

THE CABINET
21 OCTOBER 2013

Subject: **Stratford-on-Avon District Core Strategy – New Proposals Consultation**

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 on the intended inclusion within the Core Strategy of development proposals referred to as the Stratford Canal Quarter Regeneration Zone, together with two associated employment sites, and the new settlement at Gaydon/Lighthorne Heath. A number of issues have been raised in relation to the new settlement proposal, which identify the need for further detailed assessment work to be undertaken prior to the Council determining that this proposal is the most sustainable option for the District.

Recommendations

- (1) That the Council be recommended to confirm the Stratford Canal Quarter Regeneration Zone, with its two associated employment sites, as forming part of the preferred development strategy for the District as proposed in the emerging Core Strategy, in accordance with the proposed changes set out in the Appendix 1 to this report;**
 - (2) That the consultation responses in relation to the new settlement proposal at Gaydon/Lighthorne Heath be noted; and,**
 - (3) That prior to formal consideration of the soundness of this new settlement proposal the issues outlined in paragraphs 3.13, 3.14 and 3.19 of this report be subject to a more detailed analysis to evaluate the robustness of the evidence base that the Gaydon/Lighthorne Heath new settlement proposal is the most sustainable option for the District.**
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1 Background/Information

- 1.1 At its meeting held on 22 July 2013 the Council agreed to endorse the Intended Proposed Submission Core Strategy but resolved to undertake further focused consultation on the proposed inclusion within that Strategy of proposals relating to a new settlement at Gaydon/Lighthorne Heath and to the provision of employment land east of Birmingham Road at Stratford-upon-Avon. The consultation also covered the proposed Canal Quarter Regeneration Zone and employment land south of Alcester Road due to the interrelationship between the three areas.
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- 1.2 The 'New Proposals Consultation' was launched on 1 August 2013 and the period for responses ran to 13 September 2013. This period was extended to 27 September 2013 specifically for the parish councils of Gaydon, Lighthorne and Lighthorne Heath. The consultation has been undertaken in accordance with the Council's Statement of Community Involvement. All relevant documentation was made available on the Council's website. During each week of the consultation period the Council's planning policy team ran an informal drop-in session at a venue in Stratford-upon-Avon and in the vicinity of Gaydon/Lighthorne Heath. This gave interested parties an opportunity to discuss the proposals. A special joint meeting of the Southam/Feldon and Wellesbourne/Kineton Community Forums was held to discuss the new settlement proposal. The Regeneration Zone proposal was discussed at an ordinary meeting of the Stratford-upon-Avon Community Forum. Policy officers have attended individual Parish Council meetings on request.
- 1.3 An 18 page brochure was published both on-line and in hard copy and has been widely circulated. The brochure outlined the purpose of the consultation, provided a resume of relevant feedback received via earlier consultation exercises on the Core Strategy, outlined the technical evidence taken into account by the Council and explained the intended development strategy. It then described in more detail the two new strategic proposals.
- 1.4 The consultation Comment Form invited respondents to indicate either support for or objection to the proposals and to comment on their reasons. Feedback was sought both on the principle of and on the appropriateness of the specific requirements relating to the following proposals:
- Identifying the Canal Quarter Regeneration Zone as a site for mixed-use development including approximately 700 homes.
 - Identifying 14 hectares of land to the south of Alcester Road, Stratford-upon-Avon as a site for new employment land.
 - Identifying 15 hectares of land to the east of Birmingham Road, Stratford-upon-Avon as a site for new employment land.
 - Identifying land at Gaydon/Lighthorne Heath as a location for a new settlement providing 4,800 homes (1900 by 2028) and including employment, community, retail and open space uses.

2 Summary of responses to the consultation

- 2.1 The following paragraphs provide a summary of the issues raised concerning each of the new proposals.

Identifying the Canal Quarter Regeneration Zone as a site for mixed-use development including approximately 700 homes

- 2.2 The proposal receives support from a number of local organisations including Stratford-upon-Avon Town Council, Stratford-upon-Avon Neighbourhood Plan Steering Group, Stratford Voice, Stratford Vision, the Alveston and Shottery Village Associations, Stratford College and Stratford Town Trust. The regeneration of the area is strongly preferred to further edge-of-town greenfield expansion. The area is recognised as largely unfit for purpose in its current state, with acknowledged traffic

problems and little room for businesses to expand. Several of the major businesses are known to be keen to relocate. The proposal is seen as an opportunity to strengthen the links between Birmingham Road/the Maybird Centre and the town centre. New housing within the area would be sustainably located within the town. Warwickshire County Council is supportive and advises that further work is being undertaken to ascertain what measures may be required to optimise proposed Town Centre Improvement measures as identified in the Strategic Transport Assessment (October 2012) to take into account the Canal Quarter proposals. It suggests that consideration should be given to the creation of a multi-functional local community hub to serve not only the new housing but the existing estate west of Masons Avenue. Several respondents refer to the importance of wide consultation and involvement in the preparation of the proposed masterplan for the zone.

- 2.3 The proposal receives support from 78% of the 55 individual residents who commented. Their representations reference the benefits of relocating the businesses, the sustainable location which should encourage walking rather than car use, the positive re-use of brownfield land and the opportunity to enhance the canal corridor. There is no consistency in the concerns expressed by those who object to the proposal, with references to traffic congestion and other infrastructure issues being the most common.
- 2.4 The Canal and River Trust, Environment Agency, Inland Waterways Association and Natural England are all supportive, drawing attention to the potential to achieve environmental enhancements to the canal corridor and improved pedestrian and cycle links. Centro is also supportive and sees it as an opportunity to improve links to the railway station. NHS England identifies that this development would require the provision of additional services at the Bridge House Medical Centre. South Warwickshire NHS advises that existing Acute and Community Healthcare are at full capacity and unable to accommodate increased patient demand from population growth. A developer contribution (either through S106 or CIL when adopted) for the required Acute and Community Healthcare facilities should be provided. CPRE Warwickshire is supportive of the principle but recommends a different detailed approach.
- 2.5 The representations made on behalf of landowners and house builders focus on the viability and deliverability of the proposal. Doubts are raised over the deliverability of housing given uncertainties over land assembly, the high costs associated with building on brownfield and potentially contaminated land, the relocation of existing businesses and the market's perceived ability to absorb a high density development. There is criticism that the proposal is imprecise, vague and not fully explained, so for example there is no consideration of the viability or deliverability of this proposal in the PBA viability report on the new settlement and Stratford Urban Extension options. Infrastructure and environmental improvements are not explained or costed and it is uncertain that the provision of affordable housing can be afforded. The proposal is not considered in the Sustainability Appraisal of strategic options (June 2013) or any supplementary report and there are other sites that may be able to provide the new housing and employment more sustainably. The representations suggest it would be unsound to rely on

the work to date to support provision of the 700 homes. Provision should be made elsewhere to make up the 700 dwellings, with the regeneration zone being identified as an 'opportunity area' to provide additional housing over and above the minimum housing requirements. One response suggests that the regeneration zone could be enlarged to include two buildings on Timothy's Bridge Road that are outworn and need replacement. A further comment from a landowner within the zone points out that some businesses require a location close to the town centre and would not wish to relocate to the proposed alternatives.

Identifying 14 hectares of land to the south of Alcester Road, Stratford-upon-Avon as a site for new employment land

- 2.6 Most of the local organisations referred to above similarly support this allocation, accepting that the regeneration of the Canal Quarter will require land to relocate displaced businesses and allow some growth. Reference is made to the need to secure a high quality and extensively landscaped development commensurate with the edge-of town location. It is acknowledged that there is good access to the A46, but it is suggested that provision should be made to enable the future widening of the road. One representation suggests the allocation might be enlarged to meet the requirements for future growth. Wilmcote Parish Council considers the proposal unsound. Warwickshire County Council advises that there would be traffic impacts on the A46 Wildmoor roundabout that would require mitigation.
- 2.7 The proposal receives support from 60% of the 25 individual residents who commented. Their representations reference the need to increase employment opportunities and commend the accessibility of the site. The comments from those objecting to the proposal are again diverse. They include reference to urban sprawl, potentially increased reliance on car journeys and impact on the natural environment. One respondent suggests only one new site is required and that the Birmingham Road site is more suitable.
- 2.8 Centro is supportive subject to the provision of good cycle and footpath links. CPRE Warwickshire considers the proposal to be unsound and unjustified in principle. Employment uses should not be relocated to unsustainable locations in open countryside and would result in a harmful incursion, with the damage outweighing the advantages. The Environment Agency has no concerns. Warwickshire Wildlife Trust advises that the land includes a local wildlife site (LWS) and is adjacent to a potential further LWS, features that should be acknowledged from the outset to adequately reflect development constraints.
- 2.9 There are a number of comments on behalf of landowners/house builders. Some raise no objection and generally agree both that the site can be developed sustainably addressing landscape, ecology and transport issues and that the specified requirements are appropriate. One supporter argues that the southern boundary could be extended further south to better reflect natural features and provide more defensible boundaries. This would also enable better plot depths and widths. Representations on behalf of the site owner suggest that the range of acceptable uses should be extended to include B2 and B8 as well as sui generis commercial uses such as car dealerships; and that it is not lawful to reserve all or part of the site for businesses relocating

from the regeneration zone, so the text on 'what is to be delivered' needs to be amended. Other representations point out that the special character arguments used against housing growth on the periphery of Stratford have not been applied to employment sites which have greater impact; the Landscape Sensitivity Study does not consider these sites, so this is a deficiency in the evidence base.

