

**THE CABINET
28 APRIL 2014**

Subject: **Stratford-on-Avon District Core Strategy – Focused Consultation: 2011-2031 Housing Requirement and Strategic Site Options**

Lead Officer: **Dave Nash**
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**Lead Member/
Portfolio Holder:** **Councillor C Saint**

Summary

This report presents to members the results of a focused consultation exercise undertaken on proposals to change the Core Strategy plan period to 2011-2031, to set the housing requirement to be met over that period at 10,800, and to seek comments on the strategic option(s) that should be pursued to meet that increased housing requirement.

Recommendations to Council

- 1. That the responses concerning the change to the plan period be noted and the proposed Submission Core Strategy be prepared on the basis of a plan period from 2011 to 2031.**
 - 2. That the responses to the housing requirement figure be noted and The Cabinet accordingly confirms the number of homes over the plan period that should be included in the proposed Submission Core Strategy.**
 - 3. That the responses concerning the strategic development options be noted and be used to inform the identification of a preferred option to be included in the proposed Submission Core Strategy.**
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1 Background/Information

- 1.1 At its meeting held on 13 January 2014 the Cabinet resolved to undertake a further period of focused consultation. The purpose was to seek views from interested parties on the proposed change to the Core Strategy plan period, the proposed housing requirement for that new plan period and the alternative strategic development options that, having been promoted, were assessed as being the most realistic options available (minute 610 refers).
 - 1.2 The focused consultation was live between 31 January 2014 and 14 March 2014. A 32 page brochure was published both on-line and in hard copy. The brochure outlined the purpose of the consultation, provided a resume explaining the proposals concerning the plan period and the housing requirement, and explained that the Council was seeking views about the most appropriate approach to providing additional land to meet
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the identified need for around 2,500 more homes. It then described in more detail the five strategic options.

This report analyses the representations made. In seeking views on the relative merits of the different strategic development options, respondents were asked to place each option in rank order.

2 Summary of responses to the consultation

- 2.1 The following paragraphs provide a summary of the issues raised concerning each of the questions posed in the consultation.

Changing the plan period from 2008-2028 to 2011-2031

- 2.2 A summary of the responses is attached as Appendix 1. The change to the plan period is supported by 80% of the respondents. Amongst those not supporting the change, a common concern is that 2031 is too distant a time horizon towards which to plan. Members will be aware that this end date is necessary to ensure compliance with the requirement that plans should look forward at least 15 years beyond their expected date of adoption. Some concerns would perhaps have been alleviated had the consultation document mentioned that the plan must also be kept up to date by regular review, ensuring that the Council can respond to new circumstances should they arise.
- 2.3 The key issue raised in the responses is not the extension of the plan period to 2031, but the rolling forward of the start date to 2011. The representations made on behalf of a number of house builders suggest that, whilst this is not unreasonable in itself, it leaves unresolved a claimed under-provision of new homes during the period 2008-2011. The representations suggest that additional homes should be added to the requirement for 2011-2031 to reflect this under-provision. There is further comment on this at paragraph 2.12 below.
- 2.4 A related point was raised in relation to retail provision, in the sense that a concern was raised that the updated study might have omitted to reflect any development that took place between 2008 and 2011. It is confirmed that all the studies commissioned to update the evidence base reflect the population at 2011 as confirmed by the Census and take into account anticipated housing growth over the plan period, including any outstanding commitments as at April 2011.
- 2.5 Overall, nothing has arisen via the consultation to suggest that the revised plan period should not be confirmed.

Setting the housing requirement at 10,800 additional homes

- 2.6 A summary of the responses is attached as Appendix 2. Members should note that this simply provides an analysis of the representations received; it does not contain anything by way of a response on behalf of the Council. The core issue is the extent to which 10,800 additional homes represents an accurate and objective assessment of need (OAN) over the plan period. As found previously when consulting on this matter, views are polarised between the community and the development industry. A number of responses from local residents suggest the figure is too high and that the focus should be on meeting locally generated needs rather than to cater for continuing inward migration. Conversely, the representations made on behalf of house builders argue that the figure does not reflect OAN and advance a wide

range of alternative figures, the highest being 20,000. Fundamentally, this issue turns on the weight that can properly be attached to the Coventry and Warwickshire Joint SHMA and the extent to which the Council's proposal for 10,800 new homes is consistent with the SHMA.

- 2.7 As previously advised, the Joint SHMA was prepared in accordance with the approach recommended in the draft Planning Practice Guidance (PPG) issued by DCLG in 2013. The PPG has now been finalised and was issued afresh on 6 March 2014. There is no substantive change in the advice concerning the assessment of housing needs that would require a review of the Joint SHMA. A number of representations point to factors claimed to be outside the scope of the work set out in the SHMA, yet for the most part it is apparent that the SHMA does make clear reference to those factors.
- 2.8 It is argued that the SHMA does not properly reflect the impact on in-migration to the District of the recession and the moratorium. It is clear that in-migration between 2006-2011 was below that of the previous 5 years, but this was impacted on by a number of issues including the policy stance of the Regional Spatial Strategy. In any event, the SHMA takes into account the longer term 10 year migration trend and its favoured projection for 2011-2031 assumes a slightly higher average rate of in-migration than that shown by the 10 year trend.
- 2.9 Substantive representations have been made on the alleged failure of the SHMA to propose a housing need figure that will support the ambitions for economic growth. The SHMA indicates that for Stratford-on-Avon District an additional 540 homes per annum will support employment growth of 65 jobs per annum. This relatively low figure is in part a reflection of the age profile of the existing population. It indicates 2.1% growth in the local economy over the 20 year period 2011-2031, which is lower than the growth experienced in the 10 year period prior to 2008. Employment related forecasts predict a much stronger growth in the number of jobs in the District - for example the 475 per annum predicted by Experian would equate to growth of 21% over the plan period. However, the SHMA takes the view that this matter should be assessed across the housing market area as a whole, given the inherent uncertainties in economic forecasting. This is an approach endorsed by Environmental Resource Management (ERM), the Council's advisers on the housing requirement. The SHMA concludes that the employment forecasts do not provide a basis per se for an adjustment to the housing requirement at the HMA level. It also identifies that commuting dynamics mean that it is probably not realistic to achieve an exact balance between labour demand and supply growth at a local authority level. However, it does also point to the potential need to consider higher housing provision in this District to support the local economy - this is the main basis for the conclusion in the SHMA that the OAN for Stratford-on-Avon should be 570 homes per annum rather than 540 homes. Without such an uplift it may be the case that there will be an increase in cross-boundary commuting. In proposing a housing figure at 540 homes per annum, the Council is taking the advice of ERM that any additional dwellings are just as likely to be occupied by retired households or those intending to commute to jobs outside the District as they are to be occupied by people who work here.

- 2.10 The representations argue that the identified OAN fails to take sufficient account of affordability and the need for affordable housing. These matters are fully assessed in the Joint SHMA. It concludes that the net need for affordable housing per annum in Stratford-on-Avon is 133 homes, although it also indicates that this need might be increased by up to 100 units per annum to cater for in-migrating households. This suggests that around one household in 10 moving into the District would need to access affordable housing. The SHMA points out that ongoing trends show an increasing number of households resorting to the private rented sector to meet their needs, despite this being a relatively unaffordable option. ERM's advice to the Council is that a modest increase in housing provision is unlikely to increase the supply of affordable dwellings. They also point out that households in need of affordable housing are already included in the overall housing projections, so there should be no need to adjust the OAN to cater for their needs.
- 2.11 There are representations on other factors such as the assumed vacancy rate. This is set at 3% across the whole market area, despite evidence of different rates for both vacancies and second homes across the area. The SHMA justifies this approach on the basis that whilst there may be evidence of different rates of vacancy/second homes in the existing housing stock, there is also evidence to suggest that it is reasonable to apply a standard 3% rate to new housing stock.
- 2.12 I return now to the issues around an alleged shortfall of provision. The representations raise two areas of concern, namely a shortfall of provision in the District since 2008 and a failure to provide for the potential future shortfall of provision in other areas, including both Birmingham and Coventry. On the former, as is evidenced by the SHMA, over the period 2001-2011 the rate of housing delivery across the market area as a whole and in the District in particular exceeded that proposed under the adopted Regional Spatial Strategy (RSS). The same is true when looking at delivery over the period 2006-2011 against the RSS Phase 2 Revision figures as recommended by the RSS Examining Panel. Whilst this Revision was never formally adopted, the Panel figures have been widely interpreted as providing the most up-to-date, objective and independently tested assessment of housing need pending the adoption of new local plans that will supersede the RSS approach. The SHMA indicates that net completions in the District between 2006 and 2011 exceeded that suggested by the Panel by 608 units. The SHMA has taken fully into account the assessed backlog in affordable housing provision arising from this period, which is incorporated into its identified OAN. On this basis there is no shortfall arising from the years prior to 2011. As for the future, the Council will provide evidence that it has fully discharged the Duty to Co-operate with other councils on the strategic matter of housing provision. The Council's immediate neighbours are all committed to meeting their OAN within their own administrative areas. There is no objective evidence available at this stage to indicate that the District will be required to accommodate additional development to meet housing needs arising in other areas. Should such evidence arise, it will be addressed via a future review of this Strategy.
- 2.13 The summary draws attention to the representations made by other authorities within the Coventry and Warwickshire HMA. There have been

ongoing discussions subsequent to the receipt of these representations. It is understood that there is now a greater understanding of the rationale behind the Council's identification of OAN as being represented by the SHMA midpoint headship rate projection of 10,800. In finalising the Strategic Economic Plan, as published by the Local Enterprise Partnership, the OAN for the market area as a whole was acknowledged as lying within a range of 3750 to 3800 homes per annum. There have likewise been ongoing discussions about the relationship between the proposals for employment growth and the OAN for housing. If the Council supports the employment led growth proposed by JLR at Gaydon, the amount of land likely to be brought forward for employment purposes over the plan period will significantly exceed that identified by the recent Sub Regional Employment Land Study as being needed to meet local employment growth. Such support would be based on an understanding that the JLR proposals entail growth of strategic regional or national importance that should be supported in addition to bringing forward up to 35 hectares of land on other sites to meet more local needs. It remains unclear at this stage what impact the JLR development will have on the need for housing across the whole market area.

- 2.14 Having regard to all these issues, it is perhaps the extent to which 10,800 homes over the plan period will adequately support and be consistent with the economic growth potential of the District that will be subject to the greatest ongoing scrutiny. To date the Council has not accepted that there is any justification to uplift the housing requirement to secure an appropriate balance between housing and employment growth. The consultation response has added to the evidence available and, members are advised to consider this point in particular when determining the level of growth that will be proposed in the Council's submission document. In general, there is felt to be no evidence to suggest that any of the alternative assessments reflected in the responses made on behalf of various developers are any more reliable or objective than the analysis set out in the Joint SHMA. Conversely, the community based arguments for a reduced figure are not sustainable in the light of the evidence and housing regard to the Government's acknowledged ambition to boost significantly the supply of housing.

Strategic options

Option A - Further Dispersal

- 2.15 A summary of the responses is attached as Appendix 3.
- 2.16 In many respects, the positions adopted by those both supporting and opposing the further dispersal option are tenable. This suggests that an overall strategy incorporating the dispersal of housing development to a wide range of settlements in the District, based on their character and function and the availability of services and employment opportunities, is reasonable given the nature of the District. Conversely, an over-reliance on dispersing development to smaller villages would not be appropriate due to the impact this would have on their character and the need to travel longer distances, most likely by car, to shops, services, jobs, schools, etc.

- 2.17 The approach proposed in the strategy is one of dispersal and it is important to recognise that this option is most likely to involve further dispersal to the District's larger settlements where there is evidence that the pace of change over recent decades has had a significant environmental and social impact. The Council must judge the extent to which ongoing development can be directed to these settlements without creating impacts that would be regarded as unacceptable. These would include, for example, seeking to accommodate growth that would cause significant harm to the transport network or create problems in ensuring that a sufficient choice of school places is available to meet needs.

Option B - Gaydon/Lighthorne Heath

- 2.18 A summary of the responses is attached as Appendix 4.
- 2.19 The concerns raised about this option are very similar to those expressed as a result of the earlier 'New Proposals' consultation, notwithstanding the significant change in the scope of the proposals to accommodate growth associated with Jaguar Land Rover (JLR).
- 2.20 The consultation has not revealed any evidence that, should the Council identify GLH as its preferred strategic development location, the development cannot be achieved in a sustainable manner consistent with the overall purpose of the planning system.
- 2.21 Members will note that various responses express a note of caution about the detailed impacts of this (and other) options and identify that further work is required to understand the details of the mitigation that would be put in place to offset those impacts. This is to be expected at this stage of the plan making process. However, the Council needs to have reasonable grounds to believe that the proposals can be brought forward in a timely manner and preferably on the basis that they will have positive overall impacts.
- 2.22 This option is unique in terms of the employment related growth that is incorporated into the proposals. The JLR expansion plans for the Gaydon site are of strategic economic importance. Whilst the precise nature of the development is yet to be determined, ongoing discussions make it reasonable to conclude that it is likely to result in a wide range of job opportunities. This option would significantly extend the availability of housing in close proximity to what is already a substantial employment site. It would offer both future and existing employees a realistic choice to live in closer proximity to their workplace, and thus provides the potential to reduce longer distance commuting. However, housing development in this location must also be supported by attractive sustainable transport options available to new residents, many of whom would travel to workplace destinations in nearby larger towns and beyond.
- 2.23 The revised proposals for GLH are such that the on-site provision of a secondary school is unrealistic. It is likely that Kinton School will be expanded to cater for the additional pupils. This will need to be carefully planned to ensure the school site can be accessed without causing traffic problems in the village centre.
- 2.24 The Council is committed to ensuring that development does not compromise the integrity of existing settlements. It is apparent that this option can be delivered without compromising the integrity of the historic

settlements of Gaydon and Lighthorne. It would incorporate strategic landscaped and/or natural open buffers to both villages. The position with the settlement of Lighthorne Heath is undoubtedly different. The development would be inextricably linked to this village and, if this option is favoured, it is recommended that it be conceived as an expansion of Lighthorne Heath that specifically should address how the existing homes and the future community will be fully integrated.

Option C - Long Marston Airfield

- 2.25 A summary of the responses is attached as Appendix 5.
- 2.26 The consultation has not revealed any evidence that, should the Council identify Long Marston Airfield as its preferred strategic development location, and subject to the mitigation of transport impacts, the development cannot be achieved in a sustainable manner consistent with the overall purpose of the planning system. Whilst the updated Water Cycle Study has flagged an issue concerning waste water disposal, there is no reason to believe that a technical solution to the problem could not be identified and this is already being actively pursued by the site promoters.
- 2.27 There are divided views about the extent to which this option provides a sustainable solution in transport terms. Whilst there is the possibility of some sort of transport link being restored along the route of the Greenway, the development is not promoted on the basis that this must happen. It allows for, but does not secure, a reinstatement of the heavy rail link from Stratford-upon-Avon to the south. It also includes an investigation into the potential for a light transport link. The site is currently difficult to access from the strategic transport network. The proposals present an option to construct a relief road to the south and west of Stratford-upon-Avon, linking to the A46 at Wildmoor via the permitted but yet to be constructed road across land west of Shottery. The delivery of this road remains uncertain, as do the environmental impacts of providing a southern link between Shipston Road and Evesham Road (at Bordon Hill). The transport evidence is that the delivery of such a link road is essential to mitigate traffic impacts on the town.
- 2.28 As with other options, various responses express a note of caution about the detailed impacts and identify that further work is required to understand the details of the mitigation that would be put in place to offset those impacts. The comments at paragraph 2.21 apply equally to this option.
- 2.29 It is clear that, with an eventual capacity of around 3,500 homes and having regard to other committed development in the vicinity, there is the potential for a new secondary school to be provided on-site. This is the only strategic option where such on-site provision is viewed as likely and achievable.
- 2.30 A new settlement in this location would be in close proximity to the villages of Long Marston and Quinton. There is considered to be adequate scope to ensure that the integrity of these villages is protected through an appropriate approach to green infrastructure provision, including strategic landscaping.

Option D - Southeast Stratford-upon-Avon

- 2.31 A summary of the responses is attached as Appendix 6.
- 2.32 The consultation has not revealed any evidence that, should the Council identify Southeast Stratford-upon-Avon as its preferred strategic development location, and subject to the resolution of issues concerning traffic impact and secondary school places, the development cannot be achieved in a sustainable manner consistent with the overall purpose of the planning system.
- 2.33 A key question mark in relation to this proposal is the deliverability of an Eastern Relief Road linking Banbury Road (A422) to Warwick Road (A439) in the vicinity of Ingon Lane. This would require the new road to cross the River Avon floodplain between Tiddington and Alveston. The funding sources to secure this link are uncertain.
- 2.34 The development would be expected to deliver up to 2,750 homes, insufficient in itself to justify the provision of a new secondary school on-site. However, development on this scale at Stratford-upon-Avon would create a demand for secondary school places that cannot be met on existing school sites and it would thus be necessary to identify a suitable site for a new school. No site has been identified at present.
- 2.35 This option differs from those involving the establishment of a new settlement. Development would be brought forward as a sustainable urban extension of the town. It would involve the loss of relatively high grade agricultural land. A main issue raised in the public feedback is the impact of further development at Stratford during the current plan period, given the significant commitments that already exist and the support for the redevelopment of brownfield land within the town boundary.

