terms of justification, purpose, design and implementation.

Comments above apply

Section 5.6: Site Specific Briefs

See comments for Policy H6 regarding the need for/purpose of identifying further large-scale housing sites in NP, specifically land between Warwick Road and Lighthorne Road. It may be preferable to identify it as a Reserve Site should it be required if circumstances change.

Is there any evidence which assesses the proposed housing sites alongside other potential sites within the village? This evidence will be critical when the Examiner considers the Plan and representations on it.

Assessments have been carried out and a matrix has been formulated which give a traffic light comparison of the sites. This along side residents' preferences will provide the necessary evidence and is submitted as part of the NDP evidence base.

General Comment

Whilst the plan states that it is based on extensive research and robust engagement with the local community, there is little detail included in the way of published evidence or reference to details surrounding public consultation/engagement throughout the process.

It was not a requirement to submit evidence with the consultation documentation, but it will be submitted to the examiner.

9 October 2015.