- 2.10 A representation submitted on behalf of DEFRA, which is currently seeking to dispose of the nearby experimental farm complex at Drayton, raises an objection on the grounds that the proposal involves the use of agricultural greenfield land when there is a vacant developed site with available land immediately adjacent; that development of the greenfield site will create competition that threatens the re-use of the Drayton site buildings; and that the proposed A46 access improvements have the potential to complicate or threaten the access improvements at Drayton. The representation promotes the Drayton site as an alternative site for employment use, stating that all services are currently available on site and the land is available in the short term.

Identifying 15 hectares of land to the east of Birmingham Road, Stratford-upon-Avon as a site for new employment land

- 2.11 Across the board the representations on this proposal are more mixed. Amongst the local organisations, there is support from the Stratford-upon-Avon Neighbourhood Plan Steering Group, Stratford Vision and the two village associations. The Town Council also supports 'on balance', notwithstanding some concerns about removing land from the Green Belt. There are similar comments from Old Stratford and Drayton Parish Council, which stresses the importance of maintaining and reinforcing the landscape and controlling the detailed nature of any development. Wilmcote Parish Council considers the proposal unsound, saying that there is no evidence that the relocation of businesses is viable, to show the proposals are necessary or that there is any justification to release two sites rather than just one. It particularly argues that there is no evidence to justify or explain what the 'exceptional circumstances' are for proposing an employment allocation in the Green Belt. It proposes that the land between Bishopton Lane and the A46 should be considered for a business park. Stratford Voice is concerned about the loss of Green Belt land and the potential for increased traffic congestion, and queries whether an alternative might be to increase the size of the Alcester Road site. Warwickshire County Council advises that there would be traffic impacts on the A46 Bishopton roundabout that would require mitigation.
- 2.12 The proposal is opposed by 58% of the 26 individual residents who commented, principally on the grounds that the release of Green Belt land is not justified. Other concerns again make reference to urban sprawl, potentially increased reliance on car journeys and impact on the natural environment. The need to release this site is questioned on the basis that alternative brownfield land may be available and/or that the enlargement of the Alcester Road proposal would be preferable. Those who support the allocation suggest that the development of this site has the least impact on the setting of the Town, it is close to both the strategic highway network and to the park and ride and Parkway station, and point out that there are already commercial uses in the area.

- 2.13 Centro is particularly supportive of this allocation in view of its proximity to the Parkway Station. CPRE Warwickshire considers the proposal to be unsound and unjustified in principle. Employment and retail uses should not be relocated to unsustainable locations in open countryside, in this case in the Green Belt. No exceptional circumstances have been demonstrated. The proposal would result in a harmful incursion in the countryside and its damage would outweigh the advantages. The Environment Agency has no concerns.
- 2.14 The representations on behalf of landowners/house builders suggest that the site is not suitable because of its Green Belt and previous Special Landscape Area status. In addition to the concerns outlined in paragraph 2.7 above, it is suggested that as Green Belt land the allocation has not been subject to relevant Sustainability Appraisal tests, the circumstances are not 'exceptional' and a strategic review of Green Belt would be required before the land could be released.
- 2.15 A representation from one of the owners of land within the site confirms his willingness to see the land developed and refers to its proximity to Stratford Parkway and Park & Ride, to its partly brownfield nature with existing commercial buildings, and to a belief that any new development would be well contained and not impact unduly on wider countryside.
- 2.16 One representation promotes an alternative site closer to Stratford Parkway Station, with the criticism that the proposed site extends too far along Birmingham Road and would appear as ribbon development. The alternative location, centred on the parkway station, is put forward as a single site for the entire Stratford employment allocation.

Identifying land at Gaydon/Lighthorne Heath as a location for a new settlement providing 4,800 homes (1900 by 2028) and including employment, community, retail and open space uses

- 2.17 Not unexpectedly it is this proposal that has generated a significant majority of the representations received. Equally not unexpectedly, there is evidence of support from the wider District and of objection from the more immediate locality, with the latter being the source of most of the comments received from individual residents.

Response from Parish and Town Councils

- 2.18 **Combined representations from Lighthorne, Lighthorne Heath and Gaydon Parish Councils**

Object to the proposed new settlement. There are serious shortcomings both of a procedural and substantive nature with the proposal and the new proposals consultation document:

- The linkage between the new settlement proposal and Jaguar Land Rover is not made explicit.
- There must be proper consideration of socio-economic linkages with Warwick District but this has not happened.
- It is imperative that proper SEA procedures are followed if public confidence is to be maintained. In particular, this must include full public engagement. An SEA for the plan is required by law. This is a fundamental flaw and no further progress should be made until it has been rectified.

- Certain areas of potential environmental concern seem not to have been addressed.
- The narrowness of the site leaves limited room for buffer strips/landscaped bunds, which may be necessary to achieve adequate domestic acoustic standards, particularly on the site facing the M40.
- There will be effects from vehicular pollution and some mitigation is likely to be required.
- There may be sites of ecological value in the proposed development area but this has not been considered. No delivery mechanisms are considered to enhance green infrastructure provision.
- It is understood that there is ancient woodland on the site.
- The SHLAA identifies Lighthorne Heath as an option but physical constraints are identified including local wildlife sites and high/medium landscape sensitivity. These constraints seem not to have been given due weight.
- There is no evidence of proper consultation with Warwick District Council and Cherwell District Council. In the absence of such cross boundary co-operation it is unlikely that the plan can be found to be sound.
- It is likely that short trips to Warwick/Leamington will use the B4100 which may well cause significant congestion problems which have not been properly considered. There is no clear delivery mechanism for the suggested park and ride facility.
- At present there is insufficient information to allow the alternatives to be assessed in an open transparent fashion.

2.19 **Lighthorne Heath Parish Council (additional representations)**

Residents have been surveyed in order to gauge their opinions on the new settlement proposal. The survey concludes that the majority of those who responded have an objection to the proposal. The main objections surround the fact that the majority of people who live in a village chose to live in a village primarily because of its rural location and have concerns over the impact this development will have on their quality of life.

Another significant factor is the increase in traffic. It is believed that the proposed traffic improvements will be insufficient to meet the needs of the proposed new settlement.

There is a significant element that are open to the new settlement proposal if it means that Lighthorne Heath will benefit from some re-development, re-branding and service improvements such as mains gas or fibre-optic high speed broadband.

2.20 **Gaydon Parish Council (additional representations)**

The Council objects strongly to this proposal. The District Council has decided that a new settlement is the preferred option based on a Citizens Panel survey which considered the views of a limited sample of District residents.

There are a number of brownfield sites in the district which could be developed. These sites should be used before grade 2 agricultural land is destroyed.

There is no evidence that the District Council has properly consulted with major employers in the area and this is evident by the response from Jaguar Land Rover.

There is no SEA available and no further reports have been carried out. Therefore conclude that there is insufficient information available for issues such as pollution and environmental concerns to be addressed adequately in order for the Core Strategy to be judged sound.

The area around Castle Farmhouse and towards Lighthorne Heath is of historic interest. Gaydon is an ancient settlement which includes a Roman salt road. A site of national importance has been identified nearby but there is no report from the County Archaeologist.

The consultation is not sound as there is no evidence of proper consultation with Warwick District Council and Cherwell District Council.

The Sustainability Assessment concludes that the site would be car dependent. The Strategic Transport Assessment identifies impacts on local networks, including increases in delays, queues and journey times.

Properties in Gaydon have flooded at least four times in the past ten years. Gaydon is high on the list of villages affected by flooding as it is affected by both storm and foul water.

A development of this size will destroy local identity and impact badly on views from a grade II listed building and scheduled ancient monument (Burton Dassett beacon tower).

The Council has serious concerns regarding the consultation process. The proposal has been 'developer led' which in itself is a reason for doubt. A development of this magnitude warrants a full statutory consultation period.

2.21 **Other Parish and Town Councils**

The proposal is supported by Southam Town Council and the Parish Councils representing Arrow with Weethley, Beaudesert and Henley-in-Arden, Claverdon, Kineton, Loxley, Tysoe, Welford-on-Avon, Wellesbourne and Wolverton. Kineton Parish Council includes a number of more detailed comments about infrastructure provision. Harbury Parish Council has submitted balanced comments, identifying that the new settlement would benefit from good access to the strategic road network, would ease development pressures elsewhere, the new business park would be economically beneficial and public transport could be expected to improve. It expresses caution about traffic impacts on the rural road network, potential impact on services in nearby villages, the need to ensure air and noise pollution is not problematic and the importance of the existing settlements maintaining their identity. Long Compton Parish Council and Neighbourhood Planning Sub-committee welcome the revised strategy as it better reflects both the sustainability of the Local Centre Villages and protects the important countryside in which they are located.

The proposal is opposed by the Parish Councils representing Bishops Itchington, Butlers Marston and Radway and by the Parish Meeting of Charlecote. Concerns are expressed about the impacts on the rural road network, the impact of a new urban settlement on rural character, an over-concentration of social housing, impacts on education and health

provision and the transparency of the process. Moreton Morrell Parish Council does not formally object but expresses concerns about traffic impacts and lack of information about potential benefits.

Response from Statutory Bodies and Interest Groups

2.22 Warwickshire County Council (WCC)

Transport: WCC undertook a Strategic Transport Assessment (June 2013) of this proposal which took account of the likely cumulative impacts of the proposal alongside Warwick District Council's Core Strategy proposals. WCC is satisfied that this work, which identified what transport mitigation measures are likely to be required, is robust, although it considers more refined and detailed evidence will be required for the Examination in Public. This work is underway.

Community Facilities: There should be at least one multipurpose community centre within the development providing a mix of retail, health, post office and meeting rooms. The learning academy should be more centrally located in the development to improve pedestrian access from the north. The development should include a 'green corridor' (e.g. footpath, cycleway, bridleway) through the development linking to the woodland at the northern end.

