

**Stratford-on-Avon District
Local Development Framework**

Draft Core Strategy 2012

CONSULTATION

February 2012 - March 2012

Consultation Responses Received

**Policy Team, Corporate Support
Stratford-on-Avon District Council**

The Cabinet 10 September 2012

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Draft Core Strategy 2012 - Summary of Representations

0.1 General Comments

1. I am writing to confirm that all previous comments and representations made on behalf of our clients should remain "on the table" and all our previous representations should please be borne in mind when preparing all future planning policy documents.

Godfrey-Peyton Chartered Surveyors

2. The principal safeguarding concern of the Ministry of Defence (MOD) relating to the Core Strategy is the need to constrain developments within the MOD statutory safeguarding explosive consultation zone surrounding DM Kineton.

Christopher Evans, Defence Infrastructure Organisation

3. The inner explosive safeguarding zone is known as Inhabited Building Distance (IBD) which is identified by the yellow line on the published MOD safeguarding plan. Within this zone, the MOD monitors the management and use of developments to maintain public safety and is likely to object to developments that support persons living, working or congregating for long periods of time. The outer safeguarding explosive zone is known as Vulnerable Building Distance (VBD) and is identified by the purple line on the MOD statutory safeguarding plan. The MOD is unlikely to be concerned by developments within this zone unless the proposal supports a high concentration of people such as hospitals, schools, nurseries and cinemas. All buildings occupying the VBD should be deemed 'non-vulnerable' that is of robust construction and design, so that should an explosion occur at DM Kineton, buildings will not collapse or sustain damage that would cause critical injury to the occupants. Buildings that contain large areas of glass, tall structures and of lightweight design are commonly classed as vulnerable. I can confirm that the MOD has no immediate concerns to the Draft Core Strategy however DIO Safeguarding should be consulted on developments (including a change of land use) that fall within the published safeguarding consultation zone surrounding DM Kineton.

Christopher Evans, Defence Infrastructure Organisation

4. During the first draft core proposal, the villagers of Wellesbourne gave their opinions on the various sites listed in that proposal. How much weight is now being given from the villagers comments made in 2010?

Robert Rose, Protect Wellesbourne Group

5. At the end of each section there is a list of "Key Drivers". The list contains three types of document. The first type of these documents are established statutes, laws, European Directives ie. documents which demand compliance in the strictest sense. The second type of documents relates past policy statements of SDC and the third type of documents relate to mostly draft documents produced in the past year or so for developing the framework which themselves are under discussion. It is therefore very difficult to distinguish what we are obliged to do and what we are consulting upon and developing. Furthermore, lack of adequate cross referencing and lack of a detailed reference list of documents being referred to made location of some key drivers impossible.

Graham Musson, Bearley Parish Council

6. There are comments made that would appear of substantial import that are not defined or mentioned elsewhere in the document. An example would be in section 1.1.3 *'It is expected that this will be dealt with by the District Council's Site Allocations Development Plan Document, scheduled for January 2013, or by the neighbourhood planning process, whichever comes the sooner'*. For a Parish Council (PC) the 'neighbourhood planning process' needs definition. The only other mention in the LDF is 8.4.10. A search of the SDC website has the phrase mentioned relating to the planning process which did not provide adequate detail for the PC.

Graham Musson, Bearley Parish Council

7. Our first concern was to ensure that the Core Strategy and the LSP Sustainable Communities Strategy (SCS) did not conflict in any way. We are able to confirm that there are no conflicts of note. The LSP will be reviewing the SCS in due course and will be mindful of the CS.

Alan C Bartlett, Local Strategic Partnership

8. The group was concerned that between now and when the final CS is approved developers will try to get large developments approved and there is evidence of moves in this direction.

Alan C Bartlett, Local Strategic Partnership

9. We welcome the opportunity afforded by the Government's localism policies for a more local approach to be taken to policy making and we acknowledge the considerable changes made since the previous draft of the Core Strategy. We support the direction of travel and the general thrust of these changes. However, we consider that the new legislative framework offers the opportunity for much bolder measures to protect the district's 'Jewel in the Crown', the town of Stratford-upon-Avon. We believe that the more local approach makes it incumbent on the Council to ensure that public consultation reaches all sections of the public, including groups such as young people who traditionally need encouragement to participate in such activities.

Martin Luscombe, Stratford Voice

10. The previous Local Plan and the LDF make much of Parish and Neighbourhood Plans of which Whitchurch cannot take part. Has the District tried to draw the extent of these parish and neighbourhood plans (existing and in progress) on a map of the parishes in the District? If this was done Whitchurch and many others would be shown as the area where the LDF policies are unvaried by parish plans etc. Most of these areas will be the most rural of the District.

Robert Howe, Whitchurch Parish Meeting

11. Which brings me to PPS7. I note that this is referenced to some policies in the LDF. The parish of Whitchurch is willing to work within the checks and balances of present guidance as in PPS7. However on 2nd April I should like to say from the chair that this has not changed but with the NPPF I understand that planning guidance is to be condensed. Will this involve a change in the LDF?

Robert Howe, Whitchurch Parish Meeting

12. I wanted to bring to your attention that around 20 residents attended last night (Probably less than 2% of the population) and although a majority of those there, including the representative of the Parish Council, seemed in favour of as much housing development as you could apportion, it is not necessarily representative of many other residents not in attendance. This of course is something that can be taken up with our Parish Council via the local survey, but I thought it necessary to balance up the opinion to you, in case you left with any misapprehension. The views of the few do not always represent those of the many.

Neil Hourigan

13. We would be opposed to Stratford district providing greenfield land for development by other local authorities, notably Redditch. While applauding and encouraging inter-council co-operation, we feel a line should be drawn at helping them solve their housing problems in such a way.

David and Beverlie White

14. Stratford finds itself at a crossroads. Hopefully, the first stage will be our common aim of stopping the 800-home development at Shottery. There are many good points in the draft core strategy document. They may outweigh the bad ones, but we hope that the points we have made here will help in the abandonment of the negative ones.

David and Beverlie White

15. We are at a key moment. Sustainability must mean an end to a policy of no building at all of housing in some rural areas. There are clear signs of economic blight

Will Hanrahan

16. Presumably at some stage there will be a more specific proposal regarding plans for a definite number of houses at particular sites. When can we expect to see these, how will they be circulated and how much 'consultation' might be offered.

Liz & Peter Freeman, Mark & Mandy Worrall

17. The village hall is an integral part of village life for many people. It is in need of major refurbishment. We need to seek outside grants to support this.

Ms Karen Parnell, Wixford Parish Council

18. Think that the use of areas alongside motorways and major trunk roads could be used for tree planting that could then be harvested. Would help to reduce noise levels, part of the overall scheme and provide renewable energy.

Tim Phillips

19. It was felt that the language was too nebulous, which could perhaps lead to misinterpretation and a false sense of security.

Sarah Summers, Stratford-upon-Avon Town Council

20. As we have similar aims and aspirations, the Warwickshire branch of the IWA and the ANT have combined with a joint reply, which is very appreciative of the hard work the planning department of Stratford-on-Avon District Council has done to prepare this draft and we are in general agreement with its proposed policies.

Graham Nicholson, Inland Waterways Association (Warwickshire Branch)

21. References throughout the document to Planning Policy Statements should be deleted and references to the newly published NPPF introduced.

Rose Freeman, Theatres Trust

22. The town council is appreciative of the way in which SDC has responded to previous criticisms of the 2008 and 2010 versions and has taken on board the particular planning and development needs of Shipston as perceived locally.

Mrs G Beaumont, Shipston-on-Stour Town Council

23. We would like to complain how very difficult it was to understand the 'Draft Core Strategy 2012' and even being computer literate, we were unable to figure out the information required for 'Section', 'Policy' and 'Consultation Question'. We have ended up having to call SDC twice to get information and understand what to do!

Rupert & Clare Welch

24. Weighting for Parish Plans - Too often Parish Plan's clear requirements have been overridden in planning decisions, where the District plan is seen by officers as pre-eminent. If anything this weighting should be reversed. Usually Parish Plans are the result of higher levels of public engagement (eg 20-25% of residents compared with 1-2% for District plans) and the specific matters are less generalised and specific to the community.

Nigel Rock

25. Language throughout is weak and vacillating. If we are to ensure a sustainable future, in view of climate change, rising energy costs, protecting heritage and landscape, protecting communities, we should not be building linguistic loopholes after loopholes in the Core Strategy.

Councillor Jenny Fradgley

26. The strategy appears to be making decisions on 2001 census statistics. Stratford-upon-Avon itself has changed quite dramatically in numbers of residents, homes and facilities so the future should be based on more up to date statistics than those produced in 2001.

Ian Fradgley

27. Weight limits should be set for Clopton Bridge and also the town centre, but allowing for delivery vehicles to deliver to town centre shops at specific times, deliveries should be made to the back door (off street) rather than front doors on the main shopping streets.

Ian Fradgley

28. There should be aspirations for Stratford to have a Bus Station, Town Museum (not necessarily a Shakespearian one which is something the RST may wish to do as part of the Courtyard conversion) and an Arts Centre.

Ian Fradgley

29. Considerable community work is being done to develop a neighbourhood plan which will reflect the desires and needs of Stratford residents. This should provide strong guidance in all areas of the core strategy.

Councillor Kate Rolfe, Stratford Liberal Democrat Group

30. There is concern around the evidence base from the 2001 census that is now considerably out of date.

Councillor Kate Rolfe, Stratford Liberal Democrat Group

31. We are concerned that there is no indication how general principles outlined will be implemented in practice.

Councillor Kate Rolfe, Stratford Liberal Democrat Group

32. I cannot see mention of the Arden Special Conservation (*Landscape?*) Area - is this to be maintained or dropped?

Graham Medley

33. I am strongly opposed to the portable signs being placed on the pavement outside numerous cafes, shops, Building Societies etc. If this obstruction/clutter is to be allowed by the Council, a charge should be made.

F Hodgson

34. Core Strategy is overall very sensible, within choices of overdevelopment and keeping the beauty spaces which attract visitors and residents or preserving the historic charm and interest of a unique town.

B Escott

35. Grants (bribes) from developers need to be refused. Any money-service is suspect. Closed door hearings need to be banned. We need full support of the local MP Zahawi.

S J Warrilow

36. As a disabled person I would like to see better pavements- most are very uneven. Moe shops that I could get into - a lot have steps.

B Lomas

37. Bancroft Gardens are a disgrace, all the money spent on it, someone made a few quid out of it. Not a sign of any colour. Suggest go and have a look at Jephson Gardens in Leamington, especially in the summer.

Mr & Mrs D J Chamberlain

38. Why has Waitrose been allowed to build outside Trinity Mead Road encroaching Green Belt? Where is bypass link from Boundary Lane to A46? 20 years must almost have gone. Any sign? Houses up there Nos. 12, 13, 14 sites on green belt land. I think not.

Sylvia Leighton

39. Where will all the extra cars (2-500) park whilst attending the new cinema? There just is not adequate space within short walking distance. This will be a 10am - 11pm problem.

W E & B O Cave

40. Our neighbouring councils are now requesting post codes before allowing people into their waste reception centres. This is not cross border co-operation.

Jeff Perks

41. The overall vision is fine but the objectives and policies are too vague for the vision to be realised.

Jeff Perks

42. No late trains for London for RSC plays! No late return trains from London for theatre or events in the capital.

Mary & D A R Morgan

43. Please can the station steps be reinstated from the Alcester Road to the station forecourt - last time the wooden steps disintegrated, they had to be replaced as this is a public right of way. Suggest the next steps should be concrete with metal railings.

Miss N Whittard

44. The NPPF was published on Tuesday 27 March 2012. This document has immediate effect and provides the most up to date policy framework against which local plans should be prepared. Significantly it replaces PPS12 along with 42 other policy documents, circulars and guidance notes. In order for a Local Plan to be sound it must be consistent with national policy. Specifically, 'the plan should enable the delivery of sustainable development in accordance with the policies in the Framework'. At the heart of the NPPF is a presumption in favour of sustainable development which is stated at paragraph 14. It states that the presumption '*should be seen as a golden thread running through both plan-making and decision-taking*'. (Also referred to bullet points for plan-making.)

Rego Southam Limited

45. Speed max 30 MPH in town and local.

P R Gilmore

46. Whilst the formulation of a Strategy for the District as a whole is to be welcomed, the importance of paying due regard to local opinion and preferences is an important aspect of emerging planning policy. It is essential for the development of coherent communities and for the best use of local resources, and must not be dismissed lightly or overlooked.

Brian W Lewis

47. The methodology employed in the SHLAA was it itself fundamentally flawed, in that sites were only considered 'viable' if a landowner had expressed an interest in or willingness to develop a site, but when the authority's 'call for sites' had not been universally acknowledged. Other sites were arbitrarily deemed to be unsuitable for reasons which would not be sustainable under closer scrutiny. The data collected on this basis remains unreliable and any assessment of suitable sites must involve extensive evaluation on behalf of the whole of the local community.

Brian W Lewis

48. I regret that the effectiveness of any consultation exercise must remain in doubt when a submission by Kineton Parish Council in response to previous consultation (September 2009) and relating to specific sites proposed for development, has apparently been disregarded in this latest draft.

Brian W Lewis

49. The NPPF, published on 27th March, emphasises the need to involve local people more in planning policy and decisions for their locality. I trust the DCS will be amended to allow for maximum participation by local communities in strategic planning for their neighbourhoods.

**K J Griffin-Gallagher, Mr M Hipkiss, L H Brice, E Lycett, G F Lycett, R N Butler
Mark Hind & Tonia D'Bras, Roger Pamment**

50. At 83 years old I have no interest in events other than battling with day to day living. Being partially disabled, that is enough to cope with.

Mrs J Moore

51. Great benefits to tourism and the enjoyment of the countryside will result from the increase in tourism and employment; and the opening of sustainable access to heritage sites whilst giving greater access to the river and the countryside.

John Macarthy-Filgate, The Stratford and Warwick Waterway Trust Ltd

52. We note that the Strategic Objectives are referred to by many of the policies but often reference is made to the wrong Objective, or indeed to Objectives which do not exist. the document should be checked for such inconsistencies and amended accordingly.

Aston Martin Lagonda Ltd

Jaguar Land Rover Ltd

53. It is noted the intended plan period is from 2008 which is not consistent with neighbouring authorities where plans have a base date of 2006. Stratford District needs to plan for the same period or this may have implications on housing provision in adjacent districts.

Taylor Wimpey UK Ltd, The Glebe Committee, Walton Estates

54. I feel this consultation is flawed as I only found out about it last night. Why was not a notice provided in the Council Tax demand?

Philip Crook

55. The areas of cross boundary issues should be expanded.

Bernard Alsop, Noralle Traditional County Homes

56. Any future building work will be very unpleasant for Shottery village, busy and noisy. Why are there so few seats in shops and around the town. M&S 3 seats, Barclays Bank 4. We need some pleasant little resting areas. Trees and flowers in Town Square and what happened to the deckchair man in Bancroft Gardens?

Freda Douthwaite

57. The Plan should make provision for housing for the period from 2006 not 2008. It seems to have lost the reference to the period 2006 - 2008 and provides no reasoning why the start of the period has been amended. The effect of this is to ignore two years of housing need and demand. The base date of 2006 originates from the Regional Spatial Strategy Phase 2 Revision (RSS) and whilst it is accepted that following the abolition of the RSS the District can set their own targets, the Localism Act introduces a duty to co-operate to ensure coherence with neighbouring authorities' strategies. Adjoining authorities of Solihull, Redditch and South Worcestershire plan from 2006 and Stratford-on-Avon needs to be in accordance with this. The figure of 8000 houses is based on a 20 year period and leads to an annual delivery rate of 400 houses (8000/20yrs) and in the event this figure is found to be justified (which Stansgate believe it should not) it needs to be projected over the 22 year period of 2006-2028. This would increase the level of required provision by 800 dwellings. This would reflect the 15 years post adoption in other plans in the West Midlands.

Walton Estates

58. It has been indicated to me in previous conversations with the SDC, that potential building plots of an area of 2/3 acres, would be considered as windfall sites and thus dealt with on an ad hoc basis. If such small developments are to be considered around the edge of Stratford and its nearby villages as proposed in the draft, then would this be the way they are dealt with.

Clive Griffiths

59. As a general observation the Draft Core Strategy makes few references to the work of the VCS. This is disappointing given the current political emphasis on Localism and 'The Big Society'. I suspect many people working in the sector will view this as an omission.

Charles Barlow, Voluntary Action Stratford-on-Avon District

60. Just tried to follow up this document that said to the end of March though now I've found out that this meant only to the 30th. With such an important impact on local infrastructure I am also surprised to see how short this consultation period was.

John Brine

61. (Edge of town shopping would result in residents of Bidford meeting their top up shopping needs by travelling to Stratford-upon-Avon).....This should not be the intention of policy. Such an approach would be contrary to the draft CS stated Vision of "...building active communities who are able to enjoy local services...", it would also run counter to the intent of a number of facets of draft CS Policy CS1, in that it would encourage unsustainable travel patterns, and remove the potential from local communities to meet their needs and requirements locally.

St Francis Group

62. (Sites at Fenny Compton) Further to recent discussions held with Stratford-on-Avon District Council, Christ Church, Oxford proposes that the attached site is highly suitable for development in accordance with Policy CS16 of the Draft Core Strategy. The site sits comfortably within the existing built limits of the settlement, contained by development on three of the four site boundaries.

C Mahony, Christ Church

63. (Sites at Fenny Compton) The enclosed Masterplan demonstrates the extent of residential development that could be accommodated on the site. Accordingly, it is requested that the site be considered through the Site Allocations process as a potential development site. Should the Council seek to identify boundaries to the built up area of settlements, then it is considered that the identified site should fall within the boundary of Fenny Compton, enabling the delivery of a limited number of new homes on a contained site.

C Mahony, Christ Church

64. Section 1.1.3 states that it is not the purpose of the Core Strategy to identify specific areas for development. The identification of such a specific area of development (7.1.6 Bishopton - this can only really refer to one or two existing fields) is not therefore consistent with the terms of reference of the Core Strategy. A general consultation over the Core Strategy does not provide enough attention to these major development proposals, and has been made without specific consultation with affected residents.

Stephen Ollerenshaw

65. General comment re "Affordable Housing" - I find it difficult throughout the document to distinguish whether the descriptor is applicable to open market or "social" housing.

Councillor S H Jackson

66. Tanworth-in-Arden Residents Association has chosen not to contribute using the online forms as it feels the opportunity to comment on the overall Core Strategy is too prescriptive. By channelling responses to specific questions we fear the answers you get may be too narrowly focussed. We appreciate the cost savings involved to the public purse but hope you will note these reservations when you are undertaking similar exercises in the future.

The Chairman, Tanworth-in-Arden Residents and Neighbourhood Watch Association

67. We also note from the latest minutes of the Working Group that a great deal of detailed research into housing and Local Service Villages will not be available for some time. Given the "transitional" period now accepted by the government we would urge a slightly longer period of reflection and greater consultation at the next stage of the process. Given the crucial role of the Local Plan in the future planning regime there would seem to be less need for the excessive haste being shown at the moment.

The Chairman, Tanworth-in-Arden Residents and Neighbourhood Watch Association

68. Based on the results of the parish plan survey, the following principles have been adopted

- The character of Preston should be preserved
- The landscape setting should be preserved for the present and future generations, protecting views into, out of and within the village.
- New building, including extensions, housing, conversions and alterations, should be in sympathy with local building styles and materials.
- Existing derelict and semi-derelict properties should be modernised and converted for residential.
- New builds, where appropriate, should be in keeping with the character of the area and to address the needs of the village for a mixed range of housing.

Mrs S Bush, Preston-on-Stour Parish Council

69. Would you please accept the site edged red on the attached location plan and put it forward as an allocated site for future residential development within the District Core Strategy. The site is located off the A3400 in Alderminster. The site is a suitable and sustainable location.

Mr S Chance, Chance & Wildish Architecture

70. There was a very strong desire (at the Henley and Studley Community Forum) for local communities to have a much greater say in how, or if, development happens in their area.

Justin Kerridge

71. Following consideration of the 2012 Draft Core Strategy on the part of MGPC, we are broadly in agreement with the document itself and the comments laid out by Cllr Kerridge as detailed below. We feel that the document expresses the goals of the Strategy clearly and in a manner that's both interesting and easily digestible.

Ms Rebecca Howes, Mappleborough Green Parish Council

72. Considering how to accommodate the unmet needs from neighbouring authorities where it is reasonable to do so will be a test of soundness of the local plan (paragraph 182 of the draft NPPF).

James Stevens, The Home Builders Federation

73. The document is too long for normal members of the public to be able to digest and, therefore, it does not encourage a reply to this very important consultation document. Perhaps a better and clearer method should be found. On the positive side, in general the aspirations contained in the document are good - let us hope you find policies strong enough to ensure they are adhered to.

Elisabeth Uggerlose

74. I have lived in the rural community of Napton-on-the-Hill for some 19 years, and I have for much of this time been concerned by the lack of sustainability of our South Warwickshire Villages. Shops, offices, schools, garages, pubs, clubs, libraries, bus services and other rural amenities all seem to be dwindling away, and the current restrictive SDC planning policy has much to answer for. It is only recently that the moratorium on development has been relaxed, and I believe that now is the time for rejuvenation and growth of our rural communities. Therefore I am very supportive of the draft Core Strategy, and the principle of sharing the projected housing need between the market towns and the identified 39 Local Service Villages.

Richard Woodcock

75. A figure of 8000 homes is quoted for the District, however this is for the period 2008-2028. I understand that the figure was reduced from 12,000 and we are already four years behind. Please can we progress this with a more robust pace to ensure that applications are advanced quickly based on the Government principle that "Sustainable housing applications are under a presumption of success, unless there is an exceptional reason to refuse". The housing need is not merely based on numerical achievement but a 'local community need', therefore cases where there is evidence from Parish Plans, family needs and affordable housing plans, these should be 'fast-tracked' and supported, based on the local need rather than any resistance to specific locations.

Richard Woodcock

76. Self Help Family Units - I am disappointed by the apparent lack of reference in the draft Core Strategy to 'Self Help' schemes as identified in the existing policy - Appendix 5 'Meeting the Needs of Local Communities'. The opportunity for families to build single dwellings on family owned land drives straight to the heart of 'Community Led' proposals, allowing families to fulfil the needs of their children and parents without resorting to the requirement to move from their locality. S106 agreements provide ample protection that such applications should again be 'fast-tracked' in support of 'affordable housing' aspirations.

Richard Woodcock

77. Brown Field sites - The utilisation of brown field sites and redundant farm buildings seems sensible, however it should be recognised that these are few and far between in rural communities. Perhaps the definition of brown field should be widened to 'previously developed sites', which might include pieces of land that have formerly been used for play areas, builders yards, tennis courts, market gardens, etc etc, but not necessarily sustained buildings in the past, and are no longer forming part of 'unspoiled Green Belt'.

Richard Woodcock

78. Parish Councils - question the motive and influence of Parish Councils. Far too often they hide behind the concept that they are 'locally elected representatives' of the local community, and use that position to gain unfair influence. I know from experience that it is very difficult to find candidates to work in this voluntary capacity, and that a shortage of suitable nominees and general apathy by the local community can lead to Parish Councillors to be elected by a tiny section of voters. The basic question is 'Do they really reflect the views of the local community, or are they representing themselves and their prejudicial interests?'. My view is that the Stratford District Council which has the portfolio for Housing Needs, and that more robust methods of consultation are required, such as Parish and Neighbourhood Plans which will have an audit trail of evidence to support credibility, and achieve the required growth and sustainability.

Richard Woodcock

79. As recognised in the Draft Strategy, Wellesbourne has become a dormitory town - described as out-commuting. The need for housing for people local to Wellesbourne is not great (Ref Wellesbourne Housing Needs Analysis 2010) so the recent approval for 225 houses on the Redhill site will easily accommodate local people wanting affordable housing.

David & Susan Close

80. I have to record my concern and objections to the totally inadequate notification, communication and period of consultation for a) residents to become aware, b) to digest and consider the amount of material (250+ pages), c) discuss, consult and respond. I only heard about his exercise by hearsay. I understand that some public meetings were held - but I and most others were totally unaware of such being planned or implemented. The authority may satisfy itself that it has followed the letter of what is required for consultation, but not the true spirit of proper public consultation. I hope the next stages will be properly and adequately communicated to residents.

David Preston

81. The NPPF, published on 27th March, emphasises the need to involve local people more in planning policy and decisions for their locality. I trust the DCS will be amended to allow for maximum participation by local communities in strategic planning for their neighbourhoods.

Mrs Lesley Smith, A J Mann, Mrs C J Mann

82. Making reference to the Sustainability Appraisal implications after each policy is welcomed and aids transparency.

Ben Horowitz, Worcestershire County Council - Principal Planner (Sustainable Development)

85. It is ridiculous that we only have four weeks to respond to a draft document that, if implemented, will set the developmental plan for the next 16 years. It is difficult to make meaningful comments when so many CS supporting studies and reports are unavailable (listed the studies). In respect of Local Service Villages in general, the Working Group expressed a wish that definitive figures for the respective LSVs should be provided at the earliest possible opportunity.

Ewen Cunningham

86. At the outset we would like to request that the whole preparation of the Core Strategy should be paused for a reasonable period to allow a more considered response than that allowed by the original timetable. We appreciate that there were concerns that the district would be caught without a current Local Plan to combat a projected tidal wave of developer-led applications. However, the Government has now made clear that there will be a transitional period and that the old plans, and progress on new plans, will be taken into account during this time. Given the importance attached by Government to getting Local Plans right, we feel that a modest respite would help improve the Core Strategy greatly.
Ms Julie White, Tanworth-in-Arden Parish Council

87. RPS considers the Core Strategy and the Sustainability Appraisal to be unsound.
Trustees of W A Weaver

88. There is much said about the need to reduce the carbon footprint, our own parish was a Catg4 village which was meant to be, due to lack of services, not suitable for further development. Nothing has changed yet your proposal to allow buildings of up to 2% year on year has serious repercussions for our village. Not least at 101 dwellings this allows for 15 new houses - that is a lot for a village of this size to contend with, with no services, no pub, shop or bus service. If the directive was previously the reliance on the car was prohibitive and was to be factored in then we see no reason for this policy to be changed.
Mrs Valerie Ingram, Shotteswell Parish Council

89. Here in Warwickshire Police we really welcome the full and open engagement provided by Stratford District Council throughout the development of this Draft Core Strategy. This has been very important from our own strategic point of view and it is very encouraging to see the inclusion of a number of points that will bring real benefits in maintaining low crime and disorder in the district.
Tim Sanders, Warwickshire Police

90. We consider that the Core Strategy fails two of the tests of soundness identified at paragraph 182 of NPPF. The Plan has not been 'positively prepared' as it does not meet objectively assessed development requirements. The plan is also 'unjustified' as it is not the most appropriate strategy based on proportionate evidence.
Brian Lewis

91. The draft Core Strategy does not meet the full, objectively assessed needs for market and affordable housing in the market area as required by paragraph 47 of NPPF. The draft Core Strategy is not based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area as required by paragraph 158 of NPPF.
Brian Lewis

92. Whilst we understand the urgency to get the Core Strategy in place we do find the resulting document somewhat confusing eg Section 9 - Spatial strategy refers to Local Service Villages and Main Rural Centres and elsewhere to "Local Rural Centres". It is not clear if these are the Main Rural Centres or the Local Service Villages.
Linda Ridgley, Harbury Society

93. We note of page 54 the reference to the need to assess the cumulative impact of development proposals on the landscape. This principle should apply throughout the Core Strategy.
Linda Ridgley, Harbury Society

94. We have not mentioned each reference to the individual Planning Policy Statements and the need for them to be now removed and the relevant part of the NPPF referred to in their place as we presume this will be undertaken.
Laura Perry, Environment Agency

95. The representations submitted therefore conclude that as currently drafted the Core Strategy is '**Unsound**', but could be made 'Sound' by incorporating the changes suggested.

Iwan Jones - Urban Renaissance Villages (URV) and Helical Bar

96. From the time I read *Delivering a Fundamental Change* to the present moment, I have been concerned to know what would happen to the existing policies in district and borough local plans, because none of the proposed documents in the Local Development Framework seemed apt to receive them. I wrote to the Minister for Local Communities and Local Government and after more than one prod from my MP received a discouraging letter that suggested, half-heartedly, that local planning authorities might put policies into one of the documents in the Local Development Framework. I wrote to each of the eight local planning authorities in Warwickshire, (which include Birmingham and Coventry), and received desultory and ambiguous replies that told me little, except that nobody had the slightest enthusiasm for the new planning system.

Mr N A M Butler

97. If this core strategy replaces the Local Plan Review the result will be one collapse after another in the face of developers large or small, at planning committee meetings and public inquiries, and the countryside under your governance will be ruined for future generations. Planners and developers are two sides of the same coin and depend on one another. The latter are only evil when the former fail to play their role diligently and robustly. If the planning system lacks effective policies then the developers will dominate and short term gains will bring inevitable long term losses.

Do you really intend to leave the planning system at Elizabeth House without the means to play an effective part in this dialectic?

Mr N A M Butler

98. The Localism Bill empowers local communities to have genuine opportunities to influence the future of the places where they live and not be dictated to by the authorities.

H Barlow

99. One of the key problems of the strategy is that Stratford District Council does not look at development as a whole.

Mrs Dorothy Mitchell - Studley Parish Council

100. I agree with the basic philosophy but the objectives need to be subject to periodic review so that negatives are dealt with by amendment. I suggest a 3 year review cycle is introduced.

Councillor George Atkinson

101. The flow of traffic from North to South and vice-versa depends largely on the Clopton Bridge and its accesses and egresses. Urgent consideration is needed to alleviate the situation by the W.C.C

B H Richardson

102. I am very happy that the Council is getting its corporate head around the survival of Stratford as we know it. Many more houses (however lucrative from a Council Tax angle) and we will be gridlocked - lose all our tourists.

Mrs C M Richardson

103. In summary, good policies are written in clear, concise, simple language. These policies seem to be guidance rather than a set of rules to be adhered to. We don't feel that the policies in this document are clearly defined or consistent.

This might also be a good point to register our feelings over the two "final" draft copies SDC issue. Although the Council seems to be in denial, we, that is those who got through the first draft issued are confounded by the fact that this was not the "final" draft. The "final" draft was issued on 29th Feb. This gave little time to read through, what is a long document, for the second or third time. What mystifies is that SDC did not publicly acknowledge the mistake to the public at large nor issue an apology. Is the council hoping that nobody noticed?

Mrs J and Mr M Buckley

104. The fact that we have not answered a question should not be construed as meaning that we do not have an opinion on the subject. It is highly probable that we do not have sufficient information to make meaningful comments. For example, extracts from the LDF Framework Working Group meeting minutes from meeting of 28 Feb 2012 show;

- CS working group members didn't get the revised CS until 28-30 Feb (half way through the consultation);
- CS workshops were being carried out before the final CS was in circulation;
- Landscape & Visual Sensitivity Study of Local Service Villages and Assessment of Special Landscape Areas - final report submission date is 22 June 2012;
- Strategic Housing Market Assessment Review - final report submission due in May 2012;
- Water Cycle Study Update - final report submission date is 22 June 2012;
- SHLAA Panel Progress - The Working Group expressed the view that potential gypsy and traveller sites should be included in the SHLAA - (no date as to when the SHLAA would be completed);
- Ecological and Geological Study of Local Service Villages (LSV) in general, the Working Group expressed a wish that definitive figures for the respective LSVs should be provided at the earliest possible opportunity.

It is difficult to comment on the results of studies that have not been conducted and reported at the end of the consultation period.

- We find the layout of the document unhelpful with regard to dealing with the questions. The document is laid out in sections and the questions should have been numbered according to the sections e.g. for Section 3, "The Vision" - question numbering Q3.01, Q3.02, etc would have been helpful;
- We do not understand why the formatting of the bullets changes through the document. As this document is a holistic document, surely the formatting should remain consistent throughout?
- Para 3.1. states: "The draft Core Strategy needs to set a clear Vision for future development in the District". We agree wholeheartedly with this statement. However, we have difficulty appreciating the scope of the policies as they are currently drafted because the majority of them are, in our view, not specific enough and ergo subject to personal interpretation. These policies are effectively to become the overarching rules governing the future planning process and, for that reason, require to be specific and objective. At present, these draft policies are, in the main, subjective and non-specific which is entirely unsatisfactory as it leaves SDC as judge and jury. Further, this document will become a statutory document when adopted. Unlike EU law, English law is not purposive; the document requires to set out absolutely specific and clear policies.

J Buckley - Earlswood & Forshaw Heath Residents Association

105. In summary, good policies are written in clear, concise, simple language. Policy statements address what is the rule rather than how to implement the rule. The policies in the draft Core Strategy are mostly drafted as guidance, rather than a set of rules to be adhered to. Policy statements need to be made readily available to all and their authority must be clear and they must represent a consistent, logical framework for action. Finally, it is quite common to have designated "policy experts" (perhaps identified at each policy heading) readily available to interpret policies and resolve problems. This could be beneficial in this instance too.

J Buckley - Earlswood & Forshaw Heath Residents Association

106. We wish to express our disgust at being only given four weeks to review the final draft Core Strategy and two days to read, digest and incorporate the pertinent content of the National Planning Framework into our response. This is neither reasonable nor democratic in our view.

J Buckley - Earlswood & Forshaw Heath Residents Association

107.

- We are very unhappy at having to review the draft Core Strategy when there is no extant "Strategic Housing Land Availability Assessment" available. How can we possibly comment on the Council's planning policy re housing over the next decade and a half when the council either isn't prepared to detail it or hasn't developed one?;
- Surely, it is a legal obligation that the Core Strategy identifies brown field sites? We can find nothing in the draft that makes us believe that the council has fulfilled this statutory obligation;
- We believe that too little consideration has been given to agricultural land and agro-business developments.
- Farmers also need protection from outside development and encroachment onto farming land in order to formulate their own forward plans and to adapt to new business practices and technologies;
- As pressure mounts on farmers to increase yields, this will increase potential chemical pollutants used in agricultural business and also organic pollution from waste products. We are already seeing problems which can be caused by intensive farming, such as blue-green algae in Earlswood Lakes.

These issues do not appear to be addressed to any degree in the consultation.

- We note that there is no analysis anywhere within this draft document of the impact that HS2 may have on the district, although it is given a fleeting mention as one of the cross boundary issues at S2.3.2.2. Our view is that it will have a greater impact on tourism and business commuting than most of the items identified in this document. While HS2 may only come into service towards the end of the life of this Core Strategy document, it will have an impact prior to its inception through construction employment and administration employment, as well as disruption caused by necessary construction projects. Due to its importance, it is not unreasonable for the Council to have considered this and have a strategy surrounding its proposed construction and future operation;
- We also believe that the Core Strategy should take into cognisance current and future "green" initiatives e.g. the Insect Pollinators Initiative, as part of the District's "green" credentials and that all developmental and infrastructural projects should be required to consider ways to improve our green credential e.g. in this particular instance, increase the presence of pollinators by, for example, planting appropriate flowering plants and providing water sources for insect life to prosper in heavily built up areas and also, by the reduction in the use of insecticides generally. This should also help towards achieving several of the objectives detailed in the draft Core Strategy and make Stratford-on-Avon a leading light in environmental issues.

- A straw poll, conducted amongst residents while completing this consultation exercise, reflects the strong feeling that SDC regards Tanworth Parish and Earlswood in particular as remote and insignificant and shows scant regard to the desires of the residents. The residents feel that SDC doesn't care about providing us with adequate services (transport and policing in particular) or protection of the green belt. The residents also believe that SDC has no understanding of the pressure that the Parish's green belt is being subjected to, particularly from Solihull MBC. This belief is borne out by such things as the draft Core Strategy ignoring the three SSSIs in the Parish (although SSSIs closer to Stratford are mentioned in the draft) and removing "Arden Special Landscape Area" without consulting or advising anyone in the Parish Council.
- We would draw your attention to S9, para 86 of the NPPA which states: "If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt". We fully believe that Earlswood fits this description due to the pressure being put upon it by not only SDC but also Solihull MBC and Bromsgrove DC. Earlswood MUST be included in the green belt.

J Buckley - Earlswood & Forshaw Heath Residents Association

108. Air Quality Management Areas:

A number of AQMAs or potential AQMAs have been identified in Stratford, Studley and Henley. An action has to be produced with the transport authority to find the most cost effective methods of improving air quality, encouraging active participation and raised awareness of air pollution issues.

The AQMA has been mentioned in the draft Core Strategy along with measures to manage and mitigate traffic management and encourage more tree planting. Exactly how this will be done and the resilience of any further decisions has not been developed. There is a danger that unless addressed in the Core Strategy the chance to take a broad holistic view will be lost.

Solutions can include:

Trees: Vegetation, especially trees, is much more effective than built surfaces in removing pollutants from the air. Some species are better than others. There are dis-benefits as well as benefits that affect longevity. Conditions may be needed to ensure that any tree is maintained, remains healthy and is replaced if damaged.

Open space: Open space contribute to the visual and social quality of the urban area and can improve air quality. Maintenance, ease of access, protection against future development and any perceptions of safety have to be considered.

Traffic management:

- Encourage public transport, walking and cycling as transport modes that reduce the dominance of traffic in town centres as ways to reduce air pollutant emissions and improve air quality. Acceptability to residents is important for the introduction and longevity of any scheme.
- Routes must not be obstructed or removed in future, and must be adequately maintained. The destination of route must remain useful and attractive, public interest in walking / cycling maintained and alternative modes of transport should be available to those who are infirm or have a disability.
- The provision of more parking is not necessarily the best option as it can discourage other more effective measures being taken and is expensive to maintain.
- Alternative vehicles such as electric vehicles could be encouraged and incentivised along with the necessary charging infrastructure.
- A bus/rail interchange and bus station are overdue in Stratford upon Avon.
- Cycle routes should be adequate for the role they are to play and must not expose cyclists to danger.

Councillor S A Juned

109. note the reference in paragraph 153 that any additional development plan documents should only be used when they are clearly justified. Therefore the intention to produce a District wide Site Allocations DPD does not sit comfortably with national planning policy and it is likely that the Third Draft Core Strategy will be required to be significantly altered to meet these requirements. This is particularly the case given the scale of development proposed (2,240 dwellings) within the Local Service Villages is central to the strategy of the Plan, but not supported by any evidence at present; only now is the SHLAA being updated with a request for sites in rural areas. This evidence will be key to assessing the deliverability of the strategy, particularly given paragraphs 84 and 115 of the NPPF which concern Green Belts and AONBs.

J.S. Bloor (Tewkesbury) Limited and Hallam Land Management

110. It is noted that here is a lack of focus on mitigating and adapting to climate change for draft policies CS11 (Natural Features) and CS15 (Design and Distinctiveness). Climate change poses the most serious **long-term threat to England's natural environment. Natural England therefore recommends** that these policies address climate change mitigation and adaptation in addition to draft Policy CS2 (Climate Change and Sustainable Energy) to reflect the seriousness of the issue.

Mr Jamie Robert Melvin - Natural England - Land Use Operations

111. The NPPF, published on 27th March, emphasises the need to involve people more in planning policy and decisions for their locality. I trust the DCS will be amended to allow for maximum participation by local communities in strategic planning for their neighbourhoods.

Julian Davey & A J Mann - Eclipse Road Residents Group - Deputy Chairman & Nina Knapman

113. with a more robust policy on wind farm development by SDC, this could lead to a reduced level of cost to the council. It is already widely acknowledged that appealed applications cost far more in the long run and therefore, with a tighter policy, unsuitable developments might be discouraged. This would also save the long protracted strain placed on local communities and relieve some burden on councils/tax payers.

Although we appreciate any structure plan has to be accepted by the inspector, there is nothing to stop our local authority taking the lead, especially if you are working alongside other neighbouring authorities, they might follow your direction too.

Mrs Valerie Ingram - Shotteswell Parish Council

114. It is considered that the Draft Core Strategy in developing the Preferred Option for Development does not provide sufficient flexibility to account for a rapid shift in the demand for housing or other economic changes in detriment to the overall soundness of the plan.

Codex Land

115. We will look for planning policies that support technological infrastructure and in particular rural areas. We will support the strategic employment sites of the strategy.

Jasbir Kaur - Warwickshire County Council

116. The National Planning Framework requires Local Plans to include policies for health and well being. The County Council is also responsible for Public health and we would seek overarching planning policies in the Local Plan that support health and well being as part of new developments in the District. We are committed to delivering the best possible health and wellbeing outcomes for everyone, helping people to live Warwickshire.

Planning for health is important not only from a legislative perspective, but also in relation to costs. Promoting healthy lifestyles, avoiding health impacts and tackling health inequalities throughout the

planning process could result in major cost savings to society. There is significant evidence on the effect that spatial planning has on community health and well-being of residents through development management

Transport and traffic, access to public transport, lack of open space and where we shop for food are just a few examples of how the built environment influences our physical and mental health.

Jasbir Kaur - Warwickshire County Council

117. The NPPF emphasises the need to involve local people more in planning policy and decisions for their locality. I trust the Draft Core Strategy will be amended to allow for maximum participation by local communities in strategic planning for their neighbourhoods.

Mr & Mrs Godson

118. The whole plan appears to be quite vague and gives the feeling that a lot of things within it could be interpreted various ways.

Mr Alan Oliver

119. We accept the need for improved housing and employment opportunities throughout the district but we feel the draft Strategy is a somewhat blunt weapon. It is a centralised document that does not embrace the specific 'localism' that is required in different parts of Stratford-on-Avon District. What may apply to Bidford and Kineton does not apply to Studley, Claverdon, Southam or Tanworth.

Tanworth-in-Arden Residents Association

120. it is noted the intended plan period is from 2008 which is not consistent with neighbouring authorities where plans have a base date of 2006. Stratford District need to plan for the same period or this may have implications on housing provision in adjacent districts.

Ainscough Strategic Land, Banner Homes (Midlands) & Walton Estates

121. We have read the Sustainability Appraisal of the Stratford-on-Avon Core Strategy Policy Options produced by Lepus Consulting Ltd (January 2012). The report concludes at para. 4.1.7 in respect of the four Large Rural Brownfield Sites: "The large-scale schemes cited in this policy are likely to have numerous and wide-ranging impacts, of which the effects could be significant. The policy needs to strengthen its resolve to minimise adverse impacts."

In our view, both the suite of policies contained in the CS (2012) and the Area Policy Profiles at Section 10.11 already provide adequate protection in respect of the impacts. All four sites are the subject of Master Plans that have either been adopted by the District Council or are in the process of preparation. All the sites have been the subject of considerable professional and technical investigation as well as community involvement, and we are confident that the CS (2012) in respect of these four sites is sound, both justified and effective, and finally consistent with national policy

Follett Property Holdings Ltd

122. The timing of the 2012 Core Strategy consultation process has come at a very pivotal period in the evolution of planning policy in England, given the issue of the National Planning Policy Framework (NPPF) on 27 March 2012. it is therefore important that the Council takes stock of the Government's clear planning policy, particularly in respect of housing land supply, prior to proceeding to the submission draft of the Core Strategy.

Given the uncertainties which currently exist in the planning system, it is essential that the Council continues to provide a commitment to a plan led system that encompasses strategic development issues whilst importantly addressing the problems of housing affordability and meeting the district's housing growth requirements.

Importantly in the context of Stratford-upon-Avon the NPPF advises the Council to boost significantly the supply of housing...RPS is concerned that the Local Planning Authority is not following the clear guidance in the NPPF regarding taking an evidence based approach to establishing the housing requirements.