Option E - North of Southam and Stoneythorpe

- 2.36 A summary of the responses is attached as Appendix 7.
- 2.37 The consultation has not revealed any evidence that, should the Council identify Southam/Stoneythorpe as its preferred strategic development location, the development cannot be achieved in a sustainable manner consistent with the overall purpose of the planning system. There are, however, some issues concerning the potential impact of the HS2 proposals on the deliverability of the Stoneythorpe site.
- 2.38 The separate proposals raise different issues regarding the integrity of existing settlements. The proposals for the North of Southam site have been criticised as essentially joining together the town of Southam and the village of Long Itchington. At its northern end the site would abut the existing village, whilst to the west it also wraps around the small group of dwellings at Model Village. The land at Stoneythorpe is physically and visually detached from Southam. Its development would create a small satellite village.

Each development would provide on-site primary schooling, but there are no proposals to provide on-site secondary schooling. It is envisaged that sufficient scope exists to secure an expansion of the existing Southam College.

Statistical analysis of site rankings

- 2.39 A statistical analysis of the responses to Q3 in the consultation document is included at Appendix 8. There were 1164 responses that provided a full ranking of the options. The analysis of these responses shows that Gaydon/Lighthorne Heath is the most popular option, having the lowest mean score and also (at 34%) the highest proportion of respondents ranking this as their preferred option. Conversely, this option scores second highest (at 18%) in terms of the respondents who rank it as their least preferred option. In terms of mean score, Long Marston Airfield is ranked as a very close second preference. This is the preferred option for 25% of respondents and is the least preferred option for only 9%. The least preferred option overall is Southeast Stratford, which is the preferred option for only 5% of respondents and ranked as the least preferred by 44%.
- 2.40 As would be expected, the results show a significant variance by location of respondent. This is demonstrated by the analysis based on the six community forum areas within the District. There are large differences in the number of responses from each locality, with 45% coming from Stratford-upon-Avon, 21% from Southam, 19% from Wellesbourne/Kineton and only 15% from elsewhere. This dispersal of respondents will have impacted on the outcome. Within the different areas, Gaydon/Lighthorne Heath is the preferred option amongst the respondents from the Alcester/Bidford, Shipston and Stratford-upon-Avon localities, whilst Long Marston Airfield is the preferred options amongst the respondents from the Southam and Wellsbourne/Kineton localities.

It is also important to recognise that 333 respondents did not fully rank the five options. Most notably, there were just over 200 responses from residents living in the general vicinity of the Gaydon/Lighthorne Heath site that simply ranked that proposal as the least preferred option. Had these residents provided a complete ranking, it is quite possible that the order of preference shown by the mean rankings would have been different. The Council should clearly bear this in mind when considering what weight ought to be given to these results in the overall decision making process. That said, it remains evident that in terms of the 'popular vote' there is an indication that across the District as a whole the strongest levels of support as demonstrated by this consultation exercise attach to the proposals at Gaydon/Lighthorne Heath and Long Marston Airfield.

Newly promoted strategic options

- 2.41 Some 25 additional sites have been promoted via representations received. The vast majority of these sites have been registered previously and/or are not strategic. The following are deemed to be new strategic sites submitted for the first time in the Core Strategy process:
- West of Wellesbourne (Airfield) – approximately 95 hectares for residential development (c.1,600 dwellings) plus a primary school, local centre, playing fields, potential secondary school.
 - Dallas Burston Polo Grounds, north of Leamington Road, Southam – approximately 30 hectares for residential development (c.700

dwellings) plus a primary school, local centre, Continuing Care Retirement Community, recreation facilities, open space.

- Land at Lower Clopton, Stratford-upon-Avon – approximately 34 hectares for residential development (c.750 dwellings) with proposed direct from the A46. The site is within the Green Belt.

2.42 The promoters of the sites at Wellesbourne and Southam (Stoneythorpe) have each submitted supporting documentation, including a sustainability appraisal. The Wellesbourne submission includes a vision document, whilst the Stoneythorpe submission includes Concept Proposals and a separate transport assessment. Members will appreciate that it has not been possible to subject these proposals to the sort of scrutiny that has taken place in respect of those submitted in response to the 2013 'Call for Sites', and thereafter subject to technical assessment and public consultation.

2.43 Advice received on this matter is that should the promoters provide sufficient detail for the Council to conclude that the sites are potentially deliverable a view would need to be taken as to whether they need to be considered through the procedures at the EIP and, if they proved to be so clearly outstanding, available and deliverable that failure to include them within the Core Strategy would render the plan unsound, then the Council may need to consider adjournment and re-consultation as a worst case option at that time. Further, if on an initial assessment it became clear that the sites were deliverable, viable and sequentially preferable to strategic sites that are expected to come forward in the early stages of the Plan period, then there may be justification for accelerating them and even for calling for a further round of consultation, depending on their value. However, there is no reason why they could not be promoted through representations under the Regulation 19 and 20 procedure in order that they could be considered by the Inspector at the Examination. To seek to attempt include new sites at this stage, without them being subjected to the same process of scrutiny and consultation as others, might be considered unfair and prejudicial by those promoting competing sites. It would be far preferable to seek to bring the sites into the process if and when it can be established that they are of substance, but there is no justification for holding up the Plan process at this stage; indeed to do so could undermine the confidence of participants in the "call for sites". In the event that the Plan is considered likely to undergo early review then this may offer the best opportunity to take them into account, rather than disrupting the adoption of the current plan which has potential consequences in terms of development management decisions, including appeals, resulting from the absence of an up to date adopted development plan.

2.43 In summary it seems evident that, to be brought forward now despite the lack of detailed scrutiny, a new site would have to be so demonstrably better than anything else previously considered that it would be unreasonable to ignore it, despite its belated submission. The site at Lower Clopton is in the Green Belt and should not be considered further at this time. The Stoneythorpe site does not seem to offer anything significantly different to that offered by previously promoted locations. The Wellesbourne site could be a more serious option for strategic development, but many issues concerning this proposal are

unanswerable in the short term. It is difficult to conceive of this site being 'demonstrably better' than other somewhat similar options.

3. Options available to The Cabinet

3.1 In light of the comments submitted and the foregoing assessment, the following options should be considered:

(1) In relation to the plan period:

- a. To confirm the plan period as running from 2011 to 2031.
- b. To confirm the end of the plan period as being 2031, but to continue to identify 2008 as being the start date for the plan.
- c. To adopt a different plan period altogether.

(2) In relation to the housing requirement (and subject to the plan period being confirmed as 2011-2031):

- a. To confirm the figure of 10,800.
- b. To identify a higher figure having regard to the issues raised in paragraphs 2.6 to 2.14 of this report.
- c. To identify a lower figure as promoted by some respondents.
- d. To request that further work be carried out prior to this matter being determined.

(3) In relation to the strategic options:

- a. To note the responses and agree that they be used to identify one strategic option for inclusion in the plan.
- b. To note the responses and agree that they be used to identify more than one strategic option for inclusion in the plan.
- c. To identify one of the new strategic options for inclusion in the plan.
- d. To request that further work be carried out prior to this matter being taken forward for decision by the Council.

3.2 In relation to (1), the advice is that nothing has arisen via the consultation to suggest that the revised plan period should not be confirmed. Option (a) is therefore the recommended way forward.

3.3 In relation to (2), members are advised that in particular they need to be satisfied that planning to deliver 10,800 homes over the plan period will adequately support and be consistent with the economic growth potential of the District. The advice is that in general there is no evidence to suggest that any of the alternative assessments reflected in the responses made on behalf of various developers are any more reliable or objective than the analysis set out in the Joint SHMA. However, the recommendation in the Joint SHMA to provide an uplift in the housing requirement to support economic growth has not been adopted to date, having regard (inter alia) to the analysis undertaken by ERM.

3.4 In relation to (3), the advice is that the responses should sit aside all other elements of the evidence base and be used to inform the identification of the Council's preferred way forward. There is not considered to be any compelling evidence to support the option of

bringing forward one of the newly promoted locations. It is considered that the Council now has sufficient evidence to make a properly informed choice. Given the importance of progressing the plan to submission, option 3(d) is not recommended.

4. Implications of the Proposal

4.1 Legal/Human Rights Implications

4.1.1 At examination an Inspector will be obliged to consider whether the Council's Core Strategy is sound and legally correct, i.e. (inter alia) that it is based on up-to-date and reliable evidence. The test of soundness is a statutory test under Section 20(5) of the Planning and Compulsory Purchase Act 2004.

4.1.2 The Council must be satisfied that the community has been involved in accordance with its Statement of Community Involvement and thus that the Council has met the requirements of s18 PCPA 2004 (as amended).

4.2 Financial

4.2.1 The cost of the ongoing Core Strategy process is covered by the Council's Local Development Framework budget.

4.3 Environmental

4.3.1 The preparation of this spatial strategy for the District has taken full account of potential environmental impacts. The emerging Core Strategy policies are subject to ongoing and independent work on a Sustainability Appraisal in accordance with the legal requirements governing the preparation of the Strategy.

4.4 Corporate Strategy

4.4.1 The Strategy is relevant to all four of the core aims of the District Council's Corporate Strategy. It includes specific proposals to address local housing need, to help business and enterprise to flourish, to minimise the impacts of climate change and to a lesser degree to improve access to services.

4.5 Analysis of the effects on Equality

4.5.1 The Core Strategy will be subject to an Equality Impact Assessment in accordance with the Council's adopted guidance.

5. Risk Assessment

5.1 As with the Core Strategy as a whole it is imperative that the proposals recently consulted upon are founded on robust evidence and analysis. The information and assessment undertaken suggests that a decision to alter the plan period to 2011-2031 would be subject to relatively low risk.

5.2 The identification of a housing requirement that properly reflects objectively assessed housing need is critical to the prospects of a submitted Core Strategy being considered sound. This report sets out representations about the Council's identification of objectively assessed need as comprising 540 dwellings per annum, or 10,800 over the plan period. This confirms that the development industry will argue that housing need is well in excess of this figure. Whilst there is felt to be no objective evidence to support any significant change, it will be evident to members that the risks of a plan being deemed unsound are likely to

decrease if the Council adopts a higher figure to have greater regard to promoting economic development.

- 5.3 The risk of the Council's plan preparation process being challenged at the Examination stage has been reduced as a result of the further period of focused consultation. The updates to other aspects of the Evidence Base reported to this meeting provide the Council with improved and more up-to-date information on which to make the decisions required to progress the Plan to its submission stage and have reduced the risk of a successful challenge accordingly.

6. Conclusion

- 6.1 This consultation, focusing on three specific issues that will be critical in terms of the overall content of the emerging Core Strategy, has provided a valuable input to the assessment of the housing requirement and to the choice of a preferred approach to strategic development. The decision making process will be enhanced by the availability of the consultation responses. Separately, further technical assessment of the various issues has been progressed.
- 6.2 Having regard to the comments received, as reflected in this report, it is concluded that the Council is in a position to take forward the proposal to prepare a Plan to cover the period 2011-2031. The substantive issue raised by this proposal was that of an alleged backlog of housing need over the period 2008-2011. The evidence suggests that there is no such backlog, but in any event this would be a matter more pertinent to the matter of objectively assessed need for the plan period than to the plan period itself.
- 6.3 The whole issue of objectively assessed need for housing will clearly be subject to ongoing challenge. The issues of concern are set out in some detail in this report. Members must now determine, having regard to the evidence available from all sources, at what level the housing requirement can properly be regarded as being objectively assessed.
- 6.4 The process of finalising the choice of preferred strategic option for development is critical to the overall plan making process. The focused consultation provides clear evidence that the Council is actively considering a range of reasonable alternatives, as it is required to do under the NPPF guidance on plan making. The comments received from all sources as a result of the consultation now need to be set against the updated evidence base as presented to this meeting via a number of separate reports. The submission version of the Core Strategy will be finalised having regard to the overall evidence base now available. It is important to ensure that the strategy continues to respect that evidence base if it is to pass the examination test of being justified.

Paul Lankester
CHIEF EXECUTIVE

Background papers:

Focused Consultation: 2011-2031 Housing Requirement and Strategic Site Options (SDC, Feb 2014)
Coventry and Warwickshire Joint Strategic Housing Market Assessment (GL Hearn, November 2013)
Update to Review of Housing Requirements for SDC (ERM, Dec 2013)

Representations submitted in response to the Focused Consultation (February/March 2014) as published on the Council's website.

Appendix 1

Summary of representations concerning the change to the Plan Period

There are 1024 responses on this issue. 80% of responses (814) support the proposed plan period, whilst 20% (210) oppose.

Arguments in Favour

Responses from Residents

The majority of residents and parish councils have ticked the agree box on the comment form and make no further comment.

Supporting comments by residents include:

- It is sensible to have an agreed long term planning policy in place for the area covering 15/20 years.
- 20 years is sensible, it represents a generation.
- The Core Strategy has taken so long to prepare, must extend the time to pass necessary tests.
- Support for the Council following the accepted process and standard practices to minimise any possible further delays to getting the Core Strategy approved. If revising the period to cover the 20 years from 2011 to 2031 helps to secure the approval of the Core Strategy as quickly as possible.
- The Core Strategy should reflect the current situation with proposals based on the latest data.
- A long term strategy can take account of impact on local services – traffic, water and sewerage.
- The timescale is accepted but all infrastructure and services must be in place before development takes place.

Responses from local authorities, service providers and developers

Supporting comments include:

- This approach is entirely consistent with Government guidance. This will ensure compliance with the requirements of paragraph 157 of the National Planning Policy Framework (NPPF).
- It allows the Core Strategy to run successively with the plan period of the current Stratford District Local Plan and take account of the latest census, household projections and social trends evidence bases.
- Beginning the Plan Period in 2011 brings the Plan in line with the Government's requirement to assess housing need based on 2011 population projections.

- This is a reasonable time frame for the identified plan period. It is wholly consistent with the objective assessment of housing need identified in the Coventry and Warwickshire Joint SHMA.
- The revised plan period will also ensure that technical evidence is updated, specifically in relation to the need for more housing, and this will ensure a more robust evidence base; thus contributing towards a legally compliant and adoptable development plan document.
- If the adoption of the Plan in 2015 is unrealistic and as set out in the NPPF there is a need to have a 15-year time horizon. Assuming an adoption date of 2016, this 20-year period gives the Plan a clear 15-year horizon.
- It is essential that the Core Strategy remains in existence for long enough to allow communities to develop Neighbourhood Plans that have meaningful impact on their future.
- A 20 year period allows other service providers such as education and healthcare to prepare for future development.
- The longer plan period gives more certainty to investors in committing to large scale longer term developments.

Other broadly supportive arguments in favour of changing the plan period but with reservations:

- Any further delays in the adoption of the Core Strategy would again take the period below the 15 year threshold. We therefore urge the Council to keep to its dates.
- Given the time needed for development and the need for an ongoing basis for planning decisions, the twenty year timeframe makes sense. But it is important for there to be a degree of flexibility in implementation to respond to unforeseen social and economic developments within the District and outside it, and for the strategy to be kept under review.
- Whilst the case for extending the plan period is reasonable, it is important to ensure that reviews of the core strategy are implemented on a timescale which will avoid the current hiatus and consequent problem of there being an insufficient five-year land supply. Make a commitment to timely reviews, on a five or ten year basis, then the end date of the plan will not be particularly significant.
- The extension of the Plan period raises issues in respect of planning positively for the development and infrastructure required in the area to meet the objectively assessed needs and principles set out in the NPPF.
- The norm for local plans is about 20 years now, but there needs to be a greater commitment to refresh the base evidence on a more regular frequency and willingness to react to changes in circumstances in a quicker and more proactive way than there has been in the past. i.e. the deletion of specific policies when they are either fulfilled or become obsolete.