Impact on Lighthorne Heath: WCC feels there is no consideration of the potentially significant impact that this development could have on the village of Lighthorne Heath and how the existing settlement could be integrated into the new concept. The scheme will dwarf the existing village and the contrast in the styles of development could leave the existing properties marginalised. The majority of new development is on the opposite side of Banbury Road and there is no reference to pedestrian or cycle access across the Banbury Road to gain safe access to facilities on both sides. New facilities and housing should be created within the existing area to draw the new community into it. There is also evidence of localised deprivation within the existing village; the new proposal should attempt to reduce it and not worsen it.

Public Health comment: Pleased to see the provision of new community and leisure facilities, parks, open space and community woodland, walking and cycling in the proposal. All of these are essential for communities to support them to achieve positive health and well being.

2.23 **Centro** – supportive of overall spatial vision. Greater reference should be made to the role of buses in making cross boundary journeys to nearby settlements as support for these services will help to reduce the use of the private car at this proposed site.

2.24 **Coventry PCT/NHS England** - Existing GP capacity could be expanded to accommodate some of the initial development. The proposals should include the provision of new premises as part of the initial neighbourhood to accommodate the equivalent of a surgery for six GPs.

2.25 **CPRE Warwickshire** – The housing requirement is based on a significant in-migration assumption. This proposal should have been subject to extensive public participation/consultation and not inserted at a late stage after three previous versions of the Core Strategy. The existing motor industry centre at Gaydon is not a justification for the new settlement. There is scope to enlarge the existing settlement at

Lighthorne Heath using land between the Banbury Road and JLR/Aston Martin, but no agricultural land should be used.

- 2.26 **Defence Infrastructure Organisation (MoD)** – no comments on the proposal.
- 2.27 **English Heritage** - There appears to be capacity for a large sized development, although the direct and indirect effects on Lighthorne and Gaydon should be carefully considered, for example the increased traffic through the two settlements and the impact on the setting of any affected heritage asset.
- 2.28 **Environment Agency** - The site is in the preferential location of Flood Zone 1. Two minor watercourses at Kingston Grange Farm will need to be assessed by a Level 2 SFRA, ideally prior to allocation. It is not envisaged that this will exclude a significant proportion of land from development. Investigations should be undertaken to assess the potential risk to the water environment resulting from the landfill sites located to the north-west and south of the site and should inform the costs and timescale of the Infrastructure Delivery Plan. Hydraulic modelling will be required prior to allocation to reassure that adequate capacity is, or will be made available to cater for the significant increase in flows post development. There is currently no headroom available for foul sewage treatment at Gaydon. If foul drainage is to be directed to these works then an upgrade would be required. Discussions with Severn Trent Water should therefore be ongoing.
- 2.29 **Homes and Communities Agency** – Welcomes the increase in housing numbers. No objection to the principle of the identification of a new settlement provided it does not limit the potential for the development of HCA land adjacent to the A435. The latter should be identified as a strategic allocation, contributing to the early delivery of housing, whilst the new settlement would contribute towards the later phases.
- 2.30 **Natural England** - a number of local wildlife sites may be adversely affected, including Lighthorne Quarry, Gaydon Coppice and Gaydon Proving Ground and two proposed sites including Chesterton Wood (now confirmed) and Castle Farm Meadow. The proposed mitigation measures may help, but the ecological issues need further consideration. Consideration should be given to designating Lighthorne Quarry as a Local Nature Reserve rather than a formal country park, with the creation of formal recreation space elsewhere, possibly to create a buffer to the ecologically sensitive areas. The Core Strategy should contain an explicit policy which protects ecological networks, including priority habitats and designated sites, within and adjacent to the proposed settlement, providing a clear steer for the masterplan. Whilst the SA identifies a likely positive effect on SA objective 2 (protecting and enhancing biodiversity), the effects remain uncertain and the positive effect depends on the subsequent masterplan. Positive effect should be ensured by including a clear policy protection and enhancement of the ecological network, including locally designated wildlife sites, proposed sites and priority habitats.
- 2.31 **Ramblers Association** - the opportunity to re-route 3 bridleways in the site away from M40 would be welcomed. Creation of a country park is also supported.

- 2.32 **Shakespeare Line Promotion Group** - concern about the proximity of proposed housing to M40. The proposal is entirely reliant on highway infrastructure and therefore conflicts with the sustainable transport principles in CS.28. Travel to Stratford and other MRCs would result in greater distances to be travelled by roads, some of which are Class C roads with difficult intersections. Long Marston is a brownfield site and has scope for rail infrastructure and direct rail links to Stratford-upon-Avon, Leamington Spa, and Birmingham. Long Marston should be reassigned as the sustainable new settlement.
- 2.33 **South Warwickshire NHS** - Evidence demonstrates that existing Acute and Community Healthcare are at full capacity and unable to accommodate increased patient demand from population growth. A developer contribution (either through S106 or CIL when adopted) for the Acute and Community healthcare facilities will be required to support the residential development.
- 2.34 **Warwickshire Ramblers** - Concern about the potential adverse impacts on the surrounding countryside northeast of M40 at Kingston and Chesterton Parish and any encroachment on the Lighthorne Village. There should be provision for the retention/protection of existing bridleways.
- 2.35 **Warwickshire Wildlife Trust** – the proposal is not justified, is likely to result in the loss of local wildlife sites (LWS) and is inconsistent with the principles of national policy. Concern expressed about the ecological evidence used to inform the biodiversity sustainability objective. The Trust considers that the LWS are material considerations and pose significant constraints to the deliverability of the development, with 27% coverage of the site as local site designations. This has financial implications in terms of mitigation, habitat creation and management. The proposal to create a country park at Lighthorne Quarry is incompatible with its nature conservation status and it would be preferable to create a Local Nature Reserve. If the principle of development is accepted there should be amendments to the site capacity to take account of any mitigation needed to safeguard the LWS. The LWS must be adequately integrated into the green infrastructure at the master planning stage and the proposal should include provision for the protection and enhancement of biodiversity. There is the potential for Habitat and Species of Principal Importance to be identified within the site – the proposal should have regard to this and the site ecological information should be reviewed and updated.
- 2.36 **Woodlands Trust** - very concerned about the effect of the proposal on the two ancient woodlands (Chesterton Woods and Gaydon Coppice). National policy provides absolute protection of ancient woodlands. Whilst it is noted that the GLH Vision includes 100 hectares of open space and linear community woodland around Gaydon Wood, at the very least there should be a 30 metre buffer between development and ancient woodland and light pollution should be avoided. Would like to see that new woodland creation forms a significant element of the open space provision to act as buffer for the existing ancient woodland and provide important biodiversity habitat with social benefits.

Response from Neighbouring Authorities

- 2.37 Oxfordshire County Council raises no objection in principle. It seeks more information on traffic impacts before it can reach final judgements on any necessary mitigation. The proposal should maximise containment and minimise car trip generation, providing a high quality public transport offer, i.e. an inter-urban express bus service which links the proposal with Banbury and Leamington Spa. In terms of economic development, although companies may be attracted to relocate to this site from within Oxfordshire, overall the proposal will be positive for the motorsport cluster in the region of which Oxfordshire is a key part.
- 2.38 Cherwell District Council is supportive of the proposed strategy, including, in principle, the proposal at Gaydon/Lighthorne Heath. The provision of a bus service to Banbury should be an essential requirement of the new proposals as it will help to ensure that the new settlement is sustainable and the traffic impact on Cherwell, particularly Banbury, is minimised. The provision of employment land is supported and may supplement CDC's aim to attract employment opportunities, including high performance engineering, to the area. The level of retail provision should avoid competition with Banbury and other town centres.
- 2.39 Warwick District Council submits no objection providing the following issues are satisfactorily addressed:
- Traffic/Highways – identify the full impacts to ensure that a joint strategy for mitigation via network improvements and/or other transport based initiatives can be put in place, thus avoiding any detriment to future development proposals within Warwick District or to Warwick and Leamington Spa and their town centres.
 - Historic Environment/Air Quality - impacts on the historic environment (air quality in particular) of Warwick and Leamington town centres need to be carefully assessed and mitigated.
 - Economic Development – the proposal may deliver economic benefits for Warwick District town centres. Employment opportunities related to the intended expansion of Jaguar Land Rover at Gaydon as well as the employment allocation may also be beneficial to Warwick District and the wider sub-region. Further discussion is needed about the quantum of employment land proposed, as this may represent oversupply for Stratford District as a whole.
 - Housing - SDC has not been a participant in the sub-regional SHMA* (pending). This may not be an issue providing that SDC's recent housing evidence has been objectively assessed in compliance with the NPPF and the joint SHMA does not suggest that there is a need for SDC to accommodate any further housing to meet sub-regional requirements. However, should the JSHMA suggest a higher housing requirement, WDC would have concerns and would wish to discuss this with SDC. There is an overlap in the geographic housing market between WDC and SDC. Given the limited distance between Gaydon/Lighthorne Heath and the WDC proposals south of Warwick/Whitnash and Leamington, it is appropriate that under the Duty to Co-operate (DtC) the overall phasing and apportionment of development is explored further.

(* NB. The reference to a sub-regional SHMA is a Strategic Housing Market Assessment of the Coventry Housing Market Area, which has

been commissioned by Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC and Warwick DC. It is believed this will report in late Autumn.)

- Deliverability - If the new settlement requires higher housing numbers or a shorter implementation timespan to ensure a sustainable outcome, WDC would welcome DtC discussions about how this site could contribute further to the key requirements of the Stratford/Warwick Districts housing and employment market area.

2.40 Coventry City Council, Nuneaton and Bedworth Borough Council and Rugby Borough Council make no specific comments about the new settlement proposal but each raise the issue of the overall requirement for housing development in the District possibly needing to be reviewed following publication of the sub-regional SHMA*. The City Council also suggests that the requirement for employment land may need to be reviewed dependent upon the JSHMA outcomes.