It is critical that prior to the Submission document the plan is refocused on establishing a robust District-wide figure and a spatial approach which appropriately focuses on Stratford-upon-Avon as the key settlement in the District. Whilst it is recognised that regional plans will be revoked, the strategic planning issues addressed in the 2009 Panel's Report relating to Stratford-on-Avon District still remain an important planning consideration until more up to date evidence is provided.

The Sustainability Appraisal must be based on the GL Hearn housing growth options and the implications of these will need to be assessed at a later stage or the document will be found to be unsound.

Miller Strategic Land, Heart of England Cooperative Society & Trustees of WA Weaver

123. It would be helpful to have a further workshop to explain how the new National Planning Policy Framework affects the draft Core Strategy. I am sure many would welcome the opportunity to find out.

Shotteswell Parish Council

124. It is essential that the continues to provide a commitment to a plan led system and strategic development issues and importantly address the problems of housing affordability and meeting the district's housing growth requirements. Paragraph 14 requires a presumption in favour of sustainable development within plan making.

The NPPF advises the Council to significantly boost housing supply. RPS is concerned that that LPA is not following the clear guidance in NPPF regarding taking an evidence base approach to establish housing requirements. Continued failure to do so, is likely to result in the plan being found unsound at examination stage as set out in NPPF Paragraph 47.

It is vital that the Submission Document plan refocuses on establishing a robust District-wide figure and a spatial approach which appropriately focuses on Stratford-upon-Avon as the key settlement. Whilst it is recognised that regional plans will be revoked, the strategic planning issues addressed in the 2009's Panel Report relating to Stratford still remain an important planning consideration until more up to date evidence is provided.

Miller Strategic Land and Taylor Wimpey

125. The Draft Core Strategy is considered fundamentally flawed and unsound because it:

- is inconsistent with NPPF and the Ministerial Statement: Planning for Growth;
- does not represent ' a positively prepared' plan;
- fails to meet the objectively assessed needs of the District, as identified by the Council's Evidence Base on housing and retail development, and
- fails to demonstrate a Duty to Co-operate with neighbouring local authorities in terms of meeting the identified and unmet housing needs.

ASL's principle objections to the Draft Core Strategy relate to:

- The insufficient housing target of 8,000 new homes and the Council's approach to reduce net in mitigation.
- The proposed spatial distribution of housing
- The removal of 'Primary Main Rural Centres' as previously set out under Policy CS 2
- The removal of a recognised supermarket requirement for Shipston-on-Stour; and
- The removal of the SHIP.1 strategic allocation.

Ainscough Strategic Land

Draft Core Strategy 2012 - Summary of Representations

1.0 Introduction

Topic: 1.1 Introduction - Policy Context

1. The Policy needs to include a statement re housing developments and the impact on service access. Given that Stratford has many areas of deprivation re access to services; then the policy should only allow development when the service access for those developments meets national standards/ country normal level. Service is the major problem for the District, hence it should be addressed as a matter of policy.

Charles Goody

3. Fully supportive of the proposals which will take the country forwards and give more chances in life to my children and their children.

Alan Wallace

4. Fully supportive of more housing in the rural settlements as long as the character of the area is not radically altered. Such housing should be limited to infill or replacement of derelict buildings. The policy will encourage more people to live in the countryside so boosting the rural economy and providing families with a chance to afford a home. Too many rural settlements are losing local services for lack of people.

Will Hanharan

5. The CLA has successfully argued a balanced approach must be taken into the concept of 'sustainable development'. We welcome the NPPF and the presumption in favour of sustainable development which should be at the heart of this strategy.

Country Land and Business Association

6. We wish that the Core Strategy could be implemented quickly so as to avoid the present hiatus in planning guidance which could encourage large-scale housing development.

Steven and Jane-Elizabeth Gee

7. The policy context will need to be amended to compliance with the published NPPF. The Regional Spatial Strategy is likely be revoked by the next stage of the process. The Core Strategy will probably be 'Local Plan' in the next version.

8. There is a strong case for deferring the next stage while more detailed policies on specific sites are added. Policy not longer supports more than one Development Plan Document where that can be avoided.

CPRE

9. Section 1.15 is misleading when it states 'As a result, it will be for the LPAs to determine their own local targets for housing, employment and other forms of development. It gives the impression that the targets for housing and employment are locally driven. This is not strictly the case as local authorities have been advised by central government in the new NPPF that the identification of housing requirements must be based on robust evidence, in order to prove its soundness (para 7, 14, 17, 47,159). The new NPPF sets out guidance on the level of housing provisions should be determined for the purposes of development planning. Account needs to be taken of evidence relating to current and future levels of need and demand and levels of housing from a range of sources, including national household growth projections, economic growth forecasts, land availability, need to improve affordability, sustainability appraisal and the impact on infrastructure.

David & Angela Tucker, Bloor Homes, Miller Strategic Land

10. With regard to section 1.1.1 the change to the end dated of the plan is noted. It is anticipated that the adoption would be 2013? Redditch Borough Council (RBC) would suggest discussions with Bromsgrove District Council (BDC) and RBC regarding alignment of submission dates in the interests of co-operation.

Redditch Borough Council

11. I am pleased to see the aim is to 'reflect issues of local concern that have been raised in the previous consultation periods'. However, there is serious concern in Alcester that the constraints set out in previous drafts, relating particularly to site ALC.3 are no longer mentioned, despite this land being suggested as a potential development option. In view of the need to ensure a five year land supply, this site, as well as others, is unsurprisingly under serious consideration well before the Draft Core Strategy is adopted. The document, and Council policy generally should therefore include at least transitional provisions to ensure the work of previous draft consultations and input from local people is not ignored when determining applications prior to adoption.

Mr and Mrs Godson, Philip Knowles, Cllr Susan Juned, Eclipse Road Residents' Group, Nina Knapman

12. The NPPF emphasises the need to involve local people more in planning policy and decisions for their locality. I trust the Draft Core Strategy will be amended to allow for maximum participation by local communities in strategic planning for their neighbourhoods.

Philip Knowles, Mr J Alderson, Mrs Vivienne Smith, Mrs J M Evans

13. In the context of Stratford-on-Avon, the NPPF advises that underperforming housing building should be compensated through Councils significantly increasing the supply of housing. The RPS is concerned that the LPA is not following clear guidance of the NPPF in relation to adopting an evidence based approach to establishing the housing requirements. Continued failure to do this is likely to result in the plan being found unsound at examination stage as confirmed by the NPPF paragraph 47:

'To boost significantly the supply of housing, local planning authorities should: Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.'

It is critical that prior to its submission, the plan is refocused on establishing a robust and increased District-wide housing deliver figure as well as providing the strategy for delivering a suitable level of housing supply across the district, as well as within the rural villages and key settlements.

Trustees of W A Weaver, Miller Strategic Land, Miller Strategic Land and Taylor Wimpey

14. That the preamble of the document provides an appropriate spatial portrait that describes the characteristics of the District and issues and challenges it faces.

Wychavon District Council, Mrs J M Evans

15. The inference in paragraph 1.1.5 and 1.1.6 and throughout the Draft Core Strategy is that the Authority has the freedom to produce a Core Strategy for Stratford District in an unfettered manner. As a result, the Core Strategy which, if it proceeds as drafted, would be at risk of being unsound. This is evident, in particular, in relation to establishing the requirements for housing.

The test of soundness which has been carried forward from PPS.12: Local Spatial Planning into the NPPF, along with an additional test. This required that a plan should be:

Positively Prepared - The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of sustainable development.

The Core Strategy must be developed in accordance with the prevailing legislation and national planning policy. We believe that to imply that changes to the planning system grant freedoms to LPAs to produce plans for their areas in an unfettered manner is not a reasonable position of the Council is now in. It would, in our view, be wrong if member of the public and councillors on Stratford on Avon are not appraised of the balance between the freedoms and responsibilities in the new planning system.

CALA Homes, Persimmon Homes (South Midlands) Ltd

16. Alongside the freedom to set housing requirements locally, an increased responsibility on the authority to ensure that the requirement is properly evidenced in a transparent and robust manner when making such decisions. The Draft Core Strategy does not display that responsibility and does not provide a robust evidence base to support its decisions.

Persimmons Homes (South Midlands) Ltd

17. I refer you to the text of the Draft Core Strategy (1.1.3) '*The Core Strategy is a strategic document and will provide a broad framework (italics mine) for determining planning applications ...*'

I refer you to the draft NPPF (paragraph 5):

The National Planning Policy Framework sets out the government's requirements for the planning system *only to the extent that it is relevant, proportionate and necessary to do so. It provide a framework (italics mine) within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect needs and priorities of their communities.* The Local Development Framework is a framework. The Core Strategy is a framework. The NPPF is a framework. When planning applications are to be determined frameworks will not suffice. Detailed policies are needed. Here is an extract from DEV.1

Development proposals will be required to have regard to the character and quality of the local area through the layout and design of the new buildings and the extension or change of use.

So far there is nothing here that could be used with great effect at a public enquiry.

However, the following principles will be taken into account in determining planning applications

Here are three of them;

The manner in which the proposed development is integrated with the existing settlement, in terms of physical form, patterns of movement and land use:

The interrelationship between the components making up the development, including buildings, landscaping, open space and access routes;

The effect of the development on the surrounding area in terms of its position, shape, size and height.

What will happen to detailed policies such as this?

From conversations I have had with planners and councillors, there are three things that might happen but which of them will happen, I have not the slightest idea:

Policies will be abolished.

- If the unthinkable happens, your ability to determine applications will be at an end and irreparable harm will be done to the countryside. You will have let the ratepayers and down and let yourselves down.

The policies will appear in the neighbourhood or local plans.

- Unhappily, most communities are unlikely to bother with neighbourhood plans and it appears that the Government's display of affection for them is a sham. A Stratford-upon-Avon Neighbourhood Plan would serve the town, but leave the rest of the district defenceless.

The policies will appear in a separate document in the Local Development Framework.

- This is the best option. With determination you could resurrect the Local Plan Review in another form. However, when this document is produced to an inspector, you would almost certainly be told that as these policies were already in the Core Strategy, there is no need to duplicate them. So you would have to fight hard to secure them, though you might succeed.

N A M Butler

Topic: 1.2 Introduction - How to comment

No comments received for this section

Draft Core Strategy 2012 - Summary of Representations

2.0 Cross Boundary Relationships

Topic: 2.1 Cross Boundary Relationships - Duty to co-operate

1. Solihull's draft Core Strategy details 1150 new homes to be built adjacent to our Parish boundary with SDC and Bromsgrove detail 199 new houses to be built adjacent to our boundary at Wythall in theirs. Although SDC states that cross border discussion is important, the track record is not encouraging, the original Dickens Heath development being a good example. Solihull MBC does not appear to acknowledge cross border discussions at all at their document. All of this places a great deal of pressure on the remaining Green Belt in our parish. (Tanworth-in-Arden)

Jeff Perks, Ewen Cunningham

2. Duty to co-operate - are there any mandatory requirement to meet health?

NHS Warwickshire

3. Discussions need to continue on key cross -boundary issues

Redditch Borough Council

4. The identification of cross boundary relationship as an important factor to be considered in the production of the Core Strategy. Section 110 of the Localism Act 2011 introduced the duty to cooperate as a statutory requirement, for which LPAs must demonstrate that they 'engage constructively, actively and on an ongoing basis in preparing a development plan.' It means that decisions LPAs make regarding their emerging development plans cannot be taken in isolation.

CALA Homes

5. Whilst the acknowledgement of cross boundary issues is supported, we believe it has not been considered sufficiently. For example, there is a reference that growth from Redditch may need to be accommodated in the district and yet it is not formally considered in the document. The decision is left out until a later date. Given that this may involve a potential review of the Green Belt boundaries and given that both Redditch and Bromsgrove are also preparing their draft Core Strategies, we consider that these issues should be considered in full now.

Paragraph 182 of the NPPF makes it clear that plans should be prepared positively and consideration should be given to unmet need from neighbouring authorities. As it currently stands, Stratford, Bromsgrove, Wychavon, Coventry and Solihull are all failing to make sufficient provision for housing within their Core Strategies. We therefore query how the Stratford CS is being positively prepared when no consideration has been given to the lack of housing provision across neighbouring authorities.

Orbit Homes, Ainscough Strategic Land

6. The County Council, as a public body will have a duty to cooperate on planning making from 6th April 2012. The duty to cooperate requires councils to 'engage constructively, actively and on an ongoing basis' on issues relevant to statutory plans. The County Council will therefore assist in plan making and infrastructure plan on an ongoing basis.

The planning issues and policies contained in the CS impact on the County Council's corporate responsibilities, particularly economic, transport, support for the elderly and extra care housing, library services, public health, gypsies and travellers and education. The Director of Public Health has responded directly to you on the Core Strategy.

The County Council has an adopted 'A Vision for Going for Growth' policy. The key values are stated below in emboldened text and their implications for planning and land use policy is explained below the emboldened text;

- **Our social investment will contribute to a county where the technological infrastructure will compare well to other British communities.**

We will look for planning policies that support technological infrastructure and in particular in rural areas. We will support the strategic employment sites of the strategy.

- **With a sense of mutual ownership of public services (the Warwickshire shareholder).**

We will support positive planning policies that embed co-location of services with the voluntary sector, private sector providers and other public bodies.

- **We will achieve a discernable reduction in inequalities of social, economic, health and well being regard of age, disability or culture.**

This applies to access to goods and services for local residents, including adequate provision for gypsies and travellers.

Planning policies on extra care housing and affordable is provided with the necessary long term supporting services. We will support proposals and policies for co-location of services.

- **A vibrant economy will produce high quality job officers in Warwickshire, raising the skill levels in the overall workforce, so that we are as productive and competitive as the best in the Country.**
- **Warwickshire will be a place which looks actively at the best practice from other places- internal as well as national - to develop innovative and entrepreneurial solutions. Our economic well being will be measured by international comparison not simply against 'West Midlands' regional standards. Our urban town centres will punch above their weight when compared to similar sized English town centres and our rural infrastructure will be amongst the best in the Country.**

We will support planning policies that support a competitive economy for inward investment.

Stratford-upon-Avon is an international destination and makes a significant contribution to the economy of the region and sub region.

- **Our growth plan will attract people to live and work in Warwickshire as a specific choice. There will be a strong brand image, underpinned by a recognition that this is one of the best places in the Country to live and work.**

Our strategic policies contained in the Local Transport and Growth strategies support the improvement and the provision of strategic infrastructure, such as junction improvements to strategic highway network and provision of new railway stations.

- **There will be a strong Health and Well being ethos about the quality of lifestyle we are encouraging ... where the brand ' Warwickshire' will be directly associated with a health-focussed lifestyle supported by the health infrastructure to match.**

The NPPF requires Local Plans to include policies for health and well being.

The County Council is also responsible for Public Health and we would seek overarching planning policies in the Local Plan that support health and well being as part of new developments in the District.

We are committed to delivering the best possible health and well being outcomes for everyone, helping people to live in Warwickshire.

Planning for health is important not only from a legislative perspective, but also in relation in costs. Promoting healthy lifestyles, avoiding health impacts and tackling health inequalities throughout the planning process could result in major cost savings to society. There has been significant evidence on the effect that spatial planning has on community health and wellbeing and spatial planning policies can address local health inequalities and social exclusion. Some Local authorities have adopted planning policies to promote the health and wellbeing of residents through development. The Local Plan can contribute to health and well being in the following way:

- The quality and opportunities of the local environment is a contributing factor in shaping health.
- Transport and transport, access to public transport, lack of open space and where we shop for food are just a few examples of how the built environment influences our physical and mental health.

- Planning can positively affect the health of residents by shaping and influencing the layout and the open spaces in between developments and securing investment for the public realm.
- For example, planning policies can include design requirements for housing layouts to encourage safe and pleasant walking to short distances to amenities and service.

Developer obligations can be used build infrastructure such as health care facilities, parks and cycling routes. There should be an overarching policy that promotes health and wellbeing for the communities in the district. Spatial planning policies can promote and provide opportunities for healthier lifestyles.

Warwickshire County Council

7. Demonstrating to the satisfaction of an Inspector that the Core Strategy has been prepared in a legally compliant manner in relation to the duty to cooperate, will require a significant amount of open and transparent work with adjoining and other Councils before the publication of the final draft version of the Core Strategy.

Persimmon Homes (South Midlands) Ltd

Topic: 2.2 Cross Boundary Relationships – How does the District interact with neighbouring areas?

1. Whilst the acknowledgement of cross boundary issues is supported, we believe it has not been considered sufficiently. For example, there is a reference that growth from Redditch may need to be accommodated in the district and yet it is not formally considered in the document. The decision is left out until a later date. Given that this may involve a potential review of the Green Belt boundaries and given that both Redditch and Bromsgrove are also preparing their draft Core Strategies, we consider that these issues should be considered in full now.

Paragraph 182 of the NPPF makes it clear that plans should be prepared positively and consideration should be given to unmet need from neighbouring authorities. As it currently stands, Stratford, Bromsgrove, Wychavon, Coventry and Solihull are all failing to make sufficient provision for housing within their Core Strategies. We therefore query how the Stratford CS is being positively prepared when no consideration has been given to the lack of housing provision across neighbouring authorities.1. The Authority's refusal, which I regard as UNLAWFUL and **contrary to Section 110 of the Localism Act** - to COOPERATE with adjoining Councils, specifically Redditch Borough Council. The good thing that came out of the Regional Study is an understanding of geography- in this case - that of the Arrow Valley.

The writer regrets the apparent closed attitude you show to the benefits of drainage, highway capacity, services viz shopping, hospital medical services, recreation, employment and refuse collection. All of which was taken into account in the Pre-designation Planning Inquiry Spring 1964 and Hugh Wilson's subsequent Master Plan copy 1968.

Adrian Bedford-Smith

2. Para 2.3.2 has identified areas of planning which require a joint approach. This paragraph makes no reference to the relationship with Warwick District. Stratford-on-Avon and Warwick Districts are inextricably linked and this needs to be reflected in this section. Both districts have similar economies, with strong tourism sectors, a prosperous and growing car industry (Gaydon in Stratford and the car component businesses in Leamington), a major presence by several well known global companies, and with strong economic growth prospects. The populations of both districts enjoy above average incomes compared to other parts of Warwickshire and the West Midlands. Both districts are located along the same strategic transport corridors comprising the M40, A46 and the Chiltern railway line, which connects them both with London and Birmingham and also other parts of the country.

3. Services - both districts have excellent state and private schools and colleges, hospitals and medical services and shopping facilities, which are appreciated by people living in both districts. Both districts have unique advantages to further enhance the economic prosperity of its communities and this will be best achieved by both district cooperating and working together to prepare their Core Strategies.

Geoffrey Price Associates Ltd

4. I think it is ridiculous that residents living on or near a county boundary are not allowed to deposit waste at their nearest rubbish depot, regardless of crossing into a neighbouring authority. We at Earlswood have to travel 30 miles to our official waste disposal depot. So much for consideration of the environment.

Vida Davies, Mappleborough Green Parish Council, Councillor Justin Kerridge, Councillor George Atkinson

5. As our joint areas of interest extend from Tewkesbury at the southern end of the Avon to Warwick in the north and also to the Stratford-on-Avon canal and parts of the Grand Union and Oxford canals with the Stratford district, we are particularly pleased to see cross boundary relationship placed so highly in the Core Strategy. We would be interested to know whether these links beyond the geography adjacent councils, as the Avon especially, should be treated as a whole and falls under the remit of several local authorities. As possible sustainable transport links, rather than just leisure resources, we feel it falls somewhat into the category which includes the major road system and rail system and as such, requires a holistic approach for many planning purposes.

Inland Waterways Association (Warwickshire Branch), The Stratford and Warwick Waterways Trust Ltd

6. It is important to recognise that water-related planning policies and decisions within one local authority area can impact upon the waterways and its corridor in adjoining local authority areas, and as such, collaborative working between local authorities in developing planning policies, for, or significantly affecting, waterways corridors is important.

British Waterways (East and West Midlands)

7. Whilst the acknowledgement of cross boundary issues is supported, we believe it has not been considered sufficiently. For example, there is a reference that growth from Redditch may need to be accommodated in the district and yet it is not formally considered in the document. The decision is left out until a later date. Given that this may involve a potential review of the Green Belt boundaries and given that both Redditch and Bromsgrove are also preparing their draft Core Strategies, we consider that these issues should be considered in full now.

Taylor Wimpey UK Ltd,

8. Whilst the acknowledgement of cross boundary issues is supported, we believe it has not been considered sufficiently. For example, there is a reference that growth from Redditch may need to be accommodated in the district and yet it is not formally considered in the document. The decision is left out until a later date. Given that this may involve a potential review of the Green Belt boundaries and given that both Redditch and Bromsgrove are also preparing their draft Core Strategies, we consider that these issues should be considered in full now.

Paragraph 182 of the NPPF makes it clear that plans should be prepared positively and consideration should be given to unmet need from neighbouring authorities. As it currently stands, Stratford, Bromsgrove, Wychavon, Coventry and Solihull are all failing to make sufficient provision for housing within their Core Strategies. We therefore query how the Stratford CS is being positively prepared when no consideration has been given to the lack of housing provision across neighbouring authorities

Persimmon Homes (South Midlands) Ltd

Topic: 2.3 Cross Boundary Relationships – The implications for development planning

1. Support for developments not impacting on sub regional infrastructure assets eg cycle routes.
2. Concerns about the growth of Redditch, delayed discharge across the Warwickshire border.

NHS Warwickshire

3. The green infrastructure links (footpaths/nature reserves) between Redditch and Stratford might be considered, ie. from Rough Hill Wood around the fields between Studley and Redditch (around Green Lane) towards the playing fields and nature reserve the other side of Washford Mill. This would help to strengthen the slim, much desired Green Belt between Redditch and Studley. Any development of Redditch into Mappleborough Green might be accompanied by a boundary change, so that the responsible authority becomes Redditch. This would make sense.

Mappleborough Green Parish Council, Councillor Justin Kerridge

4. We note at Paragraph 2.3.2 of the document that the Council is seeking the resolution of a number of cross boundary issues before submitting its final draft to the Secretary of State. The approach adopted in the Draft Core Strategy with regard to net inward migration suggests that the duty to cooperate must mean a fuller and clearer understanding of the way in which cross boundary mitigation, in relation to other councils, and indeed councils at some distance from Stratford, will need to be considered in the formulation of the Core Strategy. Demonstrating to the satisfaction of an inspector that the Core Strategy has been prepared in a legally compliant manner, in relation to the duty to cooperate will, we submit, require a significant amount of open and transparent working with the adjoining councils before publication of the final draft version of the Core Strategy

Bloor Homes

5. We welcome recognition of the important cross boundary issues with Redditch, the Vale of Evesham HGV Control Zone and the consideration and safeguarding of mineral reserves.

Cross boundary will be important as local flood risk management strategies are developed, particularly where a strategy may have downstream implications on settlements, infrastructure, habitat and water quality, as may be the case for the Rivers Avon and Arrow.

Worcestershire County Council

6. Support, in particular the potential for employment development to the north-east of Redditch. However, it is considered that there should be more explicit reference to the availability and suitability of land to the north of the A4023 for employment use, as well as Winyates Green Triangle.

Owners of land at Ravensbank Drive/Gorcott

Consultation Question: Q01

1. Housing with care is needed to be flagged up as an additional cross boundary issues.

Warwickshire County Council

2. Support- welcomes and strongly supports the reference to the Cotswold ANOB in issues being addressed.

Cotswold Conservation Board

3. Support - accords with central government and Sports England's own approach to strategic planning

Sports England

4. Agree. However, I am concerned the Solihull's Draft Core Strategy has not considered the impact of their strategy of the residents' of Earlswood and Foreshaw Heath. I would suggest an additional question 'Do our neighbours' plans affect our district?'

Caroline Cotterill.

5. Support.

Bearley PARISH COUNCIL, Wootton Wawen Parish Council, Peter Jackman, Bidford-on-Avon Parish Council, Claverdon Parish Council, Mappleborough Green Parish Council, Gordon Brace

6. It is important that given the proximity to a number of conurbations that Stratford manage issues in a co-ordinated, but responsible way. As the consultation highlights, the way in which the Green Belt is maintained is of significance given the dangers and impact of urban sprawl. This is particularly important given the proximity to Redditch, Birmingham and Solihull, Coventry etc in order to preserve the established Green Belt. It is also important to maintain a number of significantly important environmental areas such as those mentioned in the consultation, namely the Cotswold, Earlswood Lakes, Stratford and the River Avon etc, where the council has a responsibility to maintain the current environment in which we live.

Andrew Ashcroft, Mr R Eades

7. We make the case later on in our representations that the CS target for housing is far too low. One argument for having a low housing target would be that the neighbouring districts are able and willing to make up for the shortfall and that this has been explored and confirmed through a 'Duty to Co-operate, as recently reinforced in the NPPF - paras 178-181. We can see no proof in the CS or in the Evidence Base of such a joint approach.

David & Angela Tucker

8. RBC suggests further joint working is required to demonstrate exceptional circumstances for the location of new development.

Redditch Borough Council

9. We do not consider that all the potential cross boundaries have been identified. The cross boundary implications in terms of accommodating future housing needs are likely to be much greater than just those arising from Redditch. We suspect that the Council will also need to consider the implications arising from Warwick, Solihull, Wychavon, Cheltenham and West Northants, who are all advancing core strategies that do not meet their full housing requirements.

The Home Builders Federation, Miller Strategic Land

10. Consideration will need to be given to the consequences of the decisions being made by Coventry and Warwick councils to delete their previous commitments to Green Belt allocations and extensions and not meet their objectively assessed housing needs. Coventry's Core Strategy is on hold, and there is little sign that this will progress anytime soon. Warwick historically has failed to deliver the housing numbers in its plans and it is still at least a year away from submitting its Local Plan for examination. Solihull has recently submitted a housing requirement of 11, 000 homes, despite the SHMA indicating that a figure of 904 homes was needed (or a total of 19,888 homes over the full plan period of 22 years).

Paragraph 9.51 of the GL Hearn Study indicated that if the Council wished to adopt Option 3: 25% Reduction in Net In-Mitigation (8,200 Dwellings) then ' it would need to develop a clear justification and to explain where 'displaced demand' could be accommodated. This could be justified as part of a sub-regional strategy to support the regeneration of the Metropolitan Urban Areas, but would need to be supported by the wider approach adopted at this level. It is likely that this would need to be taken forward by the LEP and need the support of neighbouring authorities. In the absence of a formal regional or sub-regional planning mechanisms there are clear risks to this.'

The DCS is for a lower housing figure than the GL Hearn's Option 3 and Section 2 says nothing about where the displaced demand could be accommodated and no cross boundary partnership has been established with adjoining authorities to deliver any shortfall.

Therefore the Core Strategy is unsound.

Miller Strategic Land, Trustees of Weaver, Miller Strategic Land and Taylor Wimpey, Heart of England Cooperative Society

11. It is noted that the cross boundary areas identified have totally different characteristics, in seeking a resolution to the issues a 'joint approach' is advocated. Whilst in principle, this is considered a good approach, it should not be assumed a balanced approach is automatically correct. Safeguarding the characteristics of another authority may be to the detriment of our own authority. Adjusting the Green Belt boundaries to accommodate the needs of Redditch is just one example. Another is the impact of wind farms of the neighbouring landscape.

Councillor Hazel Wright

12. In general terms cross boundary issues need to be addressed mutually, but with the proviso that the thrust of 2.3.3 is enforced to control urban sprawl and prevent towns and other settlements merging.

The expression 'other settlements' needs to be inserted after 'towns'.

2.3.3 (6) The amenity value of the Earlswood Lakes must always be preserved.

Councillor George Atkinson

13. The treatment of HS2 railway in the Core Strategy will require further consideration, and this will be very much dependent on how the scheme progress on a national level. Other cross boundary train connections, such as the Chiltern Line and Cotswold Line and the potential for additional night services will also need to be addressed.

Ladbroke Parish Council

14. Yes - It is imperative that SDC takes account of development proposed on, or very close to its boundaries. The number of new houses with LSV and MRCs should be adjusted to reflect these. For Earlswood, our neighbouring councils are proposing to erect 1349 new homes right on our Parish Boundaries. Solihull in particular appears to have no regard for the Green Belt and its draft Core Strategy makes no mention of Solihull ever being a good neighbour or consulting on issues. These are:

Solihull MBC

Blythe Valley development	250	phase 1
Blythe Valley development	250	phase 2
Mount Dairy Farm development	200	phase 3
Cleobury Lane development	185	phase 3
Griffin Lane development	50	phase 2
Braggs Farm	65	phase 2
Four Ashes Rd development	150	phase 1

Bromsgrove DC

Wythall	199
Total	1349

This is squeezing the village and will cause a huge increase in the use of local infrastructure as the roads in Earlswood and Forshaw Heath are becoming ever more of a motorway short cut to, for example, Blythe Valley Business Park

Earlswood and Foreshaw Heath Residents' Association

15. Support expressed, particularly for:

- The growth of Redditch - development in Redditch, particularly if on the flood plains, it could increase the chances of flooding in Alcester.

Councillor Susan Juned

16. Support expressed, particularly the importance of considering the impact future development will have on the Cotswolds Area of Outstanding Natural Beauty (ANOB), the West Midlands Green Belt and Special Areas of Conservation (SAC) to the south west of the district. Natural England recommends that the following SAC are named in addition to the Severn Estuary SAC/SPA/Ramsar: Bredon Hill SAC; Dixton Wood SAC; Ensor's Pool SAC; Fens Pools SAC; Lyppard Grange Ponds SAC and River Wye SAC.

Natural England supports the recognition of the need to ensure that future development in the district do not negatively impact on the sub-regional green infrastructure assets, such as Earlswood Lakes, as well as rivers, canals, old railways and cycling routes. The statement that '*opportunities should be sought to enhance these assets wherever possible*' is also supported.

Natural England

17. Strongly support the mention of bullet point 6 and the sub-regional Green Infrastructure, but would suggest that the word 'connectivity' is added to conform to the newly released NPPF.

Warwickshire County Council (Ecology)

Consultation Question: Q02

1. I support the Duty to Cooperate on cross boundary issues particularly for:

- The growth of Redditch - development in Redditch, particularly if on the flood plains, could increase the chances of flooding in Alcester.
- Storm water run-off contributed to flooding in Alcester in 1998 and 2007. Consideration needs to be given to ways to increase flood plains areas up-stream of Alcester. If development is allowed in a flood plain or to the extension of hard surfaces results in more rainfall being channelled into the river without attenuation then the impact on Alcester could be severe.
- The provision of facilities for waste recycling and recovery should be a cross boundary issue. Waste planning is unfortunately, being dealt with separately but needs to be integrated into the Core Strategy. Facilities are boundary neutral. A resource efficient approach has to be taken across boundaries
- Resilience to future change, such as climate change is a cross boundary issue.

Councillor Susan Juned

2. No

Bearley Parish Council, Claverdon Parish Council

3. Object - We would like to see specific mention of the role that cross boundary planning can play in the protection, restoration and expansion of the natural environment. This would cross reference to the aspirations of Policy CS 11. The Government's Natural Environment White Paper 'The Natural Choice; Securing the value of nature' July 2011, executive summary states that 'Past action has often taken place on too small a scale. We want to promote an ambitious, integrated approach, creating a resilient ecological network across England. We will move from net biodiversity loss to net gain, by supporting healthy, well functioning ecosystems and coherent ecological networks'. The NPPF clearly states that planning policies should 'promote the preservation, restoration and re-creating of priority habitats, ecological networks and the recovery of priority species populations, linked to national and local targets' (para 168). Landscape -scale conservation planning can only be achieved by cross boundary working and sub-paragraph 6 in paragraph 2.3.3 should be amended to read; 'There is a need to ensure that future development proposals in the district do not adversely impact on the sub-regional assets, for example, Earlswood Lakes and linear features such as rivers, canals, old railways

and cycling routes. Opportunities should be sought to enhance these assets wherever possible *in landscape scale ecological working.*

Woodland Trust

4. Whilst the exact details of High Speed 2 (HS2) are not yet known, the local plan could include policies to reduce the impact of HS2 on the landscape, wildlife, agricultural and rural businesses along the line. Whilst HS2 will be dealt with at a national level, information within local plans could inform the way is dealt with on a more local basis.

County Land and Business Association

5. Noralle feels it is important that; in the absence of a co-ordinated regional planning tier, there should be a clear evidence of cooperation between districts in determining housing provision and in formulating other policies. The 7 cross boundary issues are important, but do not encompass all areas of concern. In our view, the plan should reflect the fact that areas to the east of the district (around Southam and Napton) naturally look towards Warwick and Leamington Spa rather than Stratford-upon-Avon itself. Similarly, both Birmingham and Coventry to the north and Oxford and Cheltenham to the south have a critical influence on the growth and development of Stratford District. These should be added as relevant cross boundary issues.

Noralle Traditional County Homes

6. Support - it should highlight that ANOB extends to Edgehill which seems to be an area that is not actively monitored. How does the council propose to keep a check on the areas within its control?

Tim Philips

7. Your policy mentions rail services but not buses. Studley is currently served by Birmingham - Bromsgrove – Redditch - Studley route 143 (First), Redditch – Alcester - Evesham route 247, and Redditch- Alcester- Stratford route 26 (Stagecoach). As these all cross county boundaries, the strategy needs to consider what is needed. I also believe that it is unfair that Studley provides many services to the people of Redditch, from schools and takeaways outlets to the sewage treatment, yet Redditch forbids us to use their nearby waste tip when our nearest at Barton Farm is 12 miles away.

Michael Bond

8. There is no reference in the cross boundary issues as stated to identify that migration between districts has any implications for development planning.

It is recognised in the preceding paragraphs that interaction with neighbouring areas include migration in and out of the district to live. This is not taken forward into implications which makes it implicit that the level of housing provision provided for later in the plan, fully provides for net in mitigation within the district.

It must therefore be the case that the district is meeting its own needs and those of net in migration in full and does not rely on any element of this being provided for in adjoining districts.

However, this is not actually as Stansgate understand the situation, having regard to Cabinet Members' views expressed at the District Council's Cabinet meeting on 5th September 2011. Paragraph 9.03 of the Plan records that Cabinet opted for a housing provision of 8,000 houses rather than the level recommended by the Council's consultant of 11,000 -12,000 houses based on rationale that includes:

- **Aim for lower net in-mitigation**

The premise of the level of provision is therefore based on reliance that adjoining districts will take on some of the burden.

If the housing needs are not met in full in the District, then this should be recognised in the cross boundary issues and the 'Duty to Cooperate ' as laid out in the Localism Act, must be adhered to if the housing provision of 8,000 is to be justified.

Mrs G Lines, Linfoot Country Homes Ltd, Taylor Wimpey UK Ltd, The Glebe Committee, Walton Estates, South East Southam Land Owners Consortium, Banner Homes (Midlands), Walton Estates

9. We feel that the District and County Council responses are required.

Mappleborough Green Parish Council

10. Any additional cross boundary issues to be considered is with regard to net in migration. This suggests that the duty to cooperate must mean a fuller and clearer understanding of the way in which cross boundary migration in relation to other Councils, indeed councils at some distance from Stratford will need to be considered. In reality the revocation of the RSS means that there is no mechanism in place which allows growth to be shared across boundaries. The districts surrounding Stratford are in the process of considering their own dwelling requirements based on their own projections and there is no agreement in place to accommodate dwellings that Stratford are not planning to deliver or accommodate. Indeed, other authorities are actually seeking to reduce the number of dwellings to be provided in their respective districts, with Solihull MBC as an example where failure of Solihull to provide their own needs would inevitably increase the housing numbers to be provided in Stratford.

CALA Homes, Persimmon Homes (South Midlands)

11. Wind farms have an enormous impact on the vista as they can be seen on the horizon for many miles and as such will have a significant impact for its neighbouring authorities. The District Council will need to ensure that its policies for these developments have a good measure of cross boundary consistencies with those authorities.

Councillor Steven Kittendorf

Draft Core Strategy 2012 - Summary of Representations

3.0 The Vision

1. To maintain and enhance the heritage and green environment of the district is so very important, not just for the community but also for the wildlife. I have been concerned about the plight of the bees for some time. Any protection for the natural environment for bees and other wildlife must be commended.

Mrs Diane Holder

2. Although worthy and well intentioned, the vision and objective offer little help in deciding how various aims should be prioritised and balanced. We proposed a much more distinctive vision for the town of Stratford-upon-Avon, within the wider vision for the district, based on the following three principles;

- The existing boundaries of the town should be regarded as the limit of expansion of the town.
- Future housing and commercial needs should be provided either on brown field sites within these boundaries or at other centres within the district.
- Green spaces surrounding the town should be protected, to prevent 'development creep'.

The rationale for the vision is that the economy of the district is highly dependent upon the Stratford's tourism industry.

Stratford Voice

3. We feel that the excellent vision statement sets the tone for what is overall a very thorough and well constructed document

Shipston Senior Citizens Action Network (SCAN)

4. English Heritage commends your unambiguous recognition of the significance of the District's historic environment to its identity and wider social, cultural, economic and environmental benefits that its conservation can bring. This emphasis in the Plan reflects the Government's commitment to the delivery of sustainable development by using the planning system to protect and enhance the historic environment.

We support the proposed Plan's vision (Q3) and Objective (Q4). However, to reflect the Plan's evident aim to encourage an improvement of the historic environment, where appropriate and to emphasis the positive and proactive strategy for the historic environment, you might include 'and enhance to both the vision and the objective no.3

English Heritage

5. Broadly supportive

Shipston Town Council, Deborah Griffiths, Martin Smart, Stephen Ollerenshaw, David and Susan Close

6. The vision should be altered to adequately meet the District's housing requirement

Noralle Traditional Country Homes

7. The vision as stated is well expressed. It does not require any major new development; indeed the scale of development proposed would undermine the vision. The level of housebuilding proposed in the document conflicts with it.

CPRE

8. The document makes many references to the Stratford-on-Avon District Sustainable Community Strategy (SCS) 2009, which is a key document for the Voluntary and Community Sector (VCS). Many issues are still current, but the SCS will need updating during the life of the Core Strategy.

Voluntary Action Stratford-on-Avon (VASA)

9. Too vague - These terms can be used to oppose planning rather than support it. Heritage is not restricted to the past. We can create heritage too, so a vision that embraces new innovative buildings and how they are constructed and placed should be included. Again the term green suggests fields, where it should include clever use of materials and creating buildings that reduce impact. Current planning based on these ill defined terms only enable people to extend existing buildings that are already heavy users of fuel. The vision should be to create 21st century heritage and improve on the new green buildings.

Debbie Wiggins

10. We are very concerned that the overarching vision of the Core Strategy fails to make reference to the importance of positively seeking opportunities to meet development needs that the District requires during the plan period. NPPF (paragraph 14) makes it clear to LPAs that in plan-making this is a key component of sustainable development. We consider that the required development needs derived from objective assessments can be provided while maintaining and enhancing the heritage and green environment of the District.

**JS Bloor (Tamworth) Ltd Gallagher Estates and Pettifer Developments Ltd,
Barwood Developments Ltd, Bloor Homes, Brian Lewis**

11. The vision includes little support for the rural economy. As the District is identified as being of distinctly rural character, we are surprised that there is no focus on the needs of the rural economy and businesses located in rural areas. The Core Strategy document and vision should provide information on how a diverse rural economy will be supported and encouraged in the district. Rural business activities that take place in the countryside must be noted for their landscape scale benefits, Stratford-on-Avon's attractive landscape is predominantly maintained by farming operations, which need support in future in order to continue to improve. Farming should therefore be recognised as a priority area for economic development activity. The district has many vibrant and expanding agricultural businesses and farmers are optimistic about the future prospects for land based industries via traditional food production, energy production or various diversified farm enterprises. Farming is a business and a key part of a prosperous rural economy, policies should promote the development and diversification of agricultural and other land based rural business. Agricultural and environmental management can and do go hand in hand. Changing agricultural practices have resulted in the creation of many thousands of hectares of habitat (for example via agri-environmental schemes). Therefore the Core Strategy should acknowledge this and promote the benefits that agricultural businesses bring to the district.

National Farmers' Union

12. The Vision should be widened to be more locally distinctive. Although the brevity of the vision is commendable, it is questioned as to whether it should be more locally distinctive, given the unique character of Stratford-upon-Avon and the special character and diversity of the district as a whole.

Mrs J M Evans, Wychavon District Council

13. The vision should include a statement that all residents of the district will have access to a range of house types and tenures that meet the need of young families, elderly and single households.

Mrs G Lines

14. ASL considers that the vision does not reflect the NPPF and the state of the economy as set out in the previous section. It does not reflect a 'positively prepared' Local Plan and one that is striving to meet the needs of the district.

Ainscough Strategic Land

Consultation Question: Q03

1. Support

Cotswold Conservation Board, Wootton Wawen Parish Council, Bidford-on-Avon Parish Council, Mappleborough Green Parish Council, Environment Agency, Gordon Brace

2. Suggest amendment to 3.3, second paragraph to read... of the District while, *in proactive liaison with the residents, building*'.

Bearley Parish Council, Claverdon Parish Council

3. The vision statement should place more emphasis on economic growth and prosperity as the basis for achieving other qualitative objectives. It should be reworded as follows:

'By building upon Stratford-on-Avon District's strategically advantageous location in the heart of England, its unique heritage and attractive landscape, we will maximise opportunities for local and inward investment to create enduring jobs with high earnings potential, ensure a younger and therefore more energetic and innovative demographic profile, meet the growling demand for an increased supply of new sustainable homes, and through our increasing prosperity, we will together maintain and enhance our historic and green environment and build healthy, safe, informed and active communities who are able to enjoy high quality local services.'

'We are concerned that the planning policy agenda is being driven by the well off retired and semi-retired middle class who have 'made it in life' and therefore less willing to embrace change.'

Geoffrey Prince Associates Ltd

4. The vision in a sentence sums up the key focus of the plan.

It doesn't therefore include the erosion of the heritage and green environment and hence any planning should be managed with the existing environment in mind, given the importance of the district surrounded by large conurbations.

Andrew Ashcroft

5. I live in a Local Service Village. I think the vision should encourage villages to be growing vital centres, encouraging more people to work at home to lessen the impact on the environment.

Peter Jackson

6. There should be an objective relating to health and well being

Reuben Bellamy

7. The character of the town should be addressed as it is currently being eroded. Maintaining green fields and retaining development with the existing boundaries. There is a need for increased designation of Green Belt sites, for example, Borden Hill.

Robin Malloy

8. Past experience show these statements are rarely delivered upon.

Tysoe Parish Council

9. The vision should include a statement that all residents of the district will have access to a range of house types and tenures that meet the need of young families, elderly and single households.

The purpose of the vision is to set out how the district will look in 2028 and the plan should strive to

achieve the vision through the implementation of the planning policies set out within it. Therefore as access to housing is a central objective of the strategy, it would be helpful to expand the vision to include this.

Linfoot Homes Ltd, Taylor Wimpey UK Ltd, The Glebe House, Walton Estates

10. There should be an acknowledgement that as a result of nationwide, regional and local population growth, the Core Strategy needs to acknowledge and manage this inevitable change and growth. An alternative wording for the Vision to bring it in line with new NPPF guidance would be; *'To maintain and enhance the heritage and green environment of the district while accommodating housing and economic growth and ...'*

David & Angela Tucker

11. The vision statement should be altered to shift the emphasis on sustainable development within the context of the heritage and green environment of the district. It should read, 'To build healthy, safe, informed and active communities who are able to enjoy local services and employment opportunities, whilst maintaining and enhancing the heritage and green environment of the District. This would reflect the NPPF.

Robert Brisker

12. The vision should be shortened to refer to the identity and character of the district; otherwise it could apply to every district in the country.