There are a variety of comments and calculations from developers concerning the impact of moving the start of the plan period from 2008 to 2011 on the number of houses required in the plan period:

- Concerned that there are significant levels of un-met need dating from the beginning of the previous plan period (2008) and up to the beginning of the new plan period (2011). This shortfall will simply be 'lost' from the plan making process. The shortfall against the relevant RS requirement for this period (500 dwellings per annum) amounts to 982 dwellings. This equates to 1.82 years against the proposed target of 540 dpa and thus is clearly not an insignificant matter for consideration in how the Plan progresses.
- Support the change of the plan period to cover the 20 year period 2011-2031. However, raise significant concerns regarding whether the Council are using this as a means to 'write off' their significant shortfall in housing delivery.
- The Council justified its base date selection of 2008 in April 2013 Cabinet report. Homes built and sites identified are identified and accounted for. This is appropriate and should remain. To change it will find the plan 'unsound'. If the start date does change to 2011 the Council should make good the under-provision of housing between 2008 and 2011 of between 500 and 1025 dwellings.
- The plan period should cover a 20 year horizon but the Council must not lose sight of the under-provision of housing since 2008 and the start of the Council's process relating to the Core Strategy.
- The 2012 version of the Core Strategy was based on 20 year plan running from 2008 to 2028. It set a target of 475 dwellings pa. resulting in need to deliver 1,425 dwellings between 2008 to 2011 (the start of the new plan period). The Council delivered 518 dwellings over this period resulting in an under delivery of 907 dwellings. Such under delivery needs to be highlighted and made transparent in any future draft versions of the Core Strategy and should be addressed in any future housing growth strategy over the new plan period.
- In terms of meeting retail needs the Council has looked at expenditure and population growth from a base date of 2008. Since then support for additional retail floorspace will have been accrued but may not have necessarily resulted in additional physical floorspace being created. To start again at 2011 when looking at future retail needs will ignore the fact that Shipston has grown considerably in term of new households (1000% since 1981 according to the Council's latest statement) and is set to grow further through committed and planned development proposals.

Arguments against

These responses are almost wholly from residents.

- The most common comment is that the 20 year plan period is too long.
- The most common plan period suggested is 10 years.
- Many consider it is illogical to start the plan period in the past. It should either start from now (2014) or when the plan is adopted.

Respondents giving the above responses consider that:

- There are too many unpredictable changes to plan so far ahead e.g. change of Government, changes in the economy, social change, HS2, population increase, effects of climate change, market forces (JLR moving out of the country).
- Commitments could become financially unfeasible or unworkable.
- There is already too much housing planned for the District. Only when need is assessed should the period be extended.
- Lack of infrastructure planning. Building must stop while facilities and amenities catch up.
- There should be smaller developments over shorter periods

Other comments where residents were against changing the plan period:

- Development should be incremental over the plan period to avoid losing the character of settlements.
- A long term plan must be reviewed on a periodic basis to ensure it is on track and meeting the needs of the local area.
- A 20 year plan does appear sensible as a longer plan will allow for longer-term planning but no alternative to the 20 year plan was offered.
- A longer term view is required to get infrastructure in place.
- The plan period should be longer to slow the pace of growth. (2020-2050 was suggested by one respondent).

Summary of representations concerning the Housing Requirement

The majority of support for increasing the housing requirement to 10,800 came from either an acknowledgement that additional housing was necessary or a begrudging acceptance that additional housing needed to be provided in line with Government requirements, provided it was of the appropriate type (including for older people), in sustainable locations accessible by public transport and supported by the necessary infrastructure.

It was also noted that by providing sufficient housing, Stratford-on-Avon District Council (SDC) would regain control of planning for the District. It was pointed out that the design of homes is more important than numbers and many of the concerns about the volume of new housing could be reduced if SDC focused on the quality of design. Whilst many respondents did not feel qualified to comment, concerns were raised about the scale of housing growth and the impacts on infrastructure, services, tourism, the rural character of the District and the relationship with employment prospects. It was noted that the higher figure will help support economic growth in south Warwickshire. As such, homes need to be located in proximity to areas of economic growth and employment. Notwithstanding this, some respondents considered that the District was already at saturation point and the growth was being fuelled by in-migration rather than meeting Stratford's own needs. Indeed, it was felt that the argument that more homes are needed simply to justify having a sound plan flies in the face of localism.

Whilst the increase in numbers to 10,800 was welcomed, many organisational responses considered that this figure was not sufficient and did not meet the District's objectively assessed housing needs as required by the NPPF. Whilst it is acknowledged that the figure of 10,800 is based on the findings of the Coventry and Warwickshire Joint Strategic Housing Market Assessment (SHMA), two inter-related objections were made: firstly, in relation to the methodology of the SHMA itself, and secondly, that notwithstanding these concerns, the SHMA only provides the starting point for identifying objectively assessed need and SDC needs to take account of other considerations, including economic growth, housing affordability, shortfall from previous years and shortfall from neighbouring districts.

The housing requirement should be based on the full objectively assessed needs (OAN) for market and affordable housing for the housing market area. Guidance on how to identify OAN is set out in the online Planning Practice Guidance (PPG):

- Use household and demographic based projections as a starting point
- Be aware that such estimates may need adjustment because formation rates may be suppressed historically by under supply and worsening affordability

- Seek to ensure growth in the working age population matches projected job growth
- Consider increasing supply where market signals (affordability and quantity) are deteriorating over time or deviate from the market signals in comparable market areas

'Plan makers should not apply constraints to the overall assessment of need such as limitations imposed by the supply of land or new development, historic under performance, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.'

It is argued that SDC has departed from the PPG but that there are no compelling reasons for doing so. Detailed objections came from respondents in the planning and development industry and focused on the following issues:

- ***Failure to take account of the recession and moratorium and the effect on net in-migration assumptions***

SDC argues that the fact that the 2008 household formation rates did not materialise (as evidenced by the 2011 census) shows they were too high. However, they were based on a projection of past trends that did not account for the recession and moratorium.

The significant decline from 2009 is clearly correlated with the financial crisis and ensuing recession that has served to depress projections of future population levels. Migration has been significantly affected by the recession and moratorium. The use of a 5 year migration trend 2006-2011 would project forward on the basis of a particularly volatile period of data and would not be sound, suggesting the 10 year trend is the most credible. However, even this is impacted by the 5 year period. The population was lower in 2012 than in 2011. It is not in accordance with the NPPF to use abnormal patterns of migration. The SHMA uses a midpoint scenario to project forward to 2031 but there is no robust justification as to why a return to the 2008 headship rates is not more appropriate. This approach has been found sound at a number of enquiries recently. The appropriate migration trend is a minimum of 1,260 people per annum as this is associated historically with the housing supply of 550 dwellings per annum.

Contrary to the above, it was commented that SDC was right to use a combined scenario with the 2008 projections for the longer terms trend beyond 2021, particularly as this approach has been confirmed by the interim conclusions of the South Worcestershire Inspector. However, SDC is reminded that such figures form the starting point to which economic factors must be added

- ***Failure to take account of economic growth***

The demographic-led scenarios provide for very low growth in employment. This needs to be set against the SDC's economic aspirations and whether a 'modest increase in the resident labour force' would be consistent with these aspirations. Reflecting the structure of the population, the District will need to see increases in net in-migration particularly if it is to support future employment growth. 10,800 is a minimum given levels of unemployment and ageing population. Industries will be loath to move to Stratford-on-Avon without a pool of available labour.

Economic projections from Experian suggest 470 jobs pa resulting in 754 homes pa compared to the 65 jobs pa provided by the SHMA. The SHMA also dismisses the economic forecasting evidence without any robust analysis of its content. There is no sectorial review of economic projections or consideration of previous economic performance. It is also noted that the economic projections are 'policy off' and are not informed by expectations of the growth plan of the LEP. Oxford Economic forecasting suggests a higher number of jobs around 740 pa or 918-955 dwellings pa. Objectors disagree with the conclusion in the ERM Report that economic-driven projections are unreliable and should not be used in setting the housing target for the District. As an example they cite historic economic performance as an indicator that economic growth in Stratford-on-Avon will be strong in the future and that SDC has been unduly pessimistic: Nomis evidence indicates that jobs grew by 1,000 in 2011 alone and Stratford has the potential to grow strongly as has been experienced in the recent past (12% economic growth between 1998 and 2008). The interim conclusions of the South Worcestershire Development Plan Inspector should also be noted: unsupported assumptions about older people's participation in the workforce.

- ***Failure to take account of affordability and the need for affordable housing***

Stratford-on-Avon has the highest lower quartile house prices to lower quartile earnings ratio in the housing market area and this ratio has remained the same despite improvements elsewhere. Housing need should also reflect market signals: land registry data shows demand and prices increasing across Warwickshire quicker than the region as a whole. Therefore to ensure housing is affordable and can meet local needs, an adequate uplift needs to be built in to the requirement.

In terms of affordable housing itself, the SHMA identifies a need for 233 affordable homes pa which would require 43% of all housing to be provided as affordable. SDC's viability assessment has not indicated that this is viable. Alternatively, applying SDC's emerging policy of 35% from sites of 5 or more, 665 homes per annum would be required. Whilst affordable housing providers will independently deliver some housing it will not be enough to make up the deficit.

- ***Failure to take account of other factors***

Whilst it was noted that household size is decreasing, there was disagreement over the implications of this trend. On the one hand it was argued that this meant the increased housing figure catered for in-migration (which should be accommodated elsewhere) rather than local need: hence, the figure of 10,800 was not acceptable and should be reduced. On the other hand, it was argued that coupled with the increase in population, the number of homes needed over the next 20 years will be far greater than 10,800 based on population increase and a smaller household size.

It was also queried whether the figure takes account of needs for C2 (residential institutions) and C4 (Houses in multiple occupation) homes which count against housing supply. Concern was raised specifically with the vacancy/second home rate of 3% used in the SHMA which does not reflect Stratford-on-Avon District: the vacancy rate (3%) and second-homes (2.3%) resulting in a combined rate of 5.3%. This would under-estimate housing needs.

In setting its housing requirement regard needs to be had to planning for a mix of housing based on current and future demographic trends, market trends, and the needs of different groups in the community. The PPG confirms the importance of delivering housing for older persons given the projected increase of households aged 65+. The SHMA states that the turnover of larger properties is low and that a relative increase in the provision of larger homes may be desirable. Sufficient provision and targets must be made to ensure these needs are met and the Core Strategy should include clear housing policies that meet the needs and demands of the elderly.

- ***Failure to take account of the shortfall from previous years***

It is unclear whether the 10,800 includes the backlog. The PPG advises that whilst projections are the starting point for OAN they may require adjustment to reflect factors affecting household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply. Analysis of past completion figures shows the District has under delivered at least 950 over the past 5 years against a need of 375 dwellings per year, or if the need was 617 per annum (based on 2011 DCLG projections), a shortfall of 2,160.

- ***Failure to take account of the shortfall from neighbouring districts***

Stratford-on-Avon plays an important role in the West Midlands economy providing supporting employment but also acting as a migration district for those working in Birmingham and the Black Country. SDC has failed to provide adequate explanation of the extent to which it has complied with the Duty to Co-operate with neighbouring authorities, in particular in terms of the Birmingham, Coventry and Warwickshire housing market areas. The Pre-Submission version of the Birmingham Development Plan identifies an untested shortfall of 33,000 dwellings that will need to be met outside Birmingham. The Stratford-on-Avon Core Strategy provides no substantive evidence to indicate that any of Birmingham's development needs can or will be accommodated within the District. This is an unrealistic position given that 10.9% of the gross intraregional out-migration flows from Birmingham 2001 – 2011 were to the Coventry and Warwickshire LEP area, which includes Stratford. Therefore, a minimum of 2,200 dwellings (up to 5,000) should be added to the Stratford-on-Avon housing requirement.

The SHMA does not include any allowances for contributing to shortfalls in housing supply outside the housing market area. This is of particular relevance to Stratford-on-Avon District which looks a number of ways. 9 of the 11 of Stratford's neighbouring Districts are not within the Coventry and Warwickshire SHMA and SDC has provided no evidence of the consequences of under supply in these districts on Stratford-on-Avon.

Comments from neighbouring councils and key organisations

A number of neighbouring councils and key organisations submitted comments, including:

- *Coventry City Council and Rugby Borough Council* (separate responses) - SDC should be planning for 11,400 in accordance with the SHMA.
- *Solihull Metropolitan Borough Council* - The adopted Solihull Local Plan 2013 includes a review mechanism to take account of any additional housing needs emerging from the Greater Birmingham and Solihull Local Enterprise Partnership Housing Needs Study due for publication later in 2014. Evidence from migration flows indicates that Stratford-on-Avon District has a relationship with Birmingham and Solihull. This relationship with the Birmingham shortfall should be recognised in the Stratford-on-Avon Core Strategy.
- *South Worcestershire Authorities* - Appears to be consistent with the findings of the SHMA although it is queried whether any account has been taken to accommodate Birmingham/Solihull LEP growth, which has recently identified a shortfall.
- *Warwick District Council* - Concerned that the level of housing provision is not consistent with the level of employment provision. The SHMA shows the imbalance between the projected number of jobs and the increase in people of working age which appears to justify uplifting housing above the mid-point projection. Furthermore, the consultation proposals indicate SDC is planning to allocate substantially more employment land than the requirements indicate. This could lead to a further imbalance in commuting and there will be knock-on consequences for neighbouring districts, Warwick in particular, to provide the housing to support SDC's projected employment increases. Accept that it is correct to use the most up-to-date migration figures (as ERM have done) but the 2012 ONS population projections have not yet been published and as such, migration assumptions should not be made ahead of their publication. Departure from the joint SHMA should also be discussed and preferably agreed with other Council's across the housing market area to ensure a consistent approach and that each Council's housing requirements are underpinned by the same objective evidence.
- *Warwickshire County Council* - supports economic growth through partnership working. Coventry and Warwickshire SHMA identifies a joint evidence base although the Housing Requirements Review does not support an uplift of housing for economic pressures, with particular reference to commuting. It is a matter for SDC to demonstrate thoroughly that it has used the most up-to-date evidence in assessing their total housing need and that the figure of 10,800 is robust.
- *Homes and Communities Agency* - Notes that the 10,800 is below the assessed needs in the SHMA and considers that this could render the Core Strategy vulnerable to challenge at examination, further delaying adoption.

Positive Planning and Soundness

Irrespective of many of the comments outlined above, many respondents considered that it was imperative SDC bases its figure on the evidence in order for the Core Strategy to be found sound at examination and prevent further planning by appeal. As such, many considered that there was no justification for deviating from the figure cited in the SHMA itself unless SDC, through the Duty to Cooperate, has agreed to accommodate its need elsewhere. It was felt that SDC has put far too much emphasis on minimising the number of new homes and not enough on the key planning task of place-making and this has held up adoption of the Core Strategy. As such SDC continues to lose substantial appeals. The housing requirement should be sufficient to meet the tests of soundness in order to avoid development on appeal. A lower figure than recommended in the SHMA increases the risk of the Core Strategy being found unsound. It was also argued that the Core Strategy should include flexibility in the last 5 years of the plan to allow additional housing should objectively assessed needs identify such housing is required. However, it was requested that the Core Strategy should include the full requirement rather than include a review (as Solihull MBC have done).

As stated in the SHMA, the figure of 600 would better support economic growth and improve affordability. The figure of 540 only supports 'modest' economic growth. No evidence that if the local economy was boosted, new jobs wouldn't be filled by in-migrants. By not taking the necessary steps to improve economic growth and housing affordability, SDC is not planning positively as required by the NPPF. Limited additional dwellings should assist in reducing the impact of worsening affordability although this is not considered sufficient to actually improve affordability. The Core Strategy has not been positively prepared since it provides no opportunity for those persons excluded from housing during the decade of the growing housing crisis to enter the property market as it plans not to accommodate the appropriate level of migration.

There was disagreement with ERM's interpretation of the conclusions of the Bath and Northeast Somerset (BANES) Inspector that underpinning housing numbers with jobs forecasts isn't wise. The Inspector actually concluded that an overriding link between jobs and homes had been made in BANES, ignoring demographic-led need which exceeded economic-led growth. There was also disagreement with ERM's conclusions that an '*uplift to support economic growth is both arbitrary and unwarranted*' since this conflicts with NPPF requirement to take account of market signals, guidance within the PPG and reputable housing market research. It also fails to respond to backlog of undersupply and potential needs across the housing market area.

Alternative Objectively Assessed Need

A range of alternative figures for Stratford-on-Avon's objectively assessed need were suggested by objectors. Some respondents presented alternative results based on different forecasting models. The 'What Homes Where?' toolkit identifies 694 homes pa and DCLG 2011 interim household projections also indicate a higher rate of growth equal to 617 households per annum. These figures provide useful benchmarks against which to measure SDC's requirement of only 540 homes pa.

Starting point is official 2011 DCLG household projections of 636 dwellings pa. As there are no agreements with neighbouring districts, this figure cannot be adjusted downwards. Market indicators suggest there is a level of unmet demand (headship rates suppressed) and an allowance should be made for a return to longer term trends, thus increasing housing number to 754pa. In light of untested assumptions regarding rates of economic activity and failure to resolve issue of shortfall, figure of 754pa should be regarded as a minimum.

In terms of alternative housing requirements, the following were suggested:

- 11,000 to 12,000 dwellings as confirmed by the Shottery Appeal Inspector and more recently the Gaydon Road, Bishop's Itchington Appeal Inspector
- 11,400 to 14,200 taking into account affordable housing needs, economic potential and market signals
- 12,000 (600pa) to provide flexibility (Core Strategies that do not adequately service economic growth have not been found sound)
- 12,340 (minimum) taking into account DCLG interim household projections of 617pa
- 13,600 taking account of a minimum of 2,200 dwellings from Birmingham
- 14,950 to 17,950 excluding unmet needs from Birmingham and neighbouring authorities
- 15,000 based on the Chelmer model which needs to be increased to 20,000 to take account of the relationship to employment
- 15,080 to 15,520 based on the economic driven scenario in the SHMA

Summary of representations on Option A – Further Dispersal

The responses to this option are quite evenly split in terms of overall numbers expressing support or opposition.

Local people (including Parish/Town Councils) hold wide-ranging views on the merits of the dispersal option, often depending on where they live or represent. There is a clear pattern whereby those living in settlements affected by one of the strategic development sites tend to favour the dispersal option. Conversely, those who live in settlements not directly affected by any of these proposals tend not to support the dispersal option as it could lead to further housing development in their own communities.

Likewise, the position of landowners and developers on the dispersal option tends to depend on whether they are promoting one of the strategic development sites or have an interest in smaller sites across the District. The former oppose the dispersal approach, whereas the latter are supportive as it provides more scope for their sites to be identified for development.

Main points raised by those supporting the option:

- Is the fairest approach – POINT MADE MOST FREQUENTLY
- Would have least impact on communities and landscape – POINT MADE MOST FREQUENTLY
- Benefits local builders and developers
- Would support local services
- Would provide rural affordable housing
- Would have the least negative impact on a single area
- Likely that existing infrastructure could cope without the need to build additional roads, sewers, etc.
- Many villages would benefit from an injection of fresh people to support life of the community
- Less impact on traffic congestion and pollution

Main points raised by those opposing the option:

- Unsustainable in terms of impact on traffic
- Existing infrastructure does not have capacity
- Puts strain on already stretched communities
- Would impact on a wide range of communities rather than concentrate impact on one area
- Dispersed population is more difficult to serve effectively by public transport and other services
- Lack of employment opportunities in rural areas so promotes out-commuting

- Insufficient development in individual settlements to support additional services and amenities
- Overall effect is likely to be as significant on the character of the District as a single concentrated development

Some respondents refer to the SA's position that the impact of dispersal is uncertain with regards to sustainability objectives, and that it runs counter to the sustainability requirements of the NPPF.

The point is made by a small number of respondents that the lack of specific sites identified makes it impossible to judge the impacts of the dispersal approach and whether it can be delivered.

A specific point raised is that the methodology for identifying Local Service Villages is not based on robust evidence.

Various responses suggested different permutations of the dispersal approach, eg. a greater (or in specific instances, lesser) proportion in Stratford-upon-Avon, Main Rural Centres (collectively or individually), or across Local Service Villages, eg. focusing on those in categories 1 and 2, and specifically to exclude an allowance for Long Marston Depot. These various views tend to reflect where owners/developers have land they are promoting.

A small number of responses suggested that additional housing could be met through a combination of further dispersal and large housing sites (but not the strategic options consulted on).

Certain developers criticise the consultation document for stating that the dispersal approach could put a strain on villages due to increasing demand on local services and facilities, or not be an effective way of providing additional services. They argue that mechanisms are in place to secure improvements and mitigate the impact of development.

Responses from Agencies

Environment Agency - If this should become the preferred option then we would wish to be re-consulted when potential locations for development are brought forward.

Warwickshire & West Mercia Police - Delivering services to the additional development proposed by Option A would fully occupy the equivalent of an additional 9 police officers and 8 police staff full-time. Staffing levels are under constant review to ensure that minimum acceptable numbers are deployed to meet existing levels of policing demand. This has the benefit of much needed savings in costs, but as a result there is no additional capacity to extend existing staffing to cover additional development.

Severn Trent Water – Dispersal option is ranked first. [NB. Water Cycle Study shows there are no overriding constraints to its delivery].

Arguments Against all Strategic Sites

There is a significant risk over the deliverability of any of the strategic sites and their associated infrastructure. There is no evidence in place to demonstrate that the strategic sites can afford or deliver the required infrastructure and at what stages in the plan process such facilities will come forward.

A strategic site plus the Canal Quarter places too much reliance on very large sites with uncertainty over delivery. Housing delivery would be more reliable

with sites being allocated on the edge of other settlements, and SuA is the most sustainable of these.

The SEA/SA process has not informed the selection of a strategic site over a more dispersed strategy.

The consultation document doesn't provide sufficient information for options B to E to be able to assess them. It underplays the benefits of dispersal.

Dispersal with explicit support for Meon Vale is a far less risky strategy as St Modwen is already building on this site.

Summary of representations on Option B – Gaydon/Lighthorne Heath

This summary is broken down into the followings sections:

- Arguments in favour of Gaydon/Lighthorne Heath (GLH)
- Arguments against Gaydon/Lighthorne Heath (GLH)
- Comments from Key organisations
- Other Comments

Arguments in favour

The strongest three arguments in favour of GLH were to do with its proximity to the motorway, its links to the West Midlands conurbation and neighbouring towns of Warwick and Leamington and its relationship to Jaguar Land Rover (JLR). It was felt that taken together these would reduce car use as residents would be closer to places of employment than if they lived elsewhere in the District.

It was also considered that the principle of a new settlement was the right way forward as an alternative to further dispersal, which would put unacceptable pressure on already stretched services. It was felt that GLH provides an opportunity to build a fully green and virtually self-sufficient community incorporating all the best planning ideas.

There was support for GLH since it is being promoted by developers and is the most advanced scheme. It was also felt that the potential benefits outweigh the dis-benefits and GLH represented the least-worst option and would do most to help protect the historic town and tourist destination of Stratford-upon-Avon.

Transport and Highways

There was support for GLH in respect of public transport: it has existing bus routes; good links both to Leamington and Banbury providing connections to rail, with further rail access at Warwick Parkway; and can provide credible solutions for transport. It was also pointed out that new settlements don't need to have a rail link. There was support for GLH subject to highway improvements and provision of civic amenities and it was argued that the new road link will ease congestion. It was also felt that GLH would be a benefit as it would split traffic between Leamington, Warwick, Banbury and Stratford for shopping etc.

Relationship between Housing and Jaguar Land Rover (JLR)

It was felt that GLH would give the District a better population/business balance, and by providing houses next to JLR it would reduce the journey to work. It was considered sensible to relate houses to employment land and reduce the need to commute and to support growth of motor industry, particularly a world class employment offer, although it was noted that the key is to ensure sufficient land is left over for employment to grow and flourish in the area. The suggestion as made that the housing mix should be skewed towards larger housing for higher income professional staff at JLR. GLH was

also seen as a positive as it would provide lower value housing away from the hot-spot of Stratford-upon-Avon.

Facilities and Services

There was support for GLH provided infrastructure and services were provided on-site since it created the opportunity for new services to meet needs to be built into the new community. It was also suggested that GLH could fund improvements to Kineton High School.

Landscape and Character

There was support for GLH as it provides an opportunity to improve the character of the area. It was also noted that the site is classified as Grade 3a/3b agricultural land, which is relatively poor quality and therefore suitable for development. There was also support for GLH in landscape terms as it was not a particularly good example of the South Warwickshire Landscape with modest impact on landscape and environment due to proximity to the employment areas and transport facilities. It was also noted in all cases, impact on the landscape will depend on the detailed design and proposed mitigation, including through the enhancement of green infrastructure. It was also pointed out that the former quarried area could provide an environmental buffer between GLH and Lighthorne.

Arguments made by the Promoters of GLH (Commercial Estates Group and The Bird Group)

GLH was previously supported by the Council's evidence base and published as a preferred option for consultation in late summer 2013 as allocation for strategic growth. The option now also facilitates a significant expansion of JLR – one of the UK's most successful engineering companies. It can also provide local housing to support existing and proposed new employees should they choose to reside close to their place of work. It is the only option that can demonstrate delivery of the three dimensions of sustainable development. Further technical work is also being undertaken in respect of noise, habitats, landscape and geology, transport and masterplanning.

The land for the expansion of JLR has been specifically identified as being an appropriate and required area of land to facilitate their short and medium term growth requirements – it is not tokenistic or speculative; it is necessary for the continued investment in the district and potentially the UK. Gaydon currently suffers from significant in-commuting due to the substantial lack of appropriate housing for employees and this is causing significant congestion. By developing a high quality housing offer, there is potential to significantly reduce existing, but more importantly future commuting associating with the Gaydon automotive cluster. More than 7,000 employees are currently located in Gaydon alone and JLR have expectations and ambitions to continue to grow significantly. The expansion of JLR and a new settlement also offers the potential to create a clustering of automotive expertise that can filter down into the new community through engagement with local schools, benefitting from the existing Education Business Partnership Centre ay Gaydon.

Beyond the substantial housing offer, GLH would also deliver a wide range of new high quality health, social, community, educational and leisure facilities through the creation of main village centre and a local centre. This will dramatically improve accessibility to essential services for existing local settlements and help foster the creation of a new community. With the majority

of the site comprising relatively low quality arable agricultural fields, it has a low biodiversity value with the exception of existing hedgerows and Lighthorne Quarry (a designated Local Wildlife Site), which would be retained. The development of the site has the potential to dramatically increase the biodiversity of the overall area through a green infrastructure strategy, likely to include such features as parkland, wetlands, community orchards, allotments, sports pitches and children's play areas.

Comments from Jaguar Land Rover

Jaguar Land Rover is in dialogue with the site promoters in respect of the overall scheme at GLH. JLR welcomes and supports the identification of 100ha of land for the future expansion of JLR operations within GLH.

Arguments against

Objections to GLH include those submitted by Chesterton Parish Council, Gaydon Parish Council, Lighthorne Parish Council, Lighthorne Heath Parish Council and the action group FORSE.

Highways and Traffic

The area of greatest concern relates to highways and traffic. Whilst objection was raised to the effect of additional traffic on rural roads in general arising from an additional 3,000 homes since they are not designed for such large volumes, the objections stressed the current serious traffic problems that local residents face on a daily basis (particularly at peak times) resulting from the presence of Jaguar Land Rover (JLR) and Aston Martin Lagonda (AML). Genuine fears were expressed that not only would GLH make the existing unacceptable traffic situation far worse (and dangerous) but there was scepticism as to whether and how GLH could lead to actual improvements.

It was also noted that GLH would have wider traffic impacts not just on the neighbouring villages where rat-running would be increased but in villages in the surrounding area as well as on neighbouring towns such as Warwick and Leamington. It was also noted that existing traffic problems are impacting existing businesses (including in respect of recruitment). GLH will make this worse.

It respect of the M40 motorway, queries were raised as to whether the planned improvements to Junction 12 have taken account of GLH. It was also felt that either way, these improvements will have no effect on non-motorway traffic. It was also noted that the B4100 is a relief road for the M40. Fears were raised at the impact of standing traffic on M40 owing to congested local roads.

Strong objections were raised to the fact that SDC was making its decisions with insufficient evidence, particularly the impacts of GLH on local roads. The Strategic Transport Assessment published by Warwickshire County Council in October 2012 concluded that GLH would lead to a massive increase in traffic flows at peak periods not just locally but throughout a large area of Stratford District, including Stratford, Leamington, Warwick and Kineton as well as increases in smaller villages which have not even been assessed in any detail. It was felt that the merits of GLH could not be judged until the further work that had been commissioned was completed.

Public transport and car dependency

Another big concern was that GLH will be a car dependent commuter town owing partly to its location next to the M40 but also as a result of the lack of services and public transport. It was cited as being between 7 and 15 miles from the nearest town and some distance from a railway station. Cycling conditions would be unfavourable. It was felt that residents would be dependent on costly public or private transport, leading to social and economic difficulties for the residents of affordable housing in particular. It was argued that GLH would not provide for sustainable travel or a choice of travel options (as required by the NPPF) not least because there are no guarantees that improvements to public transport will be made and no commitment to improve existing bus routes. Notwithstanding the above, it was pointed out that any express bus service would be caught up in the traffic congestion. Any express bus service, if at all attractive, would need a dedicated route. Objection was made to vastly increased greenhouse gas emissions and carbon footprint that is likely to result owing to the lack of employment, shopping, schools, leisure and railway that will create a car dominated settlement.

Location and Proximity to Motorway

Whilst much of the support for GLH came from its general location near to the M40 and neighbouring towns, there was by no means the consensual view with many respondents arguing strongly against GLH because of not only its remote location (being some distance from neighbouring towns) but also the presence of the motorway made it more attractive for long-distance commuting to outside the district. Both make GLH unsustainable and likely to increase greenhouse gas emissions. Specific concerns were raised as to its relationship and impact on Warwick District and development within Warwick District (and vice-versa). Indeed, it was felt by many that SDC was improperly making this decision, in isolation, without taking into account significant cross-boundary issues, including transport and the plans of neighbouring districts.

The principle of locating new homes next to or in close proximity to a motorway was questioned. Concerns were expressed at the resultant likelihood of air pollution and associated health risks, particularly on children and reference to the World Health Organisation press release 221 (17 Oct 2013) was made. Concern was also raised in respect of the impact of noise from the motorway on new homes. Findings of technical work privately commissioned showed that only 20% of GLH would experience sound levels of less than 55dBA.

It was pointed out that at the time of the M40 extension was built, the site was deemed unfit for human habitation as owners of several properties immediately adjacent the motorway were sufficiently compensated to enable them to move while others, even as much as a mile away in Lighthorne Village, were awarded generous recompense for the acknowledged noise and other pollution. Why then, it was queried is it now acceptable to try and attract the more disadvantaged members of our society into such an undesirable environment? In this respect, the desirability of homes next to the motorway was questioned. Surely SDC would be in breach of its duty to provide a wide choice of high quality homes? Existing noise from the JLR test track was also cited.

It was also noted that the GLH would be unsustainable because the motorway would restrict development to the east offering no further scope for expansion.

Countryside, Urbanisation and Flooding

Many objections to GLH related to the urbanising effect of building 3,000 homes in a rural location. Objections were raised not just in respect of the effect of turning the neighbouring villages, each with their own separate characters and identities, into suburbs of a new town, but also in respect of the wider area and concern at ribbon development along the M40 and merging the area with Warwick and Leamington. This was deemed contrary to SDC's objective to protect heritage and distinctiveness. There is no safeguarding the countryside from urban sprawl: it was suggested that a Green Belt should surround GLH to prevent further loss of countryside.

Strong objections were received in respect of the fact that GLH is a greenfield site and that brownfield sites (e.g. old airfields) should be developed first. The loss of good quality Grade 3a/3b agricultural land was highlighted, particularly in relation to the need for the UK to achieve 'food security'.

Whilst it was acknowledged that the site itself does not flood, the neighbouring villages do - Gaydon has flooded 4 times in the last 10 years. GLH is located on top of a ridge and as a result would increase and exacerbate flash flooding in surrounding villages. The impact of chemicals in water/drainage and water runoff was also cited as concerns.

Wildlife

Strong objections were raised in respect of the impact of GLH on wildlife and biodiversity. GLH is a haven for wildlife including various species of dragonfly, butterfly, plants, bats, badgers and Great Crested Newts, Red Listed breeding bird, Goshawk, otters. Lighthorne quarry is one of the most species diverse and unique sites in the country and home to slender spike-rush (1 of only 3 known sites in the country). GLH is likely to introduce invasive plant species and 1,000 new pets which will have a serious negative impact on existing biodiversity. There will also be a negative impact on bird species resulting from urban expansion into rural areas. Impact would be more acute for habitats supporting specialist species that are unlikely to adapt to a suburban environment. Transition zones between suburban and rural habitats may be relatively species rich; many of these (i.e. hedgerows) would be lost by GLH (see research by the British Trust for Ornithology Report No.464 (May 2007)). It was argued that not only has no seasonally appropriate ecological assessment been undertaken to assess the likely impacts of GLH on wildlife and biodiversity, but that GLH is contrary to the Core Strategy itself, which promises '*expansion of native woodlands and to buffer, extend and connect fragmented ancient woodland*'.

Heritage

It was argued that GLH offers no protection of historic assets and concern was raised with its impact on a number of local sites including, Chesterton Windmill (in particular, and the views from it), Burton Dassett Beacon Tower and Saxon site, Itychington Holt, Gaydon Roman Villa, Edge Hill, and Lighthorne Conservation Area as well as the historic villages of Lighthorne and Gaydon themselves. Objections were also raised in respect of the impact of GLH on on-site heritage assets including the ancient salt way (Droitwich to Northamptonshire) dating from the Iron Age and the Bronze Age round barrow.

Landscape

Concerns were raised in respect of the landscape impact of GLH given that it is recognised as being in a moderate' LDU Natural Sensitivity Zone and in accordance with the NPPF this type of sensitive landscape should be preserved where possible and enhanced. Some respondents felt that GLH was an area of outstanding natural beauty and should be protected, particularly given its proximity to Avon Dassett Hills. Reference was also made to the European Landscape Convention which acknowledges that landscape is an important part of the quality of life for people everywhere. GLH does not take this into account or the impact of light pollution that will affect the landscape at night.

A specific objection related to geology and the local lias stone and its cultural importance and heritage to the county. GLH will sit upon and juxtapose this rare and special geology; the impacts of which have not been considered.

Design

Concerns regarding the issue of design related both to the lack of design details in the proposal and there is no suggestion that GLH will meet the requirements for good design. Disquiet was raised at the fact that the site is geographically constrained (800m wide) sandwiched between a busy motorway, congested B4100 at peak times, ancient woodland and JLR expansion and there would only be access from the B4100.

Furthermore, the land currently forms a natural buffer between the M40 and existing local villages. GLH would also cause light and noise pollution and impact on existing residents.

Relationship to Lighthorne Heath Village

Many concerns were raised at the lack of integration between GLH and Lighthorne Heath village, stemming from the presence of the (congested) B4100. The road would act as a physical barrier restricting access to new facilities at GLH as well as a social barrier reinforcing distinctions and differences in housing stock and facilities between the existing older area of Lighthorne Heath and the new area of GLH. It was feared that Lighthorne Heath would become a blighted suburb tagged onto a housing estate which is contrary to SDC's duty to create sustainable and mixed communities. Objection was also raised to the assertion that Lighthorne Heath does not have a distinctive character: its 1950s housing stock is as distinctive as any in the area.

Services, Facilities and Infrastructure

Objections were received in respect of the lack of facilities and services in the area and scepticism as to whether necessary services would be provided, particularly since neither SDC nor the developer can guarantee such provision (e.g. health and buses). For example, Lighthorne Heath has been promised a doctor's surgery for some time but nothing has happened. Specific concerns were raised in respect of the impact on hospitals and added demands on emergency services. Specific concerns were raised about the impact of GLH on Lighthorne Heath primary school and the removal of the secondary school from the GLH proposal resulting in children being bussed to Kineton, Southam and Warwick, causing even more traffic congestion, particularly in Kineton itself. Concern also that 1,900 homes would be built before school provision is made.

Concern was also raised in respect of the change to the proposals and that the level of amenities has been reduced as a result of the JLR expansion,

particularly in respect of the absence of the secondary school and leisure facilities. Coupled with the lack of provision of larger shopping facilities, fears that GLH would be car dominated. It was felt that GLH will not provide sustainable basic living needs such as shops, schools, places of worship, recreational areas, open space, local health facilities, transport (road, rail, bus), swift access by emergency services. It will be a stand-alone neighbourhood with no sense of community.

In respect of infrastructure, there was no evidence to demonstrate how infrastructure will be provided or at what stages in the plan it will come forward. GLH would need massive investment in utilities and infrastructure in a sparsely populated area. There were objections to the lack of plans to include high speed broadband in GLH, the lack of gas supply to the locality (and lack of practical renewable alternatives) and issues in respect of low water pressure, particularly in summer months currently experienced by local residents. It was also noted that Gaydon wastewater treatment works has insufficient capacity and no solution has been offered to deal with wastewater issues (the 8 mile pipeline to Warwick is not viable).

Housing and Social Deprivation

A range of concerns were raised regarding the issue of affordable housing. There were fears that facilities and services wouldn't be provided leading to deprivation and social exclusion, particularly those on lower incomes, who would be faced with costly public transport/petrol costs given relatively remote local 8 miles from nearest town. Indeed, social exclusion has already been experienced in Lighthorne Heath. This would be seriously compounded, particularly if facilities were not provided at the start. However, this is unlikely to be viable.

It was suggested that affordable housing stock in Lighthorne Heath should be improved first and that affordable housing should be located closer to local demand. Indeed, GLH is unlikely to meet the needs of Stratford District residents and likely to encourage in-migration e.g. Coventry and Banbury further reducing the likelihood of GLH meeting SDC housing needs. This is contrary to NPPF which states that developments should be sustainable and support places of work. Fears were raised that as many homes as possible will be crammed onto the site and that commuter towns by their nature tend to be the focus of crime.

Economic and Relationship to Jaguar Land Rover (JLR)

A range of objections were raised in respect of this issue. It was felt that GLH would have a negative impact on rural economy through the loss of agricultural land and rural employment opportunities as well as compete with Kineton. There was also a wider concern with the nature of GLH as an isolated development and in-migration will be of no benefit to economic growth in the area. The question of how GLH meets the aim for economic growth for South Warwickshire was asked?

Many of the objections stemmed from the lack of local employment opportunities resulting from the change in the proposal from employment land to land solely for the expansion of JLR. It was pointed out that they use skilled labour as opposed to unskilled or semi-skilled workers from the locality. The likelihood of new residents residing and working at GLH is small and has been further reduced by the additional employment land being provided for JLR who use transient workers. JLR has never been an employer for local people - people stay where their families are and where their children are at school and don't

want to live where they work. It was also argued that the presence of the motor industry is not justification for a new settlement. JLR is on a brownfield site and workers come from a wide area.

Concern was also raised about the relationship to JLR since GLH is now totally dependent on one company / industry with no guarantee of permanency, particularly for a global business. On the other hand, it was also noted that the danger is that GLH will restrict growth of JLR which is an international business that needs room to expand to grow: hence the reason it relocated to Gaydon in the first place.

Many objections stated that GLH was premature since JLR plans are currently unspecified and cannot be quantified in economic terms. SDC already had to change plans. It is impossible to plan (especially in transport terms) until JLR announce their plans in June 2014. If JLR is planning for a 50% uplift in personnel how can anyone make an informed comment about 100ha of adjacent land?

Comments from Key Organisations

- *Cherwell District Council* – supportive of GLH subject to continued appraisal and inclusion of a frequent and reliable bus service to Banbury is an essential part of a sustainable approach to growth to minimise the environmental impact of traffic. Supportive of a mix of uses provided on-site and encouragement of high performance engineering whilst avoiding any negative impacts on Banbury town centre. Seek clarification of where and how secondary-age children would be schooled. Colleagues at Oxfordshire County Council should be involved in such discussions. On site provision should be provided where possible with the potential to link with training opportunities at JLR.
- *English Heritage* - on the basis of the evidence, it appears there is scope to moderate any future development to ensure harm to the significance of any effected heritage asset is mitigated.
- *Environment Agency* – the site is within Flood Zone 1, the preferable location for development. The flood risk posed by the on-site watercourses should be assessed by a level 2 SFRA. There may be an opportunity for innovative land use to reduce flood risk further downstream by utilising wooded areas and other catchment-sensitive design measures. Kingston Grange Landfill is an authorised facility and along with the disused quarry should be considered in greater detail to inform whether they are suitable to support built development over them or kept as open space. The site is underlain by permeable rocks classified as Secondary Aquifers and are capable of supporting water supplies at a local rather than strategic scale and could be important to maintain river flows. The site is not in a Source Protection Zone. It is also important that sufficient waste management infrastructure is available to accommodate any additional waste arisings as a result of GLH. Recommend that the Agency is consulted on any proposals for development. The draft revision of the Water Cycle Strategy highlights that if GLH is taken forward, Severn Trent Water will need to update their wastewater treatment plant because of insufficient capacity to deal with the proposed growth.
- *Highways Agency* – preference is for an option that has least operational impact on the strategic road network. Options B (GLH) and E (Southam and Stoneythorpe) are likely to have a concentrated impact on the M40

compared to Options A, D and C which would have lower impacts. The agency recognises that the above is just one of the many factors that SDC has to consider in selecting its preferred option and the agency will continue to work with SDC and WCC to prepare the technical evidence to support the preferred option and the mitigation required to minimise the traffic impact on the Strategic Road Network.

- *Natural England* - query the lack of reference to Gaydon Coppice local site (onsite) and the Gaydon Proving Ground local site (adjacent) and stress that any proposals are required to protect and enhance these biodiversity assets, including by buffering, linking and connecting as part of a wider green infrastructure network.
- *Oxfordshire County Council* – reiterated their comments to the New Proposals Consultation 2013 where it stated it had no objection to GLH in principle and wished to be kept informed of progress, in particular, on issues relating to transport assessments, provision of a high quality public transport offer (e.g. inter-urban bus service between Banbury and Leamington Spa) and the impact on the highway network approaching Banbury station.
- *South Worcestershire Authorities* – Opportunity to provide a masterplanned new settlement that could support/enhance services and facilities in the locality as well as benefit from the planned employment growth associated with the Gaydon automotive facilities and better serves the local housing market. The existing high levels of employment opportunities should improve the site’s sustainability credentials with the site having good access to the M40 to Birmingham and Solihull which are the main drivers of housing growth.
- *Severn Trent Water* - considers that Long Marston, GLH and the Southam strategic sites are all equally untested in terms of finding a solution to the need to increase waste water treatment capacity, notwithstanding the amber status given to GLH Heath the red status given to Long Marston and Itchen Bank (for Southam) in the Water Cycle Study 2014.
- *Warwick District Council* - awaiting outcomes of Joint Employment Land Study and the Cumulative Impacts Transport Study.
- *Warwickshire and West Mercia Police* – take an entirely neutral position of whether an option should be included in the Core Strategy. The primary issue for the police is to ensure that new development makes adequate provision for the future policing needs it will generate. The wider organisation and delivery of policing services is not on a town by town or even a district by district basis. Based on current information it is estimated that the total police infrastructure to support GLH would be £749,843 (although these findings are subject to a detailed Strategic Infrastructure Review to be carried out later in 2014).
- *Warwickshire County Council* - support GLH as it has significant economic benefits for the sub-region in terms of supporting advanced engineering. Advanced manufacturing and engineering is supported by the Strategic Economic Plan. Confirm that they are working with service providers on infrastructure provision.
- *Warwickshire Fire and Rescue* – would like the opportunity to comment at the appropriate planning stage (e.g. design of road infrastructure) to

ensure there is adequate provision for firefighting (e.g. water supplies, sprinklers).

- *Warwickshire Wildlife Trust* – do not wish rank any of the 5 options reserving judgement until there is robust and up-to-date ecological information for all sites to evaluate their relative biodiversity constraints and opportunities. The current data shortfalls and the degree of uncertainty surrounding some of the allocations at this stage do not provide a sound and level basis for decision making. We recommend that further information and evidence in respect of the following is collated: Local Wildlife Sites; Potential Local Wildlife Sites; Habitats and Species; Site Information; Sustainability Appraisal; Mitigation; Ancient Woodlands; Habitats and Species of Principal Importance; and Green Infrastructure. GLH includes ancient woodland and along with options C and E, includes several notable habitats and species.
- *Woodland Trust* - GLH is located adjacent to Chesterton Wood which contains both ancient and semi-natural woodland and planted ancient woodland. Without appropriate buffering the Woodland Trust would object to any allocation on this site. Whilst it is appreciated that GLH would not take place within the woodland it must be recognised that ancient woodland is vulnerable to outside influences or edge effects that result from the adjacent land's change of use that can have a significant impact in a number of different ways. If GLH were to be the Council's preferred option, The Woodland Trust would like to be fully engaged in early discussions as how to buffer the ancient woodland with new planting (minimum of 100m).

General Comments

Other Issues

- Large-scale schemes are an ill thought out quick fix that will result in large areas of poor housing. Need to breathe life back into our villages instead. Towns/villages/cities evolve naturally over many years. A new town does not do that. Large new settlement won't have any roots/culture/history which will lead to social deprivation. Particularly true next to motorway.
- Large scale sites pose a risk to the deliverability of homes – no evidence that viability implications been considered, particularly given the significant upfront investment of infrastructure required.
- Such schemes require considerable lead-in times (5 years post adoption) and there is no evidence that such schemes would be deliverable in the District. GLH would still require delivery of 200 homes per annum. Even with multiple builders this still requires matching sales which tend to be slow on large developments because of the lack of facilities upfront and the notion of living on a building site for a number of years. This does not make a new settlement an unsustainable option – rather it just means SDC need to be realistic as to what can be achieved within the plan period.
- SDC has failed to prove that GLH will achieve positive outcomes in economic, social and environmental terms.
- Negative impact on the Heritage Motor Museum.

- Lack of information and evidence base reports by SDC has meant assumptions about impacts (e.g. wildlife, travel to work, housing etc) have had to be made.
- Erroneous assumptions about the economic impact of JLR.
- SDC has ignored parish plans and won't meet the needs of communities.
- Consultation is flawed because the technical evidence upon which decisions should be made is not yet available. Significant proposal is being rushed through with the bare minimum of consultation with those it will affect the most. SDC has failed to provide an accurate appraisal of the proposed implications to enable residents to assess the sustainability implications of each option.
- Major planning proposal for a new settlement should not be inserted at a late stage after 3 drafts and no indication of such a proposal.

How is the Core Strategy dealing with request from Birmingham City council to deal with their shortfall?

Alternative Approaches

Suggestions were also made that a much smaller scale of development would be preferable in terms of impacts and acceptability with local residents and that there was scope to enlarge Lighthorne village by using land between JLR and Banbury Road avoiding agricultural land. Some of this is used for parking b JLR which should be within JLR site boundary.

Sustainability Appraisal and Habitats Regulations Assessment

- Not satisfied that SA analytical framework is at all meaningful.
- Inconsistencies in the SA approach and flawed evidence – LEPUS report is based on the assumption that JLR will deliver local employment opportunities and ignores noise impact of M40 and associated carbon footprint. SDC not in a position to make an informed choice. Impacts of land for JLR in lieu of employment land has not been taken account of.
- Contrary to own protocol on transport that seeks to locates homes near to places of work but report acknowledges GLH would be a commuter settlement. No mention of existing traffic impacts at peak times.
- The positive score for GLH in the SA does not appear to correspond with the identified presence of a local wildlife site and potential local wildlife site within and adjacent to the site boundary. Nor does it reflect the limited recommendations for mitigation.
- Will least affect Stratford-upon-Avon town but will impact on Warwick and Leamington.
- SDC required by NPPF to undertake an EIA. The LEPUS Report does not meet the NPPF requirements. Warwickshire Wildlife Trust and the CPRE were not consulted on the SA report.
- This development along with developments in neighbouring districts would have a negative impact of a Natura 2000 site 'Severn Estuary'.
- Potential for the CS to lead to adverse impacts on European Sites from a water quality perspective not been considered.

- SA1 – GLH performs poorly – no mention of Bronze Age Round Barrow. Not possible to mitigate the effect of construction traffic as no alternative routes. No account of Chesterton Windmill. Conclusion: adverse affect.
- SA3 – Omissions include the extensive loss of flora, tree preservation orders, introduction of invasive plant species, impact on protected species, and fact that much of the site would be within the recommended 500m buffer zone. Conclusion: strongly negative effect.
- SA5 – unrealistic to expect JLR to have many of its workers at GLH. Annual intake is of apprentices from Coventry and Birmingham. Conclusion: negative.
- SA7 – Bulk of area classified as agricultural grade 3a and 3b. Conclusion: serious adverse.
- SA8 – Air, noise and light pollution. Only 20% of area will experience noise levels less than 55dBA. Conclusion: serious adverse impacts.
- SA10 – effects of Warwick DC plans and flows between Gaydon and Lighthorne Heath to Warwick and Leamington not taken into account. Conclusion: adverse.
- SA11 – Relatively isolated rural location, little alternative to car. Conclusion: strongly negative.
- SA15 – “if selected GLH could help create a dynamic, knowledge based economy”. This is dependent on JLR. Conclusion: neutral.

Summary of representations on Option C – Long Marston Airfield Arguments in Favour of Long Marston

The promoters of this development have made the following arguments in favour of this scheme over the other options:

- It is a brownfield site;
- It provides a solution to development pressure in Stratford-upon-Avon (SuA) and it provides more housing than other options to meet long term development needs;
- It provides a package of transport measures to solve SuA's highway problems; and
- It is a self-sustaining community which meets all its own infrastructure needs (including, crucially, a secondary school on the site, funded by the developer).

Other responses in favour of Long Marston reiterate these points, picking up on a range of details under these broad headings.

Environmental Credentials

In addition to the brownfield factor, some in favour of this option argue that it has the strongest environmental credentials with the potential to be served by a reinstated railway or light tram. Reinstatement of the rail link between Stratford and Long Marston would provide Stratford with much needed connections to Oxford, London, Reading (for Heathrow) and Worcester. This, or a light tramway, would be sustainable and reduce the development's carbon footprint by placing less reliance on the private car.

Other environmental arguments in favour of Long Marston are that:

- The greenfield element is grade 3b agricultural land (i.e. of lesser quality than some other options).
- There are no significant effects on ecological or heritage assets.
- Flooding issues can be overcome.
- It uses poorly used land to better effect / it has space available.

It is in the right place to meet local needs

The view is expressed that development here would be close to where people want to live (variously expressed as near SuA, the Cotswolds and the AONB). Some argue that the development is capable of future expansion and suitable for in-migration, others that it is where local people want to live but that it is unlikely to draw new residents to the district.

Transport Measures

In addition to the potential rail or tram link, some argue that the proposed relief road and other highway measures would reduce congestion in SuA and/or the wider area (however, the counter argument is also made against the scheme – see below). They suggest that the relief road would overcome previous objections to the eco-town proposal that the site is remote from the strategic road network.

Self-contained community with all infrastructure needs provided

Many residents consider that a new settlement at Long Marston would provide substantial benefits with a secondary school, two primary schools, medical and police facilities, a relief road, an employment area and other facilities, in addition to the package of transport measures. It has all the components for a self-contained community.

Similar responses include the following points:

- It would provide an employment area (a high tech business park/4,000 jobs).
- It would provide facilities not already in this area.
- The developers would have to provide the proposed facilities as there are none already in the area.
- It is the only strategic option to provide a secondary school on-site.

Other arguments in favour

- It is the least objectionable option as it would not be destroying an existing community.
- It will inevitably happen so why not now?
- Employment is available not far away.
- Relying on one or more strategic sites will provide greater certainty than relying on dispersal (though the counter-argument is also made – see below).

Arguments Against Long Marston

Transport Objections

The main arguments made against Long Marston are that the site is relatively remote from the West Midlands urban area with weak links to the strategic transport network and that it will generate significant additional vehicular traffic that will not be mitigated by the proposed relief road. It is argued that Long Marston is the least sustainable option with no sustainable access to employment, leisure or cultural activity other than by road.

More detailed criticisms of the relief road include:

- The proposed western relief road will do little to reduce journeys into Stratford and it will not reduce congestion on the B4632, in SuA or in surrounding villages.

- The increased traffic levels in Stratford would deter tourists.
- The relief road is due to be completed in 2022 (5 years in) with traffic issues building up before any improvements are made.
- The relief road depends on linking up with the road through the Shottery development, construction of which is yet to be approved.
- The proposed new bypass would generate noise, increase carbon emissions across the River Avon valley and disturb the peace of the Greenway.
- The relief road would be almost entirely on a flood plain (that regularly floods) and would cross a SSSI by the racecourse. This would be an eyesore built upon stilts.
- A fully fledged bypass to the north and east of SuA is required rather than the proposed western relief road.

Other transportation objections cover the following points:

- Public transport will be limited.
- The light tram or railway reinstatement will not or should not happen.
- Poor transport links will make access by emergency services difficult.
- Even with the new link to the north, road links to the East, West and South are all very unsuitable for heavy traffic.
- Yet another roundabout on the top end of the A3400 as it approaches SuA from the south would cause serious congestion on that road.
- The B4632 will become more congested and dangerous. There have been 14 serious injuries and 4 fatalities over the last 8 years. No improvements to this road are proposed, just a relief road around Stratford. Why not build a road north to Wildmoor roundabout?

Other Environmental Objections

A large number of respondents comment that the site is prone to flooding. A concern is expressed that mitigating the drainage issues on the site would impact on Welford-on-Avon and other downstream locations.

It is also raised that the site is grade 3b agricultural land with large areas cultivated or used for livestock. These agricultural uses would be lost.

Others comment that the biodiversity of the grassland would be lost. The site includes an existing Local Wildlife site and almost the entire site is a potential or proposed Local Wildlife Site.

The development would not be a self-contained community

It is argued that the employment proposals are insufficient and that Long Marston new settlement would be a commuter town. It is also suggested that it is too close to Stratford to establish its own identity and would therefore become a dormitory of Stratford upon Avon.

Other objections relate to the timing of non-residential facilities, namely that the Employment Park is proposed for 2025 once 1600 homes have been built

(where will the occupants of the first 1600 homes find work?) and that the proposed delivery of new schools (first primary in 2020 and secondary in 2022) will leave children in the early phases without a local school.

Activities/Employment would be lost on-site

Objectors comment that the site provides a significant employment, rural tourism, leisure and recreational amenity. It hosts a range of festivals, leisure and business activities including two microlight flying schools, a motor glider training facility, a Sunday Market, driver training and metal recycling. It is an important local venue that brings national and international visitors to the District. Income and existing jobs would be lost.

The NPPF advocates protection open space, sports and recreational buildings (para 74) and the promotion of a strong rural economy including support for rural tourism and leisure (para 28).

Other Objections

At 2,100 dwellings, the Long Marston development doesn't meet needs to 2031 (it is 400 light).

Long Marston has had its fair share of development. The army depot development is under construction with an application for another 550 dwellings; also there is an existing application to build 380 houses in Pebworth area just over the district boundary.

Other Comments (Neither Objections nor Supports)

The master plan would need to acknowledge the site's WWII history and incorporate the remaining heritage assets into the design of the new settlement in line with the provisions of the NPPF for the protection of non-designated heritage assets (English Heritage).

If Long Marston is selected, Worcestershire County Council will need to work with Warwickshire County Council to understand how education needs will be met (Worcs County Council).

There is no priority habitat (UK BAP) recorded on the site. Any proposals should be required to protect and enhance biodiversity assets including by buffering, linking and connecting as part of a wider GI network (Natural England).

The flood risk from the Tributary of Marchfront Brook (Ordinary Water Course) should be subject to a Level 2 SFRA, ideally prior to allocation. It is not envisaged that this will exclude a significant proportion of the site from built development. The watercourses and their associated blue corridors should be incorporated as key elements of green infrastructure for the whole site. Detailed hydraulic modelling should test the impact of storing water on site to reduce flows downstream. This may provide opportunities to reduce flood risk downstream. Appropriate ground investigations will also be required as it is previously developed land. The draft revision of the water cycle study highlights that if Option C is taken forward Severn Trent Water will need to upgrade their waste water treatment works which currently has capacity for an additional 1610 dwellings in the Long Marston area. The study further states that there is not currently a solution available "within the limits of conventional treatment" (Environment Agency).

The Warwickshire Wildlife Trust (WWT) expects any preferred strategic option to deliver a net gain in biodiversity in accordance with NPPF para 109. This should be delivered by the effective protection of key nature conservation assets and

the promotion of new habitat creation. Long Marston has a Local Wildlife Site which needs protection (picked up in the SA scoring) plus 3 potential Local Wildlife Sites (pLWS) which should be assessed on the standard Warwickshire Local Wildlife Sites Criteria Assessment. If the sites are of LWS value, the findings should be fed in to a revised SA to influence choice of site. Similarly, the SA should be updated with reviewed and, where necessary, updated information from the Habitat Biodiversity Audit to identify the presence or potential of any Habitats and Species of Principal Importance for Nature Conservation. In addition, the SA should consider the details and location of all off-site enabling infrastructure and its impacts, before deciding a preferred allocation. Any LWS should be built into the GI network with appropriate buffers and extensions – use of a Local Nature Reserve would be seen as appropriate. (WWT)

The A46 around Wildmoor has limited capacity and may require localised improvements, possibly involving land acquisition (Highways Agency).

Growth at Long Marston would meet some of Wychavon District's housing needs as the housing market areas of Stratford and Worcestershire do not end at the administrative boundary and development on this site would inevitably serve some of the housing market of the Vale of Evesham (South Worcestershire Authorities).

Severn Trent Water considers that Long Marston, Gaydon/Lighthorne Heath and the Southam strategic sites are all equally untested in terms of finding a solution to the need to increase waste water treatment capacity, notwithstanding the amber status given to Gaydon/Lighthorne Heath the red status given to Long Marston and Itchen Bank (for Southam) in the Water Cycle Study 2014.

Summary of representations on Option D – South East Stratford

Support

- Better public transport and a modal shift to sustainable transport required.
- Development could provide much needed infrastructure. Relief road will ease traffic in town and over Clopton Bridge.
- Site has no biodiversity value, opportunity for new Green infrastructure to improve existing situation.
- Largest and most sustainable settlement, located where there is existing employment, shops and facilities, strategic transport routes across and outside District.
- Best use of existing infrastructure and offers most potential to improve existing situation.
- Provides strategic transport links, open space, community facilities, new homes and employment, education, existing sustainable modes of transport.
- More sustainable option than creating a new settlement.
- Achievable and deliverable within plan period – no technical or environmental constraints.
- Provision of affordable homes.
- Potential for local energy generation.
- Consideration of Stratford's function - market town or tourist magnet. Need for greater number of homes for people aged 16-39 to work the tourism and services industry – redress employment imbalance.
- Other options involve lengthy lead in time, reliant on complex large scale developments with the likelihood of long delays in housing delivery. This in turn would result in the Council struggling to maintain land supply.
- Once in a lifetime opportunity to revitalise the town centre, close to existing services – initiate solution to resolve town's problems. Occupies a sustainable location and would provide a sustainable development.

Objection

- Land procurement uncertain.

Scale

- Disproportionate amount of overall housing requirement in SuA.

- Stratford has had more than its fair share. Development should be directed towards cities such as Coventry where industry and commerce should be fiercely encouraged and housing regenerated within the city to improve the quality of life using brownfield sites etc.

Character

- proposal threatens town's character, urban sprawl.
- Impact on incremental growth on the character of Stratford, Tiddington and Alveston; destruction of the identity and character of the two villages. Loss of identity, villages' convergence with Stratford
- Identity of Stratford-upon-Avon threatened – loss of unique character to attract residents and visitors, loss of
- Loss of habitat, wildlife, agricultural land, allotments; need to protect the integrity of the surrounding rural area to maintain the major settlement of Stratford-upon-Avon as a market town
- Would change and diminish the character of the town without providing matching job opportunities. Creates a commuter mentality leading to damaging congestion and poor air quality. The town is rapidly losing its uniqueness.
- Town has increased by 40% since 2011.
- Consideration should be given to the impact on surrounding heritage assets (Alveston Conservation Area) and the wider historic context of Stratford. Consideration of the relative impact of development on significance of affected heritage assets and settings is a very important matter and should not be deferred to master plan stage.
- Design - concern are of no distinctive character – ubiquitous commuter dwellings.
- Landscape - area of medium landscape sensitivity should be addressed.
- Adverse impact on visual amenity.

Infrastructure

- River crossing to the North required.
- Expecting required development to come from developers is wishful thinking (consider the Cattle Market debacle). Lack of funding to mitigate potential shortcomings.
- Need for additional infrastructure such as allotments, hospital and schools, particularly secondary, medical services at capacity, unable to accommodate development. Improved bus service required.
- Unsustainable impact of traffic on town's infrastructure - need for bridge and relief road.

- Development of Stratford would need a cast iron guarantee of a new river crossing and relief road due to infrastructure pressures.
- Excessive infrastructure costs would render development unviable/undeliverable, given the other physical and social infrastructure required.
- Essential for the Council to support reinstatement of rail service, achieving social, economic and environmental objectives: increase tourism, journeys to Oxford, assisting jobs and shoppers, world class terminus and reduce district's carbon footprint.
- No evidence to demonstrate deliverability and key stages of infrastructure needed to provide sustainable development at options. Need information on the viability of the required bypass/link road and river crossing to assess the option.
- No viability evidence.
- Concern about the deliverability of Option in plan period as any significant delay would undermine the deliverability of the significant part of the plan.

Pollution

- EA to be consulted on development proposals in light of a Source Protection Zone One associated with a potable supply borehole on site
- Noise pollution

Traffic

- Congestion - no jobs where housing proposed, will lead to greater outward commuting.
- Relief road would provide limited benefit as traffic from the development would still need to access town via Bridgeway system.
- New road junction on the Warwick road would become a new pinch point.
- Railways stations are north of the town and unlikely to be used by those in the south.

Tourism

- Adverse impact on tourism - World Class Stratford and its old world appearance would be over developed.
- Protect Stratford as a tourist magnet and should be retained and enhanced as such.

Flooding

- Concern that any road built on the flood plan would lead to flooding of the town and further downstream into other communities.

General Comments

- Concern that people are not aware of the proposed development.

- Contrary to NPPF which identifies brownfield site regeneration rather than Greenfield sites on the edge.
- Although it is essential that development should be self-sustaining, such as the creation of a new town, access to the town would still necessitate the use of the Bridgeway system.
- Would result in a delay to the Core Strategy as master plan have to be produced and agreed.
- Potential site for mineral extraction.
- Encirclement of Tiddington could lead to expensive appeals and delays.
- Additional police officers and staff required.

Appendix 7

Summary of representations on Option E – North of Southam and Stoneythorpe

General comments

These mostly related to the fact that this option included two separate sites. Comments included:

- The sites should be separately considered and might form part of the dispersal option.
- Option E has two sites 1, brownfield and 2, agricultural land at Stoneythorpe which is very prone to flooding each year. The Cement works is an ideal site for new houses.
- Option E has a split site that makes delivery of community facilities more difficult and could lead to more pressure on facilities in Southam/ Long Itchington.

The promoters of the Stoneythorpe site objected to its grouping with 'North of Southam' and suggested it could be combined with the dispersal option.

Arguments in Favour of Southam/Stoneythorpe

The promoters of Southam North submitted representations setting out the elements of the scheme as follows:

- Approx. 2,500 homes (including third party land) [Note - not wholly clear what can be delivered by 2031, and other technical material assesses **2,600** dwellings].
- A local centre comprising a range of shops, services, community and leisure facilities (marina) as well as provision of employment land (200,000 sq.ft).
- A new primary school.
- Open space.
- Improvements to the transport network; and
- A managed recreational park utilising large areas of former quarry land and preserving and enhancing areas of particular ecological importance.

The promoters of Southam North argue that:

- It will create a new community that contributes towards housing needs. It will integrate the existing Model Village.
- The location between Southam and Long Itchington means that this proposal will benefit existing as well as new residents. A range of new amenities will be available to existing residents as a result of the development. It could also enable existing community facilities in both Southam and Long Itchington to be upgraded.
- It is partially brownfield and there is potential to preserve and enhance biodiversity. Existing green infrastructure will be incorporated into the

scheme, with walking and cycling encouraged. Local and long distance views will be respected.

- The site is within good proximity to a range of economic centres such as Leamington Spa, Coventry, Rugby, Daventry, Stratford-upon-Avon and Northampton.
- Jobs will be provided on site with the creation of a school, retail, business and leisure facilities (including the potential for a small supermarket). Jobs will also be maintained at the existing quarry works. Up to 200,000 sq. ft. of employment floorspace will be provided.
- Green Infrastructure will attract visitors from further afield bringing additional economic benefit.

Various technical documents were also submitted. Arup produced a memorandum on ecology noting the need for a Biodiversity Impact Assessment to ensure no net loss of biodiversity.

A report on demand for school places has also been produced. This highlights the issue with capacity at Southam College. Note that this also considers the impact associated with up to 2,600 dwellings.

A demolition and reclamation budget of approx £1.5m is identified.

The promoters of the Stoneythorpe proposals submitted representations which included a sustainable technologies and innovation report; this states in summary:

- Housing at Stoneythorpe will be built to Code Level 5 of the Code for Sustainable Homes;
- Rainwater harvesting will take place;
- Public buildings will incorporate green roofs;
- Facilities for sorting and recycling of waste will be included;
- Renewable energy solutions will be incorporated into the development, including a Combined Heat and Power Plant with woodland providing a local source of biofuel.

The promoters have also submitted a document relating to the benefits of locating a new settlement at Stoneythorpe. The document states that:

- Many of the main rural settlements are close to separate smaller settlements. These smaller settlements lean on the larger, benefiting the local economy and supporting existing services and facilities they provide whilst retaining their own distinct character and separation.
- The location of the site means that walking and cycling are viable options and existing bus services could be strengthened. It is argued that the development proposals would significantly improve the business case for a new railway station at or near Deppers Bridge.
- The proposals will include 10,000 sqft of light industrial uses and shops and range of local convenience stores and services to meet the day to day needs of the new community.
- Nursery and Primary School facilities will be provided on site.

- Employment opportunities in Southam are available. Employment is available further afield and directly accessible by bus.
- Junction 12 of the M40 is approximately 7 miles providing excellent connections to the wider strategic highway network and the employment opportunities at Jaguar/Land Rover.

Other responses in favour of Southam/Stoneythorpe are summarized below under a series of common themes. These are not presented in any particular order.

Scale and location

Supportive statements in relation to the location and scale of the proposals included:

- Two sites will offer different benefits and will lower the impact of any negatives as they will not be concentrated in one mass area;
- The best of the proposals involving creation of new small town/village, not to be subsumed into a larger conurbation;
- Complete new development with feeling of belonging;

Access to existing facilities in Southam and proximity to centres like Leamington were also highlighted. The view was also expressed that development at this location would balance the previous policies of locating most of the district's new housing in Stratford town itself. The view was also expressed that there would be less impact on the important tourist town of Stratford upon Avon.

Transport

Supportive comments in relation to this option around transport highlighted the proximity to the strategic road network, greater potential for newly generated traffic to be managed and a view that this part of Warwickshire has more capacity.

This option could offer an opportunity to provide improved bus provision from Southam to Banbury via A423.

Economy

Supportive comments in relation to this option around employment included its proximity to centres of employment (Leamington, Warwick, Rugby, Banbury, Daventry). The potential for economic benefits for Southam were also highlighted and the view that it would support development at JLR.

Use of Previously developed land

A number of responses supported this option on the grounds that it included the use of previously developed land.

Landscape, Geodiversity and Biodiversity

The view was expressed that development here provides the opportunity to improve the local landscape through removal of the Cement Works buildings.

Supportive Comments specific to Southam North

A number of comments were specific to the Southam site and included the following:

- The Quarry could provide additional development options following completion of extraction.
- With its links to the canal, this development could be envisaged to build on leisure links and be seen as an attractive asset.

Supportive Comments specific to Stoneythorpe

A number of comments were specific to the Stoneythorpe site and included the following:

- The visionary development of Stoneythorpe could be another potential asset to SDC;
- Stoneythorpe as presented by the developers documentation is a 'green vision' for a sustainable community, providing a 'walk to work' environment with employment on site;
- Codemasters requested that Option E should include their landholding with additional housing provided.

Arguments Against Southam / Stoneythorpe

Arguments against Southam / Stoneythorpe are presented below under a number of common themes. These are not presented in any particular order.

Southam - Cultural heritage

The Battlefields Trust has serious concerns about the north of Southam site in option E. Parts of this area includes the 1642 battlefield of Southam. Whilst this is not a registered battlefield it is nonetheless important as being one of the first brigade sized actions of the first Civil war (1642-1646) and to have witnessed one of the few recorded incidents of the use of rudimentary landmines, the archaeological signature of which may still be identifiable. The site will also contain unstratified archaeological evidence of the battle in the form of Lead shot, the identification and mapping of which would provide important information about the course of the battle and the nature of weapons being used early in the war. The Trust would oppose strongly any attempts to develop this important historical site on the grounds of the threat to extant archaeology and the significant impact on the landscape that would seriously impair the understanding of the battlefield landscape.

Southam - impact on Model Village

A number of concerns were raised about the impact that development would have on Model Village, its unique character and its setting and the potential loss of the cricket pitch and recreational area. The potential for overlooking of existing dwellings from new dwellings was also raised. Concerns about the coalescence of Southam, Model Village and Long Itchington and urban sprawl were also expressed.

Southam – Location of development

The lack of higher order facilities in Southam and the need for people to access these in Leamington, Rugby etc. was highlighted.

Scale of development/integration with Long Itchington

Concerns were expressed about the scale of development proposed relative to the existing settlement of Long Itchington – one comment was that the proposals appear set to achieve outcome numbers rather than achieving the best decision for the local community.

Coalescence was also raised as a concern – e.g. development of Southam North will link Southam with Long Itchington to create a built up sprawl (approx. 3.51 miles long) totally destroying the rural aspect, with no definition between Southam and Long Itchington.

Impact on the character of Long Itchington was also raised as a concern, e.g. it is currently a thriving Village with a strong identity and community. It is distinctly separate to Southam. The option called 'North of Southam' is actually attached to Long Itchington. Not only would this option totally dwarf Long Itchington, but it would also fill the gap between Long Itchington and Southam. Long Itchington would lose its identity as a rural Village, and would become a suburb of Southam.

Local need for affordable housing is far lower than that proposed.

Development will lead to noise and light pollution. North of Southam is in a dark sky area.

Southam – Impact on disused railway/Canal

Impacts on the disused railway and canal, which are currently enjoyed by local people and tourists was also raised as a concern.

Southam - Education

Concerns were raised about the capacity of local schools and that even with the new primary school there is a danger that children from the new homes will take places from existing villagers because they will be closer to existing schools.

The capacity of Southam College and its ability to expand was also raised as a concern.

Southam - Transport

The capacity of the local road network was raised as a concern, including the A423 to Coventry or Banbury, Leamington Road and the cross roads between the Stockton / Napton Road and the A426.

Cumulative impacts with development at the former Peugeot works were also raised as a concern. The extension of the quarry at Southam was also seen as a potential source of additional traffic.

Lack of proximity to the motorway network and train stations was also identified.

Problems associated with crossing the A423 during peak periods were also highlighted.

Southam - HS2

A typical view was that HS2 will cause significant disruption to travel over the coming years as it is constructed nearby at Southam/Ladbroke, Bascote Heath, Offchurch. The thought of further strain being placed on the infrastructure to support the building of a new large scale housing development is too much to expect of local residents.

Southam - Employment

Lack of employment locally was highlighted. People would need to commute to Banbury, Leamington, Coventry etc.

One response highlighted that Warwickshire Fly Boats is also a source of local employment with active working historic boat docks also within the footprint of the proposal.

Southam - Ecology

The potential for impacts on rare butterflies (small blue) North of Southam at the Cemex quarry site was raised. There are 2 Butterfly Conservation survey transects on the quarry site where there is housing planned.

Southam – health infrastructure

Concerns were raised about the distance to Warwick Hospital A&E. The capacity of local health care facilities was also questioned.

Southam – Sewage Treatment

Capacity of the sewage treatment works at Itchen Bank Sewage Treatment Centre was questioned.

Southam - Drainage

A number of responses highlighted that houses have experienced overflows of drains in gardens as pipes are so old and the view that should more houses be built this would all have to be replaced as the current system would not be adequate.

Southam - flood risk

Concerns about flood risk were highlighted, for example either side of the Long Itchington to Stockton road.

Southam - Residential moorings on the canal

The potential impact on residential moorings at Warwickshire Fly Boats along the length of Kayes Arm was raised.

Stoneythorpe - scale / location

Objections specific to Stoneythorpe included:

- It will be an isolated community;
- Density is excessive;
- It will lead to the loss of agricultural land;
- Proximity to the landfill site at Ufton;
- Cumulative impact on Southam – allowing for other developments already approved;
- Previously considered in SHLAA and rejected;

Stoneythorpe – landscape

Site is an area of Medium/High landscape sensitivity.

Stoneythorpe – biodiversity

Includes areas that are Biodiversity Action Plan Priority Habitats.

Stoneythorpe - flood risk

The view was expressed that the Stoneythorpe site is likely to create significant surface water flowing into the River Itchen. In the recent rains it has already flowed over the Welsh Road just on the Bascote side of Southam and an increased water flow along the Itchen into Long Itchington is almost certain to overwhelm the current flood prevention works there.

Stoneythorpe - Transport / HS2

It was noted that the site clips the HS2 Safeguarding Zone.

The view was expressed that being relatively small it would probably rely on car transport.

Other Comments (Neither Objections nor Supports)

Scale/Location

Warwick District Council wishes to understand further the impacts of development in Stratford District on the "Alternative Approach" transport study being undertaken by Warwickshire County Council. This is exploring whether there are workable solutions that would manage traffic flows in Warwick and Leamington rather than simply provide for them. This options could have an impact (positive or negative) on the feasibility and viability of proposals arising from this study.

Landscape, Geodiversity and Biodiversity

Natural England stated - We note that the north of Southam site has areas of medium and high landscape sensitivity. In addition it includes part of a Local Geological Site (this term replaces Regionally Important Geological site) and Long Itchington Quarry local site, which includes areas of deciduous woodland, a Priority habitat. Any proposals on these sites should be required to protect and enhance the landscape and geodiversity and biodiversity assets, including by buffering, linking and connecting as a part of a wider green infrastructure network.

In relation to Stoneythorpe they stated - We note that part of the Stoneythorpe site is in an area of high landscape sensitivity. The site could also potentially impact on Ufton Hill Farm Fields local site [a Local Geological Site], which has not been recognised in the report.

Warwickshire Wildlife Trust commented - "At present the Trust is aware of several notable habitats and species within the sites which have not been identified through the Sustainability Appraisal process or have been factored into mitigation or landscaping designs. The Trust is willing to work with the local authority to assist in identifying notable habitats and species, and opportunities to conserve and enhance them, for each strategic option before and once a decision is made of the preferred strategic option.

Flood risk

The Environment Agency's comments in relation to Southam/Stoneythorpe highlight that the flood risk posed to the site from the River Stowe will need to be assessed by a Level 2 Strategic Flood Risk Assessment ideally prior to allocation in order to inform the amount of development that is not at risk and is able to be brought forward for development.

They add - it is not envisaged that this will exclude a significant proportion of the site from built development. The watercourses and their associated blue corridors should be incorporated as key elements of green infrastructure for the whole site. Detailed hydraulic modelling should test the impact of storing water on site to reduce flows downstream. This may provide opportunities to reduce flood risk downstream.

Southam / Stoneythorpe - Ground conditions

"The Groundwater and Contaminated Land team in the Environment Agency have no objections to housing development within the Option E site allocations. It is noted that the Option E will provide opportunities for redevelopment of a former brownfield land (i.e. former Southam Cement works). Subsequently we recommend that the Agency is consulted on any proposals for developments. Any such proposal should be supported by the appropriate ground investigations.

Southam / Stoneythorpe - Canals

The Canal River Trust note that - This development option includes a section of the Grand Union Canal and the Grade II listed structures (Grand Union Canal Shop Lock and Grand Union Canal Shop Lock Cottage) are recognised within the site assessment. The Canal & River Trust would require any development site adjacent to the canal to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network.

They add - The waterways can be used as tools in place making and place shaping, and contribute to the creation of sustainable communities. Canal & River Trust would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community.

Cultural heritage

English Heritage's response states - I understand the County Council's historic environment service is considering the extent of Civil War activity in the Southam area to inform the suitability of development. We would welcome further engagement as the matter becomes clearer.

They add - Has the significance of the Model Village been considered and the implications of surrounding future development?

Waste Water Treatment Capacity

Severn Trent Water considers that Long Marston, Gaydon/Lighthorne Heath and the Southam strategic sites are all equally untested in terms of finding a solution to the need to increase waste water treatment capacity, notwithstanding the amber status given to Gaydon/Lighthorne Heath the red status given to Long Marston and Itchen Bank (for Southam) in the Water Cycle Study 2014.

Appendix 8

Analysis of responses that rank the strategic options

Introductory Note:

The analysis provided here focuses initially on the responses that were fully completed in accordance with the advice contained in the consultation document. These number 1164. There is separate analysis of those responses that contained a full ranking of the options, but where no name or postcode was supplied (121 in total). These responses are then shown in a combined analysis with those fully completed (1285 in total).

In addition, a further 333 responses were received in which the full rankings were not completed correctly for one reason or another. 5 responses were anonymous and incomplete. 66 responses were incorrectly ranked, for example as (1,1,1,5,1), (1,5,3,2,3) or (5,1,4,4,1). 19 responses contained information where only 2, 3 or 4 options were ranked. Finally, and most significantly in terms of their volume, 243 responses provided a rank for only one option, of which the majority (206) rated solely option B (Gaydon/Lighthorne Heath) as preference 5.

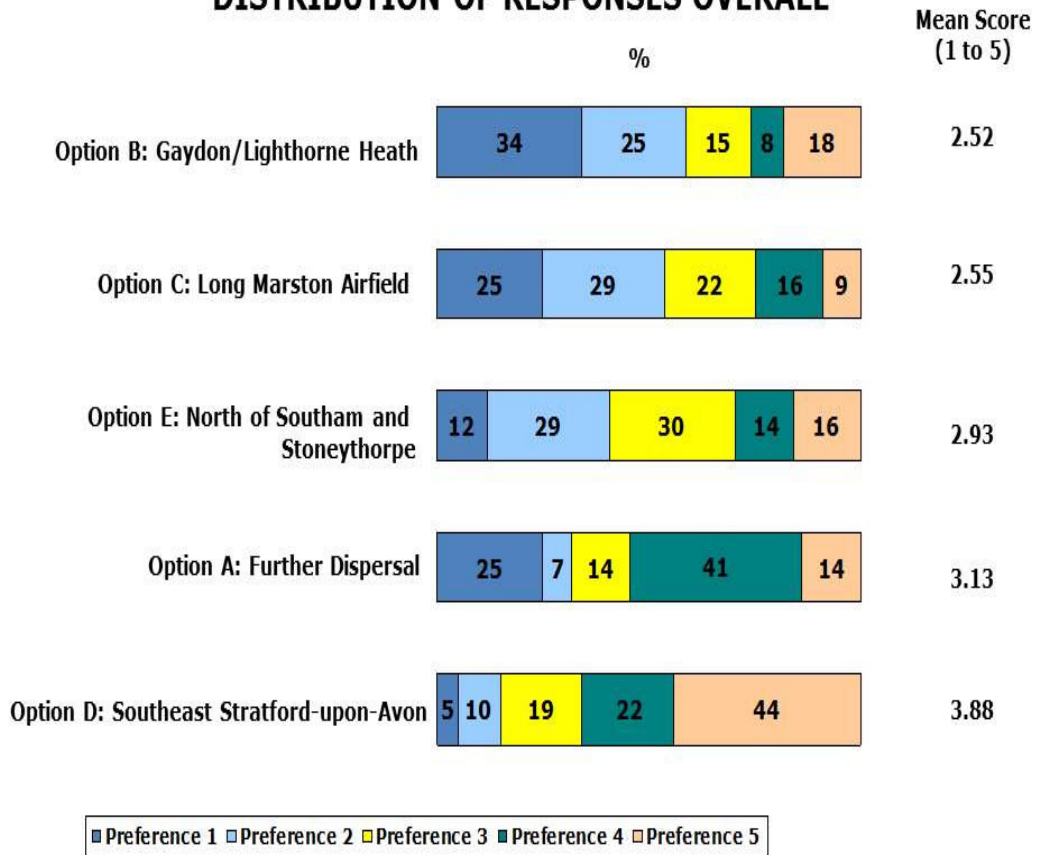
STRATEGIC SITE PREFERRED OPTIONS MEAN SCORE ORDER

STRATEGIC SITES	MEAN SCORE
Option B: Gaydon/Lighthorne Heath	2.516
Option C: Long Marston Airfield	2.546
Option E: North of Southam and Stoneythorpe	2.932
Option A: Further Dispersal	3.134
Option D: Southeast Stratford-upon-Avon	3.879
Based on those responses where a rating was given for each Site Option	(1164)

The lowest mean score of the five options is the most preferred option for those respondents who indicated a ranking from 1 to 5 for each option.

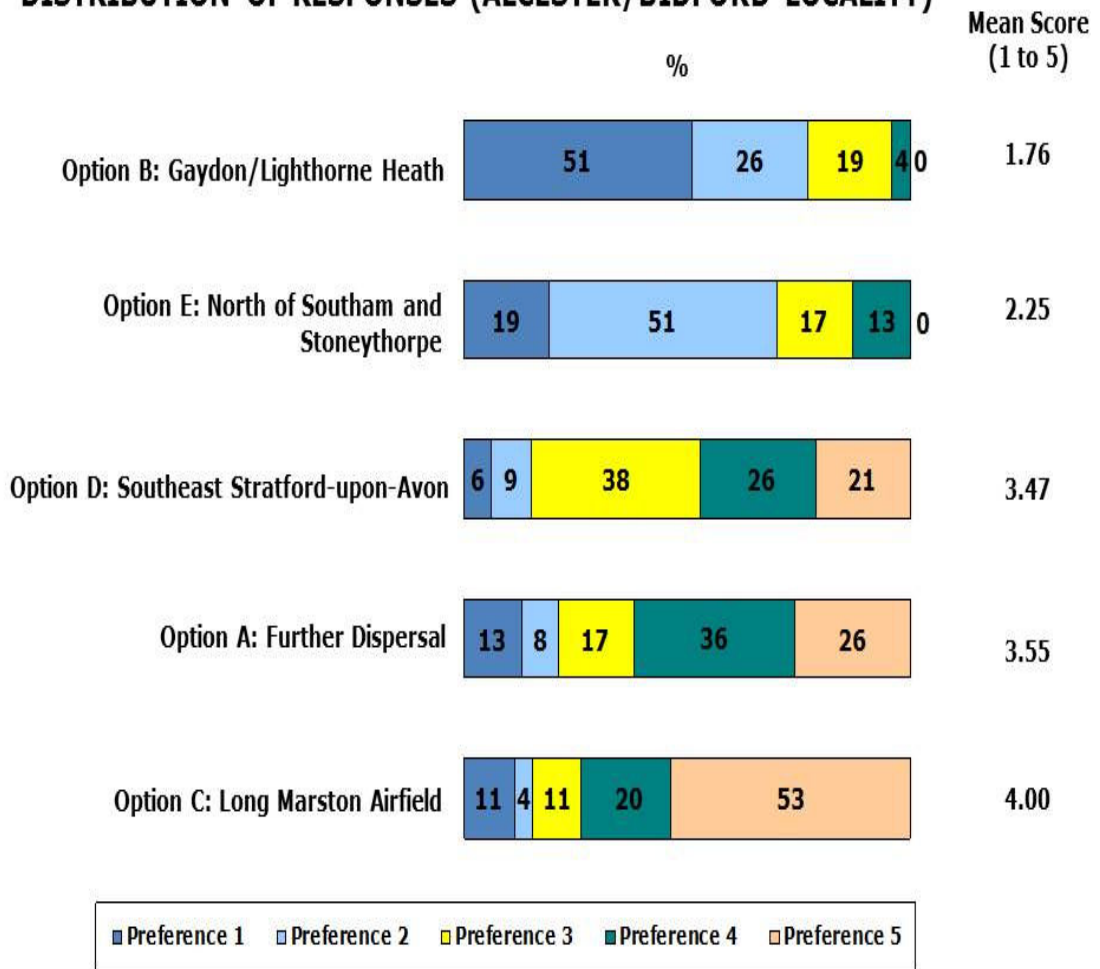
The rankings were 1 for the most preferred option to 5 for the least preferred option.

STRATEGIC SITE OPTIONS IN ORDER OF PREFERENCE – DISTRIBUTION OF RESPONSES OVERALL



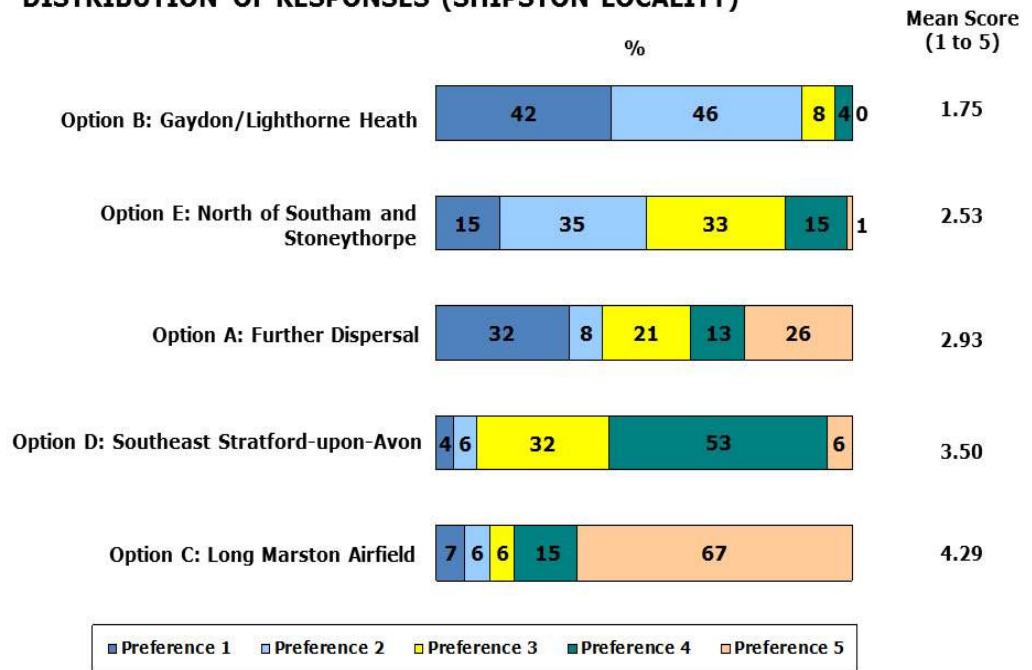
BASE: RESPONSES FROM POSTCODES IN STRATFORD DISTRICT COUNCIL AREA (1164)

**STRATEGIC SITE OPTIONS IN ORDER OF PREFERENCE –
DISTRIBUTION OF RESPONSES (ALCESTER/BIDFORD LOCALITY)**



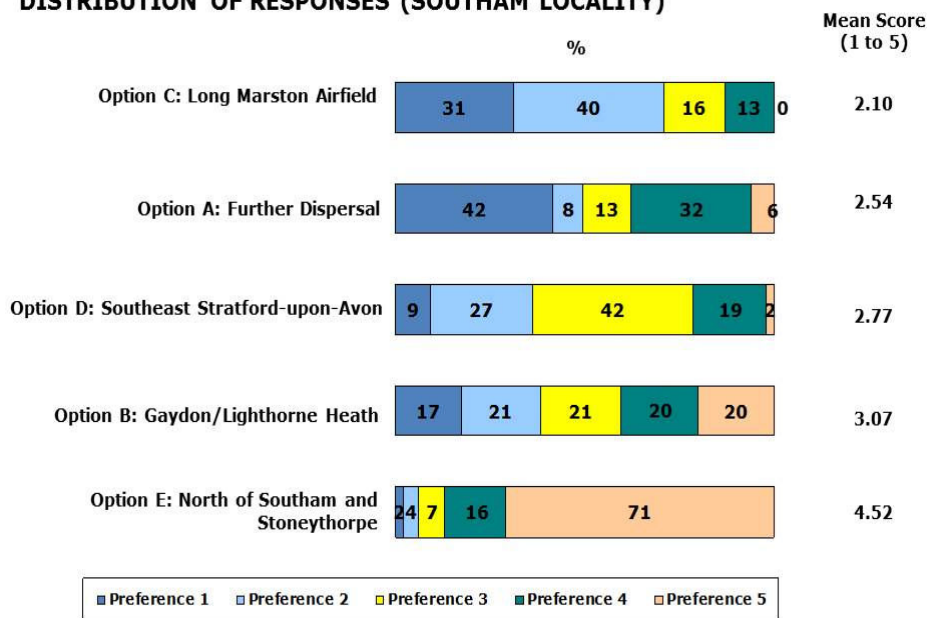
BASE: RESPONSES FROM POSTCODES IN ALCESTER/BIDFORD LOCALITY (53)

**STRATEGIC SITE OPTIONS IN ORDER OF PREFERENCE –
DISTRIBUTION OF RESPONSES (SHIPSTON LOCALITY)**



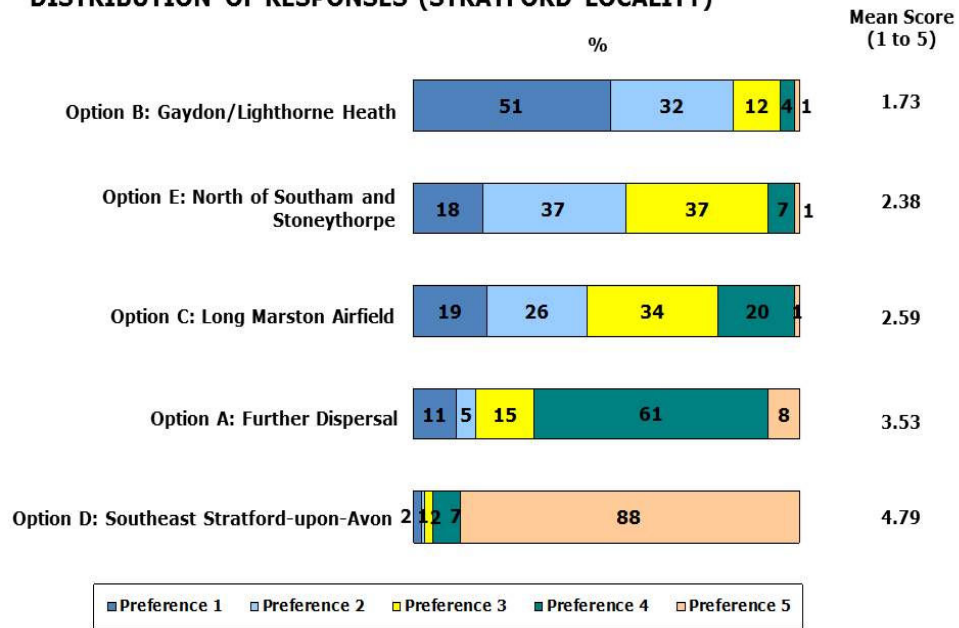
BASE: RESPONSES FROM POSTCODES IN SHIPSTON LOCALITY (72)

**STRATEGIC SITE OPTIONS IN ORDER OF PREFERENCE –
DISTRIBUTION OF RESPONSES (SOUTHAM LOCALITY)**



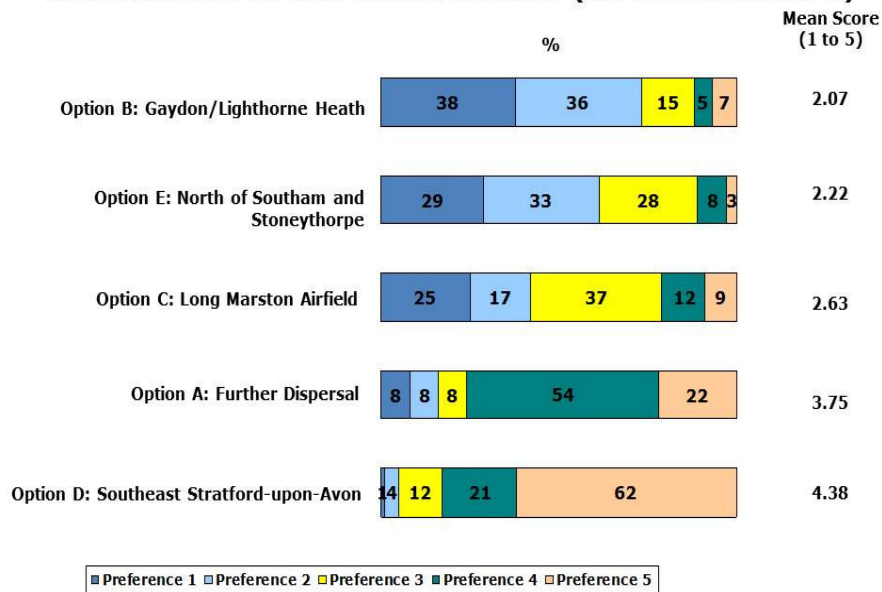
BASE: RESPONSES FROM POSTCODES IN SOUTHAM LOCALITY (245)

**STRATEGIC SITE OPTIONS IN ORDER OF PREFERENCE –
DISTRIBUTION OF RESPONSES (STRATFORD LOCALITY)**



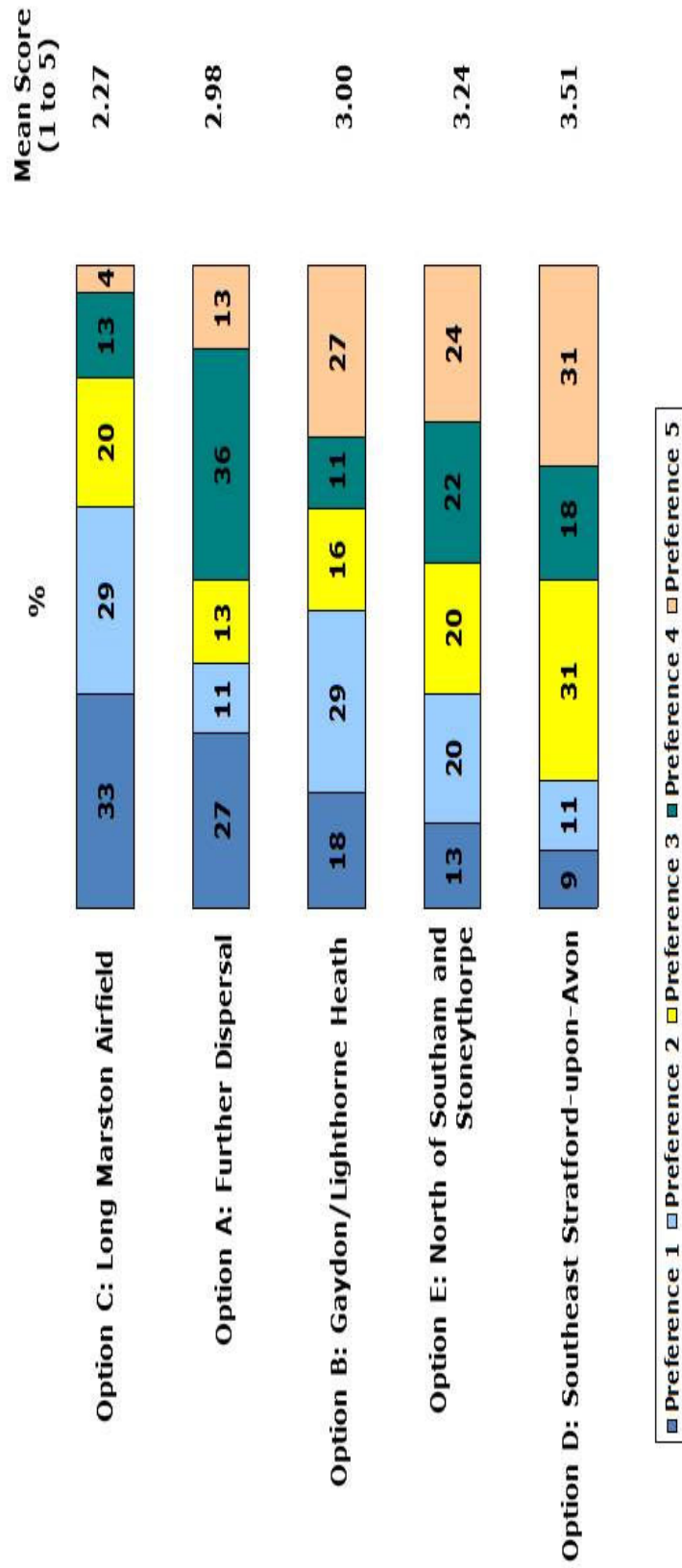
BASE: RESPONSES FROM POSTCODES IN STRATFORD LOCALITY (524)

**STRATEGIC SITE OPTIONS IN ORDER OF PREFERENCE –
DISTRIBUTION OF RESPONSES OVERALL (NO NAME INCLUDED)**



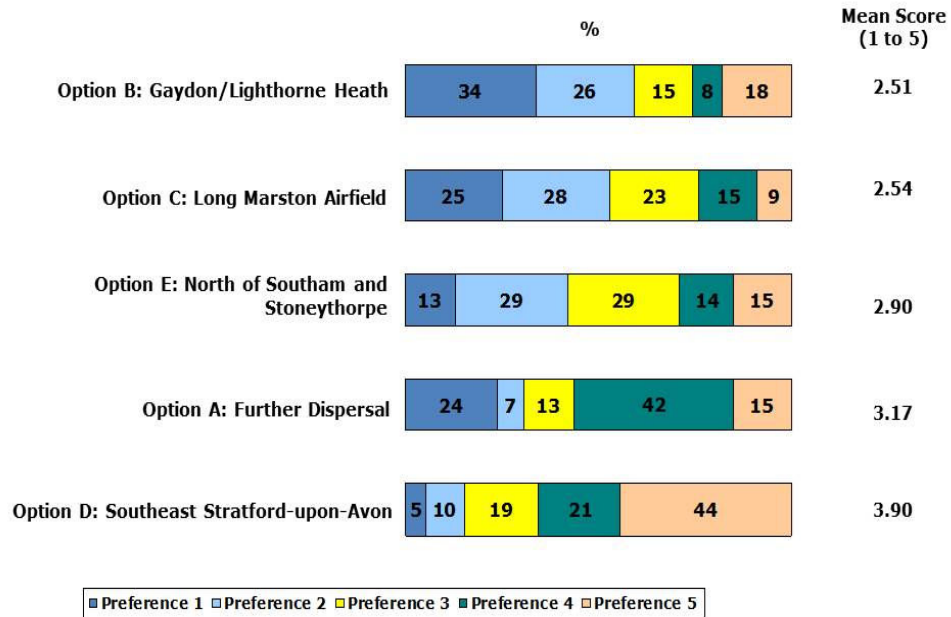
BASE: RESPONSES FROM PEOPLE WHO DID NOT INDICATE THEIR NAME (76)

STRATEGIC SITE OPTIONS IN ORDER OF PREFERENCE – DISTRIBUTION OF RESPONSES OVERALL (NO POSTCODE INCLUDED)



BASE: RESPONSES FROM PEOPLE WHO DID NOT INDICATE THEIR POSTCODE (45)

STRATEGIC SITE OPTIONS IN ORDER OF PREFERENCE – DISTRIBUTION OF RESPONSES OVERALL (NO POSTCODE/NO NAME INCLUDED)



BASE: RESPONSES FROM PEOPLE WHO COMPLETED IT CORRECTLY, THOSE RANKED CORRECTLY BUT DID NOT INDICATE THEIR POSTCODE, THOSE RANKED CORRECTLY BUT NO NAME INDICATED (1285)

**STRATEGIC SITE PREFERRED OPTIONS
DISTRIBUTION OF MEAN SCORES**

STRATEGIC SITE OPTION	Overall (1164)	Alcester /Bidford Locality (53)	Shipston Locality (72)	Southam Locality (245)	Stratford-upon-Avon Locality (524)	Wellesbourne/ Kineton Locality (224)
Gaydon/Lighthorne Heath	2.52	1.76	1.75	3.07	1.73	4.27
Long Marston Airfield	2.55	4.00	4.29	2.10	2.59	1.90
North of Southam & Stoneythorpe	2.93	2.25	2.53	4.52	2.38	2.84
Further Dispersal	3.13	3.55	2.93	2.54	3.53	2.76
Southeast Stratford-upon-Avon	3.88	3.47	3.50	2.77	4.79	3.23

Base: (1164) This includes 19 responses for the Henley/Studley locality, but not included above as the response is not high enough for statistical validity. 27 responses were received from outside the District. Figures highlighted in blue are the preferred sites for that locality.