Response from residents

2.41 A total of 428 representations were received from individual residents. 91% of these representations raise objections to the proposal. The following paragraphs consider different aspects of the concerns raised.

2.42 Development Strategy – some respondents suggest there is no justification for the scale of development proposed or for the creation of a new settlement. Many feel that the strategy should provide for a wider dispersal of development across the District and suggest it is possible to accommodate more growth in smaller settlements. There is a body of opinion that suggests a new settlement could be provided more appropriately at Long Marston, where it would use brownfield sites and there is a potential connection to the rail network. An M40 related conurbation would inevitably encourage trips by private car. Others feel there should be more development at Stratford-upon-Avon to benefit its town centre and economy or that it might be shared around the Main Rural Centres as they already have the necessary facilities and infrastructure. Several respondents say that any sites identified for development should be ready to be implemented, which the new settlement proposal is said not to be.

2.43 Nature of the location – the site is identified as being isolated from services and its development would have occupational, educational and social implications. It is said to be on the fringe of South Warwickshire in a location that does not relate well to other parts of the area. Rather, it would attract new residents to the District and provide housing for adjacent districts rather than provide for the District's own residents and communities. The location next to the M40 will increase out-commuting and make it impossible to offset the carbon footprint of the settlement.

2.44 Traffic and transport – this is the most consistent source of concern. Many say that a major increase in cars using existing roads will cause congestion, hazards to pedestrians and have an adverse effect on residents. Various local roads are identified as carrying heavy traffic flows (the B4100, Fosse Way, Lighthorne Road, Old Gated Road and B4511 are all mentioned), speeds are dangerously high, and the roads are felt to be unable to take additional traffic. On wider forms of transport, the objections point out that there is no nearby access to the

railway network and that the location is too far away from other main towns for an express bus service to be successful. As regards walking and cycling, the impact on local footpaths will mean that the amenity of walkers will be seriously affected and the main towns are too far away to make cycling a realistic option.

- 2.45 Impact on existing communities – also a consistent cause of concern, with respondents saying that the proposal will destroy much of the character, identity and function of various local villages and impact on the quality of rural life in the vicinity.
- 2.46 Landscape and countryside – there is a widespread feeling that the new settlement will destroy an attractive, tranquil rural area, transforming a beautiful stretch of land for development perceived as being unnecessary. There would be a significant effect on woodland if local roads had to be widened. The visual impact would be considerable.
- 2.47 Employment – there is a belief that few residents of the new settlement will be employed locally. There should be no reliance on jobs at Jaguar Land Rover in case they leave the Gaydon site. Further, there is no evidence that many Jaguar Land Rover or Aston Martin employees will choose to live in the new settlement. A number of respondents feel that the proposed industrial area will not be taken up and additional jobs will not be created, with others saying that the creation of a business hub supporting the motor industry is fanciful and bears no relation to reality. Others say there is no need for further employment in the area or that a business park would give a foothold for Jaguar Land Rover to expand onto the other side of B4100.
- 2.48 Housing – it is felt that the new settlement will become an overspill development for Birmingham, Banbury and Leamington. There is no need or demand for housing in this location given its distance from large towns and related facilities. There are sufficient levels of existing empty housing stock that should be used. On affordable housing, it is suggested that it is wrong to locate so much social housing in one area because local people wish to live in the area where they grew up; that it is unclear what the mix of housing will be in terms of size and tenure; and that it is unclear how social housing will be offered to Stratford District residents.
- 2.49 Pollution – the principal comments are that noise and air pollution from the M40 will be detrimental to the health of future residents. It is also a concern that the construction process will bring long term detriment to existing local residents.
- 2.50 Flooding – there are concerns that the flooding problems already experienced (notably in Gaydon and Lighthorne) will be exacerbated.
- 2.51 Infrastructure and Services – there is concern that these are already inadequate and would be overloaded by the development. There could be negative impact if existing services in nearby villages were forced to close. Insufficient detail is available to know what is to be provided. There are concerns about emergency, medical and public transport services.
- 2.52 Ecology and Biodiversity – there is substantial concern about the impact on local wildlife and habitats. There is no evidence that appropriate studies to assess this have been carried out. There is some specific

concern about impacts on areas of ancient woodland at Gaydon Coppice and Chesterton Wood.

- 2.53 Heritage – there is concern that villages with unique historic identities will change irrevocably, with the most often expressed concerns relating to Lighthorne.
- 2.54 Costs – some comment that the actual cost of necessary road improvements will be higher than anticipated and could exceed that associated with the provision of a bypass at Stratford-upon-Avon.
- 2.55 Implementation and Management – concern that new facilities will be required from the commencement of construction but there is no information about when they would be provided. It is unclear as to how the development, including country park, will be managed and by whom. There should be no commitment to the development before a more detailed masterplan has been prepared.
- 2.56 There were many comments about the identified requirements to be delivered by the new settlement. The majority of these raise matters that would be debated in the context of preparing a detailed masterplan should the principle of development be confirmed. However, in addition to the specific deliverables currently identified, reference has been made to the need for facilities such as a village hall, place of worship, burial ground and allotments. Some respondents also seek greater clarity over the potential provision of new facilities and services in Lighthorne Heath, for example improved youth provision, fibre optic broadband and mains gas supply.
- 2.57 9% of the responses from individual residents expressed support for the proposal. The representations referenced the proximity to the strategic road network and a large scale employment site, and welcomed the fact that the scale of development proposed is sufficient to secure the necessary supporting infrastructure. Some of the responses identified that, by establishing the new settlement, existing towns and villages could be expected to grow at a more sustainable rate.
- 2.58 FORSE on behalf of local residents raise a wide range of issues regarding the consultation process being flawed, the developer led strategy, non-compliance with national planning guidelines, implications for neighbouring authorities that have not been addressed through the duty to co-operate, adverse effects on biodiversity, impacts of a major increase in traffic, increased flood risk, noise and air pollution, impact on the carbon footprint, loss of local heritage and identity, the preference for a dispersal approach and availability of other sites that are readily available for development.

Response on behalf of landowners and house builders

- 2.59 There is one supporting response, stating that this is an appropriate location given the number of jobs and that the local roads have capacity.
- 2.60 General objections to the principle of development here, based on points about the *evidence*, are that:
- It is unclear from the evidence that the location for the new settlement has been robustly tested against the alternatives.

- The viability of the new settlement is uncertain given that it involves highway improvements, two local centres, three primary schools and a secondary school.
- Insufficient regard has been paid to the impact on local villages, and, more specifically, that the combination of the existing poor housing stock at Lighthorne Heath and the new settlement's 1,680 affordable homes will have a detrimental social impact. Conversely, dispersal of growth would provide affordable housing where it is required.
- Residents will be car dependent, which does not accord with the NPPF as this requires patterns of development that minimise the need to travel land maximise the use of public transport; the SA is fundamentally flawed in scoring ++ against the SA objective to *'Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel'*.
- Cumulative transport issues with WDC have not been resolved – this is a very significant cross border issue.
- Need to see information about phasing, costs, delivery of infrastructure, community & leisure facilities, public transport etc to demonstrate that the proposals are sustainable and viable. There will need to be huge investment in sustainable transport and community facilities and these have not yet been properly assessed or quantified.
- The location doesn't relate well to other parts of the district. Motorway access would attract new residents to the district and provide housing for adjacent districts rather than meet the requirements of future district residents.
- Related to this, the investment required to service the new community would be better spent closer to existing communities on sustaining and improving existing services and facilities. The proposals represent a lost opportunity to secure investment in higher level facilities and services in the district.
- The reasoning that proximity to jobs at JLR and AM makes the site appropriate is flawed as most jobs already exist.

2.61 Arguments over the process of selecting GLH are that:

- Growth of existing settlements (other than the Stratford Urban Extension) has not been tested in the SA or the PBA viability report;
- The analysis of 14 broad locations only looked at some of the strategic constraints likely to affect the delivery of sustainable development;
- the SA is flawed in its scoring;
- the process of selection relies too heavily on the promoters' evidence;
- local residents haven't been involved in any meaningful way;
- cross border issues have not been resolved; and
- it is uncertain if the Highways Agency has been engaged in the process (the DtC can't be retrospectively rectified but is about engaging partners in the process).

2.62 Jaguar Land Rover object to the scale of the new development on the grounds that it does not take account of their needs for expansion and the demand for growth of related industries in close proximity to JLR and Aston Martin. They also need reassurance that existing and proposed investments by the company are not put at risk by the lack of space for

future expansion. They recommend that, at very least, Neighbourhood 2 is given over to employment land to meet its future needs.

2.63 Some respondents do not object to the principle of the new settlement but they express concern that there are too many uncertainties over deliverability and viability to be confident that 1900 homes will be provided here within the plan period. They therefore argue that further allocations should be made elsewhere. The arguments to support this stance are:

- *Land ownership*: there is land not yet in the control of the developers at the heart of each of the two parcels required for the development of Neighbourhood 1.
- *Delivery*: should be post 2023 given the range of issues to be resolved.
- *Roads/highways*: Delivery Strategy implies the new settlement can be built without the need for infrastructure upgrades which have not already been programmed but that is not accurate. Approved improvements to J12 of the M40 – nothing in published documentation says these will be able to accommodate the additional traffic movements – could cause delays in completion of houses. Various other highways alterations are needed, some of which require third party land yet there is no indication that this will be made available. Also no timetable is provided for these.
- *Foul water drainage*: there is no confirmation from Severn Trent that the necessary infrastructure can be provided within a time period sufficient to allow the completion of 1,900 dwellings by 2028.
- *Phasing of Neighbourhood 1 - Concerns are:*
 - Adoption of Local Plan and Development Brief/Masterplan by July 2014 (suggested unlikely to be adopted before end 2014);
 - Submission of outline planning application September 2014 (need time to prepare an EIA or agree an Environmental Statement which in turn will require an agreement about infrastructure works to be undertaken. Delay of at least 6 months expected);
 - Determination December 2014 – unrealistic;
 - Overall delay over 2 years and could be more, a shortfall of at least 300 dwellings.
- *Viability* – development requirements need to be viability tested.
- *Market factors* – the strength of the market will determine the speed of delivery and the large allocations to the south of Warwick District are likely to slow the rate of delivery here.

2.64 Because of the uncertainties around delivery of the new settlement, if it is to be included it should be phased towards the later stages of the plan and further development be allocated elsewhere to ensure housing numbers are met.

3 Response to the representations received

Identifying the Canal Quarter Regeneration Zone as a site for mixed-use development including approximately 700 homes

- 3.1 The proposal is generally supported in principle. The key issues apparent from the responses concern the viability and deliverability of the development, and thus the soundness of including it in the Core Strategy. The site is phased to come forward in the period beyond 2018, reflecting the lead-in time during which existing occupiers will relocate and site preparations work will be undertaken. As such, whilst there is certainly more work to be done on the issue of delivery, this is work that arguably might be taken forward in the context of preparing the proposed Masterplan Supplementary Planning Document (MSPD). Conversely, it is arguable that more work on the overall viability of the project must be done up-front. For example, there is limited feedback from employers/landowners currently based in the zone, and whilst what exists is largely positive it would be beneficial to have a fuller picture. It should be remembered that the proposal is for a mixed-use redevelopment, so provision can be made for those employers whose businesses rely on a more central location than would be provided by the proposed edge-of-town employment sites. On the specific point concerning sustainability appraisal, it is confirmed that the most recent iterations of the overall SA have covered the proposals for the SRZ, but other parties need time to consider this work. As is confirmed in the representations from the County Council, the traffic related impacts of the proposal are subject to further detailed analysis. Whilst the Strategic Transport Assessment work carried out to date provides confidence that the impacts can be appropriately mitigated, the outputs from the more detailed work will provide greater certainty about the scope and likely cost of the work involved. On balance, it is evident that by completing some limited additional work on this proposal prior to confirming its inclusion within the Strategy the Council can significantly reduce the risk of the proposal being successfully challenged through independent examination. At this stage the policy should be revised to make it more apparent that the detailed delivery strategy will form part of the MSPD. The additional work on the MSPD should be commissioned without delay and a separate report about this will be presented in the near future.
- 3.2 The responses are considered to justify a number of specific updates to the Stratford-upon-Avon Area Strategy to bring forward the proposed regeneration project. These should reflect the aspiration to include a multi-purpose community facility within the site and identify that the canal corridor enhancements will be expected to provide ecological and recreational as well as environmental benefits. They should also clarify the status of the proposed MSPD as a document that will not only establish a comprehensive approach to the regeneration of the area but also define design codes and a delivery strategy.
- 3.3 Following the outcome of the consultation exercise a number of proposed changes to this proposal are set out in **Appendix 1** to this report.
- Identifying 14 hectares of land to the south of Alcester Road, Stratford-upon-Avon as a site for new employment land**
- 3.4 This proposal is also generally supported at least in principle. Site specific issues raised include landscape and ecological sensitivity. The site has been identified having regard to the evidence base, but the detailed requirements should make clear the need to take account of the local wildlife sites in the vicinity.

- 3.5 There is felt to be some merit in rationalising the proposed boundaries of the site by including further land to the south of that put forward for consultation. This would necessitate a phasing provision to ensure that employment land is not over-provided during the plan period, but it would establish a realistic longer term boundary and thus facilitate the early establishment of structural landscaping. It would also help to achieve a more practical layout and provide ample scope to ensure that any land needed for potential A46 highway improvements can be safeguarded. It is also accepted that the range of uses permitted can be extended to provide for light industrial development should that be proposed.
- 3.6 It is understood that in planning terms land cannot be reserved for a specific group of businesses. However, there is a clear relationship between the proposals to release land in this location and those for the SRZ. The Council's Employment Land Study confirms that no more than 10 hectares of additional employment land is required, whereas the two employment site proposals will provide for a greater amount of land than this - specifically to cater for firms wishing to relocate. It is proposed that Proposal SUA.2 be revised to provide for up to 10 hectares net additional land to come forward on this site during the plan period. If employers do relocate from the SRZ, the area of land they occupy will be in addition to the 10 hectares otherwise permitted.
- 3.7 Following the outcome of the consultation exercise a number of proposed changes to this proposal are set out in **Appendix 1** to this report.

Identifying 15 hectares of land to the east of Birmingham Road, Stratford-upon-Avon as a site for new employment land

- 3.8 This proposal is clearly more controversial, principally because of the Green Belt status of the land. The representations challenge the Council's evidence base and suggest that there are no exceptional circumstances that might justify the release of Green Belt land. It is confirmed that this proposal has been identified and analysed in the latest iterations of the Sustainability Assessment. Alternative sites have been considered and are felt to be less appropriate. There is no evidence that either of the alternative sites suggested in the responses are available. It is not considered that an overall strategic review of the Green Belt is necessary. Were it to be so, then it should appropriately have been triggered at an earlier stage in the Core Strategy process by the inclusion of employment land proposals at Alcester and adjacent to Redditch. These rely on the release of similarly sized areas of Green Belt land. It remains the case that the cumulative impact of the three proposals is not considered so significant in terms of the extent of the Green Belt in Stratford-on-Avon District that an overall review is required. However, it is apparent that the Strategy would be strengthened by the inclusion of a clearer justification for the release of this and the other sites in the Green Belt, having regard to the five purposes of the Green Belt set out in the NPPF.
- 3.9 The exceptional circumstances that are felt to justify the proposal reflect a combination of various factors including the critical importance of unlocking land within the SRZ and thus to bring forward new housing and environmental improvements; the presence of existing commercial uses on and adjacent to the site; the proximity of the site to the strategic

highway network, the Stratford Parkway Station and established bus services; and the relatively constrained nature of the site within the wider landscape. Given that general employment land needs during the plan period can be met by the Alcester Road site, and that the release of this land is justified only on the basis that it will provide a second site on which to accommodate businesses wishing to relocate from within the SRZ, it follows that the acceptable uses on the site should be restricted to that purpose. The proposal should be revised to reflect this and to make reference to the protection of any features of ecological significance and the provision of pedestrian and cycle facilities as an element of any highway works at the Bishopton roundabout.

- 3.10 Following the outcome of the consultation exercise a number of proposed changes to this proposal are set out in **Appendix 1** to this report.

Identifying land at Gaydon/Lighthorne Heath as a location for a new settlement providing 4,800 homes (1900 by 2028) and including employment, community, retail and open space uses

- 3.11 The concerns expressed about this proposal are extensive and wide ranging. Many of the representations relate to detailed aspects of the indicative masterplan prepared by the scheme promoters and are relevant to the specification of what is to be delivered rather than to the principle of a new settlement being developed in this location. These issues do not impact on the Council's policy approach or soundness of the evidence base but are matters that will be taken into account if the proposal is subject to a planning application.
- 3.12 There are a number of concerns relating to the process via which the preferred option was identified. None of these are considered to have challenged the underlying soundness of the evidence base.
- 3.13 However it is of significance that two proposals have been received that were not originally identified via the call for sites. One is in an entirely new location at Stoneythorpe, to the west of Southam, where a new settlement accommodating some 1200 dwellings is promoted. The second is a significant development of an earlier expression of interest submitted by Cemex for a development now referred to as Southam North. This would be located between Southam and Long Itchington, partly on brownfield land, and it is estimated that 2350 dwellings could be accommodated. These two proposals are currently being evaluated and will need to be discussed with Warwick DC in particular under the Duty to Co-operate. Before the Council's preferred policy approach can be confirmed it is essential that these sites are assessed to ascertain whether either (or both) of these options represent a more sustainable option for the District's spatial strategy.
- 3.14 The Council has not ignored the requirement set out within the Strategic Environmental Assessment Regulations to produce an Environmental Report to accompany the Core Strategy. In accordance with best practice this report sits within the Sustainability Appraisal (SA). However, because work on the latest iteration of the SA has been ongoing during the consultation period, it has not yet been presented to the Council, accepted into the Evidence Base and made public. The updated SA report will be presented as soon as possible, although further work on alternative sites has been necessitated by the consultation

process itself. This work has to be completed before the Council can confirm its Submission Draft of the Core Strategy.

- 3.15 In bringing forward the proposal for a new settlement the Council has taken care to discharge its Duty to Co-operate and, as is evidenced by the consultation replies, this has included full discussions with Warwick and Cherwell District Councils and the respective County Councils.
- 3.16 Issues around traffic and transportation are emphasised in the consultation responses. The two local highway authorities (Oxfordshire and Warwickshire County Councils) are both supportive and consider that the strategic highway impacts can be successfully accommodated as a result of interventions on the existing network. Both have stressed the importance of securing high quality express bus service links to Leamington Spa and Banbury, including their respective railway stations, to provide a realistic alternative to journeys by car. WCC advises that the highways information is robust but needs refinement and more detail in preparation for independent examination. The location has been criticised by many as being car dependent, but this is likely to be a characteristic of any new settlement proposal in a largely rural area.
- 3.17 It is clearly the case that more detailed work is required on traffic impacts, and it appears that most critically this work should report on two aspects:-
- The anticipated impacts on the rural highway network in the vicinity of the site, including the potential impacts on a number of local villages. This work has been commissioned as part of the next phase of assessment, is underway and is programmed to report by the end of 2013.
 - The anticipated impacts on air quality and the historic environment in Warwick and Leamington Spa. This work has been jointly commissioned in line with the Duty to Co-operate and is programmed to report by Spring 2014.
- 3.18 There are further aspects of the proposal where the evidence base needs to be developed to provide greater clarity around the detail of what is to be delivered. However, having regard to the consultation responses, there is good reason to believe that nothing will emerge that would threaten the principle of development in this location. Issues relating to ecology and biodiversity, noise and air quality and flooding/drainage are all matters that will influence the nature and extent of development but do not constrain it in principle. It is immediately evident from the consultation that the former Lighthorne Quarry should be identified as a managed nature reserve rather than an ecological reserve/country park and the proposal should be revised accordingly.
- 3.19 Paragraph 2.62 above records the concerns expressed by Jaguar Land Rover (JLR). Policy AS.11 of the Core Strategy carries forward the commitments set out in the 2006 Local Plan concerning the consolidation and expansion of appropriate uses within the Gaydon site. It is now apparent that JLR has ambitions to further develop the Gaydon site that from their perspective would best involve the use of part of the land currently proposed as lying within the new settlement. Information made available to the Council but not yet formally confirmed by the two parties suggests that JLR and the scheme promoters are seeking to reach

an agreement that would see an area towards the southern end of the proposed new settlement being identified to provide capacity for JLR's expansion plans. The implications for the new settlement proposal are significant in two respects. Firstly, the provision of general employment land associated with the new settlement would be displaced to land on the south side of the B4451 and not previously included in the proposed new settlement area. Secondly, the overall capacity of the new settlement would be reduced to around 4000 homes, although still with 1900 homes being provided during the plan period. These anticipated changes are built into the revised proposal for the new settlement. Although it was hoped that an agreement might have been reached by the time the Council met, this is unlikely to be the case. It is considered that the resolution of these discussions to the mutual satisfaction of all parties is critical to the future interests of the District. The issue is one of strategic significance and its resolution is likely to go to the core of the overall soundness of the Strategy. In the absence of an agreement the Council would be unwise to seek to progress its proposals to the stage of independent examination.

- 3.20 The more detailed consultation feedback suggests that the status of the proposed masterplan as a Supplementary Planning Document (SPD) needs to be confirmed. The Council should make a clear commitment to develop this SPD on the basis of full engagement with the local communities and other key partners. At this stage it should also strengthen the requirements to be defined more clearly via the masterplanning process. It should also build into the proposal a requirement to deliver on-site medical facilities, ecological networks both within and adjacent to the development and environmental improvements within the existing village at Lighthorne Heath.
- 3.21 Following the outcome of the consultation exercise a number of potential changes to this proposal are set out in **Appendix 2** to this report for information at this stage.

4. Options Available to The Cabinet

- 4.1 In light of the comments submitted and the foregoing assessment, the following options should be considered:
- (1) In relation to Stratford-upon-Avon:
- a. To include the Canal Quarter Regeneration Zone and both associated employment sites in the Core Strategy.
 - b. To include the Canal Quarter Regeneration Zone and only one of the employment sites in the Core Strategy; this to be the site south of Alcester Road as it is not in the Green Belt.
 - c. To undertake further work on the soundness of the Canal Quarter Regeneration Zone and associated employment sites proposals in light of the response to the consultation.
 - d. To remove all three sites from the Core Strategy and identify alternative means of meeting a comparable scale of development.
- (2) In relation to the new settlement at Gaydon/Lighthorne Heath:
- a. To include the new settlement proposal in the Core Strategy as consulted upon.

- b. To include the new settlement proposal in the Core Strategy but in a revised format that incorporates the provision of land for Jaguar Land Rover, with a consequent reduction in the overall housing capacity and the relocation of the site for more general employment purposes to land south of the B4511.
 - c. To undertake further work on the soundness of the new settlement proposal in light of the response to the consultation and the issues raised in paragraphs 3.13, 3.14 and 3.19.
 - d. To remove the new settlement proposal from the Core Strategy and identify alternative means of meeting a comparable scale of development.
- 4.2 In options a, b and d members should consider whether the preferred option can be confirmed now or whether further evidence is required prior to such confirmation.

5. Implications of the Proposal

5.1 *Legal/Human Rights Implications*

- 5.1.1 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.
- 5.1.2 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).
- 5.1.3 The Sustainability Appraisal (SA) for the Council's Core Strategy has been carried out using the best practice approach of integrating the requirements of the Strategic Environmental Assessment Directive 2001/42/EC (the 'SEA Directive') into the SA process. The SEA requirements are incorporated throughout the process and an environmental report will be included in the final SA that will accompany the Core Strategy Submission Document. A more detailed Environmental Impact Assessment for major schemes such as those consulted on here would be carried at a planning application stage as appropriate.

5.2 *Financial*

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

5.3 *Environmental*

- 5.3.1 The preparation of this spatial strategy for the District has taken full account of potential environmental impacts. The emerging Core Strategy policies have been subject to an independent Sustainability Appraisal in accordance with the legal requirements governing the preparation of the Strategy.

5.4 *Corporate Strategy*

- 5.4.1 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.

5.5 ***Analysis of the effects on Equality***

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

6. **Risk Assessment**

- 6.1 As with the Core Strategy as a whole it is imperative that the development proposals recently consulted upon are founded on robust evidence and analysis. The information and assessment undertaken to date suggests that the principle of including both the Canal Quarter Regeneration Zone (with associated employment sites) and the new settlement at Gaydon/Lighthorne Heath within the emerging Core Strategy is appropriate and reasonable. However, each of them requires more detailed assessment in order to strengthen the District Council's position when the Core Strategy is examined. The availability of this more detailed assessment prior to formal consultation on the Proposed Submission Document would reduce the risk of substantial objection relating to some of the more detailed concerns that have arisen during the recent consultation process.
- 6.2 There is considered to be considerable risk in taking forward the revised proposals for the new settlement if those proposals do not reflect the mutual aspirations of the scheme promoters and JLR. There would be similar risk if the proposals were to require such significant revision that their overall sustainability is brought into question and/or if it became apparent that a similar form of development might more appropriately be brought forward on an alternative site elsewhere in the District.
- 6.3 The need for additional work to clarify the issues outlined in paragraphs 3.13, 3.14 and 3.19 create the potential for a delay in the Council's programme for delivering the Local Development Scheme. Although every effort will be made to maintain the existing programme the Council will have to ensure that its Core Strategy addresses a minimum of a fifteen year period, there is a high risk that the Council will have to extend its Core Strategy/Local Plan period from 2028 to 2030.

7. **Conclusion**

- 7.1 This consultation, focusing on two specific large-scale development proposals, has provided a valuable input to the assessment of their suitability and deliverability. Further technical assessment is being undertaken into their impacts and effective mitigation measures, infrastructure requirements and implementation.
- 7.2 Having regard to the comments received, as reflected in this report, it is concluded that the Council is in a position to conclude that the proposals for the Stratford Regeneration Zone can be confirmed, subject to the changes identified in Appendix 1 to the report.
- 7.3 However it is apparent that the Council is not in a similar position in relation to the proposed new settlement at Gaydon/ Lighthorne Heath. This could only be the case if firstly a positive outcome as regards meeting the reasonable development aspirations of JLR and maintaining the viability of the proposed settlement is achieved. Secondly the further sustainability assessment of the two new potential development proposals has to confirm that the new settlement proposal at Gaydon/

Lighthorne Heath is still the most sustainable option for the District. If this is the case Appendix 2 outlines the potential changes that should be incorporated to reflect the comments received.

- 7.4 Further more detailed analysis should be undertaken prior to the publication of the Proposed Submission Document to ensure that concerns around deliverability and impact are fully addressed and to consolidate/explain the work done on the assessment of reasonable alternatives via the Sustainability Appraisal process. This work is likely to take around 8-10 weeks to complete.

Paul Lankester
CHIEF EXECUTIVE

Background papers:

Representations submitted on the Intended Proposed Submission Core Strategy during the consultation period

APPENDIX 1

Recommended changes to section on development proposals in Stratford-upon-Avon Area Strategy

Development Proposals

To contribute to meeting the future needs of the District, the following sites are allocated for development. The extent of each site is defined on the Policies Map.

Proposal SUA.1: Stratford Regeneration Zone

Where it is to be delivered	Canal Quarter, incorporating land at Western Road, Wharf Road, Timothy's Bridge Road and Masons Road Approx. 20 hectares (gross)
What is to be delivered	<ul style="list-style-type: none">• Housing – approx. 700 dwellings• Class B1(a/b) employment uses on a minimum of 3 hectares• Linear park alongside canal• <u>Multi-purpose community facility</u>
When it is to be delivered	Phase 3 (2018/19 – 2022/23) and Phase 4 (2023/24 – 2027/28)
How it is to be delivered	Private sector, Canal & River Trust
Specific requirements	Production of a Masterplan <u>Supplementary Planning Document</u> to establish a comprehensive approach to the whole area, to include, inter alia:

	<ul style="list-style-type: none"> • environmental, <u>ecological and recreational</u> enhancement of the canal corridor • pedestrian and cycle links through the area and with adjacent parts of the town • traffic management measures • improve links to Stratford railway station • ensure implementation of the Steam Railway Centre is not prejudiced <p><u>The Masterplan will also incorporate Design Codes and a Delivery Strategy, in conjunction with Proposal SUA.2 and Proposal SUA.3.</u></p>
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Proposal SUA.2: South of Alcester Road

Where it is to be delivered	<p>South of Alcester Road, west of Wildmoor roundabout</p> <p>Approx 14 <u>20</u> hectares (gross)</p>
What is to be delivered	<p>Employment uses comprising:</p> <ul style="list-style-type: none"> (i) Class B1(a) office and Class B1(b) research and development uses, <u>although scope for B1(c) light industry will be considered</u> (ii) Relocation of businesses from the Canal Quarter Regeneration Zone on approx. 8 hectares <p><u>During the plan period up to 10 hectares will be released, plus additional land to correspond with the area taken up by businesses relocating from the Regeneration Zone.</u></p>
When it is to be delivered	<p>Phase 3 (2018/19 – 2022/23) and Phase 4 (2023/24 – 2027/28)</p>

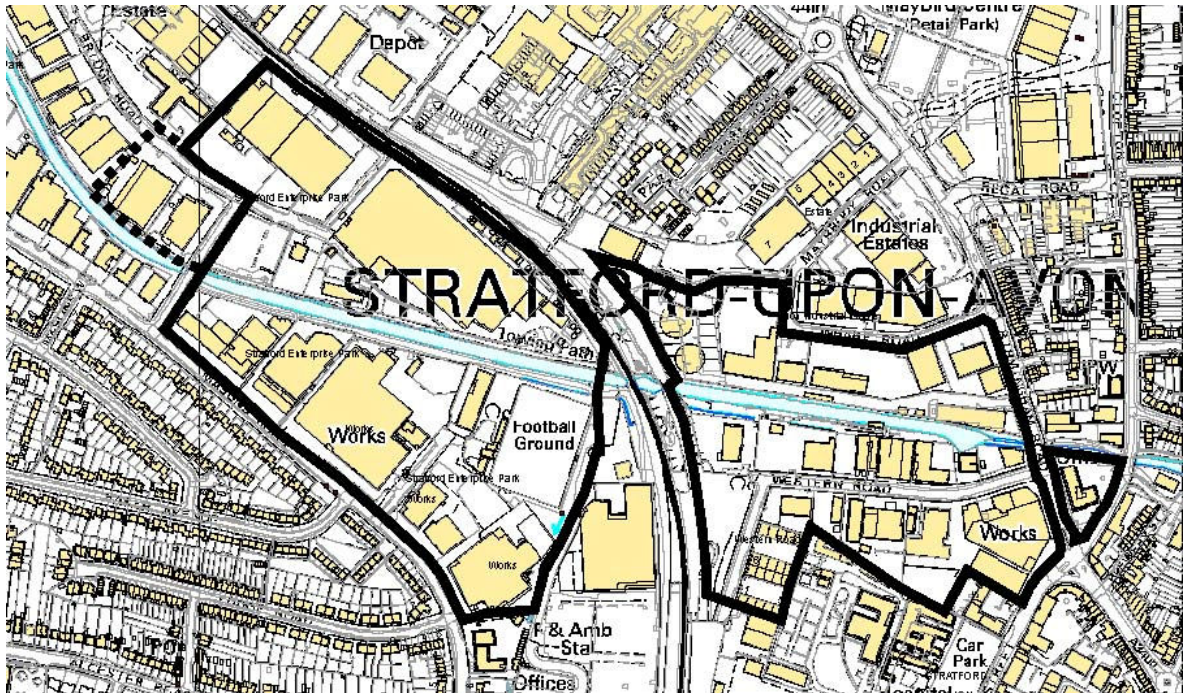
How it is to be delivered	Private sector
Specific requirements	<ul style="list-style-type: none"> • vehicle access directly off Wildmoor Roundabout or proposed Western Relief Road • improvements to Wildmoor Roundabout as required by Highways Agency • <u>provision for improvements to A46 adjacent to the site</u> • extensive landscaping within the site and on southern and western boundaries • appropriate treatment and management of mature hedgerows along road frontages • <u>protect and enhance ecological features</u> • frequent bus service into the development

Proposal SUA.3: East of Birmingham Road

Where it is to be delivered	<p>East of Birmingham Road, north of A46, Bishopton</p> <p>Approx. 15 hectares (gross)</p>
What is to be delivered	<p>Employment <u>and commercial</u> uses comprising: relocation of businesses <u>relocating</u> from the Canal Quarter Regeneration Zone on approx. 7 hectares</p> <p>(i) Class B1(a) office and Class B1(b) research and development uses</p>
When it is to be delivered	Phase 3 (2018/19 – 2022/23) and Phase 4 (2023/24 – 2027/28)
How it is to be delivered	Private sector

Specific requirements	<ul style="list-style-type: none">• vehicle access off Birmingham Road only• improvements to Bishopton Roundabout as required by Highways Agency, <u>incorporating pedestrian and cycle facilities</u>• extensive landscaping within the site and along northern and eastern boundaries• appropriate treatment and management of the mature hedgerows along the road frontages• <u>protect and enhance ecological features</u>• redevelopment of buildings known as Langley Farm• frequent bus service into the development
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Recommended change to boundary



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

Proposed Site Allocation

Proposal SUA.1

Stratford-upon-Avon Regeneration Zone



Additional Area



Not to scale

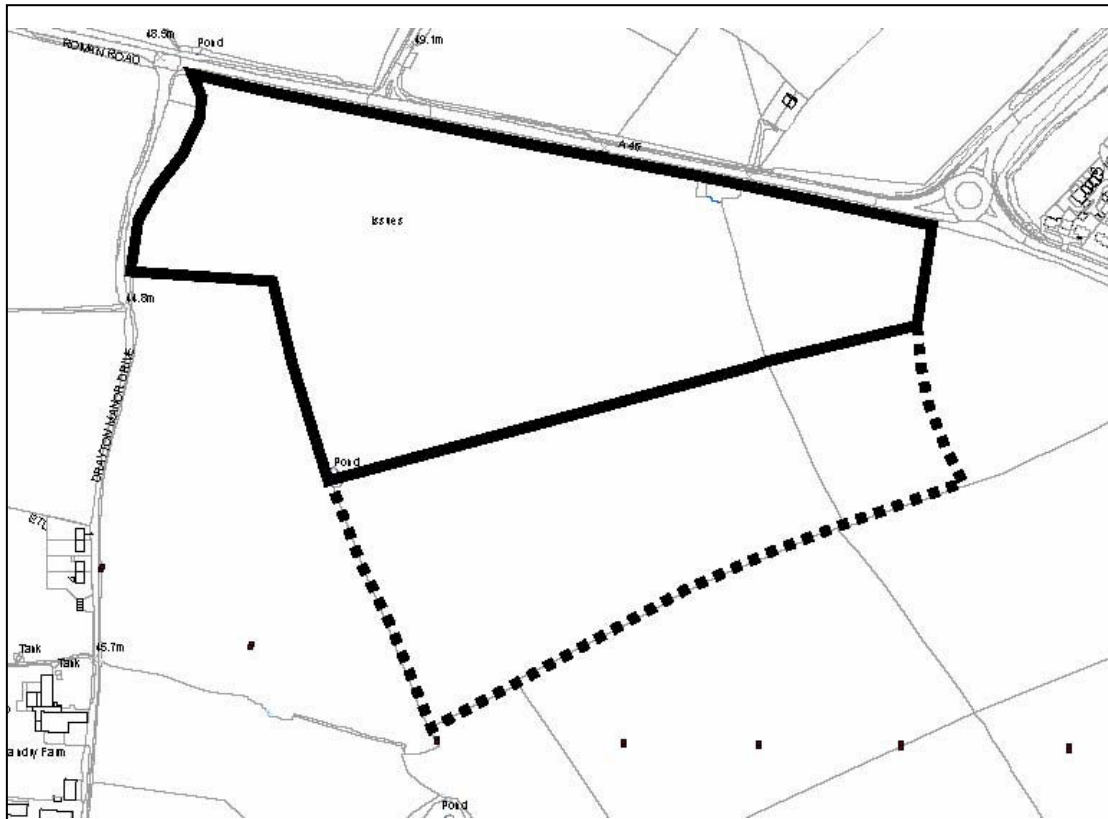


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Recommended change to boundary



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

Proposed Site Allocation


Proposal SUA.2

South of Alcester Road, Stratford-upon-Avon



Additional Area



Not to scale 

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APPENDIX 2

Potential changes to section on New Settlement proposal at Gaydon/Lighthorne Heath

NB. This is provided for illustrative purposes should this proposal prove to be the most sustainable option.

Context

The site is located near to the villages of Gaydon and Lighthorne Heath, largely bounded by the M40 to the east; the B4451 to the south; the B4100 to the west and Chesterton Wood to the north. It also includes areas of land between the B4100 and Chesterton Road, Lighthorne and between the B4451 and Pimple Lane, Gaydon.

The proposal covers approximately ~~290~~ 320 hectares. It comprises a new settlement of about ~~4,800~~ 4,000 dwellings (with 1,900 dwellings to be built by 2028) and associated services, facilities and necessary off-site infrastructure, together with 18 hectares (gross) of employment land. It also makes provision for Jaguar Land Rover to expand its operations.

This strategic location is situated about 12 kilometres south of Warwick and Leamington Spa and 15 kilometres north of Banbury, adjacent to Junction 12 on the M40. The site consists mainly of gently sloping, arable farmland with well-defined hedgerows, woodland blocks and scattered trees, and isolated farm buildings. Within the site lies Gaydon Coppice, a designated Ancient Woodland.

The adjacent villages of Gaydon and Lighthorne Heath together currently comprise some 500 dwellings. Lighthorne Heath was originally constructed to house military personnel during the 1950s. The historic village of Gaydon was originally focused around the village church. Subsequent 20th century development has infilled many of its open spaces and extended its physical form up to the junction of the Banbury Road and Southam Road.

Directly adjacent to the proposed location is the Gaydon Site, one of the principal engineering centres of Jaguar Land Rover and the location of the headquarters of Land Rover. Over the past thirty years or so a design and research centre and extensive test track facilities have become established, now used for the development of Jaguar and Land Rover vehicles, along with those of Aston Martin.

Justification

The Strategy set out in Section 6 for distributing housing development across the District is based on the need to protect Stratford-upon-Avon, the main rural centres and local service villages from excessive development that would be harmful to their respective character and function. Therefore, in order to meet the overall housing requirement for the District, a new settlement provides an appropriate and effective means of meeting those needs during the current plan period and, for the longer term, creates a new growth point in the area.

Such an approach is acknowledged in the National Planning Policy Framework, which states that 'the supply of new homes can sometimes be best achieved

through planning for larger scale developments, such as new settlements...that follow the principles of Garden Cities.'

In addition, there is a need to provide employment land which is in the right location and of the necessary quality to attract and support higher value economic growth. The location has these attributes and, specifically, will complement and have a synergy with the established research, design, testing and development of motor vehicles on the Gaydon Site, which is a key sector of the Coventry & Warwickshire sub-regional economy.

Jaguar Land Rover has over 5,000 staff at its Gaydon Site and has ambitions to grow significantly. The company requires appropriately located land to support its planned growth and future needs and has to have confidence in its ability to expand and broaden operations as part of a long term plan.

Delivery

The development of a new settlement at Gaydon/Lighthorne Heath will take many years to complete and a large proportion of its construction will take place beyond the current plan period. A comprehensive master-planning approach will be required that sets out a framework to guide development from the overall vision through to setting the implementation and infrastructure requirements for the development of the settlement in more detail.

~~A number of detailed plans will be needed, ranging from a Masterplan to detailed design codes. The Masterplan will accompany an outline planning application~~ A Masterplan, having the status of a Supplementary Planning Document, will be produced by the District Council concurrently with the Core Strategy process. It will be prepared in conjunction with the promoters of the development, key agencies and representatives of local communities. It will establish the general disposition and phasing of development, roads, services, open space and landscaping. It will also guide the delivery of the development and the provision of infrastructure.

Design principles will be established in the Masterplan, and design codes produced to be applied to subsequent detailed planning applications for individual neighbourhoods, the main centre, the employment areas and strategic recreation / open space, in order to create a clear and cohesive identity to these areas.

A significant issue that needs to be addressed in more detail relates to the impact of traffic, particularly on the M40 and on the road network into Warwick/Leamington. Cumulative impact testing of the new settlement alongside significant additional development to the south of Warwick and Leamington, as now proposed under the emerging Warwick District Local Plan, suggests that it will have an adverse impact on the road network within Warwick and Leamington. Joint work with Warwickshire County Highway Authority and Warwick District Council is ongoing to identify effective mitigation measures. Oxfordshire County Council and Cherwell District Council are also involved in assessing the impact on Banbury.

However, the analysis available to date presents a worst case scenario as regards the Warwick/Leamington impacts. Further stages of testing will assess the likelihood of trips between the proposed housing in Warwick District and the existing and proposed employment areas at Lighthorne Heath/Gaydon, as this potentially reduces the trips currently being assigned to the

Warwick/Leamington network. In addition, the possibility of a park & ride facility being provided to the south of Warwick/Leamington could be enhanced by the new settlement proposals. As such, the potential for greater levels of mode shift from car based trips should also be investigated.

Specific analysis is also required to establish the transport impacts of the new settlement on local communities, particularly Gaydon, Lighthorne, Kineton and Bishops Itchington. At this stage the increase in traffic movements is predicted to be relatively small in comparison with those affecting the M40 and into Warwick/Leamington.

The new settlement will be a sustainable and vibrant new community that is inclusive and diverse with its own distinctive local identity, founded on best practice urban design principles. These will draw on the characteristics of Warwickshire market towns and be based on high quality traditions as well as innovation.

It is important that the overall vision is clearly established to help develop the settlement's own identity and to guide the policy framework in the Masterplan. Before the District Council grants any planning permissions for the new settlement at Gaydon/Lighthorne Heath, it will need to ensure that the development will be delivered consistent with the principles set down.

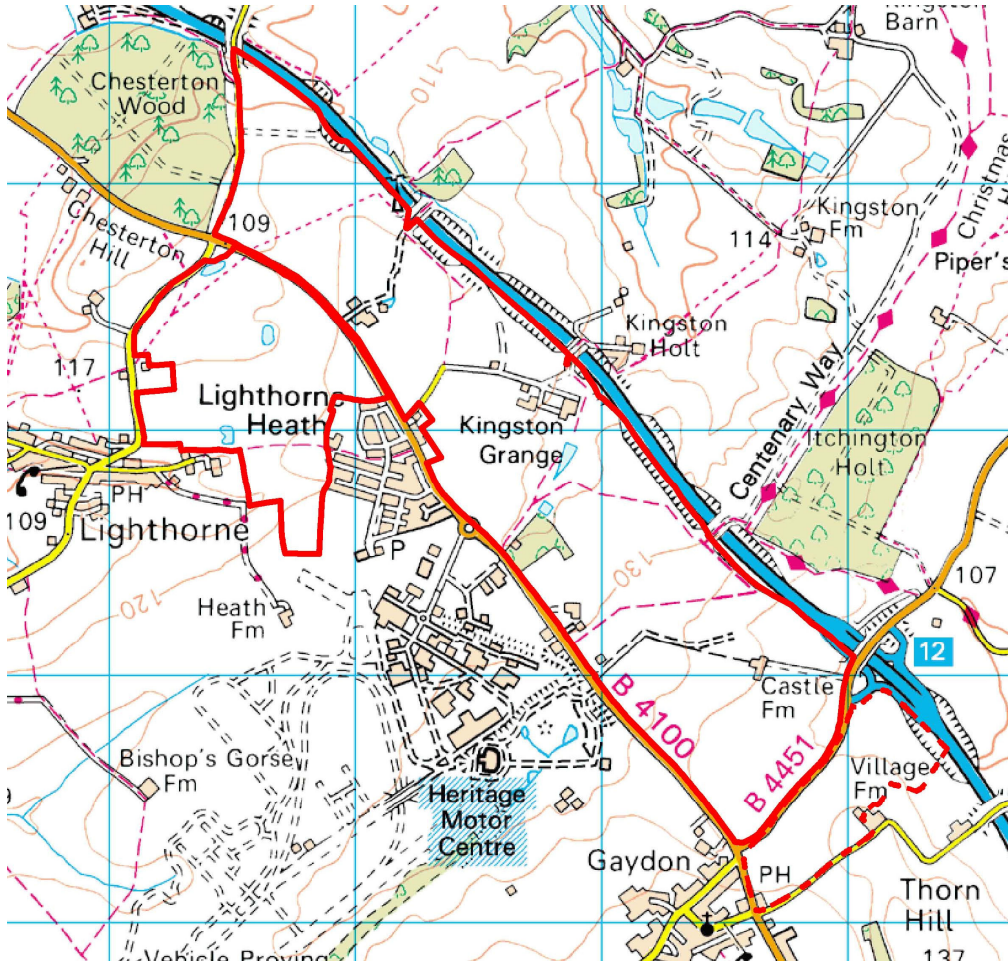
Development Proposal

To contribute to meeting the future needs of the District, the following site is allocated for development. The extent of the site is defined on the Policies Map.

Proposal GLH: New Settlement at Gaydon/Lighthorne Heath	
Where it is to be Delivered	Land <u>largely</u> bounded by M40, B4451 and B4100 and to north and east of Lighthorne Heath Approx. 290 <u>315</u> hectares (gross)
What is to be Delivered	<ul style="list-style-type: none"> • Housing – approx 4,800 <u>4,000</u> homes (1,900 homes by 2028) • Business Park – 18 hectares gross (<u>approx. 8 hectares by 2028</u>) • <u>Land and premises for Jaguar Land Rover</u> • Main centre comprising a wide range of shops and services (approx 6,000 square metres with no individual unit being larger than 1,000 square metres (gross)) • Two local <u>neighbourhood</u> centres • Community, <u>medical</u> & leisure facilities • Three primary schools • Learning Academy (Secondary school)

	<ul style="list-style-type: none"> • <u>Provision for primary and secondary schooling</u> • <u>Parks, open spaces and community woodland</u> • <u>Infrastructure improvements and upgrading</u> • <u>Structural landscaping, including alongside M40</u> • <u>Environmental improvements to Lighthorne Heath</u> • <u>Managed ecological nature reserve at Lighthorne Quarry</u> • <u>Ecological networks within and adjacent to the development</u> • <u>Highway improvements in the vicinity of the site and to the wider network</u> • <u>Walking and cycling links within the site and into the surrounding countryside</u> • <u>Frequent, express bus services to Warwick/Leamington and Banbury, including railway stations</u>
When it is to be Delivered	Phases 2 – 4 (2013/14 – 2027/28) and post 2028
How it is to be Delivered	Private sector, public sector, infrastructure and service agencies, <u>specialist organisations, Jaguar Land Rover</u>
Specific Requirements	<p>Production of a Masterplan <u>Supplementary Planning Document</u> to determine the key principles of land uses, layout, design, phasing, infrastructure and mitigation, <u>including, inter alia:</u></p> <ul style="list-style-type: none"> • <u>mix, type and tenure of dwellings, including specialist accommodation</u> • <u>community services and facilities to be provided</u> • <u>relationship to/with existing communities</u> • <u>appropriate range of uses on the employment land</u> • <u>basis for assessing schemes promoted by Jaguar Land Rover</u> • <u>ecological protection, mitigation and enhancement</u> • <u>protection and integration of Ancient Woodlands within and adjacent to the site</u> • <u>treatment of B4100 adjacent/through the development</u> • <u>public access to open space within and beyond the development</u> • <u>use of on-site resources during construction</u> • <u>incorporation of alternative energy sources</u> • <u>measures for reducing reliance on private car</u> <p><u>The Masterplan will also incorporate Design Codes and a Delivery Strategy.</u></p>

Potential change to boundary



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

Proposed Site Allocation

Proposal GLH

New Settlement at Gaydon/Lighthorne Heath



Additional Area



Not to scale

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