Councillor Hazel Wright

13. Broadly agree, but would like to include the 'protect' the heritage and green environment so as to strengthen the protection for the green belt as the NPPF suggests

Tanworth-in-Arden Parish Council

14. We feel the vision should focus more on encouraging progression of existing communities to become truly sustainable; that is communities with a balance of housing employment, recreation and other facilities to help them in the transition to self-efficiency.

Harbury Society

Draft Core Strategy 2012 - Summary of Representations

4.0 Strategic Objectives

1. Strategic Objectives

- 1. This must include renewable energy.
- 2. This must include a policy to provide housing, both affordable and open market housing, as well as policies to grow rural businesses.
- 3. This should not lead to stagnation but allow areas to evolve in sympathy with their heritage and distinctiveness.
- 4. This is particularly important for the rural area.
- 5. In providing for local housing need, it is particularly important to consider housing need within the rural area to house that community and also the needs of any rural businesses.
- 8. In rural areas there is a lack of public transport and this should not be used as a reason to prevent rural development. In the majority of areas the car will be the only mode of transport that is practicable and this needs to be recognised within the core strategy.

Country Land and Business Association

2. Shipston Town Council (STC) is in broad agreement with the vision, **objectives** and principles which underpin this document. As far as Shipston is concerned there is a need for certain refinements, more specific detail and a level of prioritisation.

3. STC supports the strategic objectives and in particular would lay emphasis on: 2 - 'Planning to protect the character of settlements and the countryside.' Shipston is a rural settlement with a unique visual characteristic. It is an historic market town lying on the edge of the Cotswold AONB. It is very sensitive to developments that might affect that characteristic or do damage to the local economy.

Shipston-on-Stour Town Council

4. I propose the following order of priority for the Strategic Objectives:

- (1) Planning to protect the District's heritage and distinctiveness;
- (2) Planning to protect the character of settlements and the countryside;
- (3) Planning to meet the challenges of climate change;

The order of the remainder is less significant.

- (4) Planning to promote and diversify the local economy;
- (5) Planning to provide for housing needs;
- (6) Planning to support the main commercial centres;
- (7) Planning to meet the need for improved infrastructure, community facilities and services; and
- (8) Planning to increase the use of sustainable transport.

Robin Malloy

5. There needs to be a specific reference to quality of design. I realise it is implied by points 2) and 3) but I feel there should be specific reference.

Martin Smart

6. 4.1 (1) would prefer the word "mitigate" rather than 'meet' - more consistent with CS 1 (d) and 5.4 3rd bullet point.

Councillor S H Jackson

7. My view of the Strategic Objectives is that they are potentially contradictory.

If the Council wishes to retain these Strategic Objectives I would like to see a paragraph dealing with conflicts between the Strategic Objectives which I think should be dealt with as follows: no Strategic Objective should be pursued to the detriment of another Strategic Objective. This is consistent with the new version of the NPPF.

Stephen Ollerenshaw

8. Centro in particular welcomes the emphasis on increasing sustainable transport modes in Strategic Objectives 7 and 8.

Centro (Economic Development Officer)

9. The Stratford-upon-Avon, Grand Union and Oxford Canals are multi-functional assets. Their functions include a water resource, a heritage and cultural asset, providing open space and biodiversity, transport artery, tourist attraction, setting for development etc. They can support Stratford-on-Avon's Strategic Objectives, in particular:

- (1) Planning to meet the challenges of climate change - The waterways are supporting climate change, carbon reduction and environmental sustainability initiatives by assisting in the mitigation of flood risk, playing a role in urban cooling, providing sustainable means of transport, supporting biodiversity and forming ecological corridors and contributing to local renewable energy targets through the use of canal water for the heating and cooling of buildings. The effective management of water can be undertaken by the waterways which are often used to assist in mitigating flood risk, acting as an important channel for flood alleviation and the disposal of surface water run off from land and from new and existing development.
- (3) Planning to protect the District's heritage and distinctiveness - The creation of a high quality built environment preserving and enhancing Stratford-upon-Avon's unique historic character is supported by British Waterways. The Stratford-upon-Avon, Grand Union and Oxford Canals have a unique historic character which should be preserved and enhanced. They also contribute to the creation of a high quality built environment by being attractive settings for development.
- (4) Planning to promote and diversify the local economy - The canal network can contribute to promotion of the local economy as a tourist and visitor attraction and the waterway infrastructure can add diversity to the local economy by supporting small and medium sized enterprises and jobs within the marine sector in manufacturing, tourism and service industries.
- (8) Planning to increase the use of sustainable transport - The waterway infrastructure which can provide travel by foot, cycle and boat as alternatives to the car, offers transport choices. The canal system widens travel choice and is an existing form of infrastructure which can also accommodate public transport and increased use by modes of sustainable transport.

British Waterways (East and West Midlands)

10. No objection is raised to the objectives as drafted. There is a concern that the emerging suite of policies and Infrastructure Delivery Plan which are supposed to meet the objectives do not take account of the cumulative effect on the viability of bringing sites forward for development. The NPPF is clear, in Paragraph 173 that:

"pursuing sustainable development requires careful attention to the viability and costs in plan making and decision taking. Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."

The only evidence in relation to viability produced by SDC was the 2009 SHLAA produced by Baker Associates. This work concludes at para. 6.5, that in relation to brownfield sites the 35% affordable housing floorspace requirement may be too onerous and not viable. Requirements placed on developers have increased eg. the amounts requested toward education have escalated significantly. there is therefore a need for an up to date and robust consideration to be given to the cumulative viability impact of policy on development proposals.

Objective (5) is stated as '*planning to provide for housing needs*'. Unfortunately the draft planning policies which are said to achieve this objective fail to do so and therefore the draft Core Strategy, if it proceeds in this way, is at risk of being unsound.

CALA Homes (Midlands)

Persimmon Homes (South Midlands) Ltd

11. The objectives would appear to us to be very vague. It is therefore not clear how they can be measured? Objectives should normally be "SMART":

- Specific,
- Measurable,
- Achievable,
- Relevant,
- Time-framed.

There is no way of knowing currently whether or not this draft proposal supports a sustainable framework as the policies are currently drafted as more of a vision statement and the objectives are not set to achieve any goals in any given timeframes. This needs to be addressed.

12. We would have expected to see some analysis of the costs and resources required to achieve a number of the objectives.

Earlswood & Forshaw Heath Residents' Association

13. We are concerned by Objective (2) 'Planning to protect the character of settlements and the countryside.' This objective could be unduly restrictive on the rural economy and could be used to stifle legitimate business activities. The objective appears to be written for tourism benefits rather than rural economic improvement for those living and working within the District.

National Farmers' Union - Policy Adviser (Environment)

14. Coventry & Warwickshire Local Enterprise Partnership (CW-LEP) is concerned that the Strategic Objectives set out in the Draft Core strategy do not adequately respond to a strategic vision for Coventry and Warwickshire or provide sufficient emphasis on the need for economic growth. In particular the Strategic Objectives to 'promote and diversify the local economy' should be more positively worded to make provision for the needs of businesses and the provision of new jobs within Stratford-on-Avon District.

Coventry & Warwickshire Local Enterprise Partnership

Consultation Question: Q04

1. Support/Agree with the Strategic Objectives

Cotswolds Conservation Board, Bearley Parish Council, Wootton Wawen Parish Council, Claverdon Parish Council, Harbury Society

2. Suggest that an additional point is added:

'(9) Planning to create healthy communities by ensuring adequate and accessible sports facilities are available to all.'

Sport England

3. Warwickshire Rural Community Council welcomes the inclusion of point (5) Planning to provide for housing needs.

Warwickshire Rural Community Council

4. These objectives are typical of most core strategies - they are not unique to Stratford. They should be reconsidered and made more appropriate and relevant. They should also be reordered in order of priority with objectives relating to economic growth and housing placed at the top. Without economic growth we will be unable to achieve the other objectives. A further objective should be added: 'To ensure a younger population profile.'

24.9% of the District's population is of pensionable age compared to 21.2% in Warwickshire, 20% in the West Midlands and 19.5% across England and Wales. To rebalance the population will ensure that the District has a healthy, active, entrepreneurial and innovative population who can drive forward the local economy. Key to achieving this objective will be an increase in the overall housing provision with an emphasis on family housing, including housing to meet local needs and also those who work in the District but currently live elsewhere and commute to work. The policy of limiting in-migration in a growing economy is unsustainable.

Geoffrey Prince Associates Ltd

5. In broad terms the Country Land and Business Association agrees with the Strategic Objectives. There is a need for a competitive viable agricultural centre within the District as well as thriving rural economies supporting both communities and the environment, and the strategy needs to set out a clear, positive vision as to how this will be delivered.

Country Land and Business Association

6. Welcome the list of Strategic Objectives. However, objective (5) should be supplemented by the word 'adequate' before 'housing needs'.

Noralle Traditional County Homes

7. Bidford-on-Avon Parish Council (BPC) agrees with the Strategic Objectives. BPC is particularly concerned about the poor infrastructure of Bidford-on-Avon, especially as it remains one of the seven (8) Main Rural Centres.

Bidford-on-Avon Parish Council

8. Reword (1) Planning to meet the challenges of climate change to read "Planning to meet the challenges of climate change with locally appropriate solutions".

Nigel Rock

9. The objectives are too vague to be workable.

Jeff Perks, Ewen Cunningham

10. There should be an objective relating to health and well being, as per the Vision.

Reuben Bellamy

11. Should there be specific reference to Agriculture as a key factor influencing a number of the Objectives?

Charlecote Parish Meeting

12. Aston Martin Lagonda (AML) and Jaguar Land Rover (JLR) support the Strategic Objectives set out in Section 4 of the Core Strategy but find that insufficient emphasis and support is given to existing businesses. An additional Strategic Objectives should be added:

'Planning to support and enhance existing businesses.' This would accord with the NPPF.

Aston Martin Lagonda Ltd, Jaguar Land Rover Ltd

14. Two of the Strategic Objectives are unsatisfactory and capable of serious misinterpretation. (4) Planning to promote and diversify the local economy, and (5) Planning to provide for housing needs, unless altered could be used to justify new employment land releases and too much new housing. There is no need to 'promote' the local economy and it is adequately diverse across Stratford District. The term 'housing needs' is liable to be equated with a calculated 'housing requirement' calculated from sources which are largely impenetrable to residents, Parish Councils and District Councillors. These two objectives should be rewritten to prevent such misinterpretation and likely misuse.

CPRE Warwickshire Branch

15. Strategic Objective (4) should be altered to read "Planning to *grow*, promote and diversify the local economy". A key plank of Central Government Policy emphasised in the new NPPF is to grow the economy in order to improve employment prospects. This growth objective should be reflected in the Strategic Objectives. The Core Strategy needs to be consistent with national policy to be found sound.

David & Angela Tucker

16. Strategic Objectives - yes we agree, however we would support any other common sense objectives.

Mappleborough Green Parish Council

17. The Strategic Objectives should make reference to protecting the identity as well as the character of an area.

Councillor Hazel Wright - Liberal Democrat Group

18. Agree in principle, however they are too vague and subjective to be workable. We would also like more explicit reinforcement of protection for Green Belt where that is relevant.

Tanworth-in-Arden Parish Council

19. Support the Strategic Objectives, but consider there should be a specific Objective along the lines of the following:

"Planning to protect and enhance biodiversity, adopting a landscape scale approach to restore habitat connectivity through development".

It is now clear that our attempts to protect species and habitats through the traditional process of local, national and international designations has been unsuccessful and if we are to reverse the decline in biodiversity we need a dramatic change in our approach which re-connects these species and habitats across the landscape. A truly sustainable development process is key to the success of this approach.

Environment Agency

20. (4) I assume the local economy applies to all settlements, ie. in addition to those in (6) *main commercial centres*. Some, if not all, of these objectives are captured in the Strategy Policy Document to 2015 yet are disregarded or at best might be looked upon as 'material considerations'. Unless the planning function becomes proactive the aspirations listed will be frustrated.

Councillor George Atkinson

21. The objectives are so vague, it's not clear how they can be measured? Objectives should normally be: Specific, Measurable, Achievable, Relevant and Time-framed (SMART). There is no way of knowing currently whether or not this supports a sustainable framework. A 'SMART' objective might be:

"Constructing 5,600 new homes by 2028". The secondary detail behind it would set out how this is to be done and how the on-going success would be gauged between now and 2028.

22. The penultimate objective is: 'Planning to meet the need for improved infrastructure and services'. This could be achieved by filling in a couple of potholes in the road. The third last principle states: 'Seek to improve the overall quality of life for the community' (*NB. not a draft core strategy objective*). This too could be achieved by just filling in a pothole or two!

23. Such loosely worded objectives and principles are of little use to town and parish councils or 'neighbourhood forums' in their quest to develop Neighbourhood Development Orders (NDOs).

24. It would also be useful to know how these objectives are costed and at what point the costs become the primary driver? This is not a criticism but it is reasonable to assume that funds will be in short supply for the next few years and the plan and objectives tailored accordingly (achievability).

Earlswood & Forshaw Heath Residents' Association

25. I endorse the stated objectives with the reservation that (5) Planning to provide housing needs is operated within the overriding principle of not outwardly expanding existing settlements. After a limit is reached, we need to develop new towns or villages.

Gordon Brace

26. The Strategic Objectives identified in the Draft Core Strategy (DCS) are broadly supported by the West Midlands Metropolitan Authorities Pension Fund (WMMAPF). The only observations we would offer are:

- Does the objective relating to meeting the challenges of climate change need to be expanded in accordance with Policy CS 1 to reference the requirement to reduce our carbon footprint and also the need to adapt to climate change.
- The NPPF highlights the need for "strong, vibrant and healthy communities (as noted in para 5.4 of the DCS). It is therefore considered that an additional objective relating to the Health and Wellbeing of Communities should be included.

West Midlands Metropolitan Authorities Pension Fund

27.

- (4) could be strengthened (draft NPPF talks of planning for prosperity). It should also refer to promoting the area's unique tourism heritage. It would be easier to deliver the other objectives with a prosperous local economy.
- (5) should be extended to include schooling needs.
- (6) - (support main commercial centres). Clarification required.
- None of the Objectives mention shopping/retail or tourism which seems inappropriate, given their strategic significance.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

28. Sustainability should be a Strategic Objective. The provision and protection of green space for recreation is an important community facility.

Councillor S A Juned

29. The 8 Strategic Objectives are broadly supported with particular support for (4) - planning to promote and diversify the local economy.

The Bird Group of Companies

30. Section 8 of the NPPF seeks to promote healthy communities. Planning policies and decisions should aim to achieve places which promote opportunities for meetings between members of the community; safe and accessible environments; mixed use development and strong neighbourhood centres; and safe and accessible developments.

Oakley Mayfield

31. Warwickshire Wildlife Trust recommends that a specific reference to the protection and enhancement of biodiversity and the natural environment should be included in the Strategic Objectives. We do not believe that the current approach to accounting for the natural environment in the protection of heritage assets and the countryside provides the right context for policies CS 1 and CS 11 or recognises the important role the natural environment plays in achieving sustainable development.

The Core Strategy needs to acknowledge that biodiversity and the natural environment is more than a series of heritage assets within a countryside setting. It is a dynamic network of sites, features and species that interconnect throughout towns and the countryside providing the natural resources and ecosystem services that underpin economic growth and social wellbeing. The natural environment should therefore be seen as being at the heart of sustainable development and thus central to policy making within the Core Strategy. This needs to be reflected in the vision and within a specific Strategic Objective in Section 4.

The policies in the strategy and our recommendations during this consultation are focussed towards delivering a resilient ecological network throughout the District. This will enable robust protection for biodiversity and the natural environment, ensure adequate climate change adaptation and mitigation and will aid with the effective delivery of sustainable development. However to achieve this, the Core Strategy needs to be ambitious with its approach to the natural environment and so provide a visionary objective that gives robust context for the preceding policies. A suggested example is detailed below:

'Planning for the protection and enhancement of a robust and functional natural environment for the District that supports economic growth, promotes social wellbeing and contributes towards wider national and local environmental objectives.'

Warwickshire Wildlife Trust

32. Natural England agrees with the draft Strategic Objectives, specifically objectives: (1) planning to meet the challenges of climate change, (2) planning to protect the character of settlements and the countryside and (8) planning to increase the use of sustainable transport.

- However, it is recommended that objective (2) is amended as follows: ' Planning to protect *and enhance* the character of settlements and the *open* countryside.'
- It is also recommended that objective (7) is amended to include green infrastructure (GI) as follows: 'Planning to meet the need for improved infrastructure, *green infrastructure (GI)*, community facilities and services.'
- Furthermore, Natural England recommends that a specific objective is included on biodiversity and geodiversity: *'Planning to protect and enhance the biodiversity and geodiversity of the District and mitigating any unavoidable damage where practicable.'*

Natural England - Land Use Operations Team

33. Would recommend that (3) reads "Planning to protect the District's *natural and historic environment* and distinctiveness."

Warwickshire County Council - Principal Ecologist

34. The Strategic Objectives in Section 4. are broadly reflective of the points made in para. 156 of the NPPF, which states that Local Plans should set out 'strategic priorities' for the area to deliver:

- "The homes and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure for transport, telecommunications, waste management, water supply, waste water, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- The provision of health, security, community infrastructure and other local facilities; and
- Climate change mitigation and adaptation, protection and enhancement of the natural and historic environment, including landscape."

Whilst we recognise the objectives are not set out in any order of priority, the main purpose of the Core Strategy is to provide a strategy for ongoing development needs of the District. As such, Ainscough Strategic Land (ASL) considers that objectives (4) to (8) should feature more highly up the list.

ASL also believe Objective (6) should be more reflective of the NPPF and plan to provide for the retail, leisure and commercial needs of communities rather than simply support the main commercial centres.

Ainscough Strategic Land

35. In addition to the eight Strategic Objectives included in Section 4. a ninth is proposed: "(9) Planning to use the large rural brownfield sites in the District so that they continue to be regenerated with new residential and employment opportunities and other suitable uses." In this way the Strategic Objectives are aligned with national planning policy which promotes the reuse of brownfield sites, now endorsed in the NPPF and Policy CS 26 which deals with Large Rural Brownfield Sites.

Follett Property Holdings Ltd

36. In relation to the specifics of the Strategic Objectives, it is considered that whilst they broadly reflect the overarching roles that the planning system ought to play, the omission of supporting the transition to a low carbon future is an opportunity missed.

Para. 17 of the NPPF contains the core principles which should underpin both plan-making and decision-taking: Planning should: "support the transition of a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (eg. by the development of renewable energy)."

It is clear from the above that the move to a low carbon economy is a key strategic aim of national policy and local plans area key tool in delivering the right type and amount of development that would achieve this goal. It is not considered that the wording within the Strategic Objectives of 'planning to meet the challenges of climate change' sufficiently supports the aim of a transition to a low carbon economy. Such a transition has wider benefits that go far deeper than just adapting to the effects of climate change, it embraces the core principles of sustainable development, namely contributing to economic growth, supporting vibrant and healthy communities and protecting and enhancing our natural, built and historic environment for future generations.

We would strongly recommend that the Strategic Objectives be amended to support the transition to a low carbon economy in accordance with para.17 of the NPPF.

Broadview Energy Limited

37. Objective (5) is stated as '*planning to provide for housing needs*'. Unfortunately the draft planning policies which are said to achieve this objective fail to do so and therefore the draft Core Strategy, if it proceeds in this way, is at risk of being unsound.

Persimmon Homes (South Midlands) Ltd

Draft Core Strategy 2012 - Summary of Representations

5.0 Sustainability Framework

1. The Core Strategy supports my belief that when considering sustainability, local issues and the views of the community, the environment and the landscape must be taken into account. The Council must protect the character and appearance of towns, villages and our special landscape, not just for residents but also for those people who visit the area to appreciate the beauty of the county - this is a tourist area. I support the Core Strategy.

Mrs Diane Houlder

2. Broadly in agreement - sustainability must be the driving factor for the duration of this proposed legislative framework and other issues must not be allowed to override this matter.

Graham Ward

3. Agree in principle with the objectives of the Sustainability Framework. BPC is particularly keen to see economic, social and environmental sustainability within its parish, and trusts the Core Strategy will reflect this.

Bidford on Avon Parish Council

4. It might be prudent to explain the meaning of the word 'sustainable' which is used extensively in this document. It might be helpful to emphasise its definition in section 5.3 page 11 - which we believe is exactly the definition used in the planning document published by the Government this week.

David and Susan Close

Topic: 5.0 Strategic Objective

No comments received for this section

Policy CS.1 Sustainable Development

1. I am exceptionally pleased to see the District Council addressing issues of conservation directly.

Mr Michael Houlder

2. Suggest the following amendment to point (i): Seek to improve the overall quality of life for the community through the safeguarding of community health, safety, wellbeing and amenities, including the provision of adequate infrastructure, services and sports facilities.

Sport England

3. If you are to achieve the level of housing in smaller rural centres you want then some sustainability will have to be given up in favour of a wider geographical spread of new houses. There is no point encouraging applications for development outside areas of public services unless you accept that residents will need to use private transport.

Morton Bagot, Oldberrow & Spernal Parish Meeting

4. It is important that Policy CS 1 protects, restores and expands the district's natural assets in order to deliver the benefits listed to existing and new communities and neighbourhoods. This is particularly relevant to native woodland. The UK is one of the least wooded areas of Europe. The Trust is therefore working to achieve its ambitious aim of doubling native woodland cover over the next 50 years. Woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits.

(c) should be amended to read at the end '...and conserve, enhance and expand the District's natural assets.'

(e) should read 'Protect, enhance and expand the biodiversity and geodiversity of the District.'

Woodland Trust

4. WRC welcomes the inclusion of points (h) provide affordable, sustainable, durable and adaptable homes for all and (j) ensure access to employment, adequate and affordable housing and a range of services and facilities for all sectors of the community in the rural and urban areas, and promote social inclusion and cohesion.

Warwickshire Rural Community Council

5. Concern that the tone of this policy is negative and puts a number of obstacles in the way of the development. It is recommended it is rewritten and divided into two parts; the first part dealing with the positive elements of delivering the housing and economy; and then the second part dealing with more restrictive issues covering protection, transport and waste etc. The NPPF requires LPA policies to be positive in their outlook and encourage sustainable development. CS.1 lists a number of reasons which make development difficult rather than concentrating on the positive.

Country Land and Business Association

6. The policy makes sense and would like to see strength placed on densities of populations in residential developments.

Tim Philips

7. Support- Monitoring the effectiveness of the plans specific strategy and policy for the historic environment will help, in turn, to measure (monitor) the delivery of sustainable development.

English Heritage

8. Support

Shipston-on-Stour Town Council, Mrs Carole Randall

9. Parts j and K dealing the economy should be placed at the top of the policy. Delivering economic prosperity is fundamental to delivering other sustainability topics. Future generations will be compromised to fulfil their own needs if we leave a legacy of debt. Economic growth and increased supply of housing with local safeguards on affordability are essential elements to establishing the basis of achieving the other sustainability principles. The first five elements of the policy, protect, reduce and ensure prudent use of ' send out the wrong message. We would like to see the policy use positive words like ' encourage, promote and support etc. There is no indication that the District has in anyway, reached or is reaching its environmental capacity to accommodate further economic and housing development, that it needs to become a district of restraint.

Geoffrey Prince Associates Ltd, CALA Homes, Ainsclough Strategic Land

10. Wording is too vague to be workable.

Jeff Perks

11. The NPPF shows the economic role of sustainable development needs to be balanced with it social and environmental roles. The social roles includes listening to local people. The councillors represent the views of the local people and should be considered.

Deborah Griffiths

12. The first principles of the policy must be paramount in dealing with all planning applications.

Robin Malloy

13. Object to principle (j) as the definition of adequate and affordable housing...for all sectors of the community' is not provided. Developers may interpret it to seek more and more housing. Housing should be provided for local need in the rural area and not provided for in-migration. This section should be revised.

CPRE

14. Part (j) reference to affordable housing appears to refer to housing provided by RSL rather than housing generally. Affordable housing is a specific concept as set out in Section 9.2 when in fact this criterion is intending to refer to housing of all types and tenure to meet the needs of all households.

15. A new criterion should be added to refer to sites for development to be identified in sustainable location that reduce the need to travel. This is in line with PSS1 and PPS3 and continues to be the focus of the NPPF.

Walton Estates, Mrs G Lines

16. An additional principle should be included to protect the rural areas of the LSVs and other settlements against inappropriate residential and industrial development that could impact on the community.

Salford Priors Parish Council

17. I regret the absence of any references to agriculture/ loss of high class land. Apart from the some passing references, CS.8 7.3.7 (2) the strategy appears to be largely silent on activity say diversification.

Councillor Simon Jackson

18. Part (a) RBC recognises the importance of this in relation to Studley and believes this is well evidenced by the jointly commissioned WYG ' Study into future growth implications for Redditch, Stage 1 & 2

Redditch Borough Council

19. Do not think that sustainability should be the overarching principle of strategy, however consider it to be extremely important aspect for future development.

Mappleborough Green Parish Council

20. Policy CS.1 - improving the efficiency of transport networks could mention improving the safety of these networks.

Highways Agency

21. Support for the principles and aim to contribute to the creation and maintenance of sustainable development. British Waterways can support these aims in particular:

- The waterways are supporting climate change, carbon reduction and environmental sustainability initiatives by assisting in the mitigation of flood risk, urban cooling, provision of sustainable transport, supporting biodiversity and forming ecological corridors and contributing to local renewable energy targets through the use of canal water to heat and cool buildings.
- The creation of a high quality built environment by preserving and enhancing the Stratford-upon-Avon Canal
- The canal treatment can contribute to the promotion of local economy as tourism and visitor attraction and assist local economy by supporting small and medium sized enterprises and jobs in the marine sector.
- Canal systems can provide an alternative means of sustainable transport.

British Waterways

22. There is currently insufficient weight given to energy efficiency and too much on energy generation. A building should be encouraged to use less energy, not just to produce alternative energy.

Stephen Marchant

23. Definition of Sustainable required.

Wellesbourne Parish Council

24. Policy CS 1 has been drafted with B2 in mind and that this definition, which appears to be a synonym for 'viable' may eventually achieve practical meaning, although the policy in its present form is waffle. How is 'sustainable definition' defined? Is it B1 or B2, or both, or neither or just a synonym for viable?

N A M Butler

25. The word 'should' is too subjective, replace with 'must' contribute to sustainable development.

Earlwood and Foreshaw Residents' Association

26. It is considered an excellent statement of our need, provided that (h) provide good homes for all, is not place specific

Gordon Brace

27. Supported, but without more details and targets, it offers too much leeway to the interpretation of developers.

Councillor Susan Juned

28. Broadly supported. It suggested that criterion (j) and (k) should be at the top of the list and thereby reflect Paragraph 19 in the NPPF to ensure planning prioritises support for sustainable economic growth.

The Bird Group of Companies

29. In the absence of the sustainable definition in the NPPF, it is essential for local authority to clarify the criteria by which the sustainability of a proposal will be judged. This in turn may help to address the ambiguity surrounding the 'presumption in favour of sustainable development' and could therefore be used as justification against challenges from development interests where proposals do not meet local sustainability standards.

30. Strong support for criterion c, d, and e and believe that it encapsulates the Government's Policy on sustainable development as detailed in the NPPF.

Warwickshire Wildlife Trust

31. We consider that the policy should be reviewed to bring it in line with the NPPF, particularly paragraph 9 and consideration should be given to including the general themes of this paragraph into the policy.

Orbit Homes, Taylor Wimpey UK Ltd, Barwood Developments Ltd, National Farmers' Union, Ainsclough Strategic Land, CALA Homes (Midlands), Persimmon Homes (South Midlands) Ltd

32. We are pleased with the willingness to embrace sustainable development, however feel that restrictions should not be placed unduly where rural and agricultural development may change the appearance of the landscape, what some perceive to be a detrimental change may in fact be perceived by others as positive change. This can be restrictive to developments which may have far reaching social and economic benefits, whilst not directly enhancing the landscape character. Agricultural businesses may require expansion as demand for agricultural home-grown produce increases: allowance need to be made for this in the policy.

33. Paragraph 161 of the NPPF states that local authorities should assess ' the needs of the food production industry and any barriers to investment that planning can resolve. We would like to ensure agriculture in taken fully into consideration, particularly long term ability for a farm to produce its product, as a farm is built to meet current demands and those anticipated in the future. Expansion of a farm is necessary when demand for products arise, this must be fully evaluated and barriers to this growth should be removed wherever possible, to prevent restriction to both the industry and the economic development of the local area.

National Farmers' Union

34. The definition of sustainable development needs to be changed to make it more balanced.

Noralle Traditional County Homes

35. Criterion (h) is an inadequate expression of the important role that the Core Strategy should play in increasing the supply of housing to meet the needs of present and future generations. In particular, we find the reference to 'affordable' homes in this context confusing. If planning is to exert influence over the affordability of market housing, it is by ensuring that there is an adequate and increased supply of land for new housing through plans such as the Core Strategy. If the reference in criterion(h) is to affordable housing as defined by national and local planning policies, the criterion is unacceptable as it is only a partial expression of the proper approach to all housing that the Core Strategy must embrace.

CALA Homes (Midlands), Persimmon Homes (South Midlands) Ltd

36. It is clear that Policy CS 1 does not sufficiently promote key aspects of sustainable development such as the increased deployment of renewable technologies and the transition towards a low carbon future. It is considered that there should be a separate criterion, distinct from reducing and adapting to climate change and explicitly supports the move towards a low carbon future. This would accord with paragraph 17 of the NPPF, which states that planning should '*encourage the use of renewable resources (for example, by the development of renewable energy)*'. Even if criterion d was to remain, it should be amended to reflect the intentions of the NPPF, particularly Section 10, para 93 which relates to meeting the challenge of climate change, flooding and coastal change by stating: '*Planning plays a key role in helping shape places to secure radical reductions in green house gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development*'.

Paragraph 97 further states that 'to help increase the use and supply of renewable and low carbon energy, LPAs should recognise the responsibility of all communities to contribute towards the generation from renewable and low carbon sources.

In its present state, criterion d merely reflects the 'location of renewable technologies.' Paragraph 93 to 97 make it clear that there should be a strong emphasis on the promotion of renewable and low carbon energy. It is therefore felt that policy needs to better reflect this key principle of central government policy, and in doing so, reflect the presumption in favour of sustainable development. The drive towards renewable energy has wider environmental benefits which should be at the fore front of the policy and decision makers minds. These comprise the increase of energy security and reducing our reliance on fossil fuels, tackling climate change by assisting in the reduction of carbon emissions and contributing towards the decarbonisation of the power sector.

The drive to support and encourage increased generation of renewable and low carbon energy is underpinned by the Government's commitment to legally binding targets under the EU Renewable Energy Directive, to source 15% of our energy consumption from renewable sources by 2020. This has been recently reiterated as a headline goal at paragraph 1.2 of the Coalition Government's Renewable Energy Roadmap. The Roadmap goes on at paragraph 2.17 to confirm that UK total energy consumption from renewables in 2010 was only 3.3%, and subsequently, a more than fourfold increase is needed to meet the 15% target.

The consistent aim to increase the deployment of renewable energy is a part of the transition to a low carbon economy, underpinned by a raft of legislation and white papers and policy documents, including the Energy Challenge (2006); Meeting the Energy Challenge (2007); The UK Renewable Energy Strategy (2009), The Low Carbon Transition Plan (2009); National Renewable Energy Action Plan (2009) The UK Renewable Energy Road Map (2011) and The Carbon Plan (2011). Taken together, they demonstrate that a massive scaling up of the renewable energy deployment needs to take place and an unprecedented effort is required by policy and decision maker. It was felt that the Core Strategies sustainability framework should better reflect this huge challenge.

Broadview Energy Ltd

Topic: 5.0 Sustainability Appraisal Implications

No comments received for this section

Topic: 5.0 Explanation

1. "Development (that is sustainable) should go ahead without delay - a presumption in favour of (sustainable) development that is the basis for every plan, and every decision. The purpose of the planning system is to contribute to the achievement of (sustainable) development." The Draft NPPF is an essentially deceitful and hypocritical document. It is also tremendously crude. Nobody with any intelligence could be taken in by it so why should you pretend to be and weaken the local planning system by making this undefined phrase in your first policy? I have read twenty-seven responses to the government consultation on the Draft NPPF by local planning authorities in the West Midlands. The vast majority challenge 'sustainable development' and roundly declare either that it is not properly defined, or cannot be defined or that in so far as it represents B2 it supports only economic growth. You are one of the few local planning authorities not to challenge this definition; you should have done so. In fact, the adjective 'sustainable' is already used at Elizabeth House as a synonym for 'viable'. The Planning Committee refused an application for travellers' pitches at Rainbow Nurseries, Welford-on Avon on the grounds, inter alia, that it was not sustainable, that is to say, the nearest shops and doctor's surgery were too far away and the local school was full up. It is evident that when you drafted Policy CS 1 you had B2 in mind and that this definition, which appears to be a synonym for 'viable' may eventually achieve a practical meaning, although the policy in its present form it is a waffle. So how do you define 'sustainable development'? Is it B1 or B2, or both, or neither, or just a synonym for viable?

Mr N A M Butler

2. I don't think sustainability should be the overarching principle of the Core Strategy. I think local decision making (at parish and town level) should be the main consideration. How we, as the planning authority, can work better with local communities to deliver what they want. This would not prejudice sustainability but it would put democracy and localism to the fore. Second to localism should be the preservation of the character of the district. That is the rural, aesthetic or historic nature of most of the district.

Councillor Justin Kerridge

3. In contrast to the explanation set out in Paragraphs 5.3 to 5.5 we find that the text of Policy CS.1 - Sustainable Development, is heavily skewed towards those principles which seek to protect, or enhance existing features of the District. We do not therefore believe that Policy CS.1 is a balanced articulation of national planning policy with regard to sustainable development as explained more carefully in the Paragraphs 5.3 to 5.5. Given the level of detail expressed in some of the principles listed under Policy CS.1, principle (h) is an inadequate expression of the important role that the Core Strategy should play in increasing the supply of housing to meet the needs of present and future generations. In particular, we find the reference to 'affordable homes' in this context confusing. If the planning system can exert an influence over the affordability of market housing, it is by ensuring that there is an adequate and increased supply of land for new housing through plans such as the Core Strategy. If the reference to principle (h) is to Affordable Housing as defined in national and local planning policies, the principle is a partial expression of the proper approach to all housing the Core Strategy must embrace.

Bloor Homes

Topic: 5.0 Development Management Considerations

1. Under the heading 'Development Management Considerations' it is suggested that the West Midlands Sustainability Checklist should be used to help ensure that planning applications will deliver sustainable development - question 13 asks whether this is appropriate and if not what else could be used. Any reliance placed on the checklist would be objectionable. The checklist is not national policy or guidance in the same way as the Code for Sustainable Homes. It is a tool kit not policy that was referred to in the now abandoned RSS revision procedure. Reference to the checklist being included, even at Regional level, was however subject to outstanding objection not least given its prescriptive nature and its provisions to seek to accelerate the implementation of the Code for Sustainable Homes. Accordingly placing any reliance on the checklist as a means of determining applications would not be appropriate.

CALA Homes (Midlands), Persimmon Homes (South Midlands) Ltd

2. In contrast to the explanation set out in Paragraphs 5.3 to 5.5 we find that the text of Policy CS 1 - Sustainable Development is heavily skewed towards those principles which seek to protect, or enhance existing features of the District. Policy CS 1 is not, therefore a balanced articulation of national planning policy with regard to sustainable development as explained more carefully in paragraphs 5.3 to 5.5.

CALA Homes (Midlands), Persimmon Homes (South Midlands) Ltd

3. Given the level of detail expressed in some of the principles listed under Policy CS.1, principle (h) is an inadequate expression of the important role that the Core Strategy should play in increasing the supply of housing to meet the needs of present and future generations. In particular, we find reference to 'affordable' homes in this context confusing. If the planning system can exert an influence over the affordability of market housing, it is by ensuring that there is an adequate and increased supply of land for new housing through plans such as the Core Strategy. If the reference in principle (h) is to affordable housing as defined in national and local planning policies, the principle is unacceptable as it is only a partial expression of the proper approach to all housing that the Core Strategy must embrace.

CALA Homes (Midlands), Persimmon Homes (South Midlands) Ltd

Topic: 5.0 Delivery and Monitoring

No comments received for this section

Consultation Question: Q05

1. Substantial under provision with respect to the Hearn Report could risk the correct balance of required demographics for sustainable development will not be achieved.

Bearley Parish Council

2. Parts (j) and (k) of this policy should be placed at the top of this list. Delivering economic prosperity is fundamental to delivering other sustainability principles. The ability of future generations to meet their needs will be compromised if we leave them a legacy of debt - financial, social and environmental - and which we are doing at the moment - student debt, unaffordable homes and high taxes to fund our pensions! Economic growth and an increased supply of housing with local safeguards on affordability are essential elements to establishing the basis for achieving the other sustainability principles - the first five elements of this policy (a to e) start with the words 'protect', 'reduce' and 'ensure' the prudent use of....' send out the wrong message. We would like to see a positive policy which uses positive words such as 'support', 'encourage', 'promote' etc. There is no indication that the District has in anyway reached or is reaching its environmental capacity to accommodate further economic and housing development, that it needs to become a district of restraint.

Geoffrey Prince Associates Ltd

3. The CLA is not content that the draft policy does support sustainable development as it is not sufficiently balanced between business, communities and the environment, and a better redress of the balance is needed within CS.1 to reflect the priorities detailed in 5.4 is required.

Country Land and Business Association

4. We are a little concerned that the definition of Sustainable Development in Policy CS1 is slightly at odds with the Government's own philosophy within the Draft Planning Policy Statement (shortly to be confirmed as formal national policy). The Planning for Growth Statement issued on 23rd March 2011 coupled with the draft NPPF makes it quite clear that the Government's approach to sustainable development relies on a delicate balance between economic, environmental and social considerations outlined in the NPPF as 'Places, Prosperity and People'. However, there is scant reference to social issues and no mention of economic growth at all within Policy CS1 - merely 'access to employment' and 'adequate and affordable housing' within Point (j). The final version of the NPPF may have further to say on this aspect.

Noralle Traditional County Homes

5. I do not consider that the Core Strategy as drafted supports sustainable development in the District because it proposes that at least 50% of new housing is provided in rural villages. This will result in:

- i) adverse effects on the landscape/character of the district;
- ii) adverse effects on climate change due to increased car journeys resulting in greater CO2 and other emissions.
- iii) disadvantage those who do not own and/or cannot afford car ownership or the high running costs as public transport is inadequate and indeed, largely absent from large parts of the rural area.
- iv) increase dependence on petrol and oil (many villages do not have a gas supply).
- v) increase infrastructure costs as many parts of the rural area have inadequate services such as drainage and electricity supplies as well as poor highway conditions. Small scale developments will not fund the major infrastructure improvements necessary.
- vi) as there is no policy controlling the phasing of development, some villages could experience very significant growth in a short time which would adversely affect their appearance, character and community cohesion as well as overloading already stretched infrastructure.

Susan and Andrew Vaile

6. 'Sustainable development' is properly at the heart of the Core Strategy, the problem is that without an adequate and measurable definition of sustainable development it is meaningless. This allows different weights to be given to the elements (economic, social and environmental) depending on circumstances, leading to never-ending debate when determining planning applications.

Long Compton Parish Council

7. Firstly, CS1 (j) should refer to access to a range of house types and tenures in place of 'adequate and affordable housing'. Reference to affordable housing in this manner appears to refer to housing provided by a Registered Social Landlord rather than housing that is generally accessible to all. Affordable housing is a specific concept as set out in Section 9.2 when in fact this criterion is intending to refer to housing for all types and tenure to meet the needs of all households.

8. Secondly, a new criterion should be added to refer to all sites for development to be identified in sustainable locations that reduce the need to travel. Locating development within easy access of services, facilities, employment and public transport can create a sustainable pattern of development which will contribute towards achieving sustainable development and is a central theme of finding sites as set out in PPS1 and PPS3 and continues to be the focus in the draft National Planning Policy Framework.

Linfoot Homes Ltd, Taylor Wimpey UK Ltd

9. The point (j) under CS1 should include a reference to market housing and not just affordable housing. Bullet point should read "*Ensure access to employment, adequate market and affordable housing and a range of services.....*". Market housing will make up some 65% of the total new housing in the district and a reference to it in policy CS1 is important.

David and Angela Tucker

10. It is not clear that the Hearn report takes into account that people are working longer and that youngsters are living with their parents longer, before moving out and in to their own homes. The report should be re-assessed in this respect.

Claverdon Parish Council

11. This section appears vague in that it claims to contribute to the achievement of sustainable development, yet the link between the economic, social and environmental role without one aspect overriding the other is not made clear. Is each aspect of the same worth? Stratford District is a diverse area and the match between infrastructure and housing is not identified. It is imperative that sustainable development is given a robust definition to allow high quality development in the right place. If it is not adequately defined the opportunity could exist to allow consent for low quality development, without proper consideration to local need.

Councillor Hazel Wright

12. Publication of the NPPF explains clearly the three dimensions to sustainable development at Paragraph 7 (reflected in paragraph 5.4 of the Core Strategy), defines core planning principles at Paragraph 17 and sets out strategic priorities which should be included in a Local plan. Policy CS1 - Sustainable Development must reflect these national priorities and better reflect the Council's own Strategic Objectives set out in paragraph 4.1 in a much more balanced fashion.

Bloor Homes

13. In contrast to the explanation set out in Paragraphs 5.3 to 5.5 we find that the text of Policy CS1 - Sustainable Development, is heavily skewed towards those principles which seek to protect, or enhance existing features of the District. We do not therefore believe that Policy CS1 is a balanced articulation of national planning policy with regard to sustainable development as explained more carefully in the Paragraphs 5.3-5.5. Given the level of detail expressed in some of the principles listed under Policy CS1, principle (h) is an inadequate expression of the important role that the Core

Strategy should play in increasing the supply of housing to meet the needs of present and future generations. In particular, we find the reference to 'affordable homes' in this context confusing. If the planning system can exert an influence over the affordability of market housing, it is by ensuring that there is an adequate and increased supply of land for new housing through plans such as the Core Strategy. If the reference in principle (h) is to Affordable Housing as defined in national and local planning policies, the principle is a partial expression of the proper approach to all housing the Core Strategy must embrace.

Bloor Homes

14. The Core Strategy is contrary to the principles enshrined in the National Planning Policy Framework of promoting growth and sustainable development. Whilst Policy CS1: Sustainable Development requires all new development proposals to contribute towards sustainable development, it is considered the overall strategy for restricted housing growth of 8000 dwellings and wider dispersal of housing to the rural areas beyond Stratford and the Main Rural Centres will result in an increase in car dependency which is contrary to the principles of sustainable development.

15. A higher level of housing for Stratford-upon-Avon would assist in reducing the high levels of in-commuting (36% in 2001) highlighted in paragraph 9.7.8 of the Core Strategy. paragraph 9.8.8 recognises Stratford-upon-Avon as the only 'strategic centre' in the District and the most appropriate location for major retail, leisure, commercial and office developments. It is therefore essential to balance this with the town also being the focus for housing growth, any other strategy will be unsound.

16. Concerned that the Local planning Authority is not following the clear guidance in the NPPF regarding taking an evidence based approach to establishing the housing requirements. Continued failure to do this is likely to result in the plan being found unsound at the examination stage as confirmed by NPPF paragraph 47. It is critical that prior to the submission document the plan is refocused on establishing a robust District-wide figure in line with the sustainable development principles of the NPPF.

Miller Strategic Land, Trustees of WA Weaver, Miller Strategic Land and Taylor Wimpey, Heart of England Cooperative Society

17. The draft policies are too vague to be workable.

Ewen Cunningham

18. The policy concentrates on the outward beauty of the area and does not provide protection for the core features of the communities within these landscapes.

Harbury Society

19. It does indeed, and with mindless iteration, just as George Orwell's sheep bleated "Four legs good, two legs better". Strike out the adjective 'sustainable' altogether on the grounds that it is meaningless and substitute the terms 'economically' or 'environmentally' or 'socially' viable as appropriate.

Mr N A M Butler

20. CS1 (a) is quite clear 'Protect, enhance and manage the character and appearance of the individual towns and villages and landscape within Stratford-on-Avon District'. Also CS1 (i) 'Seek to improve the overall quality of life for the community through the safeguarding of community health, safety, wellbeing and amenities, and the provision of adequate infrastructure, services and facilities'. Follow on policies in the overall strategy do not support either (a) or (i). Previous Policy COM.1 went some way to achieve (a) but there is no clear route to follow this through. Increasing the size of a small community does not in itself bring about improved services and facilities - history from the mid 1990s clearly demonstrates that development in the villages has been matched with decline rather than improvement in services and facilities. The Core Strategy requires to be revisited in the light of the recently revised Draft National Planning Policy Framework (2011).

P J Boreham

21. We believe that this is the wrong question. In our opinion, the question that we should be addressing is: "How will this draft policy further benefit or hinder the sustainable development of the District over the organic development that could naturally be expected to occur?"

22. The principles are sound in theory but are so vague it's not clear how they can be measured. Such loosely worded principles are of little use to town and parish councils or 'neighbourhood forums' in their quest to develop Neighbourhood Development Orders

J Buckley

23. The first objective (principle) in the policy is too restrictive. It misses the ethos of the NPPF and presumption in favour of sustainable development. It is worded in a manner that is likely to restrict rather than promote sustainable development. Overall, the objective of Policy CS.1 would be used to preserve the status quo.

Ainscough Strategic Land

24. Comments on specific objectives (principles) in Policy CS 1:

(a) with regard to the protection of the integrity of the District's countryside, the NPPF adds recognition to the intrinsic and beauty of the open countryside. However, it does not place outright protection over it and the overriding consideration is to ensure the needs of the District are met.

(b) no objection so long as the management of an asset can include its recorded loss if this can be fully justified.

(c) there is no need to repeat heritage assets.

(h) request it is amended to read 'Provide a sufficient choice of sustainable, durable and adaptable market and affordable housing.'

(j) there is no need to repeat the need for affordable housing. Also request that specific reference is made to the need to ensure all sectors of the community have appropriate access to a range of retail services to meet their needs. Also question if the promotion of social cohesion and inclusion might be best placed in the objective (principle) that seeks to improve the overall quality of life for people in the District.

(k) the Council should be giving support to a range of industries not just limited to higher value and lower impact activities.

Ainscough Strategic Land

25. It is considered that the Draft Core Strategy fails to properly support Sustainable Development. This has a number of aspects beyond simply protection and preservation; indeed, it is more to do with growth and meeting the needs of the whole community - existing and future.

BNP Paribas Real Estate

Consultation Question: Q06

1. There are no points raised in CS 1 that reflect the need and the role of the rural economy and the need to stimulate development of businesses within the rural area.

Country Land and Business Association

2. The NPPF may have further to say about 'access to employment' and 'adequate and affordable housing'.

Noralle Traditional Country Homes

3. Sites of Local and County importance in terms of ecological value should be given high importance in terms of protection when determining sustainable development proposals.

K J Griffin-Gallagher

Mr M Hipkiss

L H Brice

E Lycett

G F Lycett

R N Butler

Mark Hind & Tonia D'Bras

Roger Pamment

Mrs Lesley Smith

Mr J Alderson

A J Mann

Mrs C J Mann

Councillor S A Juned

Julian Davey

Eclipse Road Residents Group

Nina Knapman

4. CS 1 (j) should refer to access to a range of house types and tenures in place of 'adequate and affordable housing'. Reference to affordable housing in this manner appears to refer to housing provided by a Registered Social Landlord rather than housing that is generally accessible to all. Affordable housing is a specific concept as set out in Section 9.2 when in fact this criterion is intending to refer to housing of all types and tenure to meet the needs of all households.

Linfoot Homes Ltd

Taylor Wimpey UK Ltd

The Glebe Committee

South East Southam Land Owners Consortium

Banner Homes (Midlands)

Walton Estates

5. A new criterion should be added to refer to sites for development to be identified in sustainable locations that reduce the need to travel. Locating development within easy access of services, facilities, employment and public transport can create a sustainable pattern of development which will contribute towards achieving sustainable development and is a central theme of finding sites as set out in PPS1 and PPS3 and continues to be the focus of the NPPF.

Linfoot Homes Ltd

Taylor Wimpey UK Ltd

The Glebe Committee

South East Southam Land Owners Consortium

Banner Homes (Midlands)

Walton Estates

6. The policy should address a support for more local autonomy with the ability to determine locally what is necessary and fitting for individual communities. Support for Neighbourhood and Parish Plans and Village Design Statements should be part of this and should be acknowledged within the Core Strategy.

Harbury Society

7. The conversion of redundant agricultural buildings for housing outside settlements will contribute to the sustainability framework and should be introduced as policy.

Councillor George Atkinson

8. Policy should be looking to protect, assist and encourage the development of agricultural and agronomy businesses within the District. The document almost ignores this sector completely. Farm land must cover about 85% of the District and should be regarded as an asset (otherwise we all starve in the future).

Earlswood & Forshaw Heath Residents Association

9. There should be a stated geographical limit to each settlement.

Gordon Brace

10. Absence of specific references to improving the energy efficiency of buildings in the district and to managing water.

Stratford-upon-Avon Town Council

11. The District Council should set high standards for the environment and resource use. All sustainability measures should be examined to ensure that they are resilient to change and are capable of being maintained over many years. The funding and ownership responsibilities for maintenance have to be adequate. For example, Sustainable Urban Drainage for water attenuation is only a sustainable decision if facilities are managed and maintained for the purpose for which they were developed. This will require a funding arrangement for future management to be added as part of any planning condition.

Councillor S A Juned

12. Promote the re-use of brownfield sites, wherever possible, in preference to new greenfield sites.

Follett Property Holdings Ltd

Consultation Question: Q07

1. Whilst it may be inherent in the process, the manner in which it is drafted does not overtly appear to take direct account of those who are affected in the community and will be part of the policy delivery.

Bearley Parish Council, Claverdon Parish Council

2. The evidence base is not obvious in the document.

Councillor Hazel Wright

3. District Council should consider evidence from Parish and Neighbourhood Plans and design guidelines in Village Design Statements and the results of Housing Needs Surveys.

Harbury Society

4. A key driver for this policy should also be the Water Framework Directive. Other evidence should include the Strategic Flood Risk Assessment and Water Cycle Study.

Environment Agency

5. The identification of the key drivers appears appropriate.

Follett Property Holdings Ltd

Consultation Question: Q08

1. It is important that there is sufficient baseline data covering the rural areas to measure current employment, growth in employment and development of micro, SME and larger businesses within the rural area.

Country Land and Business Association

2. We would like to add a statement in line with national policy to reduce travel by private motor car.

Snitterfield Parish Council

3. An independent district wide work party should be formed to monitor and then record and publish the various aspects of the deliverance of the agreed elements of the draft framework.

Mappleborough Green Parish Council

4. Monitoring should include assessment of all completed developments against their sustainability targets, in order to inform future planning applications.

A J Mann

5. The ongoing support for the County's Habitat Biodiversity Audit will allow the Council to monitor the long term effectiveness of planning decisions on the wider environment.

Environment Agency

6. By and large this policy shouldn't need monitoring. By rewriting the objectives to make them SMART, both the District Council and the Neighbourhood Development Orders will have a rigid framework within which to comply and CS 1 will be self-monitoring.

Earlswood & Forshaw Heath Residents Association

7. Policy might be monitored by drawing together the relevant information from other monitoring - say, every three-five years.

Stratford-upon-Avon Town Council

8. Monitoring of completed developments against sustainability targets would be informative to future planning applications.

Councillor S A Juned

Eclipse Road Residents Group

9. The NPPF requires sustainable development to be seen as a golden thread running through the plan making process. Policy making and site allocations in the Core Strategy should therefore be founded on the principle that sustainable development will be delivered if it meets the policy requirements of the plan. In turn, if the sum of the policies taken together constitutes what is to be sustainable development for the district, a simple monitoring outcome of CS 1 would be to account for the number of applications that are approved contrary to the policies or site allocations of the Core Strategy.

Warwickshire Wildlife Trust

Section 6 - Resources

6.1 Climate Change and Sustainable Energy

1. Support -We need to deal fuel poverty in addition of reducing carbon emissions. This has a severe impact on health. The lack of heating leads to death and A &E admissions. The promotion of use of air and ground source heating systems should be promoted by the Council to help resolve this issue.

Charles Goody

2 Too bland - it does not set out a strategy for future work in the district. The subject of resource management is becoming highly complex, demanding and costly each year. Too much prominence given to minerals, but little on domestic water saving, which is possibly the most important topic in the next 25 years?

Dr P Reasbeck

3. Agree in principle. At a local level, BPC believe a stronger and better working partnership with STW would minimise flood risk and improve drainage in the Parish

Bidford-on-Avon PC

4. Laudable objectives but these must be consistent with the need to secure and encourage economic growth and development. Therefore, viability is key.

BNP Paribas Real Estate

Topic: 6.1 Strategic Objective

No comments received for this section

Policy CS.2 Climate Change and Sustainable Energy

1. In section 6, in relation to climate changes issues, it should be emphasised that new development should not be permitted in flood risk areas any more. If new development really NEEDS to be permitted in areas of low flood risk, such development must incorporate SUDs.

Alan Marks

2. We believe that there should be a list of the type of technologies that the Council should encourage. Also the policy should definitely emphasise the need for low impact on the historic landscape.

Wootton Wawen Parish Council

3. You may wish to cross reference the Plans historic environment policy (CS 12) and the need to ensure appropriate alterations are commensurate with the buildings historic significance and sensitivities. I refer to PPS5 Policy HE1. You might also signpost regularly updated specific advice provided by English Heritage on managing the impact of climate change on the historic environment. www.climatechangeandyourhome.org.uk

English Heritage

4. The potential for renewable energy generation needs to be balanced against the nature and character of settlements and the importance of local landscape features. Our Parish Plan shows how important and valued these features are by the residents of Priors Marston. We consider the re-instatement of the Special Landscape Areas to be important and would support their immediate reintroduction.

Priors Marston Parish Council

5. The drive to improve the use of renewable energy must not overrule the need to protect the rural character and /or street scene of the locality.

Snitterfield Parish Council

6. Considering the well publicised energy crisis the country faces, it is disappointing that a greater emphasis is not placed on ensuring all new development meet the highest standards of energy efficiency, and the improved use of resources. The sustainability of all new developments has to be the primary consideration when applications are brought forward. This is an opportunity that has to be uppermost in our planning and could be used as justification for development in some locations where it would otherwise have been refused.

Councillor Paul Beaman

7. Policies CS 1 and CS 2 stress the need for new build to be affordable, durable, adaptable to climate change etc. The great majority of buildings will exist in 2028 are already in existence but the Strategy includes no statement about the treatment of conversions and extensions of existing buildings.

Stratford-upon-Avon Society

8. Policy CS2 states that the " Council will expect all new residential development to achieve Level 4 of the Code for Sustainable Homes by 2013 and Level 5 from 2013 onwards". Yet, the Local Planning Authority will not be monitoring or regulating the construction of homes. This is a matter for Building Control Officers, who have requisite expertise in the CSFH and will be on-site on a regular basis to ensure compliance with the Code.

Hence, there is no need for Policy CS 2 to duplicate, supersede or usurp Building Regulations. Page 2 of [the Code for Sustainable Homes \(December 2006\)](#) states that the Code "will form the basis for future developments of the Building Regulations in relation to carbon emissions from, and energy use in homes, therefore offering greater regulatory certainty to developers".

Page 5 of the Code goes on to state that" The Code is closely linked to Building Regulations, which are the minimum building standards required by law. It is intended that the Code will signal the future direction of Building Regulations in carbon emissions from, and energy use in homes, providing greater regulatory certainty for the homebuilding industry".

Mrs E Creek

9. SPPC propose an additional section to cover solar energy to ensure that applications for solar farms of any size should include an Environment Impact Assessment. Such farms should be limited in size to protect the rural green landscape.

Salford Priors Parish Council

10. Encouraging greater investment in renewable energy and environmental considerations by greener developers should be off set against reduced Section 106 payments.

George Stepney

11. The Council planning policy with respect to retail developments should include a requirement that electric car charging be provided.

SDC Environmental Quality and Climate Change Panel

12. Para 6.1.10 -'renewable energy' should be prefaced "small scale"...

13. Monitoring - SDC's in-house monitoring of its CO2 emissions through its activities/services should be included?

Councillor Simon Jackson

14. NPPF promotes the use and supply of renewable and low carbon energy.

Detailed policy with prescriptive renewable energy requirements should not be included within Policy CS 2 and would be more appropriately covered by Building Regulations.

A prescriptive sustainable development policy within the Core Strategy would deter development. The policy should adopt a generic approach encouraging sustainable development where appropriate and viable. Policy CS 2 recognises that renewable, low and zero carbon energy generation can help in achieving a reduction in emissions. Specifically the policy states that all new residential development will be expected to achieve Level 4 of the Code for Sustainable Homes by 2013 and Level 5 from 2016 onwards.

It is recognised that Policy CS 2 seeks to endorse the principle of sustainable development as promoted by the NPPF. Whilst the use of renewable and low carbon energy should be encouraged by the Core Strategy, it should not include detailed and prescriptive policy setting out required efficiency ratings (eg. Code for Sustainable Homes) or set targets for carbon reduction. The level of detail would be more appropriately included within Building Regulations. This approach is endorsed by the Housing Minister Grant Shapps (see article in Appendix 1). A prescriptive renewable energy policy would deter development. The NPPF states:

'Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened' (Paragraph 173)

It is important that Policy CS 2 considers the viability implications of providing sources of sustainable energy and achieving various efficiency ratings. Overly prescriptive policy requirements and policy that seeks financial contributions should targets not be achieved, cannot be supported. Such an approach would compromise the viability of many schemes.

In order for Policy CS 2 to be effective and sound, it should encourage the delivery of renewable energy through a generic policy approach that has a positive strategy to facilitate the implementation of sustainable design and energy initiatives where appropriate and viable. This would be a more flexible approach that would not deter or compromise the quality of development. Compliance with the NPPF would also be maintained as the principle of sustainable development and renewable energy would still be a priority and strongly promoted.

Gladman Development, Brasenose College, Bloor Homes

15. Direct benefits to the local area or community should be the major factor. If a project doesn't supply local need at a considerable benefit to those affected by visual/ noise/smell/traffic etc of the proposed development then it should not be granted.

Mappleborough Green Parish Council

16. We note that the Council is consulting on whether to stipulate compliance with the full Code for Sustainable Homes. It will need to assess the viability of doing so to ensure the deliverability of the local plan. Similarly, if it wishes to stipulate compliance with Code level 4 for water ahead of the Building Regulations then it will need to assess the viability of doing so.

Home Builders Federation

17. The clear commitment to dealing with the effects of climate change could also mention the aim of locating new development in the most accessible locations, to reduce car reliance and maximise opportunities for linked trips.

Highways Agency

18. Whilst William Davis recognise the need to combat climate change through emerging planning policy, we are concerned that the climate change and sustainable energy policy outlined in draft Policy CS2 is onerous and will constrain future development.

Our primary concern is the requirements established with the policy have not been considered sufficiently in terms of residential development viability. Paragraph 173 and 174 of the NPPF provide guidance on viability of development. To be consistent with this national policy it is clear that policy requirements such as those outlined in policy CS2 need to be considered in terms of their influence on viability. The evidence base document supporting policy CS.2 is Warwickshire and Solihull Renewable and Low Carbon Energy Resource Assessment and Feasibility Study (CAMCO). The report indicates in

section 8.5 of the study that: *'Each of the LPA's needs to satisfy itself that the targets as they are framed are generally viable within the current development Markets. They should also examine whether future market conditions will support higher targets'*, before further stating that, *'In order to do this a development viability assessment needs to be conducted'*. This acknowledgement is then reinforced in the recommendations for LDF policies in the study, with recommendation 2 of paragraph 2.1 (new Development) stating that authorities should *" Conduct viability assessment(s) to collectively consider the full range of planning obligations, eg. Affordable Homes, S106, alongside the additional costs and potential incomes associated with achieving lower carbon development from ESCOs, capitalisation of the renewable energy tariffs and 'allowable solutions'*.

William Davis Ltd can find no evidence³ that the additional costs associated with addressing climate change (notably CS 2A(d) - Water Conservation) and Sustainability (CS 2B(i) - Code Levels 4 and 5) have been considered in terms of their influence on residential viability. Until this work has been done, the policy outlined in CS 2 is inconsistent with national planning policy and would in our opinion be unsound, should it be considered by an inspector in its current form, based on its current evidence base.

William Davis Ltd, Taylor Wimpey UK Ltd

19. We support the concept of any new build/extensions to have wherever practicable, the maximum amount of insulation, re-using rainwater, double glazing etc.

20. In principle, we support appropriate methods of renewable energy, such as geo-thermal, hydro power and solar. This community has already supported solar panels on farm buildings and is making a valuable contribution to energy demands by this method, this is less intrusive on the environment and should be encouraged.

22. We do not think that the council should identify energy specific targets, the reason being that sometimes these targets are unrealistic over ambitious, and then unfavourable developments may slip through, purely as a result of trying to meet such targets. This appears to have led to much discord throughout the country due to the previous Government setting unrealistic renewable energy targets.

Shotteswell Parish Council

23. These policies need firming up. They are at present largely aspirational. How will you ensure that renewable energy is generated? How will you demand the highest standards of sustainable construction? Will you still be able to demand buildings to satisfy Code 4 now government has dropped this?

24 We support the policy as far as it goes and are pleased to see the commitment to seek the highest standards of sustainable construction, but do not consider that developers should be allowed to side step their obligations by making a 'financial contribution'.

Harbury Society

25. The policy expects all new residential development to achieve Level 4 of the Code for Sustainable Homes by 2013 and Level 5 from 2016. Objection is raised to the expectation that all new residential development will achieve varying levels of the Code for Sustainable Home. Notwithstanding the reference in Para 6.1.7, the Authority should not seek requirements for the construction of new dwellings in excess of the Building Regulations. The Core Strategy provides no evidence as to why these requirements in excess of national standards should be the subject of Policy. In addition those matters not covered by the Building Regulations, as set out at Paragraph 6.1.7 are adequately covered by other draft policies elsewhere in the Core Strategy.

26. Paragraph 154 NPPF is clear that local plans should be aspirational but realistic. It will, therefore be important, as the policy is worked up, to note in respect of house building, it is the market that will really dictate the level of energy efficiency and carbon reduction in new homes over and above legal requirements. If buyers are prepared to pay the additional premium for zero carbon homes then the industry will build them. At the moment, however, evidence suggests that reducing carbon emissions is not top of the list when purchasing a property, particularly when incomes are under pressures from other sources. It is, in essence, extremely important that the viability of development proposals are not put at risk by unreasonable expectations being placed on developers.

Cala Homes

27. Policy CS 2 states 'all new development proposals should contribute towards sustainable development. Replace 'should' with 'must'.

28. Too bland by and large. It in no way sets out a strategy for future work in this area by SDC. The Services by Resource Management and Resource Generation are becoming more complex, demanding and costly each year. Some subjects are given too much prominence, e.g. minerals, whilst others, such as domestic water saving, (possibly the most important topic for the district in the next 25 years) are barely mentioned. By referring to 'Renewable Energy Generation' in general and biomass energy development, wind energy developments and energy from waste, the draft is completely misdirecting the Council's attention. These subjects are very large scale, very expensive and way outside the Council's capital resources. Certainly they must be pursued, but on a national scale.

Earlswood and Forshaw Heath Residents' Association

29. Warwickshire Wild Life Trust supports policy CS 2 and welcomes the local authority's commitment to ensure that planning contributes towards mitigating and adapting to the causes and effects of climate change. We recognise that climate change creates many challenges for the district and so it is essential that policy includes a range of measures that will help the district prepare and respond effectively. However, we believe that one such measure missing from clause A is the need to make biodiversity and the natural environment resilient to the effects of climate change.

28. Climate change is amongst the greatest threats to biodiversity worldwide and, coupled with the current fragmentation and degradation of the natural environment, threatens to compromise the future ecological security. The need to respond and adapt to these threats is well enshrined in government policy and was subsequently the subject of the Lawton report where recommendations for more bigger, better and joined up place for nature was considered as a necessary approach to address these issues. The NPPF places a responsibility on Local Authorities to contribute towards an approach by planning for and enhancing resilient ecological networks and so we believe that this principle should be firmly acknowledged in this policy.

30. The Trusts supports the cross compliance of Policy CS 2 with CS 1 and 11 in which the impact of renewable energy proposals will be assessed against their relative impact on the biodiversity and the natural environment. Whilst the Trust recognises the need to move to renewable sources of energy to reduce our dependency on fossil fuels and restrict carbon emissions, we firmly believe that such benefits should not be achieved at the expense of the natural environment. Sustainable development cannot be delivered if different sustainability principles are traded off against one another and therefore a standardised and balanced approach is needed to determine all developments, regardless of their overarching objectives.

We believe that CS.2 achieves this as it sets out criteria where renewable energy development is tested against the sustainability policy in the plan, ensuring that support can be given to truly sustainable development.

Warwickshire Wildlife Trust

31. We refer to paragraph 96 (3rd bullet) of the NPPF which clearly states, without any ambiguity, that when setting local targets for a building's sustainability, LPA's must be consistent with the Government's Zero Carbon Policy and adopt nationally described standards. We do not therefore consider it necessary for the policy to include prescribed standards, reference should instead be made to achieving the national standard required at the time an application is submitted.

32. NPPF makes reference to both renewable and low carbon energy provision, the draft core strategy focuses on renewables.

Taylor Wimpey UK Ltd

33. We welcome the approach that the draft Core Strategy seeks to support renewable energy use by striking a balance between the requirement for renewable energy with a positive and proactive approach towards mitigating and adapting to climate change, whilst also respecting wherever possible, the social, economic and environmental needs of the district. Renewable energy on farms has all round benefits so should not be discriminated against particularly where potential landscape effects can be mitigated.

34. We do not agree that some renewable technologies such as Anaerobic Digestion not be permitted in the AONB, as such developments have low impact on the landscape which can be outweighed by the long term economic benefits of waste recycling and energy production.

National Farmers' Union

Policy CS.2A Climate Change

1. Suggest minor amendment to wording of Para A.(f):

'Ensuring that buildings can cope with rising temperatures through the use of landform, layout, building orientation, construction materials and ventilation systems which do not increase carbon emissions, together with green infrastructure measures such as vegetation and open space.'

Amendment as follows ' Ensuring that buildings can cope with extreme (high or low) temperatures...'

Nigel Rock

2. Broadly Support.

Geoffrey Prince Associates Ltd

3. Paragraph A.(a) - This should be taken into account in all applications. There must be a presumption against development in the flood risk areas. Developers should be required to provide financial guarantees to any existing residents who suffer flooding as a result of development.

Robin Malloy

4. William Davis Ltd can find no evidence³ that the additional costs associated with addressing climate change (notably CS 2A(d) - Water Conservation) and Sustainability (SC2 B (i) - Code Levels 4 and 5) have been considered in terms of their influence on residential viability. Until this work has been done, the policy outlined in CS 2 is inconsistent with national planning policy and would in our opinion be unsound, should it be considered by an inspector in its current form, based on its current evidence base.

William Davis Ltd, Taylor Wimpey UK Ltd

5. ASL also note that there is no reference to the benefits of providing green infrastructure within development proposals to help reduce climate change. This should be included in this policy.

6. ASL considers that part A of the policy broadly reflects current national planning policy, albeit the policy fails to recognise that the provision of required services and facilities in a town can help to reduce green house gas emissions by reducing the overall journey miles. Reference to this should be made in Part A of the Policy.

Ainscough Strategic Land

- 7.
- Bullet Point (c) It was felt that this measure was irrelevant as this was a matter between the home owner and the insurer. However, Officers pointed out that any planning applications from flood damaged properties would be likely to carry conditions on things that would help improve resilience to future floods.
 - There was concern about any new domestic development being located in areas at risk of flooding and would like to see only low risk activity being located in such areas.

Environmental Quality and Climate Change Panel (EQCC)

Policy CS.2B Sustainable Buildings and Carbon Reduction Targets

1. This policy is unnecessary as it merely repeats what is set down in Building Regulations. It could lead to muddled advice and cause confusion between planning policy officers and building regulations officers.

2. It would not be lawful for the Core Strategy to try and over ride any impending changes in Building Regulations by insisting on higher building control standards in advance on such changes. They may not be introduced or may be different from the current anticipated changes.

Geoffrey Prince, Arrow Developments

3. The Policy requires residential development to meet standards set out in the Code for Sustainable Homes, which imposes additional costs on development over and above the Building Regulations. Whilst the ability of local planning authorities to impose local construction targets is recognised in the NPPF (paragraph 95), the District Council will need to provide evidence that this, together with the other policy requirements contained in the draft document and any future Community Infrastructure Levy, will not threaten the viability of housing development. This is as required by paragraphs 173-177 of the NPPF.

Bloor Homes, David and Angela Tucker

4. Policy CS 2 states that '*the Council will expect all new residential to achieve Level 4 of the Code for Sustainable Homes by 2013 and Level 5 from 2016 onwards*'. Yet the Local Planning Authority will not be monitoring and regulating the construction of homes. That is a matter for Building Control Officers, who have the requisite expertise in the CFSH and will be on-site on a regular basis to ensure compliance with the Code. Hence there is no need of the Policy CS2 to duplicate, supersede or usurp Building Regulations. Page 2 of the Code for Sustainable Homes (December 2006) states that '*the Code will form the basis for the future developments in relation to carbon emissions from, energy use in homes, therefore offering greater regulatory certainty to developers*'.

Page 5 of the Code goes on to state '*the Code is closely linked to Building Regulations, which are the minimum building standards required by law. Minimum standards for the Code compliance have been set above the requirements for Building Regulations. It is intended that the Code will signal the future direction of Building Regulations in relation to carbon emissions from, and energy use in homes, therefore offering greater regulatory certainty for the home building industry.*'

Since the CFSH was written (December 2006) changes to Building Regulations will require Code Level in 2013 and Level 5 in 2016. Yet it is Building Regulations that set the minimum legal standards and is

the regulatory body most closely linked to the Code. It would be inappropriate for a Local Planning Authority via CS 2 to set different standards'

Arrow Developments, Mr J Bradley, Mr and Mrs Dimarco, H G Hodges & Sons Ltd, The Glebe Committee, Walton Estates, South East Southam Land Owners Consortium

5. This code relates to 2006 Building Regulations and therefore does not present such a meaningful challenge as might be implied. It is also not as publicly recognised and understood as an energy performance certificate rating and this should be considered as an additional criteria for energy rating.

6. As with the above comment on domestic, this requirement should be backed by an energy rating which is recognisable and supports Government initiatives surrounding carbon and energy reduction.

Kineton Parish Council

7. We are also concerned that the policy as drafted may discourage the re-use of existing commercial building if there will be a requirement to incorporate energy efficiency measures, and achieve a BREEAM assessment rating of 'very good'. The re-use of existing building should, where appropriate, be encouraged as it is likely to involve the use of fewer resources than new development and placing additional burdens on the re-use of existing buildings should be avoided.

8. We welcome the inclusion of a caveat to the draft policy to recognise that actual provision will be subject to individual site characteristics and viability issues. However, we could recommend that the policy is amended to clarify the expectations for the re-use of existing commercial buildings.

9. We would also recommend that the policy is amended to clarify that the requirements only applications made in full and outline and it would not apply to reserved matters submission, in accordance with the Council's SPD on Sustainable Low Carbon Buildings.

St Modwen Developments Ltd and the Bird Group

10. Policy CS 2 should say that the District Council will 'require' (rather than expect) 'all new residential development to achieve the nationally mandated Levels of the Code for Sustainable Homes in force at the time of the start of construction.' There is no need to introduce higher levels in the district ahead of national changes, but the standards should be rigorously enforced.

Stratford-upon-Avon Town Council Neighbourhood Plan Steering Group

11. Whilst the general approach to minimising climate change is supported, consideration must be given to the viability of new development. Whilst the above expectations will be enforced through building regulations, this may have a knock-on effect in terms of viability of new development and the delivery of affordable homes. This may result in developers seeking a reduced number of affordable homes in new developments, in order to ensure that they can deliver the appropriate infrastructure on site, as well as meet various CIL requirements. Whilst this policy is dictated by other legislation, it could well have a on knock-on effect on the achievability of other policies in the plan.

Oakley Mayfield

12. We refer to paragraph 95 (3rd bullet) of the NPPF which clearly states, without any ambiguity, that when setting local standards for a building's sustainability, LPA's should do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally prescribed standards. We do not consider it necessary for the Policy to include prescribed standards, reference should instead be made to achieving the national standard required at the time an application is submitted.

13. The NPPF also makes reference to both renewable and low carbon provision, however the draft Core Strategy focuses on renewables only.

Orbit Homes, Barwood Development Securities Ltd

14. Concerns arise over B(ii) where, Developments proposals of 1000 square metres or more of non-residential floorspace must achieve 15% reduction in energy demand, taken from Building Regulations 2006 requirements, and must ensure that at least 5% energy use will be replaced by on-site renewable energy provision.' There is concern that glass houses used for horticulture and agriculture may fall within this, however at present, we do not believe Standard Assessment Procedure (SAP) or Simplified Building Energy Model (SBEM) software allows the estimation of an energy rating - most standard factors concern heat from IT equipment of human occupation. Assuming it is not currently possible to obtain an Energy Performance Certificate (EPC) of the building, we believe agricultural developments should be exempt from this requirement. Given the low energy demands required by most agricultural activities, it would be disproportionately expensive to carry out a one off energy assessment. Of course, farmers are aware of the need for energy efficiency for environment benefits, government targets and business efficiency.

National Farmers' Union

15. Objection is raised to the expectation that all new residential development will achieve varying levels of the Code for Sustainable Homes. Notwithstanding the reference in Paragraph 6.17, the Authority should not be seeking requirement for the construction of new dwellings in excess of the Building Regulations. The draft Core Strategy has no evidence as to why these requirements in excess of national standards, should be the subject of Policy. In addition, those matters not covered by the Building Regulations, as set out at para 6.17 are adequately covered by other draft policies elsewhere in the document.

16. Paragraph 154, NPPF is clear that local plans should be aspirational, but realistic. It will, therefore, be important as this policy is worked up, to note that in respect of house building, it is the market that will really dictate the level of energy efficiency and carbon reduction in new homes over and above legal requirements. If buyers are prepared to pay the additional premium for zero carbon homes, then the industry will build them. At the moment, however, evidence suggests that reducing carbon emissions is not top of the list when purchasing a property, particularly when incomes are under pressure from other sources. It is, in essence, extremely important that the viability of development proposals are not put at risk by unreasonable expectations being placed on developers.

Cala Homes, Persimmon Homes (South Midlands) Ltd

17. In part B, ASL notes that there is an error relating to the requirement for Carbon Reduction Targets for commercial buildings. The current 2010 Regulations require a 25% reduction in energy demand on 2006 Building Regulations requirement, rather than a 15% reduction as stated. However, there is no need for this part of the policy as the requirements will be set by existing and planned changes to the Building Regulations which are better placed to enforce these requirements.

Ainsclough Strategic Land

18. The standards being suggested for sustainable buildings and carbon reduction targets are the minimum required by Government guidance. The District Council should 'encourage higher than minimum standards' rather than 'require minimum standards' for buildings. The opportunity should be taken to develop resilience by anticipating the higher standards that will be expected in the future.

Councillor Susan Juned

Policy CS.2C Renewable Energy Generation

1. Biomass and wind energy do not need to be singled out, else a more complete list of alternatives ought to be presented, to include geothermal, hydropower and solar for example. Economic benefits should consider positive and negative impacts of the development in the short and long term.

Mr Darren Jackson

2. SDC should stop sitting on the fence and actually set a target for generating energy from renewable sources by 2020- this should be in line with national targets. The words 'strive to...' should be replaced with 'will meet a proportion (to be fixed) of its energy demand through a range of renewable energy technologies by 2020'.

3. If generating energy from renewable sources is to be a critical objective, then we will have to accept some of the consequences in terms of visual impacts of new structures on the landscape, ecological impacts and other local amenity impacts. Let's face it, we did during the Industrial Revolution!

Geoffrey Prince Associates Ltd

4. The Council should set the standard on renewable energy.

Deborah Griffiths

5. Paragraph 97 of the NPPF provides a significant impetus to local planning authorities to increase the use and supply of renewable and low carbon technology. More emphasis should be given to maximising the potential of renewable technologies within the District. The potential of Stratford -on-Avon District to accommodate renewable energy was outlined in the Camco Report 2010 and this should be referenced in any policy.

EDF Energy Renewables

6. The standards being suggested for sustainable buildings and carbon reduction targets are the minimum required by Government guidance. The District Council should be '*encourage higher than the minimum standards*' rather than '*require minimum standards*' for buildings. The opportunity should be taken to develop resilience by anticipating the higher standards that will be expected in the future.

7. The Council should support the intention to seek the highest standards of construction in all building projects.

8. Renewable energy: orientation and protection from overshadowing are necessary conditions for passive solar technologies.

9. On-site generation needs to consider organisation and community factors. These should be addressed at the beginning of the planning process. Resilience would be improved by facilitating the participation of the local community and where possible, forms of community management.

Councillor Susan Juned

10. Need to look at all forms of energy development, not just biomass, wind energy etc.

11. Energy development should not be granted unless there is a direct benefit to the local community. Local consultation and agreement should be paramount.

Councillor Justin Kerridge

Policy CS.2D Biomass Energy Developments

1. There are many heritage assets with archaeological interest that are not currently statutorily protected as designated sites (e.g. Scheduled Monuments, Listed Buildings etc) but which are demonstrably of equivalent significance. The absence of designation for such heritage assets does not indicate a lower significance. (See also policy HE.9.6, PPS5, para.139 of the new NPPF). The last paragraph of Section E only references designated heritage assets; we would recommend that this be amended to include other heritage assets which are of demonstrably equivalent significance.

Warwickshire County Council

2. Biomass, whilst to be applauded operates to the disadvantages of many other UK industries, The Government's promotion of biomass, using the use of fibrous pulp for burning, removes this product for the use of other manufacturers, such as furniture makers. We would like to encourage the relevant authorities to consider this issue.

Mappleborough Green Parish Council

3. Part D requires all major refurbishments to be ready for Combined Heat and Power connection. This needs to be clarified in terms of whether it relates to major developments or simple refurbishments. Further details are needed of what district wide scheme they plan to implement over the plan period for this requirement to be justified.

Ainsclough Strategic Land

4. Suggest there should be a reference to biogas (biomethane), together with emphasis on avoiding adverse impact on environment, landscape and road transport.

Charlecote Parish Council

5. D: Biomass Energy Developments. It was important to ensure that good agricultural land is retained for food production and not for the growth of biomass fuels.

Environmental Quality and Climate Change Panel (EQCC)

Policy CS.2E Wind Energy Development

1. Support that the policy all forms of renewable energy generation should be considered first as wind energy is visually intrusive, generates noise, harm the landscape, wildlife and ecology, compromise residential amenity, detrimental to business and tourism by discouraging visitors from tranquil countryside with industrial development.

2. Consider using the British Horse Society recommended separation distance for wind turbines and right of ways, including roads, stated as three times the height of overall height. For national trails and ride UK routes, it recommends separation distances of four times the overall height.

3. Paragraph d uses ETSU-97 for noise protection which is considered out of date. The local plan policy should take the opportunity to protect the countryside from the intrusion of audible and sub-sonic noise from wind turbines through stricter guidelines. ESTU-97 means the true and accurate impact of wind farms are unlikely.

4. A separation distance of 700 metres is insufficient. Legislation in Scotland and other countries require 2km. This setback goes some way to protect residents from noise which can pose a health risk. Distance separation should be 2km

Darren Jackson, Lynn Pearson, Mr I Klegerman, Catherine Hodgson, J Spencer, H Stamper, S Stamper, Cllr Simon Jackson, Shotteswell Parish Council, Fenny Compton Parish Council

5. Points listed are excellent. It may be wise to have to take into account previous schemes or initiatives that have used public monies to enrich the environment or habitat for wild life etc. Well done.

Lynn Pearson

6. On consultation for the construction of wind turbines. Network Rail LNW imposed the following condition: *'Network Rail would wish to see such equipment sited so that the lateral distance from railway boundary to foot of mast is greater than the height of mast plus length of propeller blade plus 3m. Wind turbulence may be a factor to be considered and the applicant should need to ensure the design /position of wind turbines did not present any potential problem for neighbours (railway included) Should the turbine collapse for any reason, then the developer should ensure that any fail safe distance will include the wind turbines potential for topple in the direction of the railway line. Network Rail Asset Protection Engineering involvement may only needed when constructing or undertaking maintenance of the wind turbine and then only when such activities presented a potential risk to the operational railway.'* This is condition is the minimum requirement we would wish to see any developer take on board as part of any construction or erection and maintenance of any wind turbine(s). This is standard condition, however, where a development does not meet this criteria due to safety implications, Network Rail would either object to the scheme until required asset protection measures were taken or stipulate additional conditions to the council.

7. An objection would be made to any proposed wind turbine(s) which included installation of cables under the railway to facilitate any works on site or any methods of electricity transmission, due to any potential threat to safety.

8. Objection would be made to any cabling / high tension lines over railway, pending consents/negotiation/ agreements with Network Rail(NR) National Business Team.

9. Serious consideration should be made of the following comments:

- Developers should consider shadow flicker and its effect on railway infrastructure, and the railway, particularly where safety is crucial. There may be a minimal risk to driver's vision, (perception of signalling, the route ahead and stopping in an emergency), which may be impacted on by a wind turbine.
- Possible interference with the Network Rail radio/ signalling equipment, as it is safety critical and absolutely crucial to railway operations.
- Concern about the vibration from wind turbines affecting ground conditions; with the issue of being embankments and potential instability. The construction of towers, heavy blades, gearbox and generator as well as guy lines to hold the tower in place puts a strain on ground at the base of the tower.

10. Wind turbines of a minimum of 45m in height will require a consent from Network Rail's Abnormal Load's Team.

11. NR should be consulted on applications for wind turbines. This should be added as a standard in the policy.

Network Rail - LNW

12. The number of structures or turbines and pylons should be taken into consideration.

13. The wording is that the distance is 'expected' and considers it should be more strongly expressed.

Mr I Klegerman

14. Consideration should be given to the recent British Medical Journal by Chris Hanning which found that 'a large body of evidence now exists to suggest that wind turbines disturb sleep and impair health at distances and external noise levels that are permitted in most jurisdictions, including the United Kingdom'. The BMJ editorial thus adds weight to the argument that greater set-back distances are required than those currently observed and/or special conditions are imposed to prevent excessive amplitude modulation from wind turbines.

Bryan Todd DPhil FRCS, Catherine Hodgson, Bishops Itchington Parish Council, Fenny Compton Parish Council

15. Provision should be made for the removal of the facilities and the re-instatement of the site, if it should cease to be operational.

Catherine Hodgson

16. There should be no over-riding requirement for developers of wind energy schemes to consider all alternative sustainable energy schemes. Wind energy is part of the national policy mix of renewable energy sources which will help to meet the EU and national targets of renewable energy production and also address the national energy security of supply.

This part should be deleted. SDC may wish to consider commissioning its own renewable energy study to examine options and best means for achieving these targets across the District.

17. Reference to part of this policy, stating ' the extent to which the scale and nature of the proposal reflects the capacity and sensitivity of the landscape to accommodate the development'. This is very subjective. The Council should set specific criteria for assessing impacts on the sensitivity of the landscape.

Geoffrey Prince, Broadview Energy Limited, TCI Renewables Ltd, National Farmers Union

18. Any separation distance should not be set arbitrarily in this plan, but be based on scientific evidence and local situations which may be more or less sensitive than the prescribed solutions.

Andrew Shirley, Gloucester Diocesan Board of Finance

19. Daventry and Stratford must interact when the structures can be seen over the wider cross boundary area.

Nigel Rock

20. Support for wind energy, but suggest separation distance should be 1000m to any dwelling. Also that any installation should be influenced by specific references in Parish Plans, such as nominated and protected views.

Nigel Rock

21. Paragraph 97 of the NPPF requires that LPAs have a positive strategy to promote energy from renewable and low carbon sources.

22. Paragraph 98 of the NPPF does not require applicants for energy developments to demonstrate the need for renewable energy. This policy requires an unsatisfactory test for wind development to consider all alternative sustainable energy schemes. This is not reflected in the NPPF, or in any superseded guidance. The Camco report identified that Stratford-on-Avon's Council's area had the capacity for between 16 and 142 turbines. The policy should consider the contents of this report and reference the capacity in the policy. This is not a positive approach to renewables and seeks to rank technologies against each other. The NPPF requires a positive approach to renewables, not a discriminatory one. Onshore wind farms are the most viable and mature form of renewable energy technology in the UK. Its deployment is widespread and should be considered not as an alternative energy source, but one that is complimentary to other forms of renewable and low carbon sources of energy. Wind farms can only be deployed where wind resource and other constraints permit. The

requirement to consider other alternative source of energy would provide a further and negative barrier to deployment of renewable energy.

23. Criterion (e) is too specific and doesn't reflect experience throughout the UK in developing wind farms. Policies shouldn't seek to prescribe distances and the requirement to have no unreasonable impact on residents would address this issue. Wind turbines can and are sited within 700m of residential properties. Each case should be assessed on its merits. There will be instances where 700m is not considered sufficient to protect the amenity, and conversely there will be instances where a lesser distance will be acceptable. Much depends on the local and individual factors relating to development, which is outlined in criterion (e) and should be sufficient in themselves to protect amenity. The reference to any specific distance should be deleted.

EDF Energy Renewables, National Farmers' Union, TCI Renewables Limited, Broadview Energy Limited

24. Reference to 'transmission' lines should be amended to 'distribution' lines, since wind energy developments in the district are most likely to require connection to the local electricity distribution network.

AMEC on behalf of the National Grid

25. Consideration should be given to the impact of wind farms on neighbouring landscape.

Cllr Hazel Wright

26. Any form of wind energy generator or commercial scale panel installations should be avoided, as they would ruin the character of the landscape and residential amenity.

David Preston

27. Consideration should be given to the possibility of ice throw, blade, tower and system failure. Consideration to be given to an additional provision that where turbines exceed 50m in blade tip height, a minimum set back distance to residential premises shall equal 15 times the turbine blade tip height when the blade is in the vertical position

Denis J S & S E Wilson

28. Mention is made to direct benefits to local communities to offset negative impacts on local communities. This should not be encouraged or the retention of business rates from such a development be incorporated as an inducement for development.

29. Consideration should be given to associated infrastructure for these developments, such as pylons etc, as they could be a double blight on communities.

30. To avoid shadow flicker alone 10 x the rotor diameter is recommended, given 130m turbine with a rotor span of 100m, gives the result of 1000 metre set back as a minimum. We contend 700m is insufficient.

31. A more robust wind policy, could result in costs to the council at defending appeals. It is suggested that the Council work alongside neighbouring authorities to develop policy on wind farms.

Shotteswell Parish Council

32. As a minimum the policy should be reworded to that the District will seek to maximise the proportion of its energy demand met from renewable sources to contribute towards meeting national renewable energy and CO2 reduction targets while ensuring that environmental, economic and social impacts are satisfactorily addressed.

33. The NPPF does not distinguish between different types of renewable energy technologies, or state a preference of one type over another. Paragraph 97 of NPPF puts forward positive strategy for all types of renewable and low carbon development. LPAs should:

- recognise the responsibility for all communities to contribute towards energy generation from renewable and low carbon sources.
- have a positive strategy to promote energy from renewable and low carbon sources; and
- design their policies to maximise renewable and low carbon energy development while ensuring that the adverse impacts are addressed satisfactorily.

There is no requirement under national planning policy to first consider alternative renewable energy or low carbon technology on a particular site. Every case is to be decided on its individual merits, including the benefits it would bring in helping to address climate change and safeguarding the reliability and security of energy supply. Therefore the present wording would not conform with the NPPF. The policy should be reworded to positively promote, and not restrict, any type of renewable and low carbon energy development and supporting infrastructure, including large-scale wind and solar PV.

34. The inclusion of the wording 'appropriate' suggests that the acceptability or otherwise of a proposed wind energy development could be prejudged ahead of a formal planning application and ahead of proper assessment against relevant criteria and guidance. The word 'appropriate' should be deleted.

35. There is no minimum separation distance in English planning law or national guidance (ie. NPPF and NPS-EN3 paragraph 2.7.6. The government has rejected the idea of a separation distance in England as stated in the House of Commons note SN/SC/5221 *Wind Farms - Distance from housing*. Therefore, no legal or policy basis exists for LPAs to introduce their own minimum separation distances.

36. The policy's separation distance is considered arbitrary and not supported by a large number of recently upheld appeal decisions, with Burnthouse Farm being a fairly recent example (PINS Ref. APP/D0515/A/10/2123739).

37. It is not explicit in the policy that the factors that have an influence on appropriate separation distances can mean that it is possible for wind turbines to be sited within a distance of 700m without resulting in unacceptable harm to residential amenity by reason of visual impact, noise and shadow flicker.

TCI Renewables Limited

38. The wording 'unreasonable' should be defined.

Wellesbourne Parish Council

39. It is considered that there is no basis within national policy for the implementation of separation distance between wind turbines and residential properties. Such a policy does not allow for decision makers to make appropriate value judgements about the extent of, for example, visual impact where properties are over 700m may experience effects more severe than dwellings situated under 700m.

40. It is not considered that there is anything within the NPPF or legislation that requires direct benefits to the local area or community, further than the economic and environmental benefits associated with the transition to a low carbon economy. It is recommended that this criterion is deleted.

Broadview Energy Limited

41. The impact of the scheme should also consider the adverse impact on local ecology, business, historical use of the site and tourism.

An additional item to include as follows:

'Mass concrete gravity foundations are unlikely to be appropriate. Consideration will be given to alternative foundation solutions that minimise disturbance on the natural ground and do not contaminate/influence underground water courses'.

CLlr Steven Kittendorf

42. The draft policy should emphasise the need for low impact on the historic landscape which supports our economy. Consideration for sensitive solar schemes. If the area of farmland needed for the infrastructure for a turbine were covered with solar panels, the energy could be obtained without the unacceptable visual impact.

Catherine Hodgson

43. E: Wind Energy Development. To remove the word "Appropriate" from the first sentence, thus making the statement more definite.

Environmental Quality and Climate Change Panel (EQCC)

Policy CS.2F Energy from Waste Schemes

1. Small scale electricity generation from waste should also be encouraged and supported as stand alone projects and only where it is part of new large scale developments.

Kineton Parish Council

2. We do not agree that some renewable technologies such as anaerobic digestion are not permitted in the ANOB as such developments have a low impact on the landscape, which can be outweighed by long term benefits of waste recycling and energy production.

National Farmers' Union

Topic: 6.1 Sustainability Appraisal Implications

No comments received for this section

Topic: 6.1 Explanation

Paragraph 6.1.11 states that: 'this potential for renewable energy generation needs to be balanced against the rural nature of the District'. It has long been acknowledged that renewable energy schemes need to be located where the renewable source exists. The locational requirements of large scale wind and solar schemes necessitate by their scale countryside locations. Clearly their impact on the countryside, ANOB and Green Belt should be assessed and any harm weighed against the wider objectives. It is considered that the wording of the 6.1.11 should be amended to state that: '*a high level of protection will be afforded to the ANOB, but in relation to the countryside outside the designation, the wording should be more positive towards renewable energy generation in such areas.*'

TCI Renewables Limited

Topic: 6.1 Development Management Considerations

1. With reference to the West Midlands Sustainability Checklist, it is not necessary to impose planning conditions requiring compliance with building regulations.

Cala Homes (Midlands), Persimmon Homes (South Midlands) Ltd

Topic: 6.1 Delivery and Monitoring

No comments received for this section

Consultation Question: Q09

1. On a case by case basis and within available technology based on appropriate cost/ benefits analysis.

Bearley Parish Council

2. Support - the suggested building regulations standards seem acceptable and realistic

Wootton Wawen Parish Council

3. The Building Regulations are tough enough already.

Morton Bagot, Oldberrow and Sperrall Parish Council

4. There needs to be sufficient flexibility in individual schemes to deliver any outcome. It is policy that any policy does not affect the liability of delivering housing and employment.

Country Land and Business Association

5. There appears to be no realistic understanding about the critical impact of additional costs on both affordability and deliverability. We see no justification to accelerate these targets beyond the current deadlines.

Noralle Traditional County Homes

6. Support

Kineton Parish Council

7. To accord with NPPF Paras 173-177 with regard to building regulations being required to be higher than the national set of Building Regulations, this should be a target but subject to a viability test as in some cases it may not be viable to deliver higher than nationally set and accepted standards.

David and Angela Tucker

8. Assuming the trend is to meet the respective levels of CSH, are there any estimates made to the affordability of such homes in the District? Are there any additional cost estimates to the District that may arise from acceleration of existing deadlines or any cost/ benefits analysis?

Claverdon Parish Council

9. No- targets are already very stringent and simply meeting them would be an unreasonable result.

Mapleborough Green Parish Council

10. Supportive of the sustainability and climate change agenda, but concerned about any proposals which seeks to bring forward carbon reduction standards in advance of the Building regulations programme.

ST Modwen Development Ltd and The Bird Group

11. We consider that the District Council should not accelerate the move towards zero carbon development ahead of the timeline being enforced by Building Regulations. The Government is committed to achieving reduced energy reduction and a clear pathway and mechanism to deliver this is identified in Building Regulations. We consider that the Building Regulations provide a reasonable and achievable timeline for reducing energy usage which the development industry is aligned with and already planning for with new technologies being introduced. An acceleration of carbon reduction could negatively affect the delivery of development.

We also consider that the implementation of energy reduction is best assessed and enforced through Building Regulations legislation.

Bloor Homes, Oakley Mayfield

12. No - unachievable

Napton-on-the-Hill Parish Council

13. No basis for going beyond the Building Regulations

Miller Strategic Land and Taylor Wimpey

14. No

Stephen Marchant

15. We believe carbon reduction is important. We also believe that all green house gases mentioned in the Kyoto Protocol need to be reduced. The Draft Core Strategy should therefore be expanded to include non-carboniferous greenhouse gases too. We believe that the draft programme does not go far or fast enough to achieving carbon neutrality. There is a one off opportunity to be a leading, if not the **leading** authority in the country with regard to carbon neutrality, due to the district low density population and minimum of heavy polluting industries. Solutions are already available to enable carbon zero building. We recommend going straight to this standard.

16. We recommend the district creates a SDC' carbon unit. It would enable this quantum of carbon to be measured and publishing it each year, would provide a clear indication of how Council's carbon policy is faring.

Earlswood and Foreshaw Heath Residents' Association

17. The acceleration of Building Regulations standards should be supported. The current required standards for energy efficient buildings may be insufficient in the future. Where LPAs wish to set environment targets for new buildings at a level higher than Building Regulations, The NPPF requires that these should be subject to viability testing. Resilience should be improved by exceeding these standards.

Cllr Susan Juned

18. We do not consider the acceleration of CfSH is justified or supported.

Orbit Homes, Taylor Wimpey UK Ltd, Barwood Developments Ltd, Follet Property Holdings Ltd

19. We do not think that the Council; should identify energy specific targets, mainly because the targets are sometimes unrealistic or over ambitious, and then unfavourable developments slip through as a result of trying to meet targets.

Shotteswell Parish Council

20. Q9: Ensure that developers adhered to the carbon reduction requirements applicable at the time of building, not at the time of them receiving planning permission, between which there might be a considerable gap and change in the carbon reduction requirements.

Environmental Quality and Climate Change Panel (EQCC)

Consultation Question: Q10

1. Concerns that in some instances demanding S106 payments to offset carbon emissions may harm rural schemes which may admit comparatively small amounts due to their small scale.

Country Land and Business Association

2. On a case by case basis and within available technology based upon appropriate cost/benefit analysis.

Bearley Parish Council, Claverdon Parish Council

3.No financial contribution should be required as an alternative.

Wootton Wawen Parish Council

4. We see no reason why house-builders should be burdened with an additional financial contribution- either the increased carbon reductions are imperative or not.

Noralle Traditional County Homes

5. No - it should not be permitted there should be no facility to 'trade permits' which is the case of other energy intensive sectors

Kineton PC, Napton-on-the-Hill Parish Council

6. No - this represent a get out clause for big business

Mappleborough Green Parish Council

7. As we do not yet know the Government's thinking on this issue, we recommend that this proposal is deleted, least it is not in conformity once policy on this is published.

Home Builders' Federation, Miller Strategic Land, Miller Strategic Land and Taylor Wimpey

8. Broadly supportive of the flexibility to provide a financial contribution where development is unable to meet the minimum targets towards zero carbon. The flexibility could recognise site specific constraints where it is unviable or impractical to meet targets and also allow flexibility where other policy considerations are deemed significant to outweigh the harm of development that does not meet targets. We would welcome the Council producing further details of any financial contributions.

Bloor Homes

9. Support

Stephen Marchant

10. Q10: Concern that the option of a financial contribution would result in sub-standard development and, in an effort to alleviate this, wanted to see any financial contributions being ring-fenced for specific schemes as per the list of Allowable Solutions.

Environmental Quality and Climate Change Panel (EQCC)

Consultation Question: Q11

1. Not independently, rather by adopting regional or national recommendation as much as is possible or achievable without undue increase in costs.

Bearley Parish Council, Claverdon Parish Council

2. Object

Wootton Wawen Parish Council, Napton-on-the-Hill Parish Council

3. Renewable energy is a very controversial issue. We don't see the need for a specific percentage of energy demand being met by renewable energy. It may result in a counter-productive outcome.

Noralle Traditional County Homes

4. Not necessary if question 9 is suitably managed.

Kineton Parish Council

5. It would be dangerous to identify a specific percentage of energy demand or carbon emissions to be met by a range of renewable and low carbon technologies by 2020, when technology is rapidly changing. Any target would be arbitrary and run the risk of being too high or too low.

David and Angela Tucker

6. Support

Mappleborough Green Parish Council, Gordon Brace

7. We would advise setting percentage target for renewable energy production. How developers meet the stepped targets towards zero carbon homes from 2016 onwards should be left to their discretion. A fixed approach may not always be appropriate. A detailed policy that specifies types of renewable energy production to meet the Building Regulations would be unwise lest the Council finds itself backing failing technologies or solutions.

Home Builders' Federation, Miller Strategic Land, Miller Strategic Land and Taylor Wimpey

8. There is no evidence base to support this.

Heart of England Co-operative Society, Trustees of W A Weaver

9. No - there is too much emphasis placed on energy generation, we should be making more energy efficient.

Stephen Marchant

10. We believe that climate change is such an important issue, we should be looking to reduce our current usage by 10% of this figures per annum ie. a straight line reduction to carbon neutrality in 10 years.

Earlswood and Foreshaw Residents' Association

11. The Strategy should set a target for energy reduction by 2020 in order to focus thinking on ways to achieve such reductions.

Stratford-upon Avon Town Council Neighbourhood Plan Steering Group

12. Establish specific targets for energy efficiency. A generic definition of energy efficiency measures could lead to the adoption of targets that may be inadequate in the long term and difficult to enforce. Specific targets act as a driver for higher standards.

Councillor Susan Juned

13. It is considered that the Council should set a specific target for 2020 of a percentage of the District's energy demand to be met by a range of renewable and low carbon energy sources.

TCI Renewables Limited

14. It is not known how the Council would monitor whether a District wide target was being achieved and therefore do not consider it sound.

Orbit Homes, Barwood Developments Ltd

15. No - we do not think that the council should identify specific energy targets as these are sometimes unrealistic and over ambitious and may lead to unfavourable developments being granted to meet the targets.

Shotteswell Parish Council

16. An overarching policy would be difficult to implement and frustrate development.

Follet Property Holdings Ltd

17. Q11: No, the Council should simply work to the best carbon emission savings that it can, of course benchmarking along the way to ensure that acceptable standards are being achieved.

Environmental Quality and Climate Change Panel (EQCC)

Consultation Question: Q12

1. Yes. There should always be a cost benefit analysis with any scheme and immediately available subsidies should be ignored as they are subject to withdrawal and prone to clutter the landscape with ugly relics.

Bearley Parish Council, Claverdon Parish Council

2. Objects to a list of renewables technologies as it would have a negative impact on those technologies not included. The policy should encourage both the generation and use of renewable energy technologies.

Country Land and Business Association, Stephen Marchant

3. There may be a case for including types and technologies which the Council may wish to encourage, but these will be different in different circumstances.

Noralle Traditional County Homes

4. Support - the list would be useful when modifying existing dwellings. The list must be open to modification, if and when newer low carbon solutions become available.

Mr R Eades

5. Support

Mappleborough Green Parish Council, Napton-on-the-Hill Parish Council

6. We do not recommend the Council sets policy on the types of technology to be deployed. While the Government's stepped targets in relation to zero carbon homes are mandatory, how developers achieved these targets should be up to their discretion. This is necessary lest the Council finds itself in the position of backing particular types of renewable energy provision that may prove inappropriate, ineffective and become obsolete over the plan period.

The Home Builders Federation, Miller Strategic Land, Miller Strategic Land and Wimpey Taylor, Taylor Wimpey Ltd, Barwood Developments Ltd,

7. The DCS needs to keep track of the changes to renewable and building technology, and should encourage the use of energy efficiency in design, whilst preserving the historic fabric and landscape. There should be a requirement for all large development to propose carbon efficient district heating schemes, CHP and biomass etc.

AJ Mann

8. The Council should be going out of its way to encourage carbon neutrality. As renewable technologies are advancing speedily, the Council should not have a list of technologies available, but rather be reactive to any proposals that reduce or nullify carbon output. However, we agree that some degree of sensitivity is important.

Earlswood and Foreshaw Residents' Association

9. Support, particularly solar and the use of the Avon should be investigated.

Gordon Brace

10. Policy CS.2 already includes wind and biomass. Others that raise potential development issues include micro-hydro schemes on local rivers and anaerobic digestion. The policy should include relevant statements on other technologies which raise development issues. Statements should be in presumption of favour (as in wording of Section D - Biomass Energy Developments) subject to conditions such as environmental sensitivity.

Stratford-upon-Avon Town Council Neighbourhood Plan Steering Group

11. Energy efficiency as part of the design process is the most efficient and cost effective way of incorporation. All large developments should be required to incorporate carbon efficient measures.

Councillor Susan Juned

12. Any list could be quickly outdated. The use of solar schemes in the historic landscapes needs sensitive consideration. There are some unfortunate examples in the District.

Follet Property Holdings Ltd

13. Q12: A list of the type of technologies to be encouraged could be negative as it might exclude better technologies that come forward in the future.

Environmental Quality and Climate Change Panel (EQCC)

Consultation Question: Q13

1. Other checklists are available and should be used where appropriate. The Association of Directors of Environment, Economy, Planning and Transport (ADEPT) have developed a scenarios approach with Forum for the Future. BRE have published a resilience testing approach developed by the Urban Futures research programme.

Councillor Susan Juned

2. The West Midlands Sustainability Checklist is no longer in operation, there it is not considered appropriate.

Barwood Developments Ltd, Orbit Homes, Taylor Wimpey Ltd, Redditch Borough Council

3. Support

Bearley PC, Claverdon Parish Council, Follet Property Holdings Ltd, Mappleborough Green Parish Council, Napton-on-the-Hill Parish Council

4. It is a useful background document, but should not be viewed as a mandatory standard.

Noralle Traditional County Homes

5. Concern expressed that accelerated carbon reduction targets would add to building cost and purchase price. Mixed views on renewable and low carbon technologies.

Stratford-upon-Avon Town Council Neighbourhood Plan Steering Group

6. Q13: Yes, it appears adequate.

Environmental Quality and Climate Change Panel (EQCC)

Consultation Question: Q14

1. The draft policy is rightly focused on the environmental expectations on developers, but this needs to be balanced against the essential and pressing requirement to deliver much needed homes.

Noralle Traditional County Homes

2. Some subjects are given far too much prominence, eg Minerals, whilst others, such as ' Domestic Water Saving' (possibly the most important topic for the district in the next 25 years) are barely mentioned. By referring to renewable Energy Generation, in general and Biomass Energy Developments, wind energy developments and energy from waste, the draft is completely misdirecting the Council's attention. These are large scale, very expensive and way outside the Council's Capital resources. They must be pursued , but on a national scale.

Ewen Cunningham

4. Given the large number of listed buildings in the district, serious investigation should be carried out to explore the possible use of technology to make them more energy efficient without harm.

Gordon Brace

5. The Council should seek the highest standards of construction in all building projects.

Councillor Susan Juned

6. Natural England would like to see the inclusion of solar power in the policy as biomass, wind and energy from waste are all specifically mentioned.

Natural England

7. We would recommend that the 'biodiversity' is added to the wind energy development to read ' Appropriate separation distance... and impacts on landscape, **biodiversity** or heritage assets'. This would infer the necessity to conform to Natural England Standard guidance on this matter and their appropriate separation distances.

Warwickshire County Council (Ecology)

8. Paragraph 173 of NPPF also makes reference to the cumulative impacts of obligations and requirements on site do not render the developments unviable. We can find no evidence of this.

Barwood Developments Ltd, Noralle Traditional County Homes

9. Radium systems and combined heat and power systems.

W A Lowe

Consultation Question: Q15

1. Any local target of installed capacity for 2020 should be founded on sound evidence base that fully reflects the District's ability to accommodate renewable energy developments of all types and scales. Such as Camco report which found that the district had good potential for both wind energy and biomass, although it is acknowledged that in practice this is further constrained by ANOB, which accounts for 10% of the district. Notwithstanding that, the report concluded that along with Rugby, SDC has the greatest potential to accommodate large-scale wind energy developments, which needs to be reflected in any local target(s) as well as the need to maximise renewable and low carbon technologies as required by the NPPF.

TCI Renewables Ltd.

2. The Carbon Plan (December 2011) which could assist in the development of this policy, particularly in relation to different technologies which could be used in the district.

Natural England

3. When quoting 'BREEAM/Ecobuilding assessment' it may be worth adding 'or equivalent' so that other or future standards that may emerge during the strategy lifetime can be integrated into viability or sustainable NPPF tests. This comment is potentially relevant throughout the Core Strategy.

WCC (Ecology)

Consultation Question: Q16

1. It is not known how the council will monitor whether the District wide target is being achieved and as such we do not consider the proposal sound.

Taylor Wimpey Ltd

Draft Core Strategy 2012 - Summary of Representations

6.2 Safeguarding the Water Environment

No comments received for this section

Topic: 6.2 Strategic Objective

No comments received for this section

Policy CS.3 Safeguarding the Water Environment

1. Rainwater harvesting can contribute to SUDS when installed in suitably sized development. The design of site layouts in the future will become much more heavily influenced by water management needs than in the past.

Hasker Architects

2. The role of natural habitats like native woodland is recognised as a water risk management tool with regard to SUDS, water run-off, flooding and water quality. Throughout the UK, winter is predicted to be wetter and summers drier and there is also a predicted increase in the frequency of heavy rainfall. Trees can reduce the likelihood of surface water flooding, when rain overwhelms the local drainage system, by regulating the rate at which rainfall reached the ground and contributes to run off. Slowing the flow, increases the possibility of infiltration and the ability of the engineered drains to take away the excess water. This is particularly the case with large crowned trees. Research by University of Manchester has shown that increasing tree cover in urban areas by 10% reduces surface water run-off by almost 6%. (Using green infrastructure to alleviate flood risk, Sustainable Cities - www.sustainablecities.org.uk/water/surface-water/using-gi/)

3. The Woodland Trust believes that trees and woodlands can deliver major contribution to resolving a range of water management issues. They offer opportunities to make positive water use change whilst also contributing to other objectives such as biodiversity, green infrastructure- see Woodland Trust publication 'Woodland actions for biodiversity and their role in water management. The recently joint publication by EA and Forestry Commission, 'Water for Woodland: Woodland measures for meeting Water Framework objectives. This states clearly that,' There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives. Local Authorities should steer risk management towards developing green infrastructure, increasing tree cover and investment in the management of trees. Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission's publication 'The Case for Trees in development and the urban environment' (2010) explains how the capacity for trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of SUDS.' The revised West Midlands Forestry Framework (Growing our Future, 2010) contains a climate objective CC5,' to seek further ways to deliver ecosystems services via trees and woodland, in respect of improving water and air quality, reducing flood risk, preventing soil erosion and enhancing the connectivity of biodiversity. Numerous Core Strategies are promoting woodland as water risk management tool. The Forest of Dean Adopted Core Strategy contains paragraph 6.3 which states; ... All development will be required to adapt to climate change and demonstrate how it has be accounted for... Positive land management (either as part of planning or outside of it) such as native tree planting address flood risk, heating and cooling, while providing other environmental benefits. We would like to see Policy CS.3 include a reference to land use management, such as native woodland creation, as a flood mitigation and water quality option. We would like to see this incorporated as a Trees and Woodlands SPD.

Woodland Trust

4. Endorses the planning presumption against development in flood risk areas, but would emphasize the need to reduce flood risk through improvement of drainage systems along the Stour.

Shipston-on-Stour Town Council

5. Much closer awareness of flood problems in Tysoe should be addressed by speaking to the Parish Council and the local ward member.

6. Closer consideration of two major flood events of 2007 and 2008.

Tysoe Parish Council

7. The aspirations for flood risk management throughout the document are admirable, but implementation is crucial, and monitoring and enforcement are important. Moving the goal towards the prevention of flood damage is good, but it is unlikely to achieve the goal. It is essential to pursue the goal vigorously. Pond swales and wet wooded areas should be encouraged, but they need to be managed effectively so that water levels are low before heavy rain, rise during heavy rain and drain gradually afterwards. Enforcement implies measures are taken to ensure landowners collaborate to ensure a joined-up approach to ensure that all parts of a ditch/culverts system are functioning. Encourage water butts to save water and absorb potential run-off to sewers and ditches.

John Spittle

8. The policy is not sufficiently measurable and could be enhanced. For example, all development should not be allowed to have a storm water run off into local water course if flooding, associated with that water course has occurred, either upstream or downstream of that development by a distance of (X) miles within the preceding (Y) years.

Kineton Parish Council

9. Consideration be given towards water being used as renewable energy resource.

Cllr S Jackson

10. Encourage the greater use of grey water harvesting and rain water collection in small and large developments. We suspect that grey and rain water harvesting will have a negligible impact on the cost of new housing provision. We would like development of 3 dwellings or more, wherever possible to have reedbeds dug to clean any household effluent, rendering it suitable to be returned to the non-potable water supply to the same dwellings.

Mappleborough Green Parish Council

11. This policy is welcomed, including the identification of tributaries and their relevant water quality status in part D. It should be noted that the Flood and Water Management Act 2010 delegated upper-tier and unitary authorities as Lead Local Flood Authorities (LLFA), with responsibility for their respective areas' Local Flood Risk Management (this includes Warwickshire and Worcestershire County Councils). This emerging role currently relates to ordinary watercourses, surface water and ground water flooding. Fluvial flooding from main tributaries is still currently the responsibility of the Environment Agency. The Core Strategy should refer to the Act as a key driver, and the policy may also benefit from considerations of the emerging national standards.

12. Cross boundary co-operation will be important as the local flood risk management strategies are developed, particularly where a strategy may have downstream implications on settlements, infrastructure, habitats and water quality (as may be the case for Rivers Avon and Arrow). County Councils, rather than the Environment Agency will be the Sustainable Urban Drainage Systems (SUDS) Approval Body (SAB) under the Act, although EA will remain a statutory consultee. Ordinary water course consents for discharge will also transfer to the LLFA (who will consult the EA) from 6th April.

Worcestershire County Council

13. Support

Harbury Society, Gordon Brace

14. Supports this policy in principle. We agree that development which increases the risk of flooding elsewhere should only be permitted where satisfactory mitigation measures can be incorporated, as required in section B.

15. We support the requirement for appropriate management and maintenance arrangements to be put in place for SUDs. The Flood and Water Management Act 2010, when implemented, will contain detailed provisions relating to SUDs maintenance, with mandatory approval and adoption by statutory bodies. Prior to implementation of the relevant provisions of the Act, BW's preference for SUDs schemes, which could potentially impact on its infrastructure, is the approval and adoption of the SUDs by agreement between the Developer and either the Local Authority, or the water undertaker, or at least robust financial provision to secure long-term maintenance for the life of the development.

British Waterways

16. We strongly welcome and support the inclusion of this policy. The wording of this policy is very good with regard to understanding the main issues within the council catchment and the protection of water quality. The outcomes of the Water Cycle Study have been taken into account, which is positive. The inclusion of the Water Framework Directive (WFD) allows the district to be part of the delivery mechanism for improvements to waterbodies which will enable the waterbodies to reach 'good' status and ensure no deterioration is made by development within its boundaries.

17. To strengthen the policy further, we would make the following recommendations:
Part B should make some reference to the potential of SUDs have for creating multifunctional features that benefit wildlife, creative attractive open space for leisure activities, as well as balancing storm flows and improving water quality.

16. Recommendation for part C point 2 as follows;

'Culverts will be permitted for access purposes only and should conform to the Environment Agency's culverting policy. Culverts should be removed unless it can demonstrate that it is impractical to do so.'

18. We recommend the National Standards for SUDs is considered. This is the recently produced DEFRA guidance dated December 2011, detailing the hierarchy concerning the discharge of surface water. It starts with infiltration to the ground, then goes on through various stages that should be considered, if the preceding one is not suitable.

19. We welcome the inclusion of the water efficiency standards in both CS.2 and CS.3.

20. In terms of rainwater (for more than garden use) and greywater use, we have the following comments;

If all cost effective water efficiency measures have been considered, rainwater harvesting and greywater recycling systems can be a useful manner of reducing the demand for mains water. Each domestic rainwater harvesting (more than garden use) or greywater reuse should be examined on a case by case basis, as their effectiveness varies according to scale, location and design. As a guide, rainwater harvesting systems can be appropriate where

- all feasible water efficiency measures are already in place;
- the planned system is cost effective (including ongoing maintenance costs)
- the planned system will be competently maintained and monitored;
- energy use and carbon emissions are minimised;
- the planned system will not have unacceptable impacts on a sensitive water body
- They offer a more sustainable solution to manage surface water runoff than could be provided by other SUDs approaches. The most recent and comprehensive guidance on rainwater

harvesting systems is from BS1 - BS 85815. On greywater, it is BS 8525. Some cases are available from: Harvesting rainwater for domestic uses: an information guide (Environment Agency). Conserving water in buildings, Chapter 7; using greywater and harvesting rainwater (Environment Agency). UK Rainwater Harvesting Association website

- BS1 British Standards: BS8515 - Rainwater harvesting - Code of practice and BS8525- Greywater systems - Part 1; Code of Practice

Environment Agency

21. Policy wording in the sentence ' development proposals should take into account the potential impact of climate change on water resources ...'. It is considered 'should' is too subjective, and needs to be replaced by 'must'.

Earlswood & Foreshaw Heath Residents' Association

22. The Warwickshire Wildlife Trust would also like to see the recognition of the impacts of over abstraction with subsequent restrictions on development, where over abstraction would adversely affect the natural flows needed to achieve good biological, chemical and ecological status. This is particularly pertinent to the Habitat Regulations Assessment (HRA), which identifies water quality and quality changes from new development as potential threat to the Severn Estuary SAC, SPA and Ramsar sites. Failure to take account of the recommendations in the HRA in this policy may compromise the deliverability, and thus soundness, of the spatial strategy overall.

23. The Warwickshire Wildlife Trust are pleased to note the monitoring outcomes detailed in 6.2.12 - 6.2.14. However, given the emphasis on the protection, enhancement and restoration of river corridors in policy CS.3, we would like to see a measurement of how the Core Strategy is performing in relation to the semi-natural quality of the river corridors and their tributaries. Relative measurements might include for example, length of culverts removed along the watercourses and the current proportion of semi-natural along major river corridors.

24. The Warwickshire Wildlife Trust welcomes and supports this policy to safeguard and enhance the water environment, specifically the following principles:

- the presumption against development within flood plain
- the maintenance of the floodplain and promotion of opportunities to restore natural areas of flood storage, recognising the wider landscape and ecological benefits of doing so
- the requirement to incorporate and manage SUDs into new developments
- the requirement to retain and reinstate a natural sinuous river channel within all development near to a river or a tributary
- safeguarding of sensitive sections of the river; and
- the requirement of all new development to contribute towards the improvement of water quality within named watercourse.

Warwickshire Wildlife Trust

25. We support the measures in the policy that seek to avoid further development in areas prone to development. It is particularly important new housing developments are not built in areas that flood, so that communities are not exposed to risk and economic losses. SUDs are particularly important as they allow communities to take responsibility and manage their own surface water runoff. These systems should be retrofitted to housing developments where possible. In the past, many farmers have suffered from land damage and water logging (which has resulted in a loss of food production), where nearby development has increased run off and surface water flooding.

National Farmers' Union

26. Excavation of Warwick Road lands to create additional river storage.

W A Lowe

26. Feel strongly that water harvesting should feature strongly in the Core Strategy, with the suggestion that it be applied to all new developments of a certain size to be determined.

Environmental Quality and Climate Change Panel (EQCC)

Policy CS.3A Flood Risk Areas

1. To seek assurance that new development are both themselves protected from flooding and they will result in flooding elsewhere is very commendable, but surely this is an opportunity to positively seek measures that would alleviate problems elsewhere.

John Brace

2. Long Compton has an undersized sewer which also takes storm water. Prolonged rain or flash flooding always results in contaminated water from part of the sewer accumulating in Vicarage Lane. From Vicarage Lane, it then flows through the frontage of North Down House and into Netherbrook. Any development in this part of Long Compton would only exacerbate the existing problem.

Diana Richardson

3. No new development should be built in the floodplain.

Cllr I Fradgley

Policy CS.3B Surface Water run-off and Sustainable Urban Drainage Systems (SUDs)

1. Climate change is likely to increase rainfall and flooding and mitigation measures should be included. No surface water from new developments in the area or upstream should discharge into the rivers. Storm water and flood protection measures need to be strengthened and should be considered as part of the Community Infrastructure Levy requirements.

Cllr S Juned

2. SUDs have been shown to be ineffective in preventing major flooding. It is therefore better to prevent flooding by disallowing development on or adjacent to areas with a history of flooding.

Deborah Griffiths.

3. Part B should make some reference to the potential SUDs have for creating multifunctional features that benefit wildlife, create attractive open space for leisure activities as well as balancing storm flows and improving water quality.

We recommend point 2 of part C is reworded as follows:

'Culverts will be permitted for access purposes only and should conform to the Environment Agency's culverting policy. Culverts should be removed unless it can be demonstrated that it is impractical to do so.'

4. We recommend that the National Standards for Sustainable Drainage Systems is considered. This is the recently produced DEFRA guidance dated December 2011.

Environment Agency

Policy CS.3C Protection of the Water Environment

1. We fully support the maintenance of the natural river corridors and reduction in the use of culverts, where it is possible on the majority of water courses. As both rivers and canals require suitable maintenance for such bodies as Avon Navigation Trust (ANT), the Environment Agency and Severn Trent Water, we feel that such provision could easily be used for formalised public access on foot and by bicycle, over far more of the waterways than is presently possible.

2. We are pleased to see that the core strategy is in favour of additional development, such as marinas and permanent moorings at suitable locations.

3. We also applaud the decision that proposed development should be designed to take advantage of proximity to rivers and canals as part of the planning process.

4. We note the sub-regional Water Cycle Study has identified the River Avon as being a high risk flood event zone. We are pleased to see that the Council takes this risk very seriously and will continue to consult ANT and the Environment Agency etc, to alleviate this flood risk.

British Waterways (East and West Midlands)

5. We object to Policy CS.2 Climate Change (d) and & Policy CS3 Safeguarding the Water Environment setting standards to be reached at Code for Sustainable Homes Level 4. Standards should not be accelerated ahead of the Government deadlines and building regulation requirements, particularly during the current economic climate. Affording Housing schemes should have reached Code Level 4, but this has not been carried through because of the challenges facing registered social landlords at the moment.

Gregory Gray Associates

6. There is no evidence base to require Code for Sustainable Homes Level 4.

Heart of England Cooperatives Society Ltd

7. We welcome in principle a policy to support the development of marinas and moorings. However, to fully realise the potential of the navigable waterway, the policy needs to be sufficiently flexible to recognise that waterways and waterbodies have an inherent constraint in that they are 'non-foot loose assets, i.e. the location and alignment of waterways are fixed. This dictates where the associated essential infrastructure and facilities, such as marinas and moorings can be realistically provided. It is therefore not always possible to locate such development in urban areas, nor appropriate with respect to addressing the needs of the network. There may also be site constraints to be considered, such as availability of water resources, navigational safety, geology and topography, including the canal profile, for example, whether the canal is on an embankment.

British Waterways (East and West Midlands)

8. The proposed 8 m wider ' maintenance access along all watercourses' should, in all cases, be used as pedestrian footpaths as one ' strategic objectives' initiative.

Earlswood & Foreshaw Heath Residents Association

Policy CS.3D Water Quality

1. We agree that water quality should not be adversely affected by development proposals and support the aims set out in section D. The drainage methods of new development can have significant impacts on the structural integrity, water quality and the biodiversity of waterways. The waterways have a rich biodiversity, with many areas benefiting from SSSI status, e.g. Calcutt Locks Meadow. Even minor developments can have an adverse impact on the ecology of the waterways and it is therefore important that this is considered and any impacts suitably mitigated.

British Waterways (East and West Midlands)

Topic: 6.2 Sustainability Appraisal Implications

No comments received for this section

Topic: 6.2 Explanation

1. We note the sub-regional Water Cycle Study has identified the River Avon as being a high risk flood event zone. We are pleased to see that the Council takes this risk very seriously and will continue to consult ANT and the Environment Agency etc, to alleviate this flood risk.

Inland Waterways Association (Warwickshire Branch)

2. With regard to flooding, the group felt that Parish Councils could assist SDC because they are best placed to know the 'pinch points'.

Local Strategic Partnership

Topic: 6.2 Development Management Considerations

No comments received for this section

Topic: 6.2 Delivery and Monitoring

No comments received for this section

Consultation Question: Q17

1. Yes. However, it only addresses new housing. More should be done to encourage water conservation in existing housing and commercial developments.

Alcester Town Council

2. Support

Bearley, Wootton Wawen, Claverdon, Mappleborough Green Parish Councils, Stephen Marchant, Gordon Brace

3. The policy is not sufficiently measurable and could be enhanced by "developments should not be allowed to have a storm water run-off into a local water course if flooding, associated with that water course, has occurred, either upstream or downstream of that development by a distance of (x) miles within the preceding (y) years."

Kineton Parish Council

4. If the Council wishes to specify compliance with the water element of the Code for Sustainable Homes, it will need to assess the viability of doing so, in accordance with NPPF.

The Home Builders Federation, Miller Strategic Land, Miller Strategic Land and Taylor Wimpey

5. The Council should have a water treatment plant filters back into the water table.

Cllr Hazel Wright

6. No evidence base to require Code for Sustainable Homes (CSH) Level 4.

Trustees of W A Weaver, Heart of England Cooperative Society Ltd

7. We believe that the Council should be looking at future predictions from climate models currently available. It is not obvious to us that a "100 year 6 hour rainfall event, will actually be that in 10 years' time. Climate experts anticipate much more rainfall from their climate modelling.

Earlswood and Foreshaw Residents' Association

8. All developments should aim to minimise the use of water. Meeting the CSH Level 4 is the minimum standard that should be set.

Stratford-upon-Avon Town Council Neighbourhood Plan Steering Group

9. Q17: Was there a way that we could achieve higher than Level 4 of the Code for Sustainable Homes for water conservation on new residential developments, especially bearing in mind the recent history of flooding in the area?

Environmental Quality and Climate Change Panel (EQCC)

Consultation Question: Q18

1. Support

Wootton Wawen Parish Council

2. This is for the District and County to respond to.

Mappleborough Green Parish Council, G Brace

3. We believe that the Council should be looking at future predictions from forward climate models currently available. It is not obvious to us that a "100 year 6 hour rainfall event" will actually be that in 10 years' time. Climate experts anticipate much more rainfall from their forward climate modelling.

Earlswood and Foreshaw Residents' Association

4. Policy CS 3 will be satisfactory as long as it is rigorously applied.

Stratford-upon-Avon Town Council Neighbourhood Plan Steering Group

5. Natural England is satisfied that this policy contains sufficient measures to safeguard against flooding and adapt to the effects of climate change. The Flood and Water Management Act 2010 ought to be added to the Key Drivers.

Natural England

6. The document should include specific proposals to address the increased risk of flooding due to climate change. As flood defences in Alcester overtopped twice in the last 14 years, steps should be taken to increase the level of flood protection, particularly to the north.

No surface water from new developments in the area should discharge into the River Arrow or its tributaries or upstream in Alcester.

Alcester Town Council

7. Q18: This was a question that would be put to the Environment Agency.

Environmental Quality and Climate Change Panel (EQCC)

Consultation Question: Q19

1. The scale and potential intrusive nature of insensitive infrastructure can have a significant impact on the historic environment. The design of flood defence works should be therefore sympathetic to this context.

English Heritage

2. This is for the District and County to respond to.

Mappleborough Green Parish Council

3. SDC should discharge the drainage of agricultural land and encourage the removal of existing drainage. Land would retain water, improve the existing water table and reduce the need for irrigation. There should also be a programme of dredging rivers and streams or widening them in certain places to alleviate floods rather than allocate more land for flooding.

Napton-on-the-Hill Parish Council

4. Water conservation is one of the most important issues that we will face over the period of the draft Core Strategy.

Earlswood and Foreshaw Residents' Association

5. Yes. The policy should be stronger in planning more aggressively for possible future extreme climate events. Existing flood plains may be breached more frequently, droughts may well be longer and more frequent, hence arrangements to keep more of flood water should be put in place.

Gordon Brace

6. Policy CS 3 should refer to the impact of development upstream of towns such as Alcester.

7. Flood plains and SUDS require whole-life management and maintenance.

8. Flood risks areas: Surface water run-off and SUDs; The following issues will need to be addressed:

- It is important to design -in space for SUDS during the urban planning process.
- The catchment area has to remain of a size appropriate to the solution to continue working properly and must not be taken for other uses in the future.
- The SUDs solution has to be socially acceptable by the community and any perceived safety issues from temporary flooding addressed.
- Using a diverse range of SUDs simultaneously increases their resilience to different changes.
- The design and implementation of SUDs requires an integrated approach.
- A funded maintenance plan must be put in place after construction to ensure continued efficiency.
- Ownership and responsibilities with regard to the system must be clear.
- S106 or CIL tariffs could fund maintenance.

9. In old towns such as Alcester there are still combined storm water and sewage drains. Where possible, measures should be encouraged to replace or repair these drains. Despite recent works to drain surface water quickly and attenuate the flow from storms into the river, more work is required to

restore flood plains and field drains to prevent flooding. The capacity of sewage pumping stations must be addressed.

Cllr Susan Juned

10. Recommend that there is a reference within the explanatory text that notes: *"SUDS are important ecological features within the landscape and their design and aftercare management should be a mechanism of creating and enhancing connectivity wherever possible."*

Warwickshire County Council (Ecology)

Consultation Question: Q20

1. SDC already consults with local councils regarding planning applications, but in wards which have suffered flooding issues in the past, the developer must present in detail before planning applications is decided how they will mitigate any possibility of future flooding not only with the development but also existing properties.

Cllr S Thirwell

2. In relation to the above comment and those of re-opening or culverts, the Habitat Biodiversity Audit, Wildlife Sites and Warwickshire Biological Record Centre Data and Datasets are very important in monitoring this policy's delivery. This data is and will be used to monitor "connectivity" for woodland, grassland and wetland features throughout the sub-region and SUDs will play their part in this agenda.

Warwickshire County Council (Ecology)

3. We feel this is for the District and County to respond to.

Mapleborough Green Parish Council

Consultation Question: Q21

1. The Trust is pleased to note the monitoring outcomes detailed in 6.2.12 -6.2.14. However, given the emphasis on the protection, enhancement and restoration of river corridors in Policy CS3, we would also like to see a measurement of how the Core Strategy is performing in relation to the semi- natural quality of river corridors and their tributaries. Relative measurements for this could include for example, length of culverts removed along watercourses and the current proportion of semi-natural along major river corridors.

Warwickshire Wildlife Trust

Draft Core Strategy 2012 - Summary of Representations

6.3 Waste

While paragraph 6.3.5 sets out prioritisation of waste management, as per the draft Warwickshire 'Waste Core Strategy, in the order of ' Reduce, Reuse, Recycle and Compost; energy Recovery; and Disposal, it would be beneficial to also list 'prevention' as the first priority, as set out in the Directive.

Natural England

Topic: 6.3 Strategic Objective

No comments received for this section

Policy CS.4 Managing Waste

1. Part C contains some, but not all of the policy considerations in the draft Waste Core Strategy. Rather than stating 'that proposals for the provision of waste management facilities will be assessed against the following criteria, it may be appropriate to change it to state 'proposals for the provision of waste management facilities will be assessed against all relevant Core Strategy and Development Management policies in the Warwickshire Waste Core Strategy, once adopted'.

2. (Para 6.3.6) It is suggested that paragraph should be amended to include 'in addition. The Warwickshire Waste Core Strategy, when adopted, will set out..'

3. (DMC - Point 1, P.31) Please note DEFRA is intending to remove regulations relating to Site Waste Management Plans (SWMPs). Until then, advise amending to 'accompanied by a SWMP in accordance with the requirement of the SWMP regulations (2008).'

Warwickshire County Council (Waste)

4. Need to include anaerobic digestion as a significant element of waste management.

Cllr J Fradgley

5. Warmington does not have a Parish Plan.

6. Paragraph 6.3.2 on the 2nd and 4th line contains a typo. Replace fairs with fares.

7. Monitoring - SDC own in-house statistics should also be used.

Cllr S Jackson

8. Regard should be had to the emerging WCC Waste Core Strategy. The likely impact of non-waste development on existing waste management facilities and on sites and area allocated for waste management should be given consideration. The Core Strategy should not prejudice the implementation of the WCC Waste Core Strategy (WCC WCS).

9. No detail of how the plan will be integrated with the WCC WCS provided. Waste collection infrastructure should be compatible with the WCC waste management plans,

10. Additional waste management facilities required for proposed growth should be phased in conjunction with the timing of the delivery of the supporting waste infrastructure.

11. The Draft Core Strategy should ensure development makes sufficient provision for waste management and promotes designs and layouts that will enable the integration of waste management infrastructure without adverse impacts on the street scene and local landscape.

12. Proposed new development should be supported by Site Waste Management Plans. Design and layout of new development should aim to facilitate opportunities for sustainable waste management and movement of waste up the waste management hierarchy.

Environment Agency

13. Support for policy and questions 17-26.

Harbury Society

Policy CS.4A Waste Management Plans

1. Support the use of more recycled aggregates. Government policy is encouraging a greater reuse of materials to minimise the need to extract virgin materials as part of its drive towards greater sustainability. The impact of recycled aggregates is uncertain at present and could have changed significantly by 2028 as improved methods and changed specifications for the use of recycled aggregates are implemented. Consequently, the availability of inert materials to restore mineral workings is becoming more restricted.

2. Section A should consider a more pro-active approach to directing available inert waste for restoration of mineral workings is desirable.

Salford Priors Parish Council

3. Clear and unambiguous statement for requirement of waste management plans. All policies should be stated in this unambiguous way.

Earlswood and Foreshaw Heath Residents' Association

4. It is noted that DEFRA has announced that Waste Management Plans for development will not be required because it duplicates other existing legislation. Therefore, question the legitimacy of Section A.

Ainscough Strategic Land

Policy CS.4B Design of New Development

1. Welcome the (new) inclusion for the provision of composting facilities.

Cllr S Jackson

2. Policy CS.4 states 'it will be expected'. This should be deleted and start with All. 'Should' is subjective and needs to be replaced by must. Specific exclusions should then be detailed.

Earlswood and Foreshaw Heath Residents' Association

- 3.
- Concerned about the problems surrounding recycling collections from blocks of flats, whereby communal bins became contaminated by the incorrect disposal of waste and thereby were rejected by the waste collectors. In addition to educating the occupants better on the subject, the suggestion was made that the responsibility be passed to the flat management companies who would have to pay for waste removal should it be rejected.
 - B: Design of New Development. Members requested that composting bins be installed at all new properties.

Environmental Quality and Climate Change Panel (EQCC)

Policy CS.4C Provision of Waste Management Facilities

1. A specific definition of 'adversely impact' is needed.

Earlwood and Foreshaw Heath Residents' Association

Topic: 6.3 Sustainability Appraisal Implications

No comments received for this section

Topic: 6.3 Explanation

1. It would be helpful to recognise the role of Voluntary Action Stratford-on-Avon District in the future running of the Household Waste and Recycling Centres. From 2 April 2012, Warwickshire Community Recycling will play a key part in running the Shipston, Stockton and Wellesbourne sites.

Voluntary Action Stratford-on-Avon District

2. Paragraph 6.3 - suggest amending to "in addition, the Warwickshire Waste Core Strategy, when adopted, will set out..

Warwickshire County Council (Waste Department)

Topic: 6.3 Development Management Considerations

1. Development Management Considerations (p.31) please note that DEFRA has recently announced that as part of its 'red tape challenge', the regulations relating to Site Waste Management Plans are likely to be removed. However, until such time as the regulations are formally removed, we advise amending the wording to read ... accompanied by a Site Waste Management Plan Regulations (2008).

Warwickshire County Council (Waste)

Topic: 6.3 Delivery and Monitoring

No comments received for this section

Consultation Question: Q22

1. Draft Core Strategy supports sustainable waste management in new development and we believe that composting facilities should be included in the policy.

Wootton Wawen PC

2. Policy considered sound for larger developments, but there is concern that smaller projects are unregulated and this leads to opportunities for 'fly-tipping by unscrupulous sub/operators and developers. This is a serious problem in the countryside. Suggest that all developments submit details of waste for each project and their intended method of managing it at application stage. This can be followed through with the intended waste site(s) administration(s).

Earlwood & Foreshaw Heath Residents' Association

3. Support

Natural England, Follett Property Holdings Ltd, Bearley PC, J. Buckley, Gordon Brace

4. Support the references to the natural environment.

Warwickshire County Council (Ecology)

Consultation Question: Q23

1. Support

Bearley Parish Council, Wootton Wawen Parish Council, Gordon Brace, Follet Property Holdings Ltd.

2. Yes, particularly points 2 and 3, part C with its reference to protection and enhancement of ecological and geological assets as well as landscape.

Natural England

Consultation Question: Q24

1. The use of the Waste Management Plans: The inclusion of the requirement that building projects over 300,000 should submit waste management plans is welcomed. However, the policy should also make clear how the use of these plans will be monitored and implemented.

Stratford -upon-Avon Town Neighbourhood Plan Steering Group

2. The statutory limit for the requirement of Site Waste Management Plans is £300,000 in cost. However, encouraging smaller projects to consider the use of SWMPs can assist in keeping the costs to landfill tax down for small companies and can be a useful tool in identifying resource reuse opportunities.

Cllr S Juned

3. Natural England supports reference to the Waste Pyramid, as set out in the Waste Framework Directive (2006).

Natural England

Consultation Question: Q25

1. Using the Warwickshire County Council 'Draft Waste Core Strategy - Preferred Options' is comprehensive enough.

Bearley PC

Consultation Question: Q26

1. The delivery and monitoring appears to be through planning applications and could be reactive, rather than proactive once a project has commenced.

Bearley PC

2. The Council Annual Monitoring Report should detail the quantum of waste collected in the year, split it into types and then show how much has gone to landfill, how much has been recycled etc. From the number of people/homes/ businesses within the area, the annual average can be calculated and trends extrapolated. Also, the report should show the revenue earned from recycling items, such as metals, creating compost and top dressings from organic waste and methane from organic fermentation, in order to lead the way for all council tax payers to buy into recycling by commensurate reductions in the Council rates.

Earlswood and Foreshaw Heath Residents' Association

3. Q26: Residents needed regular reminders of what can and cannot be recycled, ie. via the Council Tax booklet or revised stickers for the wheelie bins.

Environmental Quality and Climate Change Panel (EQCC)

Draft Core Strategy 2012 - Summary of Representations

6.4 Minerals

No comments received for this section

Topic: 6.4 Strategic Objective

No comments received for this section

Policy CS.5 Minerals

1. WCC requests that further clarification is provided on the status of the listed in Policy CS.5. It appears that there is a combination of:

- a) Sites submitted by industry as part of possible site allocations in the Mineral Development Framework; and
- b) Undeveloped Minerals Local Plan (MLP, 1995) site allocations (i.e Preferred Areas and Areas of Search). If so, Abbot's Salford (MLP Area of Search 9) and Bidford-on Avon have been omitted.

2. (Para 2)WCC requests that SDC Core Strategy makes this clear at this stage, no decisions have been made as to which sites will be taken forward as minerals allocations. A thorough assessment of each site submission has been undertaken, no presumption in favour of any sites as yet. Consideration should be given to changing para.2 in Policy CS.5 to 'Sites allocated as part of the Warwickshire Minerals Development Framework will be safeguarded from other forms of development'.

Warwickshire County Council

3. Section A Safeguarding - include the area south of Tiddington Road under the Golf course as safeguarded minerals reserve.

W A Lowe

Policy CS.5A Safeguarding

1. Minerals need a larger reserve.

Cllr P Barnes

2. Safeguarding mineral resources around Southam is inappropriate, as this implies that further extension might be considered acceptable in the future. Given the very large area that is already permitted for clay extraction, it is difficult to see that further extension of scale could be justified, particularly in a way that sterilises other land use.

3. I agree that a buffer of 250m should be applied, but to include ancillary and preparatory works such as bunds.

Nigel Rock

4. SPPC is concerned that the District Council has produced a list of sites. The sites have been taken from the draft WCC Minerals Core Strategy (2009), which is a consultation document, with no agreed sites. SPPC considers that if a list of sites to be safeguarded is included, then it should be drawn from an approved policy document, not a consultation document. Suggests the policy wording in Section A should be amended accordingly.

Salford Priors Parish Council

5. Policy CS.5A states 'should' be avoided'. This considered too subjective and should be replaced by 'must'.

Earlswood & Foreshaw Heath Residents' Association

Policy CS.5B Applications for Mineral Extraction

1. The use of word ' unacceptable' in the sentence which would result in unacceptable harm' is considered too subjective, the word should be changed or specifically defined.

Earlswood and Foreshaw Residents' Association

Topic: CS.5C Policy CS.5C Opportunities for Restoration

1. The restoration schemes should be time limited and where several sites are located in an area, excavation should not be allowed to commence on a new area until substantial restoration of earlier sites has been completed.

Salford Priors Parish Council

2. The policy states" the district council will expect all applications. Consider "will expect" too subjective and needs to be replaced by "requires".

Earlswood and Foreshaw Heath Residents' Association

3. Opportunities for Restoration. Timescales and the appropriate funding to be put in place for restoration schemes to try and ensure that schemes are completed.

Environmental Quality and Climate Change Panel (EQCC)

Topic: 6.4 Sustainability Appraisal Implications

No comments received for this section

Topic: 6.4 Explanation

1. Recognises that WCC are the main authority and agrees that areas within the parish mentioned should be safeguarded.

2. Suggests that ' land to south west of the village ' known as Broom Court Farm' should be added.

Bidford-on-Avon Parish Council

3. The British Geological Survey(BGS) 'Guide to Minerals Safeguarding in England' (2007) advises that: 'A district DPD could include policies that set out the general approach the district will take when determining proposals for non-minerals development within or close to Mineral Safeguarding Areas (MSAs) or existing mineral workings. Such policies should acknowledge the procedures for consulting with the Mineral Planning Authority on the existence and extent of minerals resources present and considering a case for extraction, where appropriate'.

4. BGS identified the extent of the individual mineral resources in the county, which developed the MSAs. WCC suggest that these MSAs/MCAs are either identified on a SDC proposals map and/or a link is provided to the Warwickshire Minerals Safeguarding webpage. This will help to ensure that mineral implications are accounted for in decision-making in planning applications.

5. WCC requests that applications may potentially sterilise mineral deposits within a MSA, the SDC consults with WCC. If it considers that the development might sterilise mineral reserves, the applicant may be required to submit a minerals survey to establish whether the reserve is economically viable. In some cases, WCC may insist that minerals are extracted prior to non-mineral development. It is considered that the inclusion of this procedural information will improve the effectiveness and deliverability of this policy.

WCC

Topic: 6.4 Development Management Considerations

No comments received for this section

Topic: 6.4 Delivery and Monitoring

No comments received for this section

Consultation Question: Q27

1. Support for policy.

WCC (Ecology)

Consultation Question: Q28

1. A greater emphasis in the determination of a mineral application should be placed upon the potential benefits of mineral extraction with regard to re-creating natural habitats and restoring the District's biodiversity. There should be a presumption that the majority of any mineral working is restored to enhance the local biodiversity.

Environment Agency

2. Natural England agrees that the draft policy assists in the determination of applications for mineral extraction. However, there is insufficient detail on the potential impacts of mineral extraction. Under point B, the following text is recommended:

'All development proposals will be expected to contribute towards the protection and enhancement of biodiversity, geodiversity and landscape character, ideally through a green infrastructure approach.'

Natural England

Consultation Question: Q29

No comments received for this question

Consultation Question: Q30

No comments received for this question

Consultation Question: Q31

No comments received for this question

Consultation Question: Q32

No comments received for this question

Section 7 – District Designations

7.1 Green Belt

1. Key drivers - Study into Future Growth implications of Redditch (2009) is relevant. Refer to Redditch Employment Land Review

Redditch Borough Council

Topic: 7.1 Strategic Objective

No comments received for this section

Policy CS.6 Green Belt

1. Rather use the design policy to deal with house extensions. The rigid guideline will lead to injustice and unfairness and affect other objectives of the Plan. Local plan wording favours existing large houses and ones extended before 1975. The Council must take account of all material considerations including the impact on the openness of the Green Belt. Therefore strongly agree that there should not be a specific percentage or date in the policy.

Dr Malcolm Bell

2. Resist developing in the Green Belt even if it is deemed appropriate or not. Small scale developments might be allowed in or adjacent to villages.

Alan Marks

3. Extend Green Belt status to Bordon Hill.

John Alan Finney, James Greygoose, Miss Mary Finegan

4. Green field land around Stratford-upon-Avon needs to be retained and given Green Belt status. The Core Strategy should provide maximum protection to green spaces around Stratford.

5. There is no justification to build a business park north of the A46. It spoils the gentle transition from countryside to residential.

Stratford Voice

6. The policy needs to be flexible enough to allow small scale housing schemes. The NPPF is robust enough to protect the Green Belt. Make allowance for small scale development next to villages in the Green Belt for affordable housing.

West Midlands HARP Planning Consortium

7. Don't use Green Belt land unless absolutely necessary.

Neil Hourigan

8. Object. Green Belt land needs to remain as originally intended. Define it as land that cannot be developed.

Jane Ainley

9. Support the policy, subject to development following the approach set out in Section 9 that limits housing development to 2% of existing housing stock. The Green Belt must not be eroded by developments in support of the Area Policy Profiles in Section 10.

10. Support, provided development maintains / improves the appearance of the property and does not adversely affect the area and adjoining properties.

Brian Summers

11. Object - better to wait for applications and to judge them on their merits.

12. 30% takes no account of site specific issues that have been successfully challenged by Parish Councils. Design is more important than size and we would like to see more rigorous assessment of the detail design, and less on absolute size. The District Design Guide is out of date and does not address (1) the type of large new or extended dwellings appropriate for the landscape and (2) The role of modern architecture for large houses in the landscape.

Morton Bagot, Oldberrow & Sperrall Parish Council

13. Disappointed that the Core Strategy does not allocate more areas as Green Belt. Tourism is the key driver in Stratford, so we suggest Bordon Hill and land around Anne Hathaway's cottage be accorded Green Belt status. Include Bordon Hill to the west and south of Stratford. Approach the Countryside Restoration Trust to turn the land into a tourist attraction.

David & Beverlie White

14. Define boundaries to prevent appeals. How many properties would the 2% be based on in Tanworth in Arden. Is Vicarage Hall included in the calculation? There may be disagreements about lines around settlements.

A R Dixon

15. Against the erosion of the Green Belt. Future generations need to enjoy the Green Belt.

Mr Alan Oliver

16. Appropriate for small scale development in villages in the Green Belt. Welcome principles for the following acceptable forms of development in the Green Belt:

- Small scale housing schemes within or adjacent to local service villages, consistent with Policy CS25 Countryside.
- Small scale development which meets a housing, employment or other need identified by a local community, consistent with Policy CS 25 Countryside.

17. No specific reference to the acceptability of small scale housing schemes within or adjacent to a Main Rural centre. CS 25 Countryside cross references with CS 16, providing small scale local choice schemes in Main Rural Centres.

18. Support the Local Plan approach where no boundaries are defined and small scale development to meet a need identified by a community may be appropriate within or adjacent to a settlement.

Warwickshire Rural Community Council

19. Policy CS 6 does not provide sufficient protection to the character and openness of the Green Belt. The forms of development listed in Policy CS 6 (a) to (e) is not sufficiently precise. Clause 142 in the NPPF refers to inappropriate development. Clause 143 of the NPPF refers to weight being given in the assessment of planning applications to any harm of the Green Belt. Very special circumstances don't exist unless potential harm to the Green Belt is outweighed by other considerations. Clause 144 of the NPPF refers to exceptions to development in the Green Belt. These exceptions include extension / alterations, replacement buildings and limiting infill development in villages.

20. Advice being given in Policy CS 6 is not clear. Define 'small scale'. Clause 144 of the Draft NPPF refers to construction of new buildings in the Green Belt as inappropriate. Exceptions to this include limited infilling in villages and limited affordable housing.

21. Difficult to understand what is meant by small scale extensions or replacement of new buildings in (c). What does this really mean? On page 40 of the draft Core Strategy, it is stated that the 30% maximum threshold relating to the scale of house extensions and replacement dwellings in the Green Belt will be dropped. No reasons are given for this. It may be more helpful to refer to clause 144 of the NPPF, where regard needs to be given to the construction of inappropriate buildings in the Green Belt. Exceptions are extensions or alterations of buildings that are not disproportionate or over and above the size of the original building. The 30% maximum threshold rule is too restrictive. Guidance needs to be given on the extension/replacement dwelling being in proportion to the plot or adjacent property, with no detrimental impact on the Green Belt.

22. Paragraph 7.1.6, Green Belt land north of Stratford-on-Avon should not be removed, unless there are very special circumstances. Question information contained in the Employment Study that suggests removing 5-10 hectares of Green Belt land in favour of employment. This would result in traffic and access implications.

Wilmcote Parish Council

23. The District has a role to play in maintaining the amenity we live in. Don't allow developers to take the easy way out at the expense of amenity and the strategically important Green Belt. Need a commitment to preserve and enhance the Green Belt between Redditch, Birmingham, Solihull and Coventry.

24. Restrict small scale development to infill and do not extend adjacent to local service villages.

25. If the 30% threshold rule is removed then there needs to be alternative guidelines. Development must not cause undue harm to the open character of the local area.

Andrew Ashcroft

26. Recognition needs to be given to the thriving rural economy in the Green Belt and the role it plays in a cohesive community and reducing the need to travel.

27. The policy needs to be flexible enough to deliver employment and housing in the Green Belt to sustain rural communities. An over-restrictive Green Belt policy will stagnate those communities and encourage leap frogging of development. The Green Belt must not become a dumping ground for urban infrastructure.

28. The aims of the Green Belt have not changed over 50 years. The purpose of the Green Belt is to counter urban sprawl, to prevent coalescence and to protect the setting of towns and cities. Locally, the Green Belt policy is too restrictive. The rural economy is important, so don't assume the solution is an urban based provision of employment and services.

29. Sustainability applies equally in rural and urban areas. Policies need to be positive enough to achieve sustainable rural communities and to provide a sustainable and effective buffers around cities and towns.

Country Land and Business Association

30. Don't agree with building on the Green Belt.

J L Sexon

31. Protect the Green Belt at all costs. Don't allow the Green Belt to be continually squeezed. Earlswood lakes is becoming a County Park. Don't see the benefit of Earlswood Lakes becoming a country park.

Vida Davies

32. Concern about the threat to the Green Belt. Understand the need for new housing, but rather use brownfield sites before irreversible damage is done to the countryside. The Green Belt has little infrastructure which means that this too would have to be developed. Rather choose a minimum option to find accommodation for an ever increasing population and redevelop existing sites than exploiting the precious resource that is our Green Belt.

Roy Welsby

33. The policy does not give enough protection. The policy should be more specific. There are too many get 'out clauses'. Define the exemptions.

34. Protect the Green Belt at all costs. Don't allow areas of the Green Belt to be removed and to be squeezed by surrounding Councils in Tanworth Parish.

35. Inappropriate to drop the 30% threshold. Don't trust Stratford-on-Avon District Council in protecting the Green Belt going forward. The character of settlements / villages has already been changed by oversized development of replacement dwellings.

Jeff Perks

36. The Core Strategy is appropriate and in line with paragraph 89 of the NPPF, in particular permitting small scale developments and infilling in residential areas of villages. Allowing these small scale developments helps solve national housing need, without this alternative of large scale developments leads to a detrimental impact on local areas and encroachment onto genuine green field land. Much of the designated Green Belt is already residential so limited infilling is supported. The Core Strategy should reference the NPPF. There does seem to be some confusion about the definition of Green Belt as development has already occurred in these designations.

Peter Watson

37. If inappropriate development is resisted then the policy should meet its strategic objective of protecting the character of settlements and the countryside.

38. Support small scale infill development that is community led, not developer led and meets an identified local need.

39. Boundaries may well be appropriate for local growth centre villages within the Green Belt. Other settlements in the Green Belt would be better served by the current 'washed-over' approach.

Cllr D A Stone

40. A Green Belt limitation around villages will reduce urban sprawl.

Steven & Jane-Elizabeth Gee

41. Object. Do not dilute the Green Belt.

Anne & Roger Skyrme

42. The draft policy does not give the Green Belt enough protection. Development of brownfield sites should always take precedent over green field sites.

43. Provide scope for small scale development in villages in the Green Belt.

Deborah Griffiths

44. Reservations about using boundaries to protect Local Service Villages. Boundaries are likely to be divisive and would need independent management. Building/extension of housing of housing stock should not penalise potential sites or discriminate against landowners on the edge of villages.

Richard Woodcock

45. In (e) make it clear that new buildings includes housing for rural workers to live permanently near their place of work in the countryside. Only through appropriate economic uses of the Green Belt can the openness and permanence be safeguarded as required by paragraph 79 of the NPPF.

Philip Barber

46. Inappropriate to drop the 30% limit - maintain the character of small communities by retaining a limit.

Michael Andrews

47. The 30 rule is good. It prevents lots of small houses in rural areas from becoming large detached houses that are not affordable by most people.

Barry Durman

48. Support allowing housing schemes within or adjacent to settlements in the Green Belt. These schemes do not always have to be small scale, so remove these words from the policy.

49. Current Local Plan Green Belt policies are restrictive. Support the Core Strategy approach to soften the approach to development in more sustainable villages. This additional development will provide for the needs of the local population.

Mr R Coslett

50. The 30% rule has worked well so it should be retained.

John Eagle

51. Small scale development in Green Belt villages would be consistent with the dispersed approach to development. Controlled growth in villages will help maintain existing services and help drive the creation of new ones. The focus needs to be on high quality design.

52. Appropriate to remove the 30% figure (arbitrary) from the policy and focus instead on design and impact.

Mark Blackman

53. (a)-(d) would allow development beyond that permitted in PPG2.

54. In (a) permitting housing in the countryside under very special circumstances is against the principles of the Green Belt and should be deleted.

55. The wording of (b) opens the door to Green Belt development where identified by a local community. This is unlikely to be a very useful policy.

56. Part (c) is not satisfactory as it limits extensions to 30% by volume over the original dwelling at its 1975 size.

57. Part (d) fails to recognise that some rural brownfield sites are unsuitable and non-conforming. Where sites fall into disuse a new use should not be permitted and the land should be allowed to revert to woodland or restored to agriculture.

CPRE Warwickshire Branch

58. Second paragraph of CS 6, after the words 'Green Belt will be acceptable', add the words 'and not considered inappropriate'.

59. CS 6(a), define small scale housing schemes. The proposed definition of small scale being 2% of existing housing stock of a Local Service Village (LSV) is not justified or effective. Most LSV will need 6 - 8 new developments to meet housing requirements for that LSV.

60. CS 6(b) refers to the impact on the openness and character of the area being a minimal.

David & Angela Tucker

61. Question the inclusion of the words exceptional circumstances in Policy CS 6. There is not sufficient evidence to justify development in the Green Belt. For example there are vacant office buildings in Timothy's Bridge Road where spare capacity could be used over the life of the plan. Brownfield sites for development in existing town boundaries could meet additional capacity. Although more expensive for developers, these areas could bring additional benefits to the town by connecting new business areas to the town centre.

Stephen Ollerenshaw

62. The 30% restriction on extensions in the Green Belt is unrealistic. For example our cottage was very small to start with and 30% gave very little extra room to manoeuvre even though it is on a large site. The extra 30% only gave us a tiny extension. There do need to be restrictions on the size of extensions but to apply a blanket 30% is not appropriate. We support the Green Belt and believe that it should be protected.

Robbin & Patsy Suffield

63. Review the Green Belt. The last review was in 1975.

Councillor S H Jackson

64. Do not support the Green Belt being used to meet any shortage in housing in Studley. This is being imposed on use from afar rather than letting local residents have a real say. If one part of the Green Belt is released for development then further encroachment is inevitable.

65. There are other options than using the Green Belt for housing need.

66. The Green Belt needs to be protected. The beauty and character of the countryside needs to be recognised.

67. The final draft Core Strategy needs to be stronger on using brownfield land than green field land.

Charles Farran

68. There needs to be more emphasis on protecting the Green Belt. The NPPF states that the Local Plan must incorporate safeguards over and above general protections of national policy. The final Core Strategy needs to have stronger Green Belt safeguards. One size does not always fit all.

69. The Green Belt is the most important issue around Tanworth and the Area Profile needs to recognise this.

70. Do not abandon the 30% maximum threshold. It has been invaluable in the eight years or so of its operation. There is no evidence that it does not work or that it should be changed.

Tanworth-in-Arden Residents and Neighbourhood Watch Association

71. Oppose discarding the 30% maximum threshold for replacement dwellings in the Green Belt. Tanworth-in-Arden already has an excess of larger replacement dwellings. Discarding the 30% will only intensify the situation.

Mr & Mrs J T & C A Waters

72. Preservation of the Green Belt is very important for Sambourne/Middletown and Studley. Rather develop brownfield sites than greenfield land. Some sites being proposed around Studley are therefore inappropriate. Green Belt areas should only be developed in exceptional circumstances. SDC should know that everyone will fight for the Green Belt. Development should be urban and the Green Belt protected and the 30% rule adhered to.

Studley/Henley Community Forum

73. There is a major issue on the northern side of Stratford-upon-Avon in the Green Belt, north of the A46. Some of the land is being used for motorcross activities disrupting residents on both sides of the A46.

74. The Green Belt needs to be protected and noise nuisance prevented during summer so people may enjoy their gardens.

75. Motor sport in the Green Belt adversely impacts residents and is not appropriate.

Stephen Ollerenshaw

76. Green Belt boundaries need to be defined in accordance with the NPPF. This needs to be done in conjunction with other local authorities. Support the need for certain development activities to be prescribed in the Green Belt. The identification of land for development can help inform the determination of boundaries.

The Home Builders Federation

77. Encourage small scale development to maintain the viability of villages and their services in line with the general principle of dispersing development equitably across the district.

78. Don't define village boundaries. This could exclude most suitable sites. In nearly all cases there is capacity for infill within existing boundaries. If new boundaries are defined this will encourage cries of garden grabbing and over development down the line. It will prevent the building of family homes with good sized gardens. Each site therefore needs to be dealt with on its merits.

79. In many case individual existing houses are too small to meet modern habitable standards. There should be no overall restriction size. The size of a replacement dwelling needs to be commensurate with the size of the land holding.

80. Allow small scale development in order to maintain the viability of villages and their services. Growth in villages will allow younger people to remain in the villages and small scale building to be built by local builders using local materials.

81. Abolish built up area boundaries in the Green Belt to allow suitable development on the edge of village sites to meet identified local and national need. Small scale growth should primarily be market housing and the degree of affordable should not be greater than 25% otherwise it will have an impact on the selling price of market housing. Higher percentages could be justified on large town sites.

Set Design

82. CS 6 is confusing and at variance with the NPPF (small scale housing schemes), in particular paragraph 89 in terms of the definition of inappropriate development.

83. The Core Strategy should identify those settlements where the release of land from the Green Belt will be necessary to meet development needs.

84. Policy CS 6 is in conflict with paragraphs 8.6 and 8.7 of the NPPF. CS 6 as drafted allows small scale development in villages. The policy needs to reflect the NPP'S presumption against inappropriate development in the Green Belt. Development adjacent to local service villages and infill in the Green Belt is inappropriate.

85. The Core Strategy needs to identify development needs and the review of Green Belt boundaries where necessary, rather than seeking to introduce flexibility to the Green Belt.

Bloor Homes

86. Part (d) and (e) are supported. Part (d) needs to be amended as follows: ' The proposed form of development should be consistent with the overall development strategy for the District'. The purpose of the policy should be to allow the best use of brownfield sites. Part (d) needs to reflect the original wording in the NPPF starting with the words ' limited infill or the partial or complete redevelopment... within it than the existing development'.

87. The policy adequately protects the Green Belt while allowing small scale development in villages in the Green Belt.

88. The 30% rule is a useful guide but where larger development can occur without harming the Green Belt then it should not be used to restrict development. The 30% threshold should remain an acceptable indication of what is considered appropriate, but should not be applied too rigidly where it can be demonstrated that larger extensions would not have more of an impact on the Green Belt.

Gregory Gray Associates

89. CS 6 is out of kilter with the NPPF. The Green Belt must be preserved at all costs.

90. The policy does not adequately protect the Green Belt. The policy is too non specific and there are too many get out clauses. The policy needs to be strictly defined as do the exemptions.

Ewen Cunningham

91. Object to the abandoning of the 30% maximum threshold for replacement dwellings in the Green Belt. This should be debated separately from the Core Strategy as a whole.

92. The NPPF makes it clear for the Local Plan to enshrine safeguards already provided for the Green Belt. According to the NPPF there is a presumption against development in the Green Belt unless there are very special circumstances. It is therefore strange that the Stratford-on-Avon District Council is trying to abandon a long understanding and easily understood figure.

93. There is no evidence to suggest that the 30% guideline is unpopular. The verdict from professionals in neighbouring authorities is that the 30% is an effective interpretation of national policy. The current policy appears to have been effective in that the Tanworth in Arden Parish. There have been a large number of domestic applications, but the percentage granted belies the fact that the 30% maximum threshold is not understood or is unfair.

94. Most of Tanworth in Arden is Green Belt. There are only a small number of brownfield sites and only a few omission sites. Apart from agricultural holdings there is very little retail of any size. The openness of the surroundings would prevent the development of industrial or retail.

95. The Green Belt is our most concern. Not even in Warwick or Leamington Spa are Green Belt pressures as acute. Only Studley faces comparable challenges.

96. The NPPF commits to the protecting the openness of the countryside and the Green Belt. The Tanworth Parish and other areas of the District therefore need to be given special protected status in the Local Plan.

97. Any exceptions granted for applications for development in the Green Belt need to be for very special circumstances.

Tanworth-in-Arden Parish Council

98. Development continues to leapfrog over the Green Belt and put pressure on rural communities which are not protected. Need to relax Green Belt restraints and let some settlements grow.

Harbury Society

99. Policy CS 6 needs to develop criteria for assessing applications for development covered in the NPPF.

Wychavon District Council

100. Welcome Council's supporting the redevelopment of brownfield sites in the Green Belt that aligns with the NPPF. Greater clarity is however needed on the proportion of housing to be supplied by brownfield sites in the Green Belt. Large brownfield sites in the Green Belt, such as Maudsley Park need to be identified in the Core Strategy to ensure that the strategy is effective and to assist in the monitoring and management of such sites.

101. Support the proposed wording of CS 6 and specifically part (d) which is consistent with paragraph 89 of the NPPF - supporting the redevelopment of brownfield sites in the Green Belt.

102. The Core Strategy needs to identify large brownfield sites in the Green Belt that have redevelopment potential. This approach would meet the Positively Prepared test of soundness of the NPPF and assist in the delivery of sustainable development (consistent with National Policy is another test of soundness).

103. The redevelopment of major development sites / brownfield sites in the Green Belt, such as Maudsley Park represent a significant regeneration opportunity. Clarification is however sought regarding brownfield sites located on the edge of Local Service Villages.

Urban Renaissance Villages (URV) and Helical Bar

104. Policy CS 16 effectively means that development will occur in Green Belt villages. The mechanism for this has not been addressed. Paragraph 7.1.7 notes two approaches, such as suitable villages being inset from the Green Belt and the current approach where there are no boundaries. The continuation of the current approach does not provide certainty in plan making. Favour an approach that releases land from the Green Belt. If a village is not suitable then it should be excluded from the Green Belt (paragraph 86 of the NPPF).

CALA Homes (Midlands)

105. Object to removing the 30% rule.

106. Object moving new buildings, roads etc to Green Belt areas.

Mrs B Brown

107. CS 6 part (c), the word suitable should be removed for it assumes existing structures are harmful.

Councillor George Atkinson

108. Retain the 30% guideline. This needs to apply to buildings in the policy, not just dwellings. This would be consistent with National Policy.

109. The approach needs to be consistent, yet flexible to allow exceptions for particular development - very special circumstances that would justify harm to the Green Belt.

110. The current policy has ensured that developments are not inappropriate nor disproportionate in their settings in the Green Belt.

111. Note exceptions to inappropriateness of new buildings in the Green Belt in paragraph 89 of the NPPF.

112. Extensions or alterations of a building should not result in disproportionate additions over and above the size of the original building. The same argument applies to replacement buildings.

Cathy Kimberley

113. To build on the Green Belt defeats the purpose of the Green Belt. Refer to paragraph 89 of the NPPF.

Mrs J and Mr M Buckley

114. Policy CS 6 needs to be more specific. Exceptions to the policy need to be fully detailed.

115. The Government attaches great importance to Green Belts. The main aim of Green Belts is to prevent urban sprawl by keeping land open.

116. The Green Belt serves five purposes:

- To check unrestricted urban sprawl of large built up areas
- To prevent neighbouring towns from merging
- To help safeguard the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist urban regeneration by recycling land

117. Once Green Belts have been defined, local authorities need to plan positively to enhance the beneficial use of the Green Belt (paragraph 89 of the NPPF). This is clearly at odds with Council's interpretation of Green Belt. Growth in villages is being proposed at 2% of existing stock. The pro-rata for Earlswood's share would actually result in 17.5%, all of which will be in the Green Belt. This is clearly unacceptable in light of the NPPF.

Earlswood & Forshaw Heath Residents' Association

118. Villages in the Green Belt need to have boundaries. Communities should agree with proposals within or adjacent to the boundary. Infill is not always the best policy within settlements as open fields are often a valued aspect of a village.

Justin Kerridge

119. Many agricultural businesses are located in the Green Belt areas of the District. These businesses need to be given due consideration. The Green Belt policy must be flexible enough to allow these businesses to develop. Agricultural businesses have a role to play in maintaining local landscapes, maintaining hedgerows and participate in environmental schemes. Farmers need to invest in new buildings and other infrastructure. The Core Strategy therefore needs to be flexible enough to support these businesses - refer to paragraph 91 of the NPPF.

National Farmers' Union

120. Support parts (a)-(d) of the policy.

W A Lowe

121. The five principles of the Green Belt are reiterated. Not all these functions are being met by land north of the A4023. This land needs to be removed from the Green Belt. This would achieve: -

- A defensible Green Belt boundary.
- A new boundary would reduce pressure for development and safeguard the countryside.
- Development would create a strategic employment area for Redditch.
- It would enable the use of Winyates Triangle.
- It may generate funding for new access from the Coventry highway.

Owners of land at Ravensbank Drive/Gorcott

122. Object to CS 6 (c) that refers to small scale development. This is in conflict with paragraph 89 of the NPPF that states that replacement buildings are not inappropriate development. Rather use the word 'same' than the word 'similar'. Include the words 'same use' in the policy.

123. CS 6 is not clear that there is a size restriction for replacement buildings and extensions. Quote the phrase 'not materially larger' in the actual policy. Need to avoid any doubt.

Cathy Kimberley

Topic: 7.1 Sustainability Appraisal Implications

1. Reference geodiversity as this covers geomorphological features as well as exposures.

Warwickshire County Council

Topic: 7.1 Explanation

1. Expand Green Belt status to Bordon Hill (Stratford-upon-Avon).

Mark Undery

Stella Golding

Chris Toney

Mrs Sarah Buttrick

Mr Miles Buttrick

Ms Rebecca Sayce

R D & R J Langman

Howard & Helen Grieves

Brian Darnley

Paula Owen

Marcus Weaver

Mr & Mrs Zaffignani

Mrs Caroline Wilks

Jason Duffey

David Edward Martin

James E Philpotts

Nick Poulton

Robin Malloy

Terry Brandon

Michael Whick

Mrs G Woodhall

Charles P McCormack

Sarah McCormack

2. Don't consider amending the Green Belt boundary. Do not reduce the Green Belt in any way.

Sylvia Eden

3. Green Belt status should be extended to all high sensitivity areas around Stratford-upon-Avon.

Peter & M J Donaghue

Jeannie Farr

Dr D Kalderon

Mrs E Kalderon

John Armitage

R K Fisher

Peter Condron

Mr & Mrs P Hill

Miss F Longmore

R. Burman

Mr and Mrs Fraser and Linda Edwards

Mr and Mrs D J Cholerton

Susan Marks

Joan Graham

Gordon Harrington

Bill Tucker

Stephen Parker

Mrs M. Childs

B.E.H. Whitehouse

Mr B. Childs

S.J. Wiseman

Mr and Mrs R.E. Cain

C.M. West

Mrs P. West

Mr D.C.M. Young

Patricia Young

Mrs B. Wood

P. Wiltsliel

Stefan Law

Mrs M.G. Tattersall

Alan Spreadbury

M.B. Lewis

Mrs Valerie Lageard

B.W. & Y.K. Bates

Mrs Mary Boddington

Alan Boddington

S. Watts

Mr Peter Pearce

Monica M. Beckett

G.K. Allen

Andrew Davies

J. Steele Nicholls

Peter Dingley

M.J. Bunce

Mrs Helen Petitjean

Andrew Waterhouse

Mrs S.J. Sreeves

Julia Shearing

Mr E.R. Green
John D. Jones
Peter Taylor
Mrs J. Wood
Anna Candy
Mrs D. Geldard
John Harris
Bernard R. Pumfrey
S. Venus
Mrs Diane Rogers
R.J. Beresford
Mr and Mrs J. Farrar
Mr Clive Wootton
Jean Powrie
Nicholas Smith
Peter J. Hudson
Mrs C C Scott
Mrs S.M. Cragoe-Jones
R.D. Heppell
Mrs J. Calvert
Mrs A. Murray Watts
Harry Nicholls
Anna Cooke
S.M. & P.V. Wall
Mr D. & Mrs J.H. Smart
John Priest
Mrs Margaret Ann Smith
Mr Richard L. Smith
Mrs G.M. Reid
Maureen & John Hill
Mrs C.A. Cooper
Mr Derrick Burford
Mrs G Pawley
J. Robertson
Paul Kershaw
P.F. Wyatt
T.F.R. Crossley
Mr B.G. Harrison
F. Hodgson
Mr & Mrs D.J. Hammond
Mr & Mrs R. Stephenson
Patricia Jebb
B. Escott
Mr Clifford Rose
Norman and Freda Kitcher
Mrs Vera Hawkins
Mr & Mrs P F & M M Williams
A.M. Tudor
Mrs D E Bonham
D. Daniel
Joy Watson
Anastasia & Peter Hunter
Mr J.M. and Mrs J.A. Kent

B. Lomas
Mr & Mrs D.J. Chamberlain
B. Stewart
Mr J.M. Hind
Mrs Barbara Spencer
Michael Crutchley
A. McIntyre
Mr & Mrs G & W Mazey
Michael Stockhill
James Pullin
Peter Landsman
David Gooman
Steve Taylor
George W. Sykes
A.L.S. Orr
B. Rossington
Mrs Mary Austin
H. Carragher
A.J. Whiting
W E & B O Cave
G.I. Chamberlain
J.M. Stocks
Dai Gistiws
Tony & Sue Holmes
Ann C. Curtis
J.C. Edwards-Broome
Mrs M.S. Wade
Caroline Stewart
W. Macdonal
H.R. Beach
Mr R. Dawney
Malcolm J. Wilkes
Dave & Mo Sargent
R. Dyer
R.D. & R.J. Langman
Mrs E.J. Allard
Brian P. Edwards
Don Hanson
Mary Jeffery
Carl Conn
Wyndham Perring
John Miller
B. Littlewood
D.E. Swinbourne
Mr & Mrs R.C. & J.D. Hawkins
W. Alan Head
D. Pearson
Michael & Sheila Mills
Alan & Sharon Morris
Mary & D.A.R. Morgan
E.A. Foster
Miss N Whittard
Mrs Elisabeth Brace

Mrs D Leuets
Edwina Nicholls
R.Green
A L & J K Page
Mr Frank Woodhall
Caroline Abercrombie
Mr C. White
Roger and Susan Blackwell
Mr & Mrs D A & R A Atkinson
Mrs E. J. Hart
P.R. Gilmore
Mr D.J. Ockendon
Syvia J. Cooper
Ken & Mary Ryman
Pat & Michael Bird
Eric Ward
George & Bryony Disher
Penny Gildea
Barbara & Peter Dodd
Kevin Gildea
Mrs B A Sylvester
Freda Douthwaite
Fiona Mackie
B.H. Richardson
Mrs C.M. Richardson
E.W. Head
Graeme Ramsay
Mrs E M B Sellar

4. Do not consider extending the Green Belt to all high sensitivity areas around Stratford-upon-Avon.
Mr Richard L Smith, John Oldfield, S J Warrilow, Mary Monteith

5. Support extending Green Belt status to Bordon Hill. Bordon Hill provides an open and green vista to those approaching Stratford from the B439.
Elizabeth Lang-Sadler

6. Inappropriate for housing to be located in the Green Belt where a local housing need assessment has suggested that current needs are being met and where there are no employment prospects. This would only export unemployment to rural areas.
John Brookes

7. Redrawing the Green Belt is contrary to the NPPF. Including specific areas for development create a presumption in favour of sustainable development in the Green Belt.
Stephen Ollerenshaw

8. There area exceptional circumstances for employment related development in the Green Belt - Gorcott Hill. Add more detail regarding site size in Section 7 and explain the reasons for these exceptional circumstances.
Redditch Borough Council

9. Land north of Arden Road Alcester, reword the final sentence to read as follows 'Development would be dependent on substantial landscaping...'

10. Establish boundaries in Green Belt villages. Communities need to agree with proposals within or adjacent to these boundaries. The open nature in settlements can be a valued aspect of a village, so infill is not always the best policy.

Mappleborough Green Parish Council

11. Assess the land north of the A4023 and west of the A435 as suitable for employment. Bromsgrove District Council has identified the land for an extension of the Ravensbank Industrial Estate. There may be scope to further extend such a development into Stratford District. The amount of land suitable for development may be restricted by the attractive landscapes and setting of the listed Gorcott Hall to the north.

Bromsgrove District Council

12. SDC should undertake a full strategic review of its Green Belt as the landscape assessment does not fulfil this role. This would inform the emerging plan and ensure the site selection process is more 'robust and sound'. Agree that the purpose of the Green Belt land separating the village of Studley from Redditch is critical and should not be developed. However, the land south of the village stifles the ability of the village to accommodate any future growth.

Barratt David Wilson Ltd.

13. Paragraph 7.1.6, Henley-in-Arden is inset in the Green Belt. On this basis there are no alternatives areas for land for development adjacent to the urban area that are outside the Green Belt. This is incomprehensible.

14. Paragraph 7.1.7, third line, suggest replacing 'within' for example, or if 'inset' is removed.

Earlswood & Forshaw Heath Residents' Association

15. Releases of land at Bear Lane would have community benefits. The site is contained within the Green Belt, and defensible boundaries would prevent additional encroachment of new development in the Green Belt.

Oakley Mayfield

16. Client's land is located within the Green Belt. The NPPF allows Green Belt boundaries to be reviewed through the preparation of Local Plans. Land should only be included in the Green Belt where it meets the criteria for including land in the Green Belt.

17. Land south of Blacksoils Brook should be removed from the Green Belt and allocated for employment. This land could then be used in association with land being promote by the Bromsgrove District Council for employment use, and allow the creation of a strategic employment site on the eastern side of Redditch.

18. Apply the following criteria for land that should be retained as Green Belt:

- Checks unrestricted urban sprawl
- Prevents neighbouring towns coalescing
- Safeguards the countryside from encroachment
- Preserves the setting and character of historic towns
- Assists urban regeneration by recycling land

Owners of land at Ravensbank Drive/Gorcott

19. No need to develop land in the Green Belt north of the A46. Traffic would be added to roads in the area and an underpass for the A46 would be an expensive proposal to get site access. This would be an intrusion into the Green Belt and extend the town boundary outside its natural limits.

Councillor Peter Moore

Topic: 7.1 Development Management Considerations

1. Support removing this restrictive policy. 30% policy is not appropriate as other local authorities allow greater percentage of extension and uplift. Solihull allows 40% uplift which does not cause harm to the Green Belt. Removing the 30% rule will not harm the openness of the Green Belt.

Mrs Julie Lovett

2. Do not support removing the 30% threshold limit on the size of building extensions or replacements. This will give developers free reign.

Freda & Peter Venables

3. Do not support removing the 30% volume rule. Rather assess each development on its merits. 30% of a small building may not be reasonable for today's way of living and equally 30% of a large building may be inappropriate. The idea of setting a bench mark is supported.

Mr & Mrs J Moore

Topic: 7.1 Delivery and Monitoring

No comments received for this section

Consultation Question: Q33

1. Object. The Victorians set up the Green Belt to protect the countryside. Any incursion sets a precedent for further development. Rather develop brownfield sites before greenfield sites. No development should be allowed in the Green Belt.

R E Hooper

2. The character and openness of the Green Belt should be governed by what is outlined in Parish Plans as well as the Policy.

Bearley Parish Council, Claverdon Parish Council

3. Subject to maintaining restrictions on housing as set out in Spatial Strategy Section 9, and the Green Belt not being eroded by encroaching development.

Brian Summers

4. Won't be possible to achieve housing targets unless strictly controlled changes are made to Green Belt policy.

Morton Bagot, Oldberrow & Spornall Parish Council

5. The Green Belt is an essential guard against the undesirable spread of towns and villages into the surrounding countryside. The Parish Council oppose the relaxation of the Green Belt as far as the land west of Birmingham Road and north of the A46 at Bishopton is concerned.

Old Stratford & Drayton Parish Council, Jane & Peter Emmerson

6. The policy must uphold the principles of a Green Belt and should be reinforced as necessary to ensure full protection.

Mr R Eades

7. It will help the Green Belt by tidying up some brownfield sites. Encouraging to see that the 30% rule could be dropped in favour of CS 6.

Councillor S Thirlwell

8. Don't develop outside the boundary of the A46. To provide a foot tunnel will be very expensive and would also have safety issues.

Mrs Andrea J Blood

9. There seems to be diminishing respect for Green Belt areas in Tanworth-in-Arden.

Core Strategy Consultee

10. A significant proportion of the District's dispersed growth is planned for local service villages. Of the 39 LSVs 8 are located in the Green Belt. Larger villages such as Wilmcote, Claverdon and Snitterfield have more local services and better access to public transport. Those LSVs in the Green Belt will benefit from good rail access. There needs to be clear guidance on why development in the Green Belt is not 'inappropriate'.

11. Question whether the Core Strategy can override paragraphs 87-89 of the NPPF. It would be better to remove LSVs from the Green Belt allowing land on the edge of settlements to accommodate proposed growth.

David & Angela Tucker

12. The Green Belt should be upheld by resisting inappropriate development. Firstly consider brownfield sites that do not have high environmental value. The policy should have stronger words about exceptional circumstances allowing for leakage of the Green Belt.

Councillor Hazel Wright

13. There should be no exceptional circumstances for removing areas from the Green Belt. Delete areas West of Birmingham Road and North of the A46, Bishopton. This is a main corridor and gateway into Stratford-upon-Avon and would be a mistake to extend urban sprawl north of the A46.

Marson Rathbone Taylor

14. No the Government recommends that local plans should provide details of specific things that are valued and should be protected. Parishes in the West Midlands Green Belt should have specific protection. The wording of the policy needs to be much tighter. There are too many loop holes.

Tanworth-in-Arden Parish Council

15. Too much restriction.

Stephen Marchant

16. No. You assume that PPG2 will be carried forward into the NPPF. Why should you trust the draft NPPS on this matter.

Mr N A M Butler

17. Strongly object to proposed planning applications for the Earlswood, Tanworth and Forshaw Heath Areas, and in particular the erosion of the Green Belt.

Mrs B Brown

18. The next draft Core Strategy needs to protect the West Midlands Green Belt more than it has, particularly the Tanworth-in-Arden Conservation Area.

Edward & Annette Drake

19. The preferred option for development does not provide protection of villages within the Green Belt.

P J Boreham

20. The Government attaches great importance to the Green Belt. The fundamental aim of which is to prevent urban sprawl by keeping land open. The essential characteristics of Green Belts are their openness and their permanence. The Government's intentions regarding the Green Belt are at odds with Stratford-on-Avon District's interpretation of the Green Belt.

21. The policy is too non-specific and there are too many 'get out' clauses. The policy needs to be strictly defined. Local consultation and the use of the Localism Act 2011 should be encouraged and respected.

Mrs J and Mr M Buckley

22. There will not be sufficient protection. The policy is too non-specific and there are too many 'get out' clauses. Strictly define the exemptions. Local consultation and the aid of the Localism Act, Parish Councils or qualifying bodies, Neighbourhood Development Orders (NDOs) should help ensure sufficient policing.

Earlswood & Forshaw Heath Residents' Association

23. Resist the exceptional use of the Green Belt. Several Members of the Neighbourhood Plan Steering Group strongly object to potential development on land West of Birmingham Road / north of the A46. Concerned about the impact of businesses on the Green Belt. A wide range of other sites should rather be explored in order to minimise the impact on the Green Belt.

Stratford-upon-Avon Town Council

24. The Green Belt is under valued and we support its enhancement through a green infrastructure led approach.

Natural England

Consultation Question: Q34

1. Monitor and restrict development in order to preserve the nature of Green Belt areas.

Robb Kightley

2. Only if a Parish Plan is in favour and in accordance with established needs of the village. Development must have minimal impact on its character.

Bearley Parish Council, Claverdon Parish Council

3. Support the policy being flexible enough to allow for small scale development. National policy is robust in its protection of the Green Belt and should not be replicated in the policy. Allowance for small scale development adjacent to villages in the Green Belt enables affordable housing development to come forward to meet identified need in rural areas where existing restrictions prevent this.

Tetlow King Planning

4. Yes, but not if other development is allowed under section 10. Area Policy Profiles are eroding the Green Belt, reducing the separation gap between non Green Belt areas and villages in the Green Belt.

Brian Summers

5. Support if there is no other way to achieve targets.

Morton Bagot, Oldberrow & Sperrall Parish Council

6. Object. Little evidence of sustainability with local services and employment in most villages.

Richard Dearing

7. Object. Agree with Tanworth Alliance's view on potential harm to the Green Belt. Even if individual developments are not too large there do not appear to be restrictions on the number of these developments. In addition, do not support removing the 30% rule.

Michael Scott

8. No. Large towns have the infrastructure to support development. Many villages do not have the same level of services.

Mr R Eades

9. Have reservations regarding the use of boundaries to protect Local Service Villages. Boundaries are divisive and would need independent management to ensure that the provision to build and extend housing stock does not penalise potential sites or discriminate against land owners on the edge of villages. No boundary should run closer than 200 metres from current housing stock.

Richard Woodcock

10. Support infilling in villages within the Green Belt. To allow no growth is inconsistent with the NPPF which encourages mixed communities and economic growth. Not allowing growth will end village life as there won't be people to support local services such as pubs, shops, schools etc.

Donna Savage Planning

11. Support housing schemes within or adjacent to settlements in the Green Belt. Such schemes though may not always be small scale, so remove these words from the policy.

Linfoot Homes Ltd, Arrow Developments

12. Current Local Plan policies regarding development in the Green Belt are very restrictive. The proposed approach in the Core Strategy intends to soften the approach to development in more sustainable villages. Support allocating land for development in villages provided additional development need meets the needs of the local population.

Linfoot Homes Ltd, The Glebe Committee

13. Inappropriate to allow new housing within the Green Belt where a local housing need assessment has suggested that current needs are being met, especially where there are no employment prospects.

John Brookes

14. Controlled growth in villages helps maintain existing services and helps create new ones. Focus on high quality design.

Mark Blackman

15. Support minimal development only.

Mappleborough Green Parish Council

16. There is no need for development or infilling unless agreed in a Neighbourhood Plan. Small scale development should only be allowed where it complies with current policy and is identified in a Neighbourhood Plan.

Tanworth-in-Arden Parish Council

17. Insufficient consideration has been given to where over 160 houses will go in Studley. More emphasis should be given to smaller development sites within and around the village. Only consider the relaxation of the Green Belt boundary where the change would have minimal effect on the Green Belt and immediate environs.

Stephen Marchant

18. This is necessary and consistent with CPRE's statement about facilities / services in villages being lost because of the lack of development that has created stagnation.

Councillor George Atkinson

19. Only agree if there is protection via local choice, as for example COM1.

P J Boreham

20. With local consultation and the NDO framework of the Localism Act 2011, this should ensure an appropriate level of development.

Earlswood & Forshaw Heath Residents' Association

21. Yes, but there needs to be a definition of small scale. This is unlikely to be applicable to Neighbourhood plan areas.

Stratford-upon-Avon Town Council

22. A number of villages can and need to accommodate development. The words 'small scale' is misleading and unnecessarily restrictive. Development within the Green Belt must reflect national guidance as set out in the NPPF. No other criteria will be required.

BNP Paribas Real Estate

Consultation Question: Q35

1. No. Retain the current approach in the Local Plan. Where no boundaries are defined and there is an identified local need then development may be appropriate within or adjacent to these settlements.

Bearley Parish Council

2. The policy is appropriate. No need to define boundaries for villages where development may be proposed as this may pre-empt flexible and sustainable development proposals.

Tetlow King Planning, West Midlands HARP Planning Consortium

3. Object. Retain the current approach. Where there are no defined boundaries a local community could identify a need for small scale development. The approach should be more flexible and effectively policed in settlements that are not tightly structured.

Wootton Wawen Parish Council

4. Retain villages in the Green Belt. Do not inset them. If a boundary is set it will be easier for builders to argue a case for extensive development within the boundary.

Mr R Eades

5. Where housing schemes are proposed next to settlements in the Green Belt changes to Green Belt boundaries will need to be made to allow development to proceed.

6. In villages without defined Green Belt boundaries it is difficult to apply Green Belt policies. These settlements need to have Green Belt boundaries in accordance with PPG2. Sites proposed for development should also be inset from the Green Belt.

Linfoot Homes Ltd, Arrow Developments, Mr R Coslett

7. In Local Service Villages in the Green Belt it would be difficult to apply Green Belt policies. These settlements should have defined boundaries and inset from the Green Belt in accordance with PPG2. Any proposed development sites should also be identified and inset from the Green Belt.

Mr J Bradley, Mr & Mrs Dimarco, H G Hodges & Sons Ltd, Mr R Chabra

8. Where housing schemes are proposed next to settlements in the Green Belt changes to Green Belt boundaries will need to be made to allow development to proceed.

The Glebe Committee

9. Boundaries should be defined for villages in the Green Belt in order to inset them in the Green Belt. However it would take years to get these boundaries identified.

David & Angela Tucker

10. Yes, by the Parish Council, not imposed by a higher authority.

Claverdon Parish Council

11. The Green Belt must remain and be protected at all costs. It must not be possible to remove areas of the Green Belt for development as the Green Belt is continually being squeezed.

Ewen Cunningham

12. No. This would result in the in-filling with developments within the boundaries of the village.

Tanworth-in-Arden Parish Council

13. Section 9, paragraph 86 of the NPPF: 'If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt'. Earlswood fits this description due to pressure being put upon it not only by Stratford-on-Avon District Council but by Solihull MBC and Bromsgrove DC.

Mrs J and Mr M Buckley

14. Do not understand what is meant by 'If small scale development is to be supported in villages that lie within the Green Belt, consideration should be given to defining boundaries for each one to 'inset' them from the Green Belt. Such development would then be expected to take place within those boundaries - paragraph 7.1.7 of the Draft Core Strategy.

Earlswood & Forshaw Heath Residents' Association

15. All settlements need defined physical boundaries. It is not appropriate to relax any regulation which preserves the Green Belt.

Gordon Brace

16. The current approach advocated in the Core Strategy does not provide certainty in plan making. We favour an approach that seeks to identify settlements where release of land from the Green Belt will be necessary to meet development needs. Paragraph 86 of the NPPF states that a village should not be washed over by the Green Belt if a village makes an important contribution to the openness of the Green Belt. If this is not the case then the NPPF states that a village should be excluded from the Green Belt.

CALA Homes (Midlands), Persimmon Homes (South Midlands) Ltd

17. Claverdon is one of many Local Service Villages that is washed over by the Green Belt. This is unhelpful as a means of determining the most suitable locations for new development. Factors such as accessibility to main public transport routes, shops and services are more important in establishing appropriate locations and villages to which development should be directed.

Persimmon Homes (South Midlands) Ltd

18. Define boundaries prior to a comprehensive Green Belt review and confirming growth targets. A proper Green Belt review is required. Before that development within the Green Belt should reflect national guidance and the need to encourage sustainable transport.

BNP Paribas Real Estate

Consultation Question: Q36

1. Inappropriate as every case is different and should be judged on its merits.

Trevor Bury

2. Inappropriate to drop the 30% threshold. The percentage increase applied for in the application would give an indication as to the appropriateness of the application.

Bearley Parish Council

3. Don't agree with the 30% threshold for extensions or replacements within the Green Belt as this would be arbitrary and would not reflect individual circumstances. There is however still a need to provide a range of affordable housing in the Green Belt where prices tend to be inflated.

Country Land and Business Association

4. Avoid 'back door' over-development.

Richard Dearing

5. The 30% rule needs to stay in force. Its removal would see smaller properties expand into large 5, 6, 7 bedroom properties which would destroy the openness and character of villages. Each scheme would then need to have an impact assessment.

Mr R Eades

6. Maintain the 30% increase in any one house as a general guide.

Lugton

7. Retain the 30% guidelines as set out in the Local Plan. Failure to maintain this will result in unacceptable development in the rural countryside and villages protected by the Green Belt policy in PPG2.

Snitterfield Parish Council

8. Don't want any dilution of the Green Belt. Do not agree with the current policy of limiting the maximum size of replacement dwellings to 30%.

Anne & Roger Skyrme

9. The 30% rule interprets the legal requirement of any new building in the Green Belt not to be materially larger than the one being replaced.

Core Strategy Consultee

10. Support removing this restrictive policy. The expansion of properties does not go against the principles of the Green Belt. The test should be that the resulting building is not materially larger than that which it replaces or extends.

11. Adjacent authorities have different policy requirements whilst still having a percentage uplift rule. Solihull for example has a 40% rule for extensions in the Green Belt. This is deemed to be acceptable. The purpose of the Green Belt is the same all over the country, so why should an increase to the 30% be harmful in Stratford and not in Solihull?

12. The ultimate test is does the proposal cause harm to the openness of the Green Belt. Apply a test of proportionality rather than a prescriptive percentage.

Donna Savage Planning, Dean Lovett

13. Removing the arbitrary 30% restriction will result in more harmonious designs appropriate to each individual site.

David & Angela Tucker

14. The 30% threshold sets an upper limit on the dwelling size or extensions should remain intact.

Councillor Hazel Wright

15. The 30% rule for extensions and alternations in the Green Belt is unrealistic. In our case it gave us a tiny extension with very little room to manoeuvre. The 30% restriction has meant that we have had to forgo a utility room, downstairs WC and a small balcony to the main bedroom.

Robbin & Patsy Suffield

16. Support removing the 30% threshold imposed on households in the Green Belt. Families should be given opportunities to extend their homes as desired. This is more cost effective than families moving away from existing schools and potentially disrupting children's education. Extensions also create additional employment for local tradesmen.

17. There still needs to be some restrictions so that the street view of existing housing stock fits in with the character of the village. Extensions should not create an eye-sore for the village.

David Evans

18. Drop the 30% threshold on the size of replacements in the Green Belt. In some case where there are small properties on large sites built before 1975, it would be appropriate to have a larger threshold without the need to fall back on the permitted development route. It should rather be considered on a case by case basis whilst not being detrimental to the Green Belt.

Marson Rathbone Taylor

19. Completely inappropriate to drop the 30% upper limit as it will lead to total abuse. Don't trust the Stratford-on-Avon District Council in protecting the Green Belt - based on past performances. The Green Belt must be rigorously upheld as the character of small settlements / villages has already been changed by oversized development of replacement dwellings. The 30% rule may have its shortcomings but no control is completely unsatisfactory.

Ewen Cunningham, Earlswood & Forshaw Heath Residents' Association

20. There is no evidence to suggest that the 30% guideline is unpopular and causes problems. The verdict from planning professionals in neighbouring authorities outside SDC is that the 30% is a rather effective local interpretation of national policy.

21. Don't agree. The 30% ruling is a bench mark used when considering planning applications. It is not sufficient to say that there is no harmful effect based on the size of a house. Past examples show that where the 30% rule has been ignored it has resulted in oversized inappropriate development. This will become much worse if the 30% rule is removed. No officer has identified a need or want for this removal. There is no justification or evidence for its removal.

Tanworth-in-Arden Parish Council

22. Object. The proposal to discontinue the guideline that has existed for some time saying that replacement houses in the Green Belt should normally not be increased in size by more than 30% will have a detrimental effect on the character of some locations. Tanworth in Arden for example has suffered from the demolition of good quality small houses only to be replaced by drab mock Georgian boxes. This changes the face of the countryside.

John Whale

23. It would be fatal to drop the 30% rule. If you fail to protect the Green Belt ratepayers will not forgive you.

Mr N A M Butler

24. We will suffer if the Core Strategy goes through with the lifting of the 30% rule.

Mr & Mrs J Hemsley

25. Object to the removal of the 30% rule.

M J Brown, Edward & Annette Drake

26. Appropriate to drop the 30% because it discriminates against smaller dwellings where there is no harm to the Green Belt. For all dwellings the policy has proved unrealistic as is evident from the number of applications. Removing the 30% will not lead to harm within the Green Belt.

Councillor George Atkinson

27. Retain the current 30% guideline for extensions to dwellings and replacement dwellings. This provides a consistent yet flexible approach. Only in very exceptional circumstance would there be justification to harm the Green Belt. Agree that the increase size limit in the policy should apply to all buildings, not only dwellings. This would be in keeping with the NPPF.

28. The 30% limit for extensions and alterations to buildings should be maintained, but at a lower percentage. For new buildings this figure is no longer appropriate. The NPPF is clear that new buildings should not be materially larger than the building being replaced. Anything that is not material will be less than 10%. The guideline for new buildings should be an increase below 10%.

Cathy Kimberley

29. Do not drop the regulation that preserves the Green Belt. More should be done to protect green space that is not designated as Green Belt.

Gordon Brace

30. Agree that the 30% restriction should be lifted because it is restrictive and does not meet the changing needs of families.

Mr & Mrs R W Westwood

Consultation Question: Q37

1. The Site Allocations Development Plan Document is not mentioned as a key driver. What is it?

Bearley Parish Council

Claverdon Parish Council

2. Identify those settlements where a release of land from the Green Belt will be necessary to meet development needs.

Bloor Homes

3. Take cognisance of feedback under the Localism Act 2011 and the wishes of Parish Councils and 'qualifying bodies'.

Earlswood & Forshaw Heath Residents' Association

4. Make opportunities available for starter businesses. For example barns under offer should be available on a 2 year lease to attract aspirational groups of people and to assist farmers maximise their overheads.

W A Lowe

Consultation Question: Q38

1. A review of applications every five years would give evidence of how the Strategy may best be formulated.

Bearley Parish Council

2. The Study into Future Growth Implications of Redditch (2009) is relevant and it may be appropriate to refer to the Redditch Employment Land Review.

Redditch Borough Council

Consultation Question:

1. Monitor the effects of small scale development.

Bearley Parish Council, Claverdon Parish Council

2. Once developments have been accepted by Council as meeting planning regulations, then these future developments need to be discussed with local authorities, parish Councils or qualifying bodies.

Earlswood & Forshaw Heath Residents' Association

Draft Core Strategy 2012 - Summary of Representations

7.2 Areas of Restraint

1. As a parish council on the edge of the town of Stratford-upon-Avon, we welcome the use of this designation to support the Green Belt policy and to provide a safeguard against unsympathetic development on the edge of the town.

2. Yes, the AORs are still appropriate.

Peter Emmerson (Chairman), Old Stratford & Drayton Parish Council

Topic: 7.2 Strategic Objective

No comments received for this section

Policy CS.7 Areas of Restraint

1. The proposal to increase 'areas of restraint' is welcomed.

David and Beverlie White

2. We object to this policy as it is not supported by any statutory provision. The objective is similar to the green belt, but it should carry significantly less weight. There need to be clear criteria and a clear vision as to how communities and businesses will be incorporated into the strategy. The policy should be deleted in its entirety.

Andrew Shirley, Country Land and Business Association

3. There is an apparent need for restraint in larger areas but no mention or specification of smaller places. This appears to devalue their worth. Radway is near to DMC Kineton, which could change over the years, either way there is no allowance for this.

Tim Phillips

4. This policy can be an effective tool in the conservation of designated and non designated historic landscapes defined by the Warwickshire Historic Landscape Characterisation Project and the associated Extensive Urban Survey. These may help to identify land that is genuinely important to protect from inappropriate development because of its historic value (Draft NPPF para 24).

Rohan Torkildsen, English Heritage (West Midlands Region)

5. The principle of areas of restraint must be retained. We need to introduce boundaries around rural settlements to ensure developments are contained on sites which would not start an urban sprawl and impact on the character of these local service villages.

Mrs Marie Rendell

6. A detailed definition of an 'Area of Restraint' needs to be laid down. The draft tells us what they are not but not what they are. With a definition we will be able to hold SDC to account. We do not know how such areas are differentiated from green belt and what differences such terminology will make.

Jeff Perks

7. The Stratford Area of Restraint should be extended to include Bordon Hill.

Deborah Griffiths

8. The historic character of an area, not just its open nature, can contribute to the character of an adjacent settlement. We would recommend that Policy CS.7 recognise this, requiring that development

across such an area must not harm or threaten the historic landscape character where this makes an important contribution to the character of the settlement.

Anna Stocks, Warwickshire County Council - Archaeological Information and Advice

9. The policy of Areas of Restraint is supported.

Robin Malloy

10. It is very important that certain areas around settlements are designated as areas where development cannot take place unless there is special justification.

11. The boundary of the Area of Restraint in Shipston should stay as outlined in the Shipston plan.

Councillor Richard Cheney

12. We support the Areas of restraint and the policy as set out. This policy has been carried forward from the 2000 and 2006 Local Plans and is justified.

Mark Sullivan, CPRE Warwickshire

13. Kineton Area of Restraint - The boundary should be drawn up in consultation with the Parish Council. Should also consider including the old railway route around the edge of the village which have not been absorbed into existing developments.

Ms Jane Cove, Kineton Parish Council

14. Strongly support inclusion and intent of this policy.

15. Not sure that the first paragraph of CS7 makes clear that the (adjacent) countryside also must not be harmed/threatened

Councillor S H Jackson

16. Areas of Restraint should remain to ensure that a development must not harm or threaten the open nature of a settlement. Cumulative effects should be taken into consideration.

Councillor Hazel Wright

17. In Southam, the Area of Restraint should reflect the findings of the Landscape Sensitivity Report 2011 and the north west corner of the proposed designation should not be included. The area is shown on the accompanying maps, based on Plan 7 of the Draft Core Strategy and the Landscape Sensitivity report.

Stoneythorpe Hall (Jersey) Ltd

18. The policy needs to be brought up to date to reflect the positive approach to rural growth within chapters 3 and 6 of the NPPF. Areas of Restraint are out of step with the NPPF and are not required, given the guidance already available and relevant national advice. The emphasis of sustainable development will provide sufficient protection where required.

Joanna Male, Gregory Gray Associates

19. The continued identification of Areas of Restraint is not supported. There is confusion about the role of these outdated designations. The DCS states that they are not landscape designations but their purpose is valid due to work undertaken by the Landscape Sensitivity Study 2011. Areas of Restraint are not appropriate having regard to the NPPF. They should be deleted from the Core Strategy. The need for protecting areas on the edge of settlements could be determined through the identification of development sites in Neighbourhood Planning process.

CALA Homes (Midlands)

20. This policy needs to define 'Area of Restraint' as there is currently no definition, legal or otherwise, in the document.

21. The policy also states "development must not harm or threaten its open nature". It is also imperative to have definitions of 'harm' and 'threaten' as these are both subjective nouns.

22. The second paragraph starting "Specific circumstances..." should be removed completely as the drafting is too non-specific. It is imperative that "special circumstances" is defined, as is "substantial forms of development", "including a clear demonstration that no alternative site outside an Area of Restraint would be feasible", "clear demonstration", "alternative site", "Area of Restraint" and "feasible".

J Buckley, Earlswood & Forshaw Heath Residents' Association

23. Areas of Restraint should be re-examined and, unless exceptional circumstances can be shown, should be re-designated as Green Belt. Areas of Restraint are not supported in national policy guidelines.

Councillor S A Juned

24. Areas of Restraint is not a nationally recognised designation. We do not support the continuance of this designation unless properly justified. The Council will need to explain what it is restraining and what, by inference, it is protecting. This needs to be informed by a Character Assessment that defines this character.

Orbit Homes

25. The countryside is a working, economic environment and is not simply a recreational resource. It is necessary to allow improvement and development of agricultural businesses by extension of existing agricultural buildings and extension of new buildings. Areas of restraint may unduly limit some agricultural developments. The district has a variety of thriving agricultural enterprises. With concerns over food security, rising population and climate change, food production will continue to be a vital function of the British countryside. The section must include a description of the important economic function of the countryside. Refer to para 28 of the NPPF relating to expansion of rural businesses and promoting development and diversification of land-based businesses.

Helen Cork, Policy Adviser, National Farmers Union

26. A 5 year rolling programme would enable control by SDC of this policy.

W A Lowe

Topic: 7.2 Sustainability Appraisal Implications

No comments received for this section

Topic: 7.2 Explanation

1. (7.2.3) There is no evidence that protection provided within planning policy statements is inadequate, nor indeed that the NPPF does not adequately reflect environmental protection.

2. (7.2.8) Whilst this policy is not intended to restrict development it will do by its nature. It only refers to agricultural and recreational development and not to other forms of employment development. Such a policy is not provided for in planning policy statements or the National Planning Policy Framework.

3. The CLA request that this policy is deleted from the Core Strategy in its entirety.

Andrew Shirley, Country Land and Business Association

4. (7.2.8) Yes, a sensible proviso.

5. (7.2.9) This would be better omitted because it is open to various interpretations in the future.

Gordon Brace

6. (7.2.5) ASL note that the AOR which runs along the eastern boundary of Shipston-on-Stour is not listed in paragraph 7.2.5. ASL suspect this is simply an error given the area is referenced on the Shipston plan at Section 10 and identified in the Council's Landscape Sensitivity Assessment. ASL request that this AOR is referenced in this part of the Core Strategy as well for completeness and consistency.

Ainscough Strategic Land

Topic: 7.2 Development Management Considerations

No comments received for this section

Topic: 7.2 Delivery and Monitoring

No comments received for this section

Consultation Question: Q40

1. A helpful concept.

Robert B. Freedman

2. There is no justification for the designation of areas of restraint being included within the core strategy and no reason to amend the boundaries as this policy does not match either evidence on the ground or national policy and therefore should be removed in its entirety.

Andrew Shirley, Country Land and Business Association

3. Areas of Restraint is not a nationally recognised designation. We do not support the continuance of this designation unless properly justified. The Council will need to explain what it is restraining and what, by inference, it is protecting. This needs to be informed by a Character Assessment that defines this character.

James Stevens, The Home Builders Federation

4. We do not support the continued identification of Areas of Restraint in the Draft Core Strategy. There is a manifest confusion about the role of these anachronistic designations. Paragraph 7.2.4 states that areas of restraint are not considered to be local landscape designations, however at paragraph 7.2.6 it states that the Council believes their purpose remains valid further to work undertaken by the Landscape Sensitivity Study produced in 2011. If there is a need to protect certain areas on the edge of settlements, this could be identified through the process of determining sites suitable for development or the Neighbourhood Planning process.

Bloor Homes

5. A detailed definition of "Area of Restraint" needs to be made before specifying this policy. The Draft tells us what they are not but doesn't tell us what they are. We are entitled to a specific definition in order to make meaningful comment or to hold SDC to account should perceived policy breaches occur. We do not know, for example, how such areas are differentiated from green belt and what differences such terminology will make.

Ewen Cunningham

6. Of course it is.

Mr N A M Butler

7. Please define "an area of restraint". This might be a good idea but we don't know what it means. The draft tells us what they are not but doesn't tell us what they are. We are entitled to a specific definition in order to make meaningful comment.

Mrs J and Mr M Buckley

8. We believe hits is a good idea in principle but, as there is no laid down definition of an "Area of Restraint" it's a pointless policy as currently drafted due to SDC being judge and jury on where these areas are located and how they are controlled. A detailed definition of "Area of Restraint" needs to be laid down before specifying this policy. The draft tells us what they are not but doesn't tell us what they are. We are entitled to a specific definition in order to make meaningful comment or to hold SDC to account should perceived policy breaches occur.

J Buckley

9. We cannot determine the additional benefits that "Area of Restraint" status generates. At Para 7.2.6 the Core Strategy Document states: "The District Council believes their purpose remains valid and intends to carry them forward into the Local Development Framework. This has been upheld by the Landscape Sensitivity Study produced in 2011, which concluded that they are worthy of protection as they contribute strongly to settlement character." However, the Council does not give any indication as to why it is believed that the report's findings indicate that they "contribute strongly to settlement character". The report actually says: "It is recommended that these findings are taken into consideration in the preparation of the Local Development Framework and allocation of sites for housing and employment development.", which is not, in our view, the same thing.

J. Buckley

10. Yes

Gordon Brace, W A Lowe, The Clerk to Alcester Town Council

11. Still justified. In general support for existing areas of restraint but Infrastructure Working Party discussing whether all appropriate and if boundaries should be amended.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

12. The current Ecological and Geological Study of the 39 settlements may also identify Areas of Constraint or "Green Areas" (NPPF).

Dave Lowe, Warwickshire County Council - Principal Ecologist

13. The continued identification of Areas of Restraint in the Draft Core Strategy is not supported. There is a manifest confusion about the role of these anachronistic designations. Paragraph 7.2.4 states that areas of restraint are not considered to be local landscape designations, however at paragraph 7.2.6 it states that the Council believes their purpose remains valid further to work undertaken by the Landscape Sensitivity Study produced in 2011. The identification of Areas of Restraint is not appropriate having regard to the NPPF which, does not support such designations and it is therefore recommended that these are deleted from the Core Strategy. If there is a need to protect certain areas on the edge of settlements, this could be identified through the process of determining sites suitable for development or the Neighbourhood Planning process.

CALA Homes (Midlands), Persimmon Homes (South Midlands) Ltd

14. Areas of Restraint are not justified at this stage. They predate and do not reflect current government guidance as set out in the NPPF.

Charles Robinson, BNP Paribas Real Estate

Consultation Question: Q41

1. Yes

Gordon Brace, W A Lowe

2. Still justified. In general support for existing areas of restraint but the Infrastructure Working Party is discussing whether all are appropriate and if boundaries should be amended. Possibly involve people outside the Council in monitoring.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Consultation Question: Q42

1. The coverage of the Shottery Area of Restraint should be extended westwards to include all the land around Anne Hathaway's Cottage and the adjoining areas along Shottery Brook and up the slopes of Bordon Hill. This would recognise the economic importance of visitors to the cottage, the sensitivity of the landscape, the importance of this area as a gateway to Stratford and the sensitivity to flooding of Shottery Brook (All points well-recognised in the document).

Robert B Freedman

2. My client wishes to have Shottery Hall removed from the AOR (part of the site is in the AOR). Removal would not erode the value of the AOR or the purpose of its designation to protect inherently open character.

Spitfire Properties LLP

3. Preservation of the land separating Shottery and the land to the north towards Alcester Road (the Green Lung) is vital to preventing Shottery and Stratford from merging. The AOR provides a landscape setting for Shottery. Removal of this land from the AOR would not result in merging the two areas or have a detrimental impact on the setting of the village.

Spitfire Properties LLP

4. There is frontage development right along Church Lane, Shottery. Allowing development of the Shottery Hall site follows the existing character of the area (frontage development). There is a natural boundary that runs along the rear of the site which could form a defensible boundary for the AOR/Green Lung. The site would not be visible from many vantage points.

Spitfire Properties LLP

5. Having land in the AOR potentially prevents development which handled sensitively with high quality design has potential to contribute to the character and appearance of the area. The AOR should be redrawn to exclude this site.

Spitfire Properties LLP

6. The existing boundaries and interpretations of the 'Area of Restraint' along the River Avon corridor seem today to be out of date, and as such compromise the Stratford Council policy. The line on the map takes little recognition of conditions on the ground. It is time the local residents were consulted and the line accurately redrawn to reflect what is in place today.

Clive Griffiths

7. I would like the full area of my property (including all land-locked land) to be taken out of the AOR as it only has access via the house and is used predominantly as a garden. Nearer to Stratford 'total properties' are excluded.

Clive Griffiths

8. The existing boundaries are tight, and the effect of immediately adjacent development can have a high impact on the effectiveness of restraint in the areas at present defined. Shottery is a good example.

Gordon Brace

9. It is considered that partial development of the north west corner of the area identified as So08 in the Landscape Sensitivity Study 2011 (Potential Development Option 4 on Map 7, Southam) should not be included within the Area of Restraint (Map included in response).

Stoneythorpe Hall (Jersey) Ltd

Consultation Question: Q43

1. Yes

Gordon Brace

2. Questions the AOR between Kineton and Little Kineton along the River Dene. The most appropriate location for new development in Kineton is to the north of Banbury Road, given the constraints eg. floodplain, Edgehill Battlefield site and its use as agricultural / allotment space. New development to the south of Banbury Road is broadly inappropriate. The exception is KIN.C allocation in the Local Plan. Although the AOR is indicative there is a concern that it includes the KIN.C allocation, which is brownfield and available for residential development. Opportunities to secure 60-90 residential units in Kineton between 2011 and 2028 are likely to be limited - therefore it seems inappropriate to discount an existing allocation. Development of this site would fully accord with the development strategy for Kineton by securing infill sites. It is requested that the AOR is defined to exclude the KIN.C allocation.

West Midlands Metropolitan Authorities Pension Fund

Consultation Question: Q44

1. If this policy is to be retained it should adequately address the needs of the community and rural business development.

Andrew Shirley, Country Land and Business Association

2. It has been suggested that development in an AOR should only be supported when it meets multiple Strategic Objectives.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Consultation Question: Q45

1. You are the custodians of the District's future for generations to come.

W A Lowe

Consultation Question: Q46

1. The delivery and monitoring appears to be regarding planning applications and could be reactive rather than proactive once a project has commenced.

Graham Musson, Bearley Parish Council

2. If the impact of this policy is to be monitored in the future it should not only look at environmental improvement but also quantify lost job opportunities, stagnation of the housing market and impact on local communities.

Andrew Shirley, Country Land and Business Association

Draft Core Strategy 2012 - Summary of Representations

7.3 Cotswolds Area of Outstanding Natural Beauty (AONB)

No comments received for this section

Topic: 7.3 Strategic Objective

No comments received for this section

Policy CS.8 Cotswolds Area of Outstanding Natural Beauty

1. The Cotswolds Conservation Board welcomes and strongly supports this policy.

Malcolm Watt, Cotswolds Conservation Board

2. I would suggest an additional point - sport and recreational pursuits. Some sport can only take place in natural environments eg. sailing, climbing and these sports can exist in AONB. However through careful management plans and planning conditions any conflicts should be eliminated.

Bob Sharples, Sport England

3. We support this policy as it enables the development of small scale housing schemes where these will respect the historic or built character, local distinctiveness or landscape quality of the surrounding area. As with the Green Belt policy, this will enable housing schemes to come forward that meet housing need and demand in areas otherwise suppressed by planning or economic conditions.

West Midlands HARP Planning Consortium

4. Please also note that it does not appear that the Dassett Hills are within your areas of outstanding natural beauty. Could you please review and confirm.

Phill Wood

5. We support aspirations relating to strengthening protection for areas of outstanding natural beauty.

David & Beverlie White

6. WRCC agrees that it is appropriate to allow small-scale development in the Cotswolds AONB and that small-scale schemes in accordance with policy CS25 Countryside and Villages, are appropriate.

Phil Ward, Warwickshire Rural Community Council

7. Long Compton is within an area of outstanding natural beauty. Anything which threatens areas such as these must be avoided for the benefit of generations to come.

Trevor & Mary Brookes

8. Currently at the Radway end of the AONB it abuts the MOD. They have more lights than a Christmas tree which has its effect on the area both in and out of the AONB. While this is existing and not future development, there needs to be consideration given to future developmental impact outside or on the borders of the area. Land Rover at Gaydon being another example. High impact visually from its high point in the landscape extending across a wide area. This point probably also should be in the other development criteria.

Tim Phillips

9. Long Compton Parish Council assumes that these policies (under CS25) can be applied to the AONB but Cotswolds Conservation Board's development policy applies where they are contradictory.

Mrs Janet Blackwell, Long Compton Parish Council

10. I feel it is appropriate to allow small scale development in the AONB providing these developments are supported by a local needs assessment.

Councillor R. Cheney

11. We would expect some restrictions to apply to land adjacent to Areas of Outstanding Natural Beauty.

Mrs J Hancox, Tysoe Parish Council

12. Policy may need tightening up - ie. qualification of what is 'reasonable being adjacent to or outside the AONB'.

Councillor S H Jackson

13. Strong support is given to the inclusion of a specific AONB policy.

Andrew Ford, Wychavon District Council

14. Policy CS8 states: "should" is subjective and needs to be replaced by "must". Specific exclusions require to be detailed. "Special qualities" is subjective and not defined in legislation and therefore need specific definition. "Could" needs to be replaced with "will" and "adverse impact" needs to be defined as it is subjective.

J Buckley, Earlswood & Forshaw Heath Residents' Association

15. Although you have been forward thinking to include the AONB, you make mention of adjacent sites to such designations which is good, but how far does this extend, we are concerned without specifics the policy is too loose and then we shall be susceptible to speculative wind farm developers.

Mrs Valerie Ingram, Shotteswell Parish Council

16. Re Long Marston Storage Depot - the site is located in close proximity to the Cotswolds Area of Outstanding Natural Beauty (AONB) and Meon Hill lies to the south of the site. The site and therefore the proposed scheme would be visible from these areas. The impact of the proposed development would need to be considered in landscape terms so as to ensure that there would be no adverse impacts on its character and setting. The AONB has been an important consideration in relation to the preparation of the proposed Masterplan, with the supporting Development Framework Document establishing the key concepts of a landscaping scheme which places the key emphasis on providing open spaces, screening and retaining landscaping along the southern and western boundaries of the site.

Codex Land

17. Some development is needed within the AONB in order to protect the future viability of the farms and rural businesses that are responsible for managing the local landscape. It is well known that profitable farm businesses have more funds to invest in landscape management via hedge restoration and planting. Allowing some development, for example farm retail, will give local people opportunities to access and connect with the landscape. This could have a beneficial impact on the health of people living in the district through access to the environment and healthy foods. It will also help to connect people to their local environment.

Helen Cork, National Farmers' Union - Policy Adviser (Environment)

Topic: 7.3 Sustainability Appraisal Implications

No comments received for this section

Topic: 7.3 Explanation

No comments received for this section

Topic: 7.3 Development Management Considerations

No comments received for this section

Topic: Delivery and Monitoring

No comments received for this section

Consultation Question: Q47

1. I consider the Core Strategy should provide more guidance on how this area will be conserved and protected from harmful development both in the countryside and within villages. There should be positive policies of conservation to enhance both the natural and built environment. The area should be preserved for future generations to enjoy yet the CS envisages substantial development in some villages within the AONB which would be contrary to national objectives of minimising traffic congestion, light pollution and noise within the area. Consequently I consider that the scale of any new development within the AONB should be restricted to affordable housing justified to meet local needs.

Susan & Andrew Vaile

2. The AONB, which has the highest national status of protection is a designation reflecting the area's unique landscape, both natural and built. The Core Strategy should include stronger commitment to the conservation of wildlife and cultural heritage within the AONB and in particular, clear advice on how development will be controlled in this area. To meet sustainability criteria development in the AONB should be restrained to ensure that future generations continue to enjoy its characteristics.

Mrs Janet Blackwell, Long Compton Parish Council

3. No

Gordon Brace

4. Natural England supports additional guidance on how development is to be controlled within the Cotswolds AONB.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q48

1. We support this policy as it enables the development of small scale housing schemes where these will respect the historic or built character, local distinctiveness or landscape quality of the surrounding area. As with the Green Belt policy, this will enable housing schemes to come forward that meet housing need and demand in areas otherwise suppressed by planning or economic conditions.

Meghan Rossiter, Tetlow King Planning

2. There must be the provision of small scale development opportunities within the Area of Outstanding Natural Beauty, particularly where this relates to housing provision (both affordable and open market) and in particular employment development. The AONB cannot depend on housing and employment being provided from outside its boundaries as this would be clearly unsustainable encouraging greater travelling.

Andrew Shirley, Country Land and Business Association

3. The NPPF states that "Great weight should be given to conserving landscape and scenic beauty in ... Areas of Outstanding Natural Beauty, which have the highest status of protection ...The conservation of wildlife and cultural heritage are important..."

Susan & Andrew Vaile

4. Yes but only of the highest criteria and should be residential not commercial.

Mrs J Hancox, Tysoe Parish Council

5. We feel that it would be appropriate to allow small scale development as long as it is appropriate in size and quality and justified by a needs Assessment. Allowing small scale enlargement of domestic gardens in the AONB could be restricted to size.

Mrs E M Pogmore, Brailes Parish Council

6. It is important that in the Cotswolds AONB greater restrictions on small-scale development should be applied than elsewhere. The statutory purposes of designating an AONB require tight planning control. Use of Article 4 Directions to remove some permitted development rights (eg. on household extensions and for farm buildings) is justified in the Cotswolds AONB.

Mark Sullivan, CPRE Warwickshire Branch

7. Yes - allow small scale development.

Councillor S H Jackson

8. Within conditions. We cannot allow any part of the UK to atrophy, but neither can we open the door to economic arguments put forward primarily to benefit developers, to destroy a national asset.

Gordon Brace

9. As stated at the outset, Natural England's statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations. While there is a preference to constrain development, Natural England recognises the importance of a living landscape and hence small-scale developments that individually or cumulatively do not conflict with the AONB objectives following detailed scrutiny through an SPD may be supported in preference to greater restrictions.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q49

1. It is necessary for the Cotswolds AONB to have clear policies encouraging rural energy generation and use in accordance with the rest of this core strategy.

Andrew Shirley, Country Land and Business Association

2. Development within the AONB should be restricted to meet local needs (including those of farming and rural businesses) and in the context of a determination to retain its tranquil nature. Adjacent countryside should be similarly protected.

Mrs Janet Blackwell, Long Compton Parish Council

3. Setting absolute boundaries to settlements would help this policy too.

Gordon Brace

Consultation Question: Q50

No comments received for this question

Consultation Question: Q51

No comments received for this question

Draft Core Strategy 2012 - Summary of Representations

7.4 Vale of Evesham Control Zone

1. 7.4.1 - aligns with Domain 1 of PH Indicator Framework - Improving the wider determinants of health.

Emily Smith, NHS Warwickshire - Health Development Manager (Health Inequalities)

Topic: 7.4 Strategic Objective

No comments received for this section

Policy CS.9 Vale of Evesham Control Zone

1. the CLA is concerned that a 5% cap on the increase of HGV traffic would only allow for a very small expansion of some businesses and the prevention of expansion at all of others and could stagnate development within this area. This policy would particularly impact on the establishment of new businesses within the Vale of Evesham where traffic movements in the past may have been minor and therefore the 5% threshold would be reached very quickly. This is particularly true of farm diversification enterprises and it is important that agricultural movements are counted as HGV movements as most tractors and trailers would fall within this bracket. It is considered that setting such a threshold is particularly restrictive and dependent on how the 3 criteria within this policy are applied.

Andrew Shirley, Country Land and Business Association

2. It is important that HGV movements across the historic Bidford Bridge cease. There is continuous damage to the fabric of this monument and residents fear for its survival.

Mrs Elizabeth Uggerlose, Bidford-on-Avon Parish Council

3. Salford Priors Parish Council supports the proposals for the Vale of Evesham Control Zone and asks for its principles to be incorporated into the core strategy as it has a particular impact on Salford Priors in view of the large numbers of HGVs and large articulated trucks using School Road to access the Orchard Farm Packing Station along with the other two industrial estates in the parish. If further industrial developments are to be supported then such a policy would protect our rural environment. SPPC considers that it is appropriate to operate a policy to restrict development in the Vale of Evesham that generates heavy vehicle movements. SPPC would want the parish of Salford Priors to be included within the zone.

Mr Michael J Philpott, Salford Priors Parish Council

4. Para 7.4.3 gives rise to questioning why this policy should relate exclusively to the Vale of Evesham. What about Gaydon and environs due to the Jaguar/Land Rover site for example?

Councillor S H Jackson

5. The Vale of Evesham HGV SPD 2001 is considerably out of date and needs reviewing to be in accordance with current national transport policy, as most recently expressed through the Dept of Transport, 'Strategic Rail Freight Interchange Policy Guidance' November 2011. This conforms that it is Government Policy to develop a network of Strategic Rail Freight Interchanges. It also recognises that a range of rail freight facilities should be developed from 5-10 ha up to 50ha sites. In particular 3.3.3 makes clear that - "The Government does not consider that the United Kingdom's current predominantly road-based system of logistics represents an economically or environmentally sustainable model for the future."

Mr J R Morgan, Stratford Rail Promotion Group

6. The Report of Panel for the former Regional Spatial Strategy Phase Two Revision, September 2009, made clear that - "it is axiomatic that the RLS should be rail-served if such facilities are to be encouraged in the interests of sustainable transport." The Panel also found that - "we also consider that the expectation that the full suggested 50 or more ha should be on a single site is both unnecessary and unrealistic" in encouraging rail freight.

Mr J R Morgan, Stratford Rail Promotion Group

7. The adopted Vale of Evesham HGV SPD as expressed through draft Core Strategy Policy CS 9, Vale of Evesham Control Zone, is therefore out of date and needs to encourage the development of an intermodal rail freight depot, which within the context of Stratford District, could be at Long Marston. The previous 2008 large scale development proposals for Long Marston recognised the potential for developing such a facility. Honeybourne Airfield in the Wychavon District Council area also has such potential within the Vale of Evesham SPD area.

Mr J R Morgan, Stratford Rail Promotion Group

8. The current Vale of Evesham HGV SPD does nothing to remove lorries from the road network and the current policy of concentrating HGV depots at a single site at Evesham fails to promote rail freight or recognise the environmental benefits of rail freight. The development of rail freight would accord with Government policy to promote sustainable development and a low carbon economy. Policy CS9 thereby needs to be reworded to recognise the advantages of promoting rail as part of a low carbon economy and developing sustainable transport. The six local authority partners in the Vale of Evesham SPD area need to action a review of the document.

Mr J R Morgan, Stratford Rail Promotion Group

9. Current policy ('Lorries in the Vale - supplementary planning guidance') is that development generating an increase greater than 5% will be resisted within the Vale. It appears this will be overruled if there is a greater benefit in generating jobs in a particular area affected by this policy. If this is the case, there will be an impact on Worcestershire's roads, as it will generate traffic which will use roads within the county to access the A46.

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

10. The policy should ensure there is a written routing agreement set up for every business using any new commercial development, both for generators and operators of HGVs based in or outside the area. In the first instance, road freight traffic should be channelled onto the Principal Route Network (Trunk and A-class highways). However, in respect of the Vale of Evesham Control Zone, the highest current roads class is the B4632, with the rest all C-class or unclassified roads. WCC recommends that the lowest grade of highway used as destination routes to businesses should be enhanced to safely accommodate road-based freight movements to support their operation.

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

11. Sites should be future-proofed in terms of any Transport Assessment involving potential HGV parking and movements. Sites could be owned by one firm for only 12 months before being sold on, but the next firm could deal with 4 times the number of HGVs as the previous business (on whose figures the Transport Assessment would have been based). Consultants should consider worst and ideal business case scenarios, rather than just assessing the impacts from one type of business. Any new business park, industrial estate etc should be required to provide a lorry parking facility, as the site will attract HGV movements. This should be incorporated in any plan.

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

12. Most businesses in the area, especially agricultural businesses, do not own their own fleets of HGVs but they do generate a lot of HGV movements due to the nature of their business. This restricts

the level of control available and makes enforcement following any future infringements difficult. Planning permission and conditions must therefore ensure that routing, times of operation, and noise restrictions are made clear. We would suggest that every 'step-up' in numbers of HGV movements (for example 10 to 20, 20 to 50, 50 to 100 etc), should require a special permission to ensure the planning authority keep control over the number of HGVs in the area.

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

13. Routes and access roads in the area are very rural. We suggest that roads are identified as through routes and access routes and signed appropriately. All businesses must sign up to an agreed route in and out of their site and agree they will be fined should HGVs deviate from this agreement. All businesses must produce a local delivery map for their business and this must be available to all the local residents and councils in the vicinity. They must also demonstrate that they have contacted all the satellite navigation base-mapping companies and had their address added to the databases.

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

14. Where appropriate, new development should seek to provide suitable accommodation for existing businesses or RDC to facilitate relocation to more suitable sites (located within close proximity of the Principal Road Network) if their current site has historic road freight access issues linked to unsuitable highway access, specifically C-class and unclassified highways.

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

15. Support is given to Policy CS 9 Vale of Evesham Control Zone. The Council welcomes the continuation of this policy, but in order for it to be successful it must have the support of all three of the neighbouring county highway authorities ie. Gloucestershire, Warwickshire and Worcestershire. Without this commitment it would be difficult to implement this trilateral policy by the three Local Authorities involved.

Andrew Ford, Wychavon District Council

16. "would" is subjective. Needs to be replaced with "will"

J Buckley, Earlswood & Forshaw Heath Residents' Association

17. This is an excellent provision and it should be noted that the B439 is open to abuse of truck usage to reach the M5. With fuel prices as they are, and likely to be, hauliers will choose the shortest possible route, not necessarily the most environmentally friendly one.

Gordon Brace

Topic: 7.4 Sustainability Appraisal Implications

No comments received for this section

Topic: 7.4 Explanation

1. Paragraph 7.4.7 illustrates the potential conflict between prosperity and beauty. HGVs are our lifeline in the absence of a proper railway system and their operation should be facilitated but controlled. This means making the most environmentally friendly routes the cheapest and most convenient to use. "Rat running" of HGVs is likely to continue so long as the approved route is punishing to use. Greater physical differentiation between A and B routes should be designed and built, and more "7.5 ton" limits imposed.

Gordon Brace

Topic: 7.4 Development Management Considerations

No comments received for this section

Topic: 7.4 Delivery and Monitoring

No comments received for this section

Consultation Question: Q52

1. Vehicle movement should be considered on a site by site and road by road basis, rather than on a particular quota and restrictions only imposed when additional vehicle movements are shown to be detrimental.

Andrew Shirley, Country Land and Business Association

2. Yes, to the extent it impacts on Stratford.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Consultation Question: Q53

1. The criteria against which proposals within the Vale of Evesham HGV zone will be expanded should include reference to ensuring that impacts on the safety and operation of the SRN are properly assessed and to the role of the HA in terms of assessing the acceptability of such developments.

Neil Hansen

Consultation Question: Q54

No comments received for this question

Consultation Question: Q 55

No comments received for this question

Section 8 - District Assets

8.1 Landscape

1. BPC believes it is important that the district assets are protected - this includes landscape, conservation areas and listed buildings.

Mrs Elizabeth Uggerlose, Bidford-on-Avon Parish Council

2. Over the many years we have lived near Daventry we have come to hold dear the gentle unspoilt loveliness of the surrounding countryside be it in Northamptonshire or the adjoining parts of Warwickshire. We are mindful too that decades of sound planning policies and careful development control have served well to conserve and enhance the distinctive character of this area for the benefit of both present and future generations. Of late, new threats have emerged to the appearance and tranquillity of this area and to the wellbeing and quality of life of those who live here. Irrespective of the county boundary from Shuckborough Park southwards via Boddington and Wormleighton almost to the foot of the Burton Dassett Hills, the landscape of the Feldon Parklands and the Ironstone Uplands for miles around is at risk of becoming characterised and dominated by the inescapable, intrusive, urbanising presence of wind turbines, while the wellbeing of those who live in earshot may be harmed especially by the impulsive low frequency noise and infrasound generated by these devices.

Denis J S & S E Wilson

Topic: 8.1 Strategic Objective

No comments received for this section

Policy CS.10 Landscape

1. The Cotswolds Conservation Board welcomes and strongly supports this policy.

Malcolm Watt, Cotswolds Conservation Board

2. Environmental effect of large agricultural 2000 cow herds or 15,000 pigs will be detrimental to countryside. Great problems in Shropshire not needed here.

Councillor Peter Barnes, Weston-on-Avon Parish Meeting

3. I fully support the Council's plan to investigate the reinstatement of the Special Landscape Areas. Please include the magnificent views from the Burton Dassett Country Park, which are currently enjoyed by the local residents and thousands of visitors.

Catherine Hodgson

4. We supported the reintroduction of the Arden Special Landscape Area as we believed that this would support our endeavours to maintain the character of the village and the surrounding area.

Ms Karen Parnell, Wixford Parish Council

5. Support.

Rohan Torkildsen, English Heritage (West Midlands Region)

6. Support - I think the policy on trees, woodlands and hedges is appropriate but should also include measures for long term maintenance of these features. This maintenance plan should include making the trees and hedges etc suitable for a developed area at the same time as beneficial for wildlife.

Councillor R Cheney

7. The comments under A. Landscape Character and Enhancement and B. Visual Impacts are essential and must be adhered to, to preserve the character of the town.

Robin Malloy

8. Yes it is appropriate (Section C)

Mrs J Hancox, Tysoe Parish Council

9. The policy on Landscape is generally sound and to be supported. We would support reinstatement of Special Landscape Areas.

Mark Sullivan, CPRE Warwickshire Branch

10. SPPC has particular concerns regarding the effect of new agricultural practices on the countryside and considers that a degree of regulation compatible with the need for ensuring good use of the land needs to be achieved. The main concerns are that increasingly large areas of land are being covered with clear polythene laid directly on the earth, thus compromising the attractiveness of the open countryside. Of even more impact is the increasing use of polytunnels to lengthen the growing season for soft fruits and other crops. The planning status regarding these structures needs to be clarified with local communities having the opportunity to comment on the location and extent of each development. In Salford Priors the use of polytunnels has also led to the establishment of large caravan sites to house immigrant workers thus increasing the negative effects of such developments on the countryside. SPPC proposes that Policy CS10 should include a policy concerning the effects of modern agricultural practice on the countryside with particular attention to the use of polythene sheeting and polytunnels and also the consequences associated with these practices such as the need for large temporary worker camps.

Mr Michael J Philpott, Salford Priors Parish Council

11. SPPC is concerned about the protection of trees in the parish and has been unsuccessful in many of its representations to the District Council. SPPC proposes that Policy CS10 should embrace the protection of trees under a TPO policy and ensure that any tree or group of trees can be protected at the request of a parish council when the TPO checklist criteria are fulfilled.

Mr Michael J Philpott, Salford Priors Parish Council

12. Object - Policy CS 10 will produce a conflict for each and every scheme that comes forward and could be used to block development that is policy compliant in all other respects. The policy should provide more guidance on how development proposals could enhance the character and quality of the landscape affected and set out how the basic conflict of new development and landscape character can be addressed to allow new development as allowed by other policies in the CS to go forward. This must be provided to make the CS clear and effective.

David & Angela Tucker

13. Subsection A, para 3 - "wherever possible...": Lose this and start with "Measures should...".

Rebecca Howes, Mappleborough Green Parish Council, Justin Kerridge

14. Subsection B, para 2 - Sentence reading "new landscaping should be incorporated" to read "...must be incorporated..."

Rebecca Howes, Mappleborough Green Parish Council, Justin Kerridge

15. Subsection C, para 2 - Paragraph reading "Proposals that will..." seems meaningless. I like the general feel of it but it doesn't seem to mean much. Yes, we want these things protected and enhanced and made accessible, but how to do it? In general I would like to see more mention of a need to preserve and increase the number of native trees in the district, especially so in built up areas. I would also like more emphasis on the provision of green spaces in built up areas and access to the countryside from built up areas.

Rebecca Howes, Mappleborough Green Parish Council
Justin Kerridge

16. The intrinsic character and beauty of the landscape as a natural resource should be used to define the area, thus allowing the opportunity for future generations to determine according to the then needs. Future needs are part of a sustainability package.

Councillor Hazel Wright

17. Overall, this is a well constructed policy.

Gordon Brace

18. ASL do not have any direct objection to Policy CS.10 but simply note the Council's explanation to the policy starts with the Government's overall aim to protect the countryside for the sake of its intrinsic character and beauty. This was an objective of PPS7. The NPPF confirms planning should take account of the different roles and character of different areas including the recognition of the intrinsic character and beauty of the countryside and the need to support thriving communities within it. However, it does not go any further on this matter and does not apply specific protection of the countryside, which does not form part of other statutory designated areas, such as Green Belt, and isolated housing development. This move reflects the NPPF's direct aim to '*significantly boost*' housing supply and '*pro-actively drive and support sustainable economic development*'.

Ainscough Strategic Land

Policy CS.10A Landscape Character and Enhancement

1. Overall the historic character and aspect of the landscape must be protected. Among other things, this means strict adherence to the District Council's Cabinet decisions in 2011 to limit the total number of new house to be built in the district in the period to actual need and to disperse these throughout the district.

Alan Marks

2. Support - Development should protect and enhance landscape character, avoiding effects detrimental to the locality, such as monstrous wind turbines.

Catherine Hodgson

3. The Burton Dassett Hills forms one of the most distinctive skyline features on the Feldon. They have been the subject of aesthetic appreciation from many sources and for many years. As an outcrop the hills are an important associated feature of the Cotswold escarpment (AONB) which together forms a distinctive backdrop to most of South Warwickshire's southern long views. Importantly the rugged hill tops of Burton Dassett substantially contribute to the intrinsic character and natural beauty of the views from the Cotswold escarpment. Especially of importance are the isolated 13th century hillside parish church and the 14th century hill top tower. Both are the only surviving features of a Tudor clearance, in favour of sheep, of a small medieval market town known as Chipping Dassett. (A no. of figures were included with the response).

Mrs Alison Biddle, Bishops Itchington Parish Council

4. We agree that local distinctiveness and landscape character should be protected wherever possible.

Linda Ridgley, Harbury Society

5. Policy CS 10A states "Development should have regard" and "Development should protect landscape". "should" is subjective and needs to be replaced by "must". Specific exclusions then require to be detailed.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

6. "Local distinctiveness" needs definition as most areas of the country will have coppices, woods, rolling hills, rivers, villages, towns etc. What specifically defines "local distinctiveness"? We do not know (and I'm sure that most district residents don't know either) exactly when we/they cross to SDC border into a neighbouring council area or county, so the "distinctiveness" is definitely blurred around the edges at the very least.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

7. Also, "Wherever possible, measures should" is subjective and needs to be altered to "Measures must" with detailed exclusions. A definition of "enhance" must be included too as it is subjective.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

8. Warwickshire Wildlife Trust supports the policy protection for valued landscapes in CS 10 and welcomes the specific recognition of the Forest of Arden, the Avon Valley, the Cotswolds and Feldon as the key character areas of the district. Whilst there is good protection for these areas within the policy there needs to be greater weight in the wording to secure landscape restoration, if the wider benefits of landscape restoration ie. for biodiversity, green infrastructure, climate change mitigation and enhancement of the water environment, are to be realised. The requirement for local plans to protect and enhance valued landscapes is set out in the NPPF and so we believe that to accord with national policy the current wording (ie. enhancement where possible) should be strengthened to achieve these ends.

Richard Wheat, Warwickshire Wildlife Trust

Policy CS.10B Visual Impacts

1. Support - Yes, a full Landscape and Visual Impact Assessment should accompany all major development applications. Attention should be paid to the cumulative effect of, for example, a series of wind farms in one locality.

Catherine Hodgson

2. STC fully endorses the importance of the need to protect the character of settlements. It would further agree with the statement in the Draft Core Strategy that - 'Applications for major developments should be accompanied by a full Landscape and Visual Impact Assessment'

Mrs G Beaumont, Shipston-on-Stour Town Council

3. Policy CS10B states: "Proposals for development should include...", "Applications for major developments should be..." and "new landscaping should be incorporated". "Should" is subjective and needs to be replaced by "must". Specific exclusions then require to be detailed.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

4. "reduce the impacts" needs to be defined as this is subjective. For example, planting one shrub in front of a development may "reduce the impact" from a specific angle by obscuring it from that angle and the policy vision would be achieved but from most angles, the view would not be enhanced.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

Policy CS.10C Trees, Woodland and Hedges

1. Object - We are pleased to see the reference to Ancient semi-natural woodland and veteran trees in Policy CS 10 sub-para C and paras 8.1.12 - 8.1.14. However we believe that this policy could be made even better. These are examples of semi-natural habitats which do not benefit from full statutory protection. eg 84% of ancient woodland in the West Midlands has no statutory protection and is still facing considerable threats. In the last decade 110 square miles (5%) of ancient woodland in the UK has come under threat from Destruction or degradation (Woodland Trust). Transport and infrastructure were most significant (31%), amenity and leisure (14%), housing (10%), Quarrying (6%). 1.98% ancient woodland in Stratford (UK 2.4%) is a finite resource. Also ancient and veteran trees in Stratford - Ancient Tree Hunt identifying and mapping ancient trees so they can be protected and enhanced.

Justin Milward, Woodland Trust

2. Natural Environment White Paper - para 2.56 - government commitment to ancient woodlands.

Justin Milward, Woodland Trust

3. Draft NPPF - para 169 includes protection of ancient woodland.

Justin Milward, Woodland Trust

4. Biodiversity Strategy for England - para 2.16 - protection of ancient woodland.

Justin Milward, Woodland Trust

5. West Midlands Forestry Framework - objective EB2 - prevent loss of ancient woodland.

Justin Milward, Woodland Trust

6. Absolute protection for ancient woodland is now feeding through into Core Strategies eg Bradford City Council, Purbeck District Council (example wording included)

Justin Milward, Woodland Trust

7. It is impossible to replace ancient woodland as this habitat has evolved over centuries. It contributes significantly to existing ecological biodiversity and must be protected. Planted Ancient Woodland Sites (PAWS) present a key opportunity for habitat restoration. 2% of UK is ancient woodland and 40% of this converted to PAWS - still retain ancient semi-natural woodland features - restoration is the only way of increasing ancient woodland.

Justin Milward, Woodland Trust

8. Between the 1930s and 1980s hundreds of thousands of hectares of ancient woodland were converted to conifers for the forestry industry, causing damage to plant communities. Elements of the previous ecosystem are still surviving and action to save what remains needs to start as soon as possible. When conifers reach maturity they should not be replaced with more conifers. Research was carried out by the Oxford Forest Institute into PAWS - most sites retain elements of Ancient woodland ecosystems and the best way to make the most of these remnants is to change the woodland canopy structure gradually. The Woodland Trust has produced a guide on this.

Justin Milward, Woodland Trust

9. We suggest that the first paragraph of CS10 para C be amended - *"Due to the quality of ancient semi-natural woodland and ancient/veteran trees in the former Forest of Arden, and their relative scarcity elsewhere in the District, development proposals that would result in their loss will be resisted."* We would also like to see this incorporated into a Trees & Woodland SPD.

Justin Milward, Woodland Trust

10. There needs to be a reference to the policy relating to trees, woodlands and hedges in conservation areas. Too many ancient trees and hedgerows have been lost due to developments in the countryside and in rural settlements. Protection of trees has been the LPA's second highest priority.

Mrs Marie Rendell, Snitterfield Parish Council - Chair

11. Policy CS 10C states: "the onus is on those making development proposals...". It is unclear to me what this means within this policy, as it is subjective and indicates that there is no necessity to provide such safeguards. This needs to be changed to: "those making development proposals that affect these features must present written evidence detailing how they are to be safeguarded."

J. Buckley, Earlswood & Forshaw Heath Residents' Association

12. Also, "Where possible" must be deleted and the ultimate sentence would then read: "Proposals must enable the expansion of native woodland..." and "Where possible, proposals should enable..." needs to be amended as "should" is subjective and needs to be replaced by "must". Specific exclusions then required to be detailed.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

13. The Trust recommends strengthening the wording of CS 10 to provide stronger protection for ancient woodland habitats, veteran trees and important hedgerows. These features make a vital contribution towards local ecological networks and climate change mitigation and adaptation and so a more robust approach is needed to ensure consistency with policies CS1, CS2 and CS11. We recommend that the wording specifically requires the safeguarding of such features with the onus on developers being to demonstrate how the development will retain these features within the site layout. At present we believe the current wording only requires developers to safeguard such features 'where possible' if they cannot demonstrate how the features can be protected. This would be contrary to the principles of sustainable development and would thus conflict with policy CS1. We support the policy requirements for ancient woodland buffering and extensions in the final paragraph of the policy.

Richard Wheat, Warwickshire Wildlife Trust

14. Within the Policy box would recommend the following inclusion; *"Where possible, proposals should enable the expansion of native woodland to help climate change adaptation by buffering, extending and connecting fragmented ancient woodlands, to promote recreation, public health and the local economy."*

David Lowe, Warwickshire County Council - Principal Ecologist

Topic: 8.1 Sustainability Appraisal Implications

1. I fully support the Government's overall aim to protect the countryside for the sake of its intrinsic character and beauty so that it may be enjoyed by all.

Catherine Hodgson

Topic: 8.1 Explanation

1. I would like to ask the question, Does Section 8.1.8 clearly set out and protect these areas from unwanted or harmful development, such as wind turbine sites or other industrial items of adverse visual impact? I draw your attention to the Planning Inspectorate Appeal AP/J3720/A/11/2161913 paragraph 7 of the appeal decision on Shuckburgh Estate Mast. *"Such policies should be set out in local development documents (referring to DDC's policy) accompanied by statements of what it is that it requires extra protection and why. the report goes on to say that the DDC Local Plan June 1997 refers to special environmental qualities in those areas but does not establish what those qualities are. It appears to me that the landscape in Daventry District near the site and that in Stratford on Avon district near the site are each of comparable quality to the other, and I determine the appeal on that basis"*, which seems a main reason for the inspector allowing the appeal. I request that the authors of this section are absolutely confident that their wording and proof on this section will pass such scrutiny from the Planning Inspectorate.

Irvin Klegerman, Wormleighton & Stoneton Parish Meeting

2. SPPC supports the reinstatement of the Special Landscape Areas and particularly the Arden landscape. The Parish Council has its own Design Statement based on this policy and is very supportive of the need to protect indigenous species and landscape aesthetics.

Mr Michael J. Philpott, Salford Priors Parish Council

3. The parish council feels strongly that the Burton Dassett Hills and the surrounding topography should be designated as a special landscape area. A separate report on the merits of this beautiful area is attached at Appendix A.

Mrs Alison Biddle, Bishops Itchington Parish Council

4. We would thoroughly endorse the reinstatement of SLAs, should these not be reinstated as previous designations immediately and then subject to review? We fear without these in place then smaller communities such as our own will be susceptible in the meantime, whilst these surveys are undertaken. Indeed Daventry didn't bother to remove theirs, despite the government directive and as such they have been in a slightly better position to defend their treasured landscapes.

Mrs Valerie Ingram, Shotteswell Parish Council

5. The emerging Warwickshire, Coventry and Solihull GI Strategy will be making reference to landscape with recommendations. One recommendation is to establish a model to measure Landscape Opportunities throughout the region. Would recommend that a phrase is included to recognise that this sub-regional GI strategy is a driver as well as a potential evidence base now and in the future.

Dave Lowe, Warwickshire County Council - Principal Ecologist

6. The Burton Dassett Hills forms one of the most distinctive skyline features on the Feldon. They have been the subject of aesthetic appreciation from many sources and for many years. As an outcrop the hills are an important associated feature of the Cotswold escarpment (AONB) which together forms a distinctive backdrop to most of South Warwickshire's southern long views. Importantly the rugged hill tops of Burton Dassett substantially contribute to the intrinsic character and natural beauty of the views from the Cotswold escarpment. Especially of importance are the isolated 13th century hillside parish church and the 14th century hill top tower. Both are the only surviving features of a Tudor clearance, in favour of sheep, of a small medieval market town known as Chipping Dassett. (A no. of figures were included with the response).

John Bolton

7. A proportion of the hilltop brows at Burton Dassett are now in public ownership (1971) as a Country Park which is also designated as a public viewing point. The surrounding pastoral landscape would therefore tend to be very sensitive to unsuitable or alien visual intrusions. Much consideration must be given to constructing a comprehensive 'sphere of influence' around this country park as it is used, in large part, for embracing big rural vista experiences. It is effectively a public window and therefore must carry very considerable weight when balancing any potential controversial developments likely to compromise the rural setting of this valuable and unique Warwickshire resource.

John Bolton

Topic: 8.1 Development Management Considerations

No comments received for this section

Topic: 8.1 Delivery and Monitoring

1. The cumulative impact of schemes for wind farms proposed in south Warwickshire, including the associated transmission lines and access roads, would destroy the most beautiful landscape character for the local inhabitants as well as the thousands of tourists who are vital to our local economy.

Catherine Hodgson

Consultation Question: Q56

1. Support - no comments.

Mrs V.J. Pratt, Wootton Wawen Parish Council

2. It is important that a landscape policy should focus on fitting development into the landscape rather than preventing development as its main aim. Well designed, planned and located development can fit into most landscapes whereas preventing development harms rural communities by potentially removing sources of employment from their locality.

Andrew Shirley, Country Land and Business Association

3. The policies appear to set out to protect the local distinctiveness and historic character of the District but some are very woolly. Just what, practically, does this mean - *"Proposals that will have an impact on woodlands, hedges and trees should incorporate measures to recognise their contribution to landscape character, public amenity and biodiversity"*?

Linda Ridgley, Harbury Society

4. As drafted the policy is too vague and in danger of being ignored.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

5. Natural England is satisfied that the draft policy provides sufficient guidance at a strategic level. It is recommended that the policy text details the different landscape character areas, as provided in paragraph 8.1.6. The policy could benefit from more detailed guidance, as set out below in our response to question 57.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

6. It is considered that this draft policy should help to facilitate development - subject to appropriate safeguards. As long as it is applied in this manner this policy would be supported.

Charles Robinson, BNP Paribas Real Estate

Consultation Question: Q57

1. Object - no comment.

Mrs V.J. Pratt, Wootton Wawen Parish Council

2. The overall intent should be to protect the landscape making sure that further development will only enhance the quality and character of the landscape.

Mrs E.M. Pogmore, Brailes Parish Council

3. Object - The spatial distribution of development for the District should have greater regard to the landscape character of settlements and the countryside.

Miller Strategic Land and Taylor Wimpey

4. Be realistic. Development won't "enhance". We can only seek to mitigate the effects!

Linda Ridgley, Harbury Society

5. Preserving and enhancing the landscape setting of the town is of crucial importance to maintaining its unique character and appeal, both as a place to live in and to visit. Sustainability is important and all planning applications must consider impact on natural landscaping. Stratford's landscape setting is an important feature of the town and protecting and preserving the townscape is considered absolutely crucial if Stratford-upon-Avon is to continue being an attractive town. In addition, far too many trees have been lost in the town. This draft policy recognises the need for the landscape impacts of development proposals to be considered. It would be preferable for aims to be reclassified as objectives as these are more measurable. More emphasis needed on enhancement and protection. Need to indicate how the inevitable conflicts with development policy can be resolved.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

6. Natural England welcomes additional and more detailed guidance on how development proposals should enhance the character and quality of the landscape. Such guidance could be specific to appropriate development in each of the landscape character areas listed. More detailed guidance would certainly contribute toward the protection and enhancement of the natural landscape.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q58

1. Support - we would argue very strongly that trees and hedges are critical to the local landscape and should be retained except for special circumstances.

Mrs V.J. Pratt, Wootton Wawen Parish Council

2. We think the policy on trees and woodlands etc is appropriate.

Mrs E M Pogmore, Brailes Parish council

3. Yes

Councillor S.H. Jackson

4. Hedges play a vital role in biodiversity and act as green corridors in both town and countryside areas. This policy should insist that removal of any hedge, particularly in conservation areas requires a planning application. Currently, I understand there is no such protection and hedges are particularly vulnerable to removal.

A.J. Mann

5. The policy is too weak and additional guidance is required. A more proactive stance should be taken.

Councillor S A Juned

6. Hedges are an important aspect that should be considered as part of the preservation of biodiversity.

Councillor S A Juned

7. Visual impact assessments should take into account the wider setting as well as immediate setting of proposed developments, particularly near edges of settlements and on elevated sites.

Councillor S A Juned

8. Additional guidance at a strategic level to ensure that ancient semi-natural woodland and veteran trees are afforded appropriate protection would be welcomed. Ancient woodlands are particularly important as they can be rich in rare species; are an integral part of England's historic landscapes; and act as reservoirs from which wildlife can disperse.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

9. The draft policy should refer to the NPPF which states that: *"planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."*

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

10. In particular, the Council's attention is drawn to Natural England's publication 'Standing Advice for Ancient Woodland' which states that: *"Development close to, though not directly involving destruction of an ancient woodland can nevertheless be damaging to the site... Whilst development should be kept as far as possible from ancient woodland, a minimum buffer of at least 15 metres in width should be maintained between the ancient woodland and development boundary."* Whilst the Standing Advice currently only applies in the south and east of England, it still provides a useful reference document for other Local Planning Authorities.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q59

1. I fully support the re-instatement of Special Landscape Areas (SLAs), and would encourage Stratford-on-Avon District Council to seek out other such suitable areas for protection.

Mr Darren Jackson

2. I am wholly in support of reinstating Special Landscape Areas as we have only maintained our wonderful landscapes and natural beauty spots in Warwickshire due to this status. We live in a special area of natural beauty and if we wish not to spoil it (and let's face it, it brings in the tourists, it is Shakespeare country after all!), then we need to protect it.

Ms Lynn Pearson

3. Yes these landscape protections should be reinstated in order to augment the robustness of the mechanisms by which development may be shaped and controlled.

Robb Kightley

4. Agree.

Graham Musson, Bearley Parish Council, Mrs V J Pratt, Wootton Wawen Parish Council, Councillor S H Jackson, Steve Taylor - Set Design

5. The CLA objects to the reinstatement of special landscape areas in the district for protection for the rural area is delivered through Green Belt policy and Areas of Outstanding Natural Beauty, and it is not considered necessary for there to be the imposition of a further designation with a sole aim of restricting development when there are policies within national level and within this core strategy that provide adequate protection.

Andrew Shirley, Country Land and Business Association

6. Any reinstatement of the Special Landscape Policy should make it clear that this is not an automatic constraint on development in the villages. Landscape can be viewed as a positive backcloth to well designed new development.

Bernard Alsop, Noralle Traditional County Homes

7. Noralle recognises that development should have regard to landscape, local distinctiveness and historic character. Indeed the company has forged a solid reputation for building high quality and attractive family homes which reflect the distinctiveness of the South Warwickshire landscapes. Against that background, it is important that the quality of landscape should not be viewed as a constraint against development, but a backcloth against which high quality new development should be framed. Question 59 asks whether there is a case for the reinstatement of the Special Landscape Areas. In our view, there may be a case for highlighting distinctive landscapes, but this shouldn't be regarded as a blanket restriction against new development.

Bernard Alsop, Noralle Traditional County Homes

8. Re-establishment of landscape is a good initiative.

Mr R Eades

9. I believe that the Special Landscape Areas should be reintroduced.

Councillor S. Thirlwell

10. The potential for renewable energy generation needs to be balanced against the nature and character of settlements and the importance of local landscape features. Our Parish Plan shows how important and valued these features are by the residents of Priors Marston. We consider the reinstatement of the Special Landscape Areas to be important and would support their immediate reduction.

Mrs Jennie Ellard, Priors Marston Parish Council

11. There could well be benefits from the introduction of Special Landscape Areas.

Councillor R Cheney

12. We do not understand fully the basis on which SLA are granted and are we eligible?

Mrs J Hancox

13. The introduction of Special Landscape Areas could protect certain areas and commissioning a study of four particular areas that includes Feldon Parklands would be useful.

Mrs E M Pogmore

14. CPRE supports the restoration of the local landscape designations which were in the past District Local Plans, but not 'saved' as policy in 2009. We opposed their loss which reflected Government policy at the time. There are strong grounds for local landscape designations, beyond defining 'character areas'. The former SLA designation was sound in its day. A new policy would preferably use a more significant term (eg Areas of High Landscape Value). The specialist landscape assessment work that has been commenced should be continued. A new section of Policy CS10 should allow the District Council to create Areas of High Landscape Value.

Mark Sullivan, CPRE Warwickshire Branch

15. Agree and consider that the old Arden conservation should be reinstated in total.

Mr Robert Lees, Claverdon Parish Council

16. We fully support the reinstatement of the Special Landscape Areas as previously identified in the Local Plan Review, particularly in relation to the high quality landscape which surrounds Temple Grafton village. Previous appeal inspectors have acknowledged the particularly high quality landscape in this area, including walkers and cyclists who regularly use the network of public rights of way, helping to sustain the rural economy and tourist industry.

Mrs E Timms, Temple Grafton Parish Council

17. We strongly support the reinstatement of the Special Landscape Area designations especially that adjoining land so designated by Daventry District Council in recognition of its high scenic quality and in order better to protect the intrinsic beauty of its natural, built and historic environment from unsightly visually inappropriate future development.

Denis J S & S E Wilson

18. We do support the re-establishment of Special Landscape Area as long as this is not done solely to frustrate attempts to provide renewable energy.

Linda Ridgley, Harbury Society

19. The reinstatement of SLAs is not justified and cannot be supported. The approach of national policy is that a criteria based policy, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas. In the light of this an approach which seeks to re-introduce the archaic SLA policy approach is likely to be found unsound. The NPPF confirms, as one of the 12 core planning principles, that planning should take account of the different roles and character of different areas including recognising the intrinsic character and beauty of the countryside and the need to support thriving communities within it. It does not, however, suggest the application of specific protection policies for the countryside, which do not form part of other statutory designated areas, such as Green Belt, National Parks or Areas of Outstanding Natural Beauty. This is consistent with the NPPF key objective to significantly boost the delivery of housing.

CALA Homes (Midlands) - 2 responses

Persimmon Homes (South Midlands) Ltd

20. Natural England advocates a character led approach to the protection and enhancement of the landscape, rather than local designations. This should draw upon Landscape Character Appraisal and historic landscape characterisation.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q60

1. Visual impact assessments should take into account the wider setting as well as immediate setting of proposed developments, particularly near edges of settlements and on elevated sites.

K J Griffin-Gallagher, Mr M Hipkiss, L H Brice, E Lycett, G F Lycett, R N Butler, Mark Hind & Tonia D'Bras, Roger Pamment, Mr & Mrs Godson, Phillip Knowles, Mrs Lesley Smith, Mr H Green, Mr J. Alderson, Mrs Vivienne Smith, A J Mann, Mrs C J Mann, Julian Davey, A J Mann - Eclipse Road Residents Group - Deputy Chairman, Nina Knapman, Mrs J Evans

2. We would like to see Policy CS10 supporting the replanting of the Feldon with native forest trees, to make good some of the losses suffered through Dutch Elm Disease.

Linda Ridgley, Harbury Society

3. No mention is made of the protection of Sites of Special Scientific Interest. We believe we have 2 of these - Clowes Wood/New Fallings Coppice and the River Blythe, which runs around Windmill Pool. SSSIs need to be protected at all costs.

Mrs J and Mr M Buckley

J Buckley, Earlswood & Forshaw Heath Residents' Association

4. The planting of trees in urban areas should also be addressed as the evidence is that they assist with air quality management.

Councillor S A Juned

Consultation Question: Q61

1. As we have pointed out, the Countryside Agency's Countryside Character is based on the much finer grained research of the pilot Warwickshire Landscape Guidelines. The later Countryside Character publication is much too coarse to be used to define the character of individual villages. The many Village Design Statements adopted by Stratford District Council should be definitive documents, where they exist.

Linda Ridgley, Harbury Society

2. These policies seek to judge the quality of "landscape" and its distinctive features by reference to the Countryside Agency's Countryside Character mapping exercise. We have suggested the Warwickshire Landscape Guidelines are more comprehensive but better still would be Village Design Statements, which give much finer detail.

Linda Ridgley, Harbury Society

Consultation Question: Q62

1. In general, we feel that the current regulations cover the most precious and vulnerable landscapes and flora. However, we feel that it is very difficult to make suggestions when the stated aims are not quantified. Objectives should normally be: Specific, Measurable, Achievable, Relevant and Time-framed where necessary. These objectives are not "SMART" and there is no way of knowing at this time whether or not this policy is achievable as it's not measurable.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

Draft Core Strategy 2012 - Summary of Representations

8.2 Natural Features

1. Sites of Local and County importance in terms of ecological value should be given high importance in terms of protection when determining sustainable development proposals, in order to reduce the loss of rare species and diminished habitats. I generally support policy CS11 in this regard.

Mr H Green

Topic: 8.2 Strategic Objective

No comments received for this section

Policy CS.11 Natural Features

1. The River Avon at Barford is under threat from the proposed extension of navigation by powered craft. I feel that protection should be extended to this unique area.

Rita Kubiak

2. The Cotswolds Conservation Board welcomes and supports this policy.

Malcolm Watt, Cotswolds Conservation Board

3. No reference within the policy to the difference in both planning and legislative approaches between European Protected Species and species and habitats of principal importance arising from section 41 of the NERC Act. The requirements on both the LPA and developers in relation to European Protected Species are outlined by Natural England, and place a considerable onus on the LPA to determine the continued favourable conservation status of the species and the need to ensure (prior to the grant of planning permission) that sufficient evidence is supplied on which to make this decision. This difference could usefully be reflected in the policy itself and/or in more detailed wording in the explanation.

Ben Horowitz, Worcestershire County Council

4. Policy wording does not make reference to opportunities to enhance biodiversity within development. This enhancement approach is supported by the NPPF. There is reference to enhancement within the detailed explanation, but inclusion within the policy itself would give greater opportunity and strength to this requirement.

Ben Horowitz, Worcestershire County Council

5. Policy wording does not include habitat creation where appropriate as part of development proposals, which is supported by the NPPF. However, there is a need to ensure that appropriate habitat is actually created, and that the approach and policy wording is not used by developers to justify replacement with new habitat because it better suits their own requirements, which would have a detrimental effect upon existing habitat. Creation of new habitat should be to support existing networks and to expand valuable habitat.

Ben Horowitz, Worcestershire County Council

Policy CS.11A Biological

1. If a decision is taken to build on a LWS, not all species will respond to mitigation. Creation of alternative sites will not work for many species, so development in these areas should not be undertaken without consultation of nationally acclaimed experts. Whilst ensuring habitat management, notice should be taken that not all species, in fact very few, can thrive when constantly disturbed by people. Research has shown that dog walkers, in particular, cause problems for wildlife, so there must

be many areas left for wildlife where public access is not permitted, especially if accompanied by a dog, unless strictly on a lead. It is pointless providing habitat then proceeding to fill it with what are seen as predators by the wildlife.

Mary Lindsey

2. Sites of local and county importance in terms of ecological value should be given high importance in terms of protection when determining sustainable development proposals, in order to reduce the loss of rare species and diminished habitats. I generally support Policy CS11 in this regard.

K.J. Griffin-Gallagher

Mr M Hipkiss

L H Brice

E Lycett

G F Lycett

R N Butler

Mark Hind & Tonia D'Bras

Roger Pamment

Mr & Mrs Godson

Phillip Knowles

Mrs Lesley Smith

Mr J Alderson

A J Mann

Mrs C J Mann

Julian Davey

Mrs Vivienne Smith

Councillor S A Juned

Mrs J M Evans

3. Criterion (d) seeks to protect sites that "are not yet subject to formal designation". This is not appropriate as it gives a layer of protection to specific sites that has not been proved to be justified. The biodiversity contribution afforded by a site that has no designation can be appropriately assessed and weighed in the planning balance through the development control process. The Council does have the ability, through the application process, to ensure that any positive contribution to biodiversity offered by a site is either retained or mitigated against as part of any development proposal without seeking to introduce an unjustified and ineffective policy criterion.

CALA Homes (Midlands)

Persimmon Homes (South Midlands) Ltd

4. Sub-section (b) needs to be re-written to specifically detail the parameters of sites that are described as "Those that are irreplaceable in view of their unique characteristics". This statement is too subjective to interpretation currently.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

5. Sub-section (c) requires the deletion of "except where.... habitat elsewhere". If it is felt that this sentiment is required, "good reason" needs to be specifically detailed. "Long term" needs to be defined as this is subjective. In the final sentence, "should" needs to be replaced by "must" and then specific exclusions require to be detailed and "priority habitats, ecological networks and priority species" require to be specifically detailed as none of these phrases has any legal or quasi legal definition and are therefore subjective.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

6. CS11.2 states, "Making provision, where appropriate, for..." "Provisions" need to be identified and detailed and "where appropriate" needs to be omitted as it is subjective.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

7. Warwickshire Wildlife Trust supports the principle of a policy for the protection and enhancement of biodiversity and the natural environment, but believes that CS11 in its current form will not be effective in achieving these ends. The Trust recommends the following amendments to CS11 in order to improve its effectiveness and align it with national policy.

Richard Wheat, Warwickshire Wildlife Trust

8. Section A - The policy needs to strengthen its terminology such as in the first paragraph of the policy. Suggesting that developments should aim to provide a net gain in biodiversity 'wherever possible' is weak and reminiscent of former planning policies that still resulted in significant declines of biodiversity. This is not the strong and visionary approach needed to meet the Government's ambitious target of halting biodiversity loss by 2020.

Richard Wheat, Warwickshire Wildlife Trust

9. The NPPF sets out a requirement for local authorities to positively plan for biodiversity by identifying, protecting and enhancing ecological networks. This should be at the heart of this policy and should set out where and how developments will contribute towards these ends to achieve truly sustainable development. In this instance, an introductory statement that captures the district's ambitions is needed to provide a strong context for the preceding policy provisions. For example, this could state:

'Stratford-on-Avon is working towards a resilient ecological network throughout the district that supports vital ecosystem services and provides ecological security for wildlife, people and the economy. Development will be expected to contribute towards the achievement of this network by:'

Richard Wheat, Warwickshire Wildlife Trust

10. The Trust welcomes the policy protection for a range of sites, habitats and features within clause 1A of CS11. Statutory and non-statutory wildlife sites are the fundamental building blocks of the borough's ecological network and so it is essential that protection of these sites remains robust against the growth promoted within the Core Strategy. In this instance, the Trust would support absolute protection for all statutory and non-statutory sites; however we recognise that to do so may compromise policy protection as it would be open to challenges from development pressures. In turn, we believe a practical criteria based policy, aligned to the principles of PPS9 and the NPPF, would be a more effective approach to delivering policy protection for wildlife sites that could withstand scrutiny.

Richard Wheat, Warwickshire Wildlife Trust

11. The NPPF clearly outlines that development affecting European sites (SPA, SAC, Ramsar) will not be considered sustainable development. In this instance, it is considered appropriate to apply absolute protection for these sites. For example:

'Developments that are likely to have an adverse effect either directly, indirectly or cumulatively on a site designated through the EC Habitats or Birds Directives will not be permitted.'

Richard Wheat, Warwickshire Wildlife Trust

12. SSSIs are subject to statutory protection under the Wildlife and Countryside Act 1981 (as amended), which requires local authorities to have due regard to further the conservation of the features for which the site was designated a SSSI. These sites should receive the highest level of protection, which, in accordance with the NPPF, should be reