

**Stratford-on-Avon District
Local Development Framework
Managing Housing Supply
Supplementary Planning Document
Consultation Statement**



NOVEMBER 2006

Managing Housing Supply Supplementary Planning Document Statement of Consultation

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1. Introduction

- 1.1 The draft Supplementary Planning Document (SPD) entitled 'Managing Housing Supply' was published for public consultation in early July 2006. Comments on the draft SPD were invited during the consultation period commencing on Thursday 6 July and concluding on Thursday 17 August.
- 1.2 The Draft SPD was made available for public inspection at the Council's main and area offices and also at all libraries within the District. A statement of SPD matters was published in the Stratford-upon-Herald and the Stratford, Leamington and Redditch issues of the Observer on Thursday 6 July.
- 1.3 Both the draft SPD and the statement of SPD matters were published on the Council's web site.
- 1.4 Letters were sent to over 1000 consultees on the Council's community consultation database inviting comments on the draft SPD. A full list of consultees is attached as appendix 1.

2. Summary of Issues Raised, the Council's Response and how the issues have been addressed in the adopted SPD

- 2.1 During the consultation period responses were received from 55 separate organisations and individuals. A comprehensive schedule summarising the representations received together with the Council's response is attached to this as Appendix 2. A summary of the key issues raised is provided below.
- 2.2 The approach set out in the draft SPD was supported by key consultees including the Regional Planning Body (RPB), Government Office and Warwickshire County Council. The RPB in particular confirmed that the draft SPD is in general conformity with the Regional Spatial Strategy (RSS). The RPB did however request that consideration be given to issuing the SPD as interim guidance until such time as the RSS revision provides District level housing figures.
- 2.3 The objections received fell into two broad categories; firstly, those objecting to the principle of the approach and secondly those which sought the inclusion of additional or alternative exceptions within the criteria specified by the SPD.
- 2.4 The objections to the principle of the approach cited the following grounds:
 - Dispute the statistical basis for the approach i.e. the overprovision is still projected rather than actual.
 - Question the validity of using the RSS based housing provision figures up to 2011.
 - Apparent conflict with existing and emerging government policy such as draft Planning Policy Statement 3: Housing, the response to the Barker Report and the 2003 based household projections which were released in March this year.
 - Claim that the approach will harm the local housing market, e.g. exacerbate problems of affordability, and also have an adverse impact on the local economy.

- 2.5 The more detailed objections to the SPD, in general, sought greater flexibility in terms of the exceptions which are included in the criteria. The additional exceptions which were suggested, i.e. those forms of housing development that should continue to be permitted, include:
- Sites allocated in the Local Plan.
 - Development which enables the delivery of substantial community benefits.
 - Brownfield sites within town centres.
 - Small scale schemes.
 - Housing as part of a mixed-use regeneration scheme.
 - Development which would deliver environmental enhancements particularly in Conservation Areas.
 - Specialist forms of housing such as extra care units for the elderly.
- 2.6 The representations received and the Council's response was considered by the Council's Executive at the meeting on 30 October 2006. The detailed response to the representations which was agreed by the Executive is set out in Appendix 2.
- 2.7 In the light of the representations received the Executive recommended that the SPD be adopted but with the following key changes:
- (i) That the final sentence of para 5.2 be amended to read:
- 'The operation of this SPD will be reviewed when the RSS Phase II revision provides District level housing figures.'**
- (ii) That the following paragraphs be added to the end of the section following para 4.1 entitled: 'The Approach to Managing Housing Supply':
- 'Permission will only be granted for other forms of housing development in exceptional circumstances where it is clearly demonstrated that the development is required in order to deliver substantial benefits for the local community and/or the environment which would not otherwise be forthcoming.**
- The Authority will assess whether a proposal demonstrates 'exceptional circumstances' and would deliver 'substantial benefits' using the following tests:**
- **Is the site of key importance to the character and appearance of the settlement as a whole or the general area?**
 - **Is the current condition/use of the site substantially harmful to the character and appearance of the area?**
 - **Is residential development (including mixed use development) the only practical means of achieving the desired benefit?**
 - **Has development of the site been identified as being important by the local community in a Parish Plan or similar?'**
 - **Does the proposal comply in all other respects with the relevant policies and proposals of the Local Plan?**

- (iii) That para 3.5 be deleted and the final sentence of para 3.4 be amended to read:

'It is therefore intended that all the allocated sites, which remain uncommitted will not be released for development prior to 2011, unless the development would meet one or more of the criteria specified in the approach to managing housing supply in the following section.'

- (iv) That the following paragraph be inserted:

'New Para 4.12 ` For the avoidance of doubt the approach to managing housing supply set out in this SPD does not apply to sites which have the benefit of outline permission for housing development, but where an application for the approval of reserved matters have yet to be submitted. The restrictive approach set out in this SPD will furthermore not apply to sites with extant planning permissions for residential development, unless there is no reasonable prospect of the extant planning permission being implemented.'

- (v) That the following sentence be added to para 4.6:

'For the purposes of this SPD the definition of affordable housing is that which is set out in Key Principle 8 of the Council's Meeting Housing Needs Supplementary Planning Guidance (June 2006).'

- (vi) That the final sentence of para 4.6 be deleted and that a new para be inserted as follows:

'In accordance with the approach set out in this SPD there are three main types of sites for affordable housing which may come forward:

- (i) Allocated and windfall sites where the development is exclusively of affordable housing;**
- (ii) 'Local Choice' schemes promoted within the framework of Policy COM.1; and**
- (iii) rural 'exception' schemes promoted within the framework of Policy CTY.5.**

Whilst supply from these sources counts towards the strategic housing requirements, its is considered that the continued provision of affordable housing to meet local needs accords with RSS and local policy objectives.'

- (vii) That paragraph 4.1(5) be amended to read:

'The development is for the conversion of a listed building, a building of local historic interest or a building which makes an important contribution to the character and amenity of a settlement where it can be demonstrated that this is the only viable and appropriate means of securing the future of the building in accordance with Policy CTY.2A.'

List of Organisations & Individual Contacted during Consultation Exercise

6024 Preservation Society Limited	Aston Cantlow Parish Council
Abbots Morton Parish Council	Atherstone-on-Stour Parish Meeting
Access Committee for England	Avon Boating (G.H. Rose & Son)
ACRE (Policy)	Avon Dassett Parish Council
Action for New Educational Resources for Alcester	Bancroft Cruisers
Admington Parish Council	Barcheston & Willington Parish Meeting
Advantage Alcester	Barge Association
Advantage West Midlands	Barton-on-the-Heath Parish Council
Age Concern Warwickshire	Batsford Parish Council
Alcester & District Local History Society	Bearley Parish Council
Alcester Business Network	Beaudesert & Henley-in-Arden Joint Parish Council
Alcester Chamber of Trade and Commerce	Beoley Parish Council
Alcester Civic Society	Bickmarsh Parish Meeting
Alcester Estates Ltd.	Bidford Appraisal Group
Alcester Group of Liberal Democrat Councillors	Bidford Sports & Community Initiative
Alcester Opportunities	Bidford-on-Avon Health Centre
Alcester SCAN	Bidford-on-Avon Parish Council
Alcester Town Council	Bidford-on-Avon Residents Group
Alderminster Parish Council	Billesley Parish Meeting
Alveston & Tiddington Allotments & Gardens Assoc.	Binton Parish Council
Alveston Village Association	Birmingham Road Action Group
Alveston Villagers' Association	Bishops Itchington Parish Council
Ancient Monuments Society	Bishopton Avenue Residents' Association
Arrow Parish Council	Bishopton Residents Action Group
Arts Council West Midlands	Blockley Parish Council
Aston Cantlow Action Group	Boddington Parish Council
	Brailes Parish Council

APPENDIX 1**List of Organisations & Individual Contacted during Consultation Exercise**

Bridgetown Residents Association	Chesterton & Kingston Parish Meeting
Bridgman Services Ltd	Chestnut Walk Surgery
British Horse Society	Choicesite Ltd
British Trust for Conservation Volunteers (Warks) (BTCV)	Church Lench Parish Council
British Waterways (Midlands and South West)	Claverdon Parish Council
Bromford Housing Group	Cleeve Prior Parish Council
Bromsgrove District Council	Clifford Chambers Parish Council
Bryant Developments (Taywood Projects)	Clopton Conservation Committee
Bude Canal Trust	Color Estates Ltd
Burmington Parish Meeting	Combrook Parish Council
Burton Dassett Parish Council	Commission for Architecture and the Built Environment (CABE)
Business Link	Common Ground
Butlers Marston Parish Council	Company of the Proprietors of Stroudwater Navigation
Byfield Parish Council	Compton Scorpion Estate
Camping & Caravanning Club	Compton Verney Parish Meeting
Catesby Parish Council	Compton Wynyates Parish Meeting
Central Networks	Cornwell Parish Meeting
Centre for Accessible Environments	Cotswold District Council
Centre for International Transport Studies	Cotswold Line Promotion Group
Chadshunt Parish Meeting	Cotswolds Conservation Board
Chapel Ascote Parish Meeting	Coughton Parish Council
Charlecote Parish Meeting	Council for British Archaeology (HQ)
Charwelton Parish Council	Council for British Archaeology (Region)
Chastleton Parish Council	Council for Voluntary Service
Cherington & Stourton Parish Council	Councillor Jill Dill-Russell
Cherwell District Council	Councillor G. Roache
	Councillor A. Patrick

APPENDIX 1

List of Organisations & Individual Contacted during Consultation Exercise

Councillor A.C. Higgs	Councillor L.C. Bowring
Councillor A.J. Akeister	Councillor Leslie R Hewer
Councillor A.J. Cronin	Councillor Louise E Giblin
Councillor A.R. Dixon	Councillor Lynda M Organ
Councillor Brian W Slaughter	Councillor M A Flower
Councillor C H Bates	Councillor M L Perry
Councillor C R Williams	Councillor M.C. Brain
Councillor C. Thomas	Councillor Maureen L Beckett
Councillor C.J. Saint	Councillor Nigel I Rock
Councillor C.K. Meade	Councillor Nina Knapman
Councillor Daren Pemberton	Councillor P A Beaman
Councillor David Booth	Councillor P S Seccombe
Councillor David J Close	Councillor P.A. Price
Councillor E J Dally	Councillor P.G.W. Moore
Councillor F.P. Barnes	Councillor R. Hobbs
Councillor George Atkinson	Councillor R. Stevens
Councillor H.D. Wright	Councillor R. Wright
Councillor Helen McCarthy	Councillor R.D. White
Councillor I. Seccombe	Councillor Richard Hyde
Councillor J E M Fradgley	Councillor S Gray
Councillor J H Harrison	Councillor S Thirlwell
Councillor J R Appleton	Councillor S.A. Juned
Councillor J. M. Winterburn	Councillor S.D. Beese
Councillor J.D. Short	Councillor S.H. Jackson
Councillor K.A. James	Councillor Sir William Lawrence Bt
Councillor Keith Lloyd	Councillor T W J Russel
Councillor L T Marshall	Councillor Vince Seaman
Councillor L.A. Topham	Country Land and Business Association (CLBA)

APPENDIX 1**List of Organisations & Individual Contacted during Consultation Exercise**

Countryside Agency	English Nature
Countryside Alliance	Environment Agency
Coventry & Warwickshire Friend	Environment Agency - Thames Region, West Area
Coventry and Warwickshire Learning and Skills Council	Ettington Parish Council
CPRE (South Warwickshire)	Evenlode Parish Council
CPRE Redditch Group	Exhall Parish Council
CPRE Warwickshire Branch	Farming and Wildlife Advisory Group (FWAG)
Culture West Midlands	Farnborough Parish Council
Cyclists' Touring Club - HQ	Fenny Compton Parish Council
Cyclists Touring Club (CTC)	Forestry Commission
D E Harman	Freight Transport Association - Midlands Region
Daventry District Council	Friends of Stratford Shopmobility
David Wilson Homes	Friends of the Earth - Stratford-upon-Avon
Defence Estates	Fulbrook Parish Meeting
Defence Estates	G.P. & C.M. Sampson
Defence Estates	Garden History Society
Defra	Gaydon Parish Council
Diocese of Gloucester	GB Railways Group PLC
Disability Living Foundation	Geoffrey Prince Associates Ltd
Disability Rights Commission	George Wimpey South Midlands Ltd
Dorsington Parish Council	Georgian Group
DSM Demolition Limited	Gloucestershire County Council
Earlswood & Forshaw Heath Residents' Association	Gloucestershire Housing Association
East Midlands Regional Assembly	Government Office for the West Midlands (GOWM)
Ebrington Parish Council	Great Alne Parish Council
English Golf Union - Golf Services	Great Wolford Parish Council
English Heritage (West Midlands Region)	

APPENDIX 1**List of Organisations & Individual Contacted during Consultation Exercise**

Greenpeace	Idlicote Parish Meeting
Greenway Association	ILEAP
Groundwork Foundation	Ilmington Parish Council
Gypsy and Traveller Law Reform Coalition	Ilmington Village Plan Working Group
Gypsy Council	Inkberrow Parish Council
Halford Parish Council	Inland Waterways Amenity Advisory Council
Hallam Land Management Limited	Inland Waterways Association
Hampton Lucy Parish Council	Inland Waterways Association - Warks Branch
Harbury Parish Council	Inland Waterways Association (HQ)
Harbury Society	J Christopher Ashton
Harvington Parish Council	James Plaskitt, MP
Haselor Parish Council	Jephson Housing Association Group
Health & Safety Executive	John Baylis
Heart of England Housing Group	John Maples MP
Heart of England Tourist Board (HETB)	Joint Committee on Mobility for the Disabled
Heart of England Way Association	JS Bloor (Services) Ltd.
Hellidon Parish Council	Kineton Parish Council
Help the Aged	Kinwarton Parish Council
Henley SC.AN	Ladbroke Parish Council
Henley-in-Arden Society	Lakes Partnership
Highways Agency	Langley Parish Council
Historic Narrow Boat Owners Club	Laura Mazzoli
Hockley Heath Parish Council	Levvel Ltd
Hodnell & Wills Pastures Parish Meeting	Lighthorne Heath Parish Council
Home Builders Federation	Lighthorne Parish Council
Honington Parish Meeting	Lighthorne Society
Housing Corporation (West Midlands)	Linfoot Homes

APPENDIX 1**List of Organisations & Individual Contacted during Consultation Exercise**

Little Compton Parish Council	Mr C Hodges
Little Wolford Parish Meeting	Mr C Swan
Local Agenda 21 Forum	Mr G & Ms G Lines & Kitchen
Long Compton Parish Council	Mr Neil Hobday
Long Itchington Parish Council	Mrs Halina Poloczek
Long Marston Appraisal Flood Team	Mrs J.D & Mr T. Clarke
Long Marston Parish Council (Marston Sicca)	Museums, Libraries and Archives West Midlands
Loxley Parish Council	Napton-on-the-Hill Parish Council
Luddington Action Committee	National Farmers Union
Luddington Parish Council	National House Building Council
M E Timms	National Housing & Town Planning Council
M Paddock	National Housing Federation
M. Terry	National Playing Fields Association (NPFA)
Malvern Hills District Council	National Playing Fields Association (NPFA)
Mappleborough Green Parish Council	Network Rail Infrastructure Ltd
Michael R. Wright	New Facilities for Alcester High School Technology College
Mickleton Parish Council	Newbold Pacey & Ashorne Parish Council
Midlands Architecture and the Designed Environment	North and Middle Littleton Parish Council
Midlands Architecture and the Designed Environment (MADE)	Northamptonshire County Council
Miller Strategic Land	npower
Ministry of Defence	Old Stratford & Drayton Parish Council
Minitram Systems Ltd	Open Spaces Society
Moreton in Marsh Town Council	Orange Personal Communication Services Ltd
Moreton Morrell Parish Council	Orbit Housing Association
Morton Bagot, Oldberrow & Sperrall Parish Council	
Mr A Crean	
Mr Brian Moore	

List of Organisations & Individual Contacted during Consultation Exercise

	Rembitt Ltd
Oversley Green Residents' Association	Residents Against Shottery Expansion (RASE)
Oxfordshire County Council	
Oxhill Parish Council	Richard & Mandy Purser
Pathfinder Tours	Richard Anthony Moore
Pebworth Parish Council	RMC Group PLC
Peter J. & Jane M. Beeley	Roba Metals Ltd
Pillerton Hersey Parish Council	Rochdale Canal Trust
Pillerton Priors Parish Council	Rollright Parish Council
Preston Bagot Parish Meeting	Rollright Trust
Preston-on-Stour Parish Council	Rowan Organisation
Priors Hardwick Parish Meeting	Royal Agricultural Society of England
Priors Marston Parish Council	Royal National Institute for Deaf People
Quinton Parish Council	Royal National Institute for the Blind
R Crompton	Royal Society for the Protection of Birds (RSPB)
Race Equality Support Worker	
Radway Parish Council	Rugby Borough Council - Planning Policy Team
Rail Freight Group	Rural Forum for Coventry, Solihull & Warwickshire
Railway Development Society - West Midlands	Rural Housing Enabler for Warwickshire
Railway Development Society (North Midlands)	Rural Housing Trust - HQ
Ramblers Association - Southam Group	Salford Parish Council
Ramblers' Association - Stratford-on-Avon Group	Salford Priors Parish Council
Ramblers Association (Warwickshire Area)	Salford Priors Residents' Action Group (SPRAG)
Ratley & Upton Parish Council	Sambourne Parish Council
Redditch Borough Council	Sambourne Village Association
Redrow Homes (Midlands)Ltd	Sankey Marine
	Severn Trent Water - Network Development

List of Organisations & Individual Contacted during Consultation Exercise

Severn Trent Water Ltd - StampS Team	Stewart Ross Associates Stockton Parish Council
Shakespeare Birthplace Trust	Stour Power
Shakespeare Line Promotion Group	Stratford District Manufacturers Association
Shakespokes	Stratford Rail Transport Group
Shipston SCAN	Stratford Rugby Football Club
Shipston-on-Stour Local History Society	Stratford SCAN
Shipston-on-Stour Town Council	Stratford upon Avon Town Trust
Shottery Village Association	Stratford Voice
Shotteswell Parish Council	Stratford-on-Avon & South Warks Liberal Democrats
Smith Bros & Webb Ltd	Stratford-on-Avon Cycling Campaign
Snitterfield Parish Council	Stratford-upon-Avon Canal Society
Society for the Protection of Ancient Buildings	Stratford-upon-Avon Conservative Association
Solihull Metropolitan Borough Council	Stratford-upon-Avon Rail Transport Group
South East Regional Assembly	Stratford-upon-Avon Society
South Northamptonshire Council	Stratford-upon-Avon Town Council
South Warwickshire Access Group	Stratford-upon-Avon Town Management Partnership
South Warwickshire General Hospitals NHS Trust	Stretton-on-Fosse Parish Council
South Warwickshire PIE - Promoting Inclusion and Enterprise	Studley Liberal Democrat Team
South Warwickshire Primary Care Trust	Studley Parish Council
South Warwickshire Tourism Ltd.	Sustrans (Midlands)
South West Regional Assembly	Sutton-under-Brailes Parish Meeting
Southam Town Council	T. Coggins
Sport England West Midlands	Tanworth-in-Arden Parish Council
Stannifer Developments Limited	Tanworth-in-Arden Residents Association
Staverton Parish Council	Temple Grafton Parish Council

APPENDIX 1**List of Organisations & Individual Contacted during Consultation Exercise**

Thames Water	Upper Avon Navigation Trust Ltd
The Althorp Estate	Victorian Society
The Baker Trust c/o Fletcher King	Vinegar Hill Ltd.
The British Wind Energy Association	Virgin Trains
Theatres Trust	W J Kliszewicz
Thomas Barlow & Anthony J Archer	Warmington Parish Council
Thomas Whitaker	Warwick District Council - Policy & Projects Team
Tidbury Green Residents' Association	Warwickshire and West Mids Association of Local Councils
Tiddington Residents Association	Warwickshire Association of Parish Councils
Tiddington Road Residents Association	Warwickshire Association of Village Halls
Tidmington Parish Meeting	Warwickshire County Council
Todenham Parish Council	Warwickshire County Council (Education)
Tourism West Midlands	Warwickshire County Council (Museum Field Services - Archaeology)
Town & Country Planning Association	Warwickshire County Council (Museum Field Services - Ecology)
Town Design Group	Warwickshire County Council (Property Services)
TRANSPORT 2000 (Hereford & Worcester)	Warwickshire Fire & Rescue Service
Tredington Parish Council	Warwickshire Gardens Trust
Tredington Society	Warwickshire Geological Conservation Group
Trustees of the Grammar School of King Edward VI	Warwickshire Playing Fields Association
Twentieth Century Society	Warwickshire Police
Tysoe Parish Council	Warwickshire Police
Ufton Parish Council	Warwickshire Police
Ullenhall Parish Council	Warwickshire Police
United Co-operatives Ltd	Warwickshire Police
Upper & Lower Shuckburgh Parish Meeting	Warwickshire Police
Upper Avon Navigation Trust	Warwickshire Police

List of Organisations & Individual Contacted during Consultation Exercise

Warwickshire Rural Community Council	Wolverton Parish Council
Warwickshire Rural Housing Association	Women's National Commission
Warwickshire Rural Hub	Woodland Trust
Warwickshire Wildlife Trust	Wootton Wawen Parish Council
Watergall Parish Meeting	Worcester City Council
Waterways Trust	Worcestershire County Council
Weethley Parish Meeting	Wormleighton & Stoneton Parish Meetings
Welford-on-Avon Local History Society	Wychavon District Council
Welford-on-Avon Parish Council	Wyre Forest District Council
Wellesbourne Parish Council	Wythall Parish Council
Wellesbourne Village Preservation Society	YMCA
Wellesbourne Village Society	Young Farmers
Wellesbourne Village Society	
West Midlands Planning Aid Service	
West Midlands Regional Assembly	
West Midlands South Strategic Health Authority	
West Oxfordshire District Council	
Weston-on-Avon Parish Meeting	
Whatcote Parish Meeting	
Whichford Parish Council	
Whitchurch Parish Meeting	
William Davis Ltd	
Wilmcote Parish Council	
Winyates Green Residents Association	
Wixford Parish Council	
WMPTA (Centro)	

List of Agents Contacted during Consultation Exercise

A E Cox FRICS Chartered Surveyors	Arlington Planning Services
A. Crowson	Arlington Securities plc
A. Pickford	Arrow Properties
A. Sowton	Arup Economic Consultants
A.J. Smith Associates	Ashton Planning
Acanthus Clews Architects	ASSA Ltd.
ACL Consultants	Associated Construction Consultants
Adams Holmes Associates	ATIS Real Weatheralls
Adcock Associates Design Practice	Atisreal
Aitchison Odell & Co. Ltd.	Atkins Shepherd Fidler Ltd.
Alan Johnson & Associates	Austin Smith Lord
Alan Smith	B.D.S. Marketing
Alcester Estates Ltd.	Baily, Richard S.
Alexander Corfield	Bainbridge & Co
Allied Management Services	Baker Associates
Allied Management Services Ltd.	Baker Goodchild Architects
Allison Millward Associates	Baldwin, C.
Althorp Estate	Banner Homes
Amec Design & Management	Barry Panton Sargent Partnership
Andrew Nailor	Barton Fellows Ltd.
Andrew White	Barton Willmore Planning Partnership - Cambridge
Anthony J. Harman	Barton Willmore Planning Partnership - HQ
Anthony Walker & Partners	Barton Willmore Planning Partnership-Eastern
Arc Designs	Basil Merrick
Archiscape, Chartered Landscape Architect	Batterton Tyack Architects
Architects Workshop	BDP Planning
Architectural Drawing Services	Beckett Associates
Architecture & Planning Group	

List of Agents Contacted during Consultation Exercise

Bell Cornwell Partnership	Burton Emery Partnership
Berry & Young	Business Environments Planning
Berry Morris	C & S Associates
Berry, Ernest	C. Levine
Bidford on Avon Residents Group (BARG)	C. Milton Wilkinson
Bidwells Chartered Surveyors	Calarel Design Partnership
Bigwood Ltd.	Carter Jonas
Bigwood Ltd.	Cartwright Marston Estate Agents
Bigwood Ltd.	Castons
Bigwood Ltd.	Cater & Day
Bird, Graham	Chancellors, Chartered Town Planning Consultants
BM3 Architecture Ltd	Charles Church Property Developers Ltd
Boreham Construction Engineers	Charles Phillips & Co
Bournville Architects	Charles Russell Solicitors
Boyer Planning	Chartered Town Planning Consultancy
Bradford & Bingley	Chesterton Internation
Bradley Associates, John	Christopher Hobson
Brian Barber Associates	Claire Dolan
Brian G. Manning	Clark Solicitors
Brian L. King	Client Construction Co.
Brian R. Bassett Ltd.	Cliff Walsingham & Co.
Brock Planning Consultancy	Clink & Associate, J. John
Bromwich & Co., Peter	Clive Brook Associates
Brooke Smith Associates	Cluttons
Brown Matthews	Cofton Land & Property
Brunton Design Associates	Colin Buchanan & Partners
Bruton Knowles	Colin Buchanan & Partners
Building Design Services	

List of Agents Contacted during Consultation Exercise

Colin Hatcher - Chartered Surveyor	Denham Design Partnership
Collin Jones Partnership	Denton Wilde Sapte
Compton Estates Management Services	Derek Latham and Associates
Cork Toft Partnership	Derek Lovejoy Partnership
Corstorphine & Wright	Desert Oak Ltd
Countrywide Property Management	Design & Materials Ltd.
Courtyard Designs	Development Land & Planning Consultants Ltd.
Cranston & Plummer Ltd	Development Planning & Design Services Ltd
Cross & Craig Associates	Development Planning Partnership
Cross & Harris	Dilworth Design
CT Planning	Dixon, Dobson & Carver
Cullen, Carter & Hill	Donald James & Partners
Culling & Nicholls	Donald W. Insall & Associates (Chester)
Cumming Architects	Donald W. Insall & Associates (London)
D & T Holt	DPDS Consulting Group
D N Cull	Dreweatt Neate
D. Bromley-Hillyard	Drivers Jonas
D.H. Skeats, Designer	Drivers Jonas
David H. Robotham Ltd.	DTZ Piedad Consulting
David L. Waller Chartered Surveyors	DTZ Piedad Consulting
David Lock Associates Ltd.	E.N. Sandiford, Chartered Surveyor
David Storer & Partners	E.R. Byron Associates
Davis, R.A.	E.S. Lodge Associates
Day Design Group, Laurie	E.W Harvey
Debenham, Tewson & Cheshire Ltd. - Birmingham	Eastbrook Associates (Architects) Ltd.
Debenham, Tewson & Cheshire Ltd. - London	Ecotec Research & Consulting Ltd.
Debois Landscape Survey Group	

List of Agents Contacted during Consultation Exercise

Edmund Kirby	G.K. Moss & Associates
Eiluned Morgan	G.P. Grima
Elrick Smith	G.R. Milton
Ensor, G.H.W.	G.T.D. Lewis
Entec UK Ltd.	GB Partnership
Entec UK Ltd.	Geoffrey Parker Bourne
ERB Associates	Geoffrey Wheeler and Associates
Evershed Wells & Hind	Gibb Transport Consultants
F.B. Hancock & Co.	GMA Planning Ltd - Richmond
F.C. Newby	Godfrey-Payton
F.C.Newman & Co.	Gordon Herringshaw & Associates
Farnk Toole	Gough Planning Services
Fisher German Chartered Surveyors	Gould Singleton Partnership
Fordham Research Ltd.	Gouldens Solicitors
FPD Savills	GR Planning
FPD Savills	GRA Planning Consultancy
Frank Price	Graham Pearce & Company
Frederick J. Young	Graham Steventon, Chartered Architect
Freeth Cartwright Hunt Dickins	Grand Metropolitan Estates
Fryer, R.W.	Granger & Jones
Fuller Peiser & Co	Grant & Co., Andrew
Fuller Peiser & Co.	Grant & Partners
G Jones Associates	Green Associates, Peter
G K Y Design, GKY	Grodon Hall
G L Hearn & Partners	GVA Grimley
G V A Grimley	H. Moore
G V A Grimley - Planning (Birmingham)	Halcrow Fox & Associates
G.F. Pritchard	Halliwell Landau

List of Agents Contacted during Consultation Exercise

Hamptons	Hurley Robinson Partnership
Hamptons	I & S Building Design Ltd., I&S
Hancock Associates	I. Parsonage
Hancocks Solicitors	Innes England
Harding Design	Insignia Richard Ellis
Harris Cooper & Co.	Interact Associates
Haven Estates & Co.	Intercull Designs
Hawkes, Edwards & Cave	J Christopher Ashton
Haxworth Architects	J. Cane
Hayball Associates	J. Truslove
Healey & Baker	J. Tulip
Heath Avery Partnership	J.C. Cunnane Associates
Henman Ballard	J.D. Holmes
Highpoint Rendel	J.M. Chambers
Hitchman Stone Partnership	J.M. Kemp
Holden & Leonard	Jackson-Stops & Staff
Holmes Antill	James Barr
Holmes Bury Savage Hayward Partnership	James C. Beaumont
Horner Allen Partnership	James W. Tomkins
Hossack Broome	Jesson Sewell & Swadkins
Howard & Seddon Partnership	Jigs Chana
Howkins & Harrison	Joe Samworth & Associates
Howkins & Harrison	John B. Doble
Howkins and Harrison	John B. Homer & Co.
Hugh Richards	John Chivers & Sons
Humberts - Tetbury	John Earle & Son
Hunt & Wood Partnership	John Falconer Associates
Hunter Page Planning	John P. Morris

List of Agents Contacted during Consultation Exercise

John Pass Associates	Locke & England
John Phillips Planning Consultants	Locke & England - Leamington
John Porter	Lodders Solicitors
John Spall Design Associates	Longview Consultancy
Jones Lang Lasalle	Loveitts
Jones Lang Lasalle	Loveitts - Leamington Spa
Jones, John	Lucas Land and Planning
Judith A. Thompson	Lumar Developments Ltd.
K. Coffey	Lyndon F. Cave
Keith Hatwood Architects	M. Cox
Kember Loudon Williams	M.A. Ravenhill
King Sturge	M.A. Riley
Knight Frank	M.J. Peters
Knight Frank - London	M.J. Taylor
Knight Frank - Hereford	MAC Design Services
L.M. Uzzells, Designs	Magdalen College - Surveyor
Lancelot Dyson Associates	Malcolm Judd & Partners
Land Design Associates	Malcolm Scott Consultants Ltd.
Land Use Consultants	Malcolm Timms
Landmark Information Group	Manning Design Group
Lanesfield Technical Design	Marcial Echenique & Partners
Lapworth Partnership Chartered Architects	Margaret Harris
Lawrence Jurman	Margetts
Lee & Ross Architects	Mark Mitchell & Co.
Lee Evans Abbott de Moubray	Marson Architects
Lionel Guest Chartered Town Planner	Marson Rathbone Taylor
Llewelyn-Davies Planning	Marston, E.H. & Co.
Lloyds TSB - Property Management West	Martin Elliot Partnership

List of Agents Contacted during Consultation Exercise

Martin Sedgewick	Nigel Poole Estate Agents
Martin Shearon	Noralle Building Design Services
Martineau Johnson	Oldfield King Planning
Martyn Bramich Associates	Oldfield King Planning
Matthews and Goodman	O'Neill & Bracewell Partnership
Matthews and Goodman	Ove Arup Partnership
McCoy Associates	Oxfordshire Building Surveying & Design Ltd.
Melville & Associates	P. & E. Whitticase
Michael E. Megeary	P. Stanton, Esq
Michael Jones	P. Thimbleby
Michael Partridge Partnership	P. Wilkes
Michael Reardon & Associates	P.D.B. Construction Services, PDB
Michael Smith Associates	P.J. Rushton
Miller & Partners	P.N. Seabourne
Mono Consulting Ltd	P.T. Pratt
Montagu Evans	Pamber Landscape Associates
Morrissey & Co.	Patrick J. Burton
Mrs. M.G. Phillips	Paul Dickinson Associates
MVM Planning Ltd	Paul Kentish & Co
N.D. Sudlow	Paul Upfield
Nabarro Nathanson	Paul Wilde & Co.
Nathaniel Lichfield & Partners - Cardiff	Peacock & Smith
Nathaniel Lichfield & Partners - London	Pegasus Planning Group
Neasom & White	Pegasus Planning Group (East Midlands)
Needham & James	Peter Clarke & Co.
Needham & James	Peter Creswell & Associates
Nellist Blundell Flint Partnership	Peter Draper Associates
Nicholas de Jong Associates	

List of Agents Contacted during Consultation Exercise

Peter E. Williams, Building & Design Consultant	Ragley Estate
Peter Seccombe & Sarah Douglas	Ralphs & Janes
Peter Storrie & Associates	Ramsdens
Phillips Planning Services Ltd	Rapleys
Pinsent Curtis	Raymond Smith
Planaconstruct Ltd.	Redgrave Design Group
Planning & General Services Consultancy	Reg Ellis
Planning Design Research Associates	Renfrews Chartered Surveyors
Planning Potential	Richard Chivers
Portland Planning Consultants Ltd	Richard Crook
Prism Research Ltd.	Richard Merrett
Professor Alan Hooper	Richmond Hodges & Partners
Project Planning Partnership	Ridgehaven Project Development
Provincial Property Developments Ltd.	RMJM Planning Ltd.
R & B M Gale	Robert Cartwright & Co.
R. Batson - Architect	Robert F. Smith
R. Burman	Robert Franklin Architects
R. Holtom	Robert L. Blackburn
R. John Craddock Associates	Robert Lunn & Lowth
R. Mason	Robert Stephenson Associates
R.A. Dunn	Robert Turley Associates - Birmingham
R.A. Newton	Robert Turley Associates - Bristol
R.C. Lamb	Robert Turley Associates - Winchester
R.J. Durrell	Roberts & Lloyd
R.S. Borland & Associates	Rodney Crossley
R.S. Trim	Roger Evans Associates
Rachel Berger	Roger P. Dudley & Associates
	Roger Stretton Architects

List of Agents Contacted during Consultation Exercise

Roger Tym & Partners	Shipways - Stratford-upon-Avon
Roger Tym & Partners	Shoosmiths Banbury
Rogers, G., & Co.	Shoosmiths Solicitors
Ross Williams	Simon Herrick
Roy Geden	Simon Taylor, Chartered Town Planner
RPS Group plc	Sir Alexander Gibb & Partners
RPS Group plc	Skillington Payne
RPS Group plc	Smith Gore
RPS Group plc	Smith Stuart Reynolds
RPS Group plc	Spencers
RPS Group plc	St Quintin - Chartered Surveyors
RPS Group plc	Stanley Partnership
RPS Group plc	Stansgate Planning Consultants
RPS Planning, Transport & Environment Ltd.	Stansgate Planning Consultants
RPS Planning, Transport & Environment Ltd.	Star Planning & Development
RPS Planning, Transport & Environment Ltd.	Steedman Jervis Clarke
Russell Little & Platt	Steer Davies Gleave
S W Hinton BSc MRICS	Steven Holloway
S. W. Hadland	Stewart Ross Associates
Saffron Design	Stewart Vick Associates
Set Design	Stonehouse Chartered Surveyors
Sheldon Bosley - Stratford-upon-Avon	Stoneleigh Planning Partnership
Sheldon Bosley & Partners	Strutt & Parker
Shepherd & Summers Ltd	Sutch & Thos. Hemming & Son
Shipway, Doble & Earle - Redditch	Sutton & Wilkinson
Shipways	T Jackson Associates
	T.E. Leivers
	T.J. McHugh

List of Agents Contacted during Consultation Exercise

T.S.E. Cooper	W.S.Atkins Planning Consultants
Terence O'Rourke	Wallis Design Associates
Tetlow King Planning	Warwick Estates
Tetlow King Planning	Weatherall, Green & Smith
Tetlow King Planning	Weatherall, Green & Smith
The Littman Partnership	White Mitchell
The Residents of Friday Furlong	White Young Green Planning
The Roger Coy Partnership	William McFarland
Thomas Rothermel	Wood Frampton
Thornton Hartnell Chartered Architects	Wood Frampton
Three Counties Insurance Brokers	Wood Frampton - Leamington
Tim North Associates	Wood, Kendrick & Williams
Timothy Lea & Griffiths	Wood, Kendrick & Williams
Titmuss Sainer and Webb	Wootton Jeffreys Consultants Ltd - Epsom
Tom Cole	Wright Hassall & Co.
Tony Thorpe Associates	WS Atkins Rail
Town & Country Properties	WS Atkins Transportation Engineering
Transportation Planning Associates	
Trevor Bury	WTS Ltd
Trevor Wroughton & Associates	
Tweedale Planning & Design Group	
Tyler-Parkes Partnership	
Urban Design Group	
Vaughan Mitchell & Co.	
Vicki Gittus	
Vincent & Gorbing Planning Associates	
W.J.L. Weaver	
W.M. Chapman	

**Managing Housing Supply – Draft Supplementary Planning Document (SPD) (June 2006)
Schedule of Representations Received and the Council’s Response.**

Changes made to the text of the SPD are shown in **bold**. ‘No change’ was made to text of SPD unless otherwise stated

Consultee	Section of SPD	Summary of representations	The Council’s Response
West Midlands Regional Assembly (Regional Planning Body)	General	<p>1.1 Confirms that the submitted document is in general conformity with West Midlands Regional Spatial Strategy.</p> <p>1.2 The RSS phase II revision is likely to introduce significant alterations to the housing figures. Consideration should be given to issuing the SPD to operate as interim guidance until such time as the RSS revision provides District level housing figures.</p>	<p>1.1 This confirmation is welcome and demonstrates that the approach to managing housing supply as set out in the SPD is fully justified in the context of the RSS.</p> <p>1.2 Accepted. – It is proposed that the final sentence of para 5.2 be amended to read: ‘The operation of this SPD will be reviewed when the RSS Phase II revision provides District level housing figures.’</p>
Government Office for the West Midlands	General	<p>2.1 No detailed comments to make, but very supportive of the attempt to control the release of housing sites to prevent over-provision against the current RSS provision.</p>	<p>2.1 Support is noted and welcome.</p>
Warwickshire County Council	General	<p>3.1 Supportive of the SPD and its attempt to control the release of housing sites in order to restrict over supply in relation to the RSS requirement.</p> <p>3.2 Comments in section 5.2</p>	<p>3.1 Support is noted and welcome.</p>

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		regarding the review of the SPD are noted and agreed.	
Highways Agency	General	4.1 Notes that the SPD effectively restricts new housing development that is likely to have on the motorway /trunk road network up to 2011	4.1 Noted.
Sport England	Appendix 2 Consultation Questions	5.1. Q1 – No – it is unfair on landowners and developers due to the time it can take to bring sites forward and the expense of the process. 5.2 Q2 – Yes 5.3 Q3 – Yes	5.1 Not accepted – allowing all the uncommitted allocated sites to come forward at this stage would exacerbate oversupply against the RSS requirement. 5.2 Noted. 5.3 Noted, but does not specify the other types of development which should be accepted.
Thames Water	General	6.1 General comments regarding the need to consult Thames Water in the formulation and consideration of development options. No specific comments on this SPD.	6.1 Noted.
Marson Rathbone Taylor Architects	Section 4	7.1 Exceptions should be included in the policy to allow residential development where there is a proven benefit to the community. The following specific developments are identified: <ul style="list-style-type: none"> • Redevelopment of Tiddington Fields 	7.1 Partially accepted – The wording of Policy STR2 indicates that : ‘Exceptionally, proposals for housing which have appreciable benefits for the local community and the environment will be permitted.’ This SPD sets out the circumstances in which such development may be

		<ul style="list-style-type: none"> • Redevelopment of Chestnut Walk doctor's surgery • Redevelopment of EIC at Aintree Avenue. • Proposed development at the Limes, Birmingham Road. 	<p>permitted. The criteria are of necessity tightly defined otherwise it would undermine the objective of restricting over supply. It is acknowledged however that greater flexibility could be introduced to allow schemes which deliver significant community and environmental benefits. It is not appropriate to comment on the specific schemes in the context of the SPD.</p> <p>It is recommended that the following paragraphs be added to the end of the section following para 4.1 entitled: 'The Approach to Managing Housing Supply':</p> <p><i>'Permission will only be granted for other forms of housing development in exceptional circumstances where it is clearly demonstrated that the development is required in order to deliver substantial benefits for the local community and/or the environment which would not otherwise be forthcoming.'</i></p> <p>The Authority will assess whether a proposal demonstrates 'exceptional circumstances' and</p>
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		<p>7.2 Smaller developments on appropriate sites should be excluded from the moratorium.</p>	<p>would deliver 'substantial benefits' using the following tests:</p> <ul style="list-style-type: none"> • Is the site of key importance to the character and appearance of the settlement as a whole or the general area? • Is the current condition/use of the site substantially harmful to the character and appearance of the area? • Is residential development (including mixed use development) the only practical means of achieving the desired benefit? • Has development of the site been identified as being important by the local community in a Parish Plan or similar?' • Does the proposal comply in all other respects with the relevant policies and proposals of the Local Plan? <p>7.2 Not accepted – Small-scale developments by their very nature are unlikely to deliver significant environmental or community benefits.</p>
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			Taken cumulatively they would continue to contribute to the over-supply against the RSS provision.
Color Estates Ltd	General	<p>8.1 The intention to place a moratorium on new dwellings is entirely wrong and irresponsible for the following reasons:</p> <ul style="list-style-type: none"> • Limiting housing stock will result in increasing prices to the detriment of rural and urban communities • The provision of low-cost housing is unlikely to occur. • The current housing 'boom' will pass. The moratorium is an unnecessary 'knee-jerk' reaction to recent rates of development. • Land prices will continue to rise. • Development within established town and village boundaries should be allowed to continue. • Cessation of construction will have a severe impact on local contractors and sub-contractors. 	<p>8.1 Not accepted – Failure to act to control the level of over-provision against the RSS requirement would in itself be irresponsible. The approach set out in the SPD is not a moratorium on all housing. The emphasis given to the provision of affordable housing should help to balance the local housing market, as up to this point there has been an overprovision of market housing against strategic requirements, but an under provision of housing in the affordable sector. The Council intends to monitor the impact of the SPD as indicated in the Sustainability Appraisal.</p>
Steve Taylor – SET Design	Appendix 2 – Consultation Questions	<p>9.1 Q1 – No- Town Centre brownfield sites should be released for aesthetic reasons and to accommodate in-migrants from Eastern Europe.</p>	<p>9.1 Not accepted –allowing the uncommitted allocated sites to come forward at this stage would exacerbate oversupply against the RSS requirement.</p>

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		<p>9.2 Q.2 – No – affordable housing unlikely to be built unless cross-subsidised by market housing.</p> <p>9.3 Q.3 – Yes – small scale development with 30% affordable housing</p>	<p>9.2 Not accepted – there is evidence that affordable housing schemes are still coming forward. This aspect will be monitored by the Council.</p> <p>9.3 Not accepted – reliance on market housing to deliver affordable housing will continue to fuel over-provision.</p>
GL Hearn – on behalf of Co-operative Group Property Division	Appendix 2 – Consultation Questions	<p>10.1 Q.1 – No – STUD.B should be released as it meets local needs and will regenerate this site.</p> <p>10.2 Q.2 – No – Agree in part – but suggest that the following wording be added at the end of the first para of the approach to managing housing supply: ‘....., with priority given to allocated sites in Main Rural Settlements which comply in whole or in part with one or more of the following criteria.’</p> <p>10.3 Q.3 – Yes – Housing on allocated sites in Main Rural Settlements.</p> <p>A supporting statement has been submitted setting out the justification for the release of small scale allocated sites in the Main Rural Centres</p>	<p>10.1 – 10.3 Partially accept – It is accepted that the development of allocated sites may continue to be appropriate if they meet the criteria set out in the approach to managing housing supply.</p> <p>It is therefore proposed to amend the SPD by deleting para 3.5 and amending the final sentence of para 3.4 to read:</p> <p>‘It is therefore intended that the allocated sites, which remain uncommitted will not be released for development prior to 2011, unless the development would meet one or more of the criteria specified in the approach to managing housing supply in the following section.’</p>
Brookhall Village Ltd	Section 4	11.1 Insert the following after Para 4.1.6 : ‘7. The development secures a	11.1 – 11.2 Not accepted – both of the suggested amendments are quite

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		<p>demonstrable environmental and/or economic regeneration benefit through the inclusion of live/work units in the redevelopment of an identified derelict or contaminated site, the redevelopment of which would not otherwise be viable.'</p> <p>11.2 Insert the following after Para 4.10: 'Derelict and Regeneration Sites'</p> <p>4.11 There can occasionally be sites which, because of their previous development or use, have fallen into dereliction and or have become contaminated and are a continuing cause of harm to the amenity of the local area and where redevelopment for uses not including and 'live/work' units would not be financially viable. In such cases, the management of housing supply falls to be considered alongside the economic regeneration, environmental and other benefits of redevelopment and regard will be had to the relevant general and site specific policies of the Local Plan Review.</p>	<p>specific and clearly tailored to meet the requirements of a specific site i.e. the Napton Brickworks site which is allocated in the Local Plan Review under Proposal CTY.F This site falls to be considered against the criteria set out in the SPD along with all the other uncommitted allocated sites.</p>
David Robotham Ltd	Section 4	12.1 Small redevelopment in a conservation area should be permitted.	12.1 Partially accepted – see response to 7.1 above.
Retirement Security Ltd	Section 4	13.1 Notes that affordable housing and residential care homes are excluded from the proposed	13.1 Not accepted – Do not accept that this is an anomaly. Affordable housing is clearly justified by the SPD

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		<p>moratorium, which leaves the inclusion of extra-care sheltered housing as an anomaly.</p> <p>13.2 There is an urgent need for additional extra care sheltered housing in the District. This is important for the welfare of local residents and the provision of social services and health care. There would be no chance of addressing these needs if the moratorium is applied to these schemes. Extra care sheltered housing schemes should therefore be excluded from the moratorium.</p>	<p>as an exceptional case. Care homes are not classed as dwellings under the Use Classes Order and have therefore been excluded from the SPD.</p> <p>13.2 Partially accepted – see response to 7.1 above.</p>
<p>Stansgate Planning Consultants on behalf of SCM Properties (Mr JSS Bosley and Mrs KA Willis)</p>	<p>General</p>	<p>14.1 There is no need for the Council to control the supply of housing at this time or in the manner proposed in the SPD.</p> <p>14.2 There is no evidence of an existing overprovision which would be harmful to the provisions of the RSS, and no sound strategic planning justification for introducing the controls.</p>	<p>14.1 Not accepted – Table 3 clearly demonstrates the projected surplus that will occur unless action is taken. GOWM and the RPB both support the approach which is being taken.</p> <p>14.2 Not accepted – Whilst the overprovision is still projected it is almost certain that this will occur. Table 3 does not take into account the existence of a number of applications for housing development which were received prior to 21 June 2006 and as such are not 'caught' by the approach to managing housing supply. These have the potential to deliver a significant number of additional units</p>

		<p>14.3 The definition of what amounts to 'significant' overprovision has no sound planning basis and does not allow sufficient flexibility in the supply of housing and thereby would be harmful to the local housing market, including the provision of affordable housing, and prevent the Council from providing a five year supply.</p> <p>14.4 Should controls be introduced on the supply of housing land, the early release of the Cattle Market site should be treated as an exception in</p>	<p>which are not currently shown as commitments. The trend towards overprovision is undeniable. The required rate between 2001-2006 was 528 dwellings per annum. The actual average annual rate during this period was 658 dwellings per annum i.e. 25% above the required rate. After 31.3.07 the required rate based on the RSS reduces to 396 dwellings per annum. This demonstrates that urgent action is required. Given the lead times involved in development it is unlikely that the operation of the SPD will have a significant impact on the annual rate of development for at least 12 months.</p> <p>14.3 – As the RSS requirement is expressed as a maximum, any overprovision could be deemed as significant. The figure of 10% allows a reasonable degree of flexibility in this context.</p> <p>14.4 – Not accepted – this site falls to be considered against the criteria set in the SPD along with all the other uncommitted allocated sites. See also</p>
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	<p>Appendix 2 Consultation Questions</p>	<p>order to achieve wider planning and transport objectives, and to make a positive contribution to the Council's World Class Stratford initiative.</p> <p>14.5 The Council should encourage the redevelopment of under-utilised previously developed land in the main town for housing development where environmental and other benefits would accrue.</p> <p>14.6 The Council should commit to an annual review of the situation in accordance with the requirements set down in PPG3.</p> <p>14.7 Q1 – Uncommitted allocated sites should still be released for development – in particular the Stratford Cattle Market Site should be released in accordance with Proposal SUA.I of the Local Plan Review.</p> <p>14.8 Q2 – There are other categories of proposals where permission should be granted e.g. those sites where the criteria of Policy PR.11 but where environmental and other benefits would be achieved through redevelopment for housing.</p>	<p>the response to 7.1 above.</p> <p>14.5 – Partially accepted – see the response to 7.1 above.</p> <p>14.6 – Accepted – see section 5.1 – in addition to the Annual Monitoring Report two information sheets will be produced annually which will monitor permissions and completions as at 31 March and 31 October respectively.</p> <p>14.7 – Not accepted – see 14.4 above.</p> <p>14.8 – Partially accepted – see response to 7.1 above.</p>
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<p>Stansgate Planning Consultants on behalf of various clients</p>	<p>General</p> <p>Appendix 2 Consultation Questions</p>	<p>15.1 – Challenge the need to control housing supply (see grounds specified in 13.1 to 13.3 and in 13.6 above)</p> <p>15.2 Q.1 – Preventing the development of sites allocated in the Local Plan Review will result in a shortfall of housing land within a five-year period.</p> <p>15.3 Q.2 – Agree with all the exceptions and think others should be included.</p> <p>15.4 Q.3 Additional forms of housing development should also be permitted as follows:</p> <ul style="list-style-type: none"> • Increased density – permitting revised applications at higher densities to make best use of land. • Small brownfield sites – to make best use of existing assets and promote sustainable development in urban areas. • Local Needs Housing – this should be extended to include the town of Stratford-upon-Avon • Development resulting in Significant Benefit - other sites which do not meet the 'bad neighbour' criteria of 	<p>15.1 – Not accepted – see responses to 14.1 –14.3 and 14.6 above.</p> <p>15.2 – Not accepted – see response to 14.2 above.</p> <p>15.3 – Support for the exceptions is noted.</p> <p>15.4 – Partially accepted - Including all the exceptions listed would undermine the objective of the SPD to restrict oversupply against the strategic housing requirements. However, see response to 7.1 which acknowledges that there could be a justification, in exceptional cases, for other forms of housing development not specified in the criteria listed in the SPD. It is also proposed that the wording of para 4.1(5) be amended to read:</p>
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		<p>Policy PR11 can deliver significant benefits. The redevelopment of such sites should be permitted.</p> <ul style="list-style-type: none"> • Conversion in accordance with Policy CTY.2A – all forms of conversion allowed in this policy should be included. • Re-use and Sub Division of Existing Urban Buildings - Should allow conversion and sub-division (in accordance with Policy COM.12) and the re-use of upper floors in retail areas (in accordance with Policy SUA.10) to ensure that the character and appearance of settlements is retained. • Increasing the Mix – There is a particular shortage of small units. The SPD should all small units on small sites. • Mixed use development – residential development should be allowed where it forms a component of a larger site. • Enabling development – residential development necessary to enable other forms of development should be permitted. • Other circumstances – SPD should allow for development justified by other material 	
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		considerations beyond those specified in the stated exceptions.	
Hulme Upright Manning	General	<p>16.1 Improper application of the plan, monitor and manage philosophy – the Council has been premature in adopting the SPD prior to the end of the consultation period.</p> <p>16.2 Exceptions criteria not broad enough – Clause 5 should be extended to allow residential development where it could deliver an enhancement to the character and appearance of the Conservation Area. Clause 6 should include those land uses which by virtue of their nature, lawfulness and lack of planning control, have the potential to cause unacceptable harm to nearby residents or other sensitive interests.</p> <p>16.3 Failure to show an adequate 10-year housing supply – the SPD should include calculations of housing need and build rates up to 2016.</p>	<p>16.1 Not accepted – The Council has put into effect the provisions of the extant Local Plan Policy STR.2. The SPD was not required to implement this policy. The aim of the SPD is simply to provide guidance on those types of proposal which are likely to merit favourable consideration within the terms of Policy STR.2.</p> <p>16.2 Partially accepted – see response to 7.1 above.</p> <p>16.3 Not accepted – the SPD has been prepared in accordance with the provisions of the Local Plan Review which has an end date of 2011. The period beyond 2011 will be addressed by the Local Development Framework which will replace the Local Plan. This</p>

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		<p>16.4 SPD out of step with Barker review and emerging household projections – whilst it may be prudent to resist green field development until requirements are clear there is no strategic benefit in restricting development on sustainable urban brownfield sites.</p>	<p>will be prepared in the context of a revised RSS which will for the first time specify district-level requirements.</p> <p>16.4 Not accepted – the approach has been supported by GOWM and the RPB.</p>
<p>Pegasus Planning Group on behalf of: Charles Church South Midlands Chase Midland George Wimpey Strategic Land George Wimpey West Midlands Ltd Miller Homes</p>	<p>General</p>	<p>17.1 Object to the use of Policy STR.2 as a justification for the moratorium. This policy represented a fundamental policy addition to the Plan at a late stage. The Council failed to hold a modifications Inquiry and the Plan therefore includes a wholly unjustified and untested policy on which the moratorium is based.</p> <p>17.2 Lack of community involvement – it is unreasonable for the Council to be applying the housing moratorium outwith the due process of consultation which should take place on a draft SPD.</p>	<p>17.1 Not accepted – It is noted that one of the objectors has submitted a claim under section 287 of the Town and Country Planning Act which seeks to quash the provisions of Policy STR.2 from the Plan. The claim will be robustly defended by the Council.</p> <p>The justification for the modifications made to Policy STR.2 and the decision not to hold a modifications inquiry were clearly set out at the appropriate stages of the Local Plan process.</p> <p>17.2 – Not accepted – see response to 16.1 above. The purpose of the consultation is to establish those types of housing development which should still continue to be permitted, but the principle of the approach is established</p>

		<p>17.3 – Housing land supply – The alleged overprovision is only projected and places too much reliance on sites yet to come forward. If the allocated sites are excluded then the surplus falls to 39 dwellings 0.8%. This will put at risk the ability of the Council to meet the existing requirement up to 2011. In the context of no <u>existing</u> overprovision it is not justifiable or desirable to adopt the approach advocated by the SPD.</p> <p>17.4 – Notwithstanding the fundamental objections to the SPD the policy should make clear that sites which have the benefit of outline planning permission and for which reserved matters have yet to be submitted are not caught by the moratorium.</p>	<p>by Policy STR.2.</p> <p>17.3 – Not accepted – see response to 14.2 above.</p> <p>17.4 – Accepted - It is recommended that the following paragraph be inserted:</p> <p>New Para 4.12 ` For the avoidance of doubt the approach to managing housing supply set out in this SPD does not apply to sites which have the benefit of outline permission for housing development, but where an application for the approval of reserved matters have yet to be submitted. The restrictive approach set out in this SPD will furthermore not apply to sites with extant planning permissions for residential development, unless there is no reasonable</p>
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		be taken to the definition of 'small-scale' in the context of main rural centres. The Council should reassess the balance of housing between Stratford and the Main Rural Centres.	require a shift in policy which is beyond the scope of the SPD and should be considered as part of the new Local Development Framework.
Gough Planning Services on behalf of George Wimpey Central	General	<p>19.1 This document should not be 'labelled' as part of the Local Development Framework as it implies it will provide longer - term guidance.</p> <p>19.2 The draft SPD is not within the Local Development Scheme.</p> <p>19.3 There is no flexibility within the SPD to respond to changing policy circumstances such as the review of the RSS and the preparation of the Councils LDF Core Strategy and Significant Allocations DPDs.</p> <p>19.4 This will result in an undersupply of housing in the light of revised RSS targets which will reduce access to housing and increase affordable housing needs.</p>	<p>19.1 – Not accepted – Supplementary Planning Documents form part of the Local Development Framework. This SPD is being prepared within the context of the Local Plan which is a 'saved plan' under the transitional provisions of the 2004 Act. The longevity of the guidance contained in the SPD is not relevant in this respect.</p> <p>19.2 The Local Development Scheme has been revised to include this SPD. This revision was brought into effect on 29 August 2006.</p> <p>19.3 – Not accepted – see the monitoring arrangements set out in section 5 of the SPD and the proposed amendment to para 5.2.</p> <p>19.4 – Not accepted – see response to 13.2 above.</p>

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	Appendix 2 – Consultation Questions	19.5 Q1 – No for the reasons stated above. 19.6 Q2 – Yes, but only if it is necessary to apply the SPD policy.	19.5 – Noted. 19.6 Noted
Bloor Homes	General	20.1 The SPD is an unsophisticated approach to managing housing supply. Reference should be made to annual completion rates relative to strategic guidance as suggested by the Council’s own AMR. 20.2 The sustainability appraisal is not sound and the SPD is likely to result in a failure to provide housing in line with strategic requirements in both the market and affordable sectors.	20.1 – Not accepted – the approach is a necessary one given the level of overprovision against the RSS based requirements. This conclusion is reinforced by reference to the annual rates of completion as set out in the response to 15.2 above. 20.2 The sustainability appraisal is considered to be fit for purpose. See also the response to 15.2 above.
Framptons on behalf of Coventry Turned Parts	Appendix 2 – Consultation Questions	21.1 Q1 – No 21.2 Q2 – No – overly restrictive. 21.3 Q3 – Yes – new criterion should be added: <i>'The development secures a demonstrable enhancement to the character and appearance of a Conservation Area.'</i>	21.1 – Noted 21.2 – Noted 21.3 – Partially accepted – see response to 7.1 above
Framptons of behalf of Trinity Court Surgery	Appendix 2 – Consultation Questions	22.1 Q1 – No 22.2 Q2 – No – overly restrictive.	22.1 – Noted 22.2 – Noted

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		<p>22.3 Q3 – Yes – new criterion should be added: <i>'The development supports the provision of significant community benefits, including the provision of enhanced community services.'</i></p> <p>N.B. This is supported by reference to the proposed redevelopment of the Chestnut Walk Surgery, in Stratford-upon-Avon, which would be prevented by the draft SPD as it stands.</p>	<p>22.3 – Partially accepted - see response to 7.1 above.</p>
Framptons on behalf of Coton Builders	Appendix 2 – Consultation Questions	<p>23.1 Q1 – No</p> <p>23.2 Q2 – No – overly restrictive.</p> <p>23.3 Q3 – Yes – new criterion should be added: <i>'Small-scale housing schemes within the central area of Stratford-upon-Avon.'</i></p>	<p>23.1 – Noted</p> <p>23.2 – Noted</p> <p>23.3 - Partially accepted - see response to 7.1 above.</p>
Framptons on behalf of Banner Homes Central	Appendix 2 – Consultation Questions	<p>24.1 Q1 – No – There is no actual oversupply in terms of 'committed' housing provision. The LPA could allow for the provision of a further 436 dwellings before seeking to control supply. Priority should be given to releasing the allocated brownfield sites in the Local Plan Review.</p> <p>24.2 Q.2 – No – SPD is misguided in favouring small windfall sites rather than allocated brownfield sites.</p>	<p>24.1 – Not accepted – see response to 14.2 above.</p> <p>24.2 – Not accepted – allowing all the uncommitted allocated sites to come forward at this stage would exacerbate</p>

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		24.3 Q.3 – Yes – Sites allocated in the Local Plan.	oversupply against the RSS based requirement. The other forms of development are already allowed for within the windfall allowance specified in Table 3. 24.3. – Not accepted – see 24.2 above.
Bigwood Chartered Surveyors	Front Cover / Para 1-2 Para 2.12 Para 4.1 Para 6.1	25.1 – The wording 'Local Development Framework should be removed from the front cover as the SPD relates to the Local Plan Review. 25.2 – The 10% should relate to 2009 rather than 2011 as the Local Plan is only saved for 3 years. 25.3 – the approach should refer to the period 1996-2009. 25.4 – This para is incorrectly written as the policy itself does not justify refusal.	25.1 – Not accepted see 18.1 above. 25.2 – Not accepted – the end date of the Local Plan is 2011. It is accepted that this will be replaced within 3 years through the Local Development Framework which is likely to address the period upto 2026 in line with the review of the RSS. 25.3 – Not accepted – see 25.2 above. 25.4 – Not accepted. This para accurately reflects the provisions of Policy STR.2
Armstrong Burton Planning on behalf of Greswolde Homes	General	26.1 – Community involvement – The SPD has come into immediate effect and has therefore failed the PPS12 test for rigorous community involvement. It is unreasonable for	26.1 – Not accepted see response to 16.1 above.

		<p>the Council to be applying the housing moratorium now without due process of consultation.</p> <p>26.2 – Housing Land Supply – Do not accept that level of overprovision will undermine urban renaissance. The ‘surplus’ is only projected at this stage. The moratorium puts at risk the ability of the Council to meet requirements upto 2011.</p> <p>26.3 – The SPD should be withdrawn, as it is contrary to the Government Guidance in draft PPS3, PPS12 and the Barker Report.</p>	<p>26.2 – Not accepted – see response to 14.2 above.</p> <p>26.3 – Not accepted – the approach is supported by GOWM and is in general conformity with the RSS.</p>
Hives Planning on behalf of the Diocese of Gloucester	<p>General</p> <p>Section 4</p>	<p>27.1 – It is ill conceived to restrict housing at a time when there is a national shortage. It is also premature in advance of the revision of the RSS which will address the new household projection figures.</p> <p>27.2 – Affordable Housing – Concerned that applications for affordable housing could still be refused under Policy STR.2 on the grounds that they contribute to overprovision. The Council needs to address affordable housing provision in more detail. Clarification is required as to how rural exception sites could be delivered and not be considered to</p>	<p>27.1 – Not accepted - see responses to 13.1 and 13.2 above.</p> <p>27.2 – Comments noted – Provided proposals for affordable housing accord with the provisions of Policies COM.13 or CTY.5 they will continue to be permitted. A minor amendment is proposed to address the concern which has been raised. It is proposed that the final sentence of para 4.6 be deleted and that a new para be inserted to read:</p>

		contribute to an oversupply.	<p>'In accordance with the approach set out in this SPD there are three main types of sites for affordable housing which may come forward:</p> <ul style="list-style-type: none"> (i) Allocated and windfall sites where the development is exclusively of affordable housing; (ii) 'Local Choice' schemes promoted within the framework of Policy COM.1; and (iii) rural 'exception' schemes promoted within the framework of Policy CTY.5. <p>Whilst supply from these sources counts towards the strategic housing requirements, it is considered that the continued provision of affordable housing to meet local needs accords with RSS and local policy objectives.'</p>
Councillor Nigel Rock	General	28.1 – Concerned that the SPD might encourage a more restrictive approach in villages when greater support is needed for local need development.	28.1 – This is certainly not the intention of the draft SPD.

		<p>28.2 – COM.1 – It is hoped that this document will encourage the provision of local homes for local people. Further explanatory text is needed to reinforce the local need aims.</p> <p>28.3 – CTY.F – Napton Brickworks – Concerned that the SPD will have the unintended effect of preventing any sort of development on this site by eliminating the possibility of dwellings. This should be excluded from the scope of the SPD as it reflects a local need.</p>	<p>28.2 – Small scale schemes to meet local housing needs in accordance with Policy COM.1 will continue to be permitted. The explanatory text at para 4.2 emphasises the importance of retaining the opportunities for local communities to plan for and meet their own local needs. It is unclear what further explanatory text is sought.</p> <p>28.3 – Allowing the uncommitted allocated sites to come forward at this stage would exacerbate the oversupply against the RSS requirement. This site falls to be considered against the criteria set out in the SPD along with all the other allocated sites. It would be inappropriate for the SPD to seek to exclude one specific site from its scope.</p> <p>The proposed amendment to para 3.5 and the additional paragraph which is proposed as set out in 7.1 above could enable the development of housing on this site to be considered provided it can be demonstrated to deliver a substantial environmental and/or community benefit which would not otherwise be forthcoming.</p>
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Councillor George Atkinson (WCC)	General	29.1 Seeking to impose a moratorium will not alleviate the problem of a lack of accommodation, but will exacerbate it. Other means have to be evolved to address housing need.	29.1 – Not accepted see response to 8.1 above.
Beaudesert and Henley-in-Arden Joint Parish Council	Appendix 2 – Consultation Questions	30.1 Q1. – Yes. 30.2 Q2 – Yes. 30.3 Q3 – Yes – Housing development in accordance with our housing needs survey.	30.1 – Noted 30.2 – Noted 30.3 – Noted – such schemes would fall within the scope of Policy COM.1 and will therefore continue to be permitted.
Bidford-on-Avon Parish Council	General	31.1 – Welcomes closer regulation of housing in the district. 31.2 – Concerned that adequate provision is made for key workers and young people wishing to remain in the districts towns and villages.	31.1 – Noted 31.2 – Noted - such schemes would fall within the scope of Policy COM.1 and will therefore continue to be permitted.
Ladbroke Parish Council	Appendix 2 – Consultation Questions	32.1 Q.1 – Yes 32.2 Q.2 – Yes 32.3 Q.3 – No	32.1 – Noted 32.2 – Noted 32.3 - Noted
Napton-on-the-Hill Parish Council	General	33.1 – Parish Council supports Councillor Rocks comments made in respect of Policy COM.1 and CTY.F	33.1 – see responses to 28.1-28.3 above.

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Southam Town Council	General	34.1 – Support the document	34.1 Support noted and welcome.
Stockton Parish Council	General	35.1 – Concern that there may be a tightening up of policies such as COM.1 and CTY.5. Limited growth to meet local needs both for affordable and market housing should still be permitted.	35.1 Noted – Proposals which accord with policies COM.1 and CTY.5 should continue to be permitted.
Wixford Parish Council	Appendix 2 – Consultation Questions	36.1 Q1 – Yes 36.2 Q2 – Yes 36.3 Q3 – No	36.1 – Noted 36.2 – Noted 36.3 – Noted
RASE	General Paras 2.6 and 2.9 Paras 2.12	37.1 The tone of the document is unexceptionable, but some tightening up is recommended. 37.2 Should take the opportunity to suggest to the Region that Stratford should be ‘ring-fenced’ from the County wide allocations of land for development. 37.3 Interpretation of ‘appreciable benefits for the local community’ is too open ended. Concern that this could be justified to support land west of Shottery.	37.1 – Noted 37.2 – Not accepted – this falls outside the scope of the SPD. The Council will have the opportunity to make representations to the RPB as part of the review of the RSS. 37.3 – Concern noted – The SPD cannot amend the wording which is used in the policy. There is nothing in the SPD or the Local Plan that suggests this provision could be used to justify the release of land to the west of Shottery.

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	Paras 4.3 to 4.5	37.4 Solutions to decent social housing will be dependent on subsidy. Increasing supply would have little effect on the problem of affordability.	37.4 – Noted.
	Para 4.10	37.5 Should be made clear that CPO powers will be used to prevent the wanton neglect of sites in order to gain planning permission.	37.5 – Noted – This falls outside the scope of the SPD document, but the Council will consider using CPO powers in appropriate circumstances.
Shottery Village Association	Para 2.6	38.1 Special consideration should be given to conservation needs of Stratford.	38.1 – Noted, but unclear what change is sought if any to the SPD.
	Para 2.12	38.2 Concerned about the subjectivity of the phrase ‘appreciable benefits’.	38.2 – see response to 37.3 above.
	Para 4.3 to 4.5	38.3 Increased building has already failed to reduce the price of local housing. Direct subsidy is required.	38.3 – Noted.
	Pars 4.9 and 4.10	38.4 A clear message should be sent that allowing property to fall into disrepair will not result in financial gain.	38.4 – Noted – Policy PR.11 of the Local Plan is tightly worded in order to prevent these circumstances arising.
	Appendix 2 – para 2.2	38.5 Housing should be restrained to the minimum exceeding it by 10% has a cumulative effect year on year.	38.5 – The approach adopted in the SPD seeks to reduce the level of overprovision. It is not seeking to allow requirements to be exceeded by 10% each year.
Stratford SCAN	General	39.1 The Council should take on board the wishes of senior citizens when it	39.1 – Comments are noted but it is unclear what changes if any are being

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		comes to planning e.g. down sizing from larger dwellings, the need for ground floor flats, and bungalows.	sought to the SPD.
Stratford Voice	General	40.1 The policy is welcomed. 40.2 It may be pertinent to allow some residential to be considered as part of a mixed-use retail scheme where it is strictly ancillary.	40.1 – Noted 40.2 – Partially accepted - see response to 7.1 above.
Tiddington Road Residents Association	General	41.1 The policy is welcomed. 41.2 It may be pertinent to allow some residential to be considered as part of a mixed-use retail scheme where it is strictly ancillary.	41.1 – Noted 41.2 - Partially accepted - see response to 7.1 above.
CJ & JD Cole	General	42.1 Moratorium will have an adverse impact on local businesses. 42.2 Applications could continue to be permitted subject to conditions preventing commencement until 2011. 42.3 Small to medium development should continue to be permitted. NB – The objector cites the specific	42.1 – This has to be balanced against the harm which over supply of housing causes to the RSS. 42.2 – It is not possible at this stage to predict how long the current approach to manage housing supply will remain in force. Placing such a condition on permissions would not be practicable in these circumstances. 42.3 - Not accepted – Small-scale developments by their very nature are unlikely to deliver significant environmental or community benefits.

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		example of a scheme they are proposing in School Road, Wellesbourne which is caught by the moratorium.	Taken cumulatively they would continue to contribute to the over-supply against the RSS provision.
Carsina Goodman	Appendix 2 – Consultation Questions	43.1 Q.1 Yes 43.2 Q.2 Yes 43.3 Q.3 No	43.1 – Noted 43.2 – Noted 43.3 – Noted
DE Harman	Appendix 2 – Consultation Questions	44.1 Q.1 Yes 44.2 Q.2 Yes 44.3 Q.3 Yes – adequate accommodation should be provided for the 3000 workers from other EEC countries working in the Vale of Evesham.	44.1 – Noted 44.2 – Noted 44.3 – Noted – this issue requires consideration outside the scope of the SPD.
AB Knapp	Appendix 2 – Consultation Questions	45.1 Q.1 Yes 45.2 Q.2 Yes – but affordable housing should not be mixed with bigger properties. 45.3 Q.3 No	45.1 – Noted 45.2 – Noted 45.3 – Noted
George Matheou	Appendix 2 – Consultation Questions	46.1 Q.1 Yes - 46.2 Q.2 No – Not clear how it is integrated with economic and	46.1 – Noted 46.2 - The purpose of the SPD is to control the release of housing sites in

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		<p>environmental objective or what the objectives are.</p> <p>46.3 Q.3 Yes – accommodation and land for the purpose of business and employment.</p>	<p>order to restrict any over supply against strategic requirements. Exceptions are made where proposals have specific environmental or community benefits.</p> <p>46.3 – Noted – the SPD is restricted to housing does not deal with business or employment proposals.</p>
Iain Smith	General	47.1 Has there been any consideration given to the effect on the housing market. Will it be monitored and will the Council be able to respond.	47.1 – This issue is addressed in the sustainability appraisal and there is a clear commitment to monitor and review the effectiveness and implications of the approach.
Stratford District Council – Housing Service	<p>General</p> <p>Section 4</p>	<p>48.1 The housing moratorium is strongly supported and brings with it the opportunity to bring some balance to the housing market.</p> <p>48.2 The proposed exemptions at points (1) and (2) of para 4.1 are strongly supported.</p> <p>48.3 The section at para 4.3-4.6 should contain an explicit cross-reference to the definition of affordability at Key Principle 8 of the Council’s ‘Meeting Housing Needs’ SPG.</p>	<p>48.1 – Support noted and welcome.</p> <p>48.2 – Support noted and welcome.</p> <p>48.3 – Accept – It is proposed that the following sentence be added to para 4.6: ‘For the purposes of this SPD the definition of affordable housing is that which is set out in Key Principle 8 of the Council’s Meeting Housing Needs</p>

		<p>48.4 The SPD should explicitly state that one of the benefits of the moratorium will be the effect of reducing land values. The use of the SPD as a tool to depress land values will assist the delivery of affordable housing.</p>	<p>Supplementary Planning Guidance (June 2006).'</p> <p>48.4 Not accepted – The purpose of the SPD is to manage the supply of housing in order to restrict overprovision against the RSS-based housing requirement. Whilst the SPD may have the effect of depressing land values this was not a specific reason why it was prepared.</p>
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The following responded to the consultation but did not make specific comments:

- South East England Regional Assembly
- South West Regional Assembly
- The Countryside Agency
- The Theatres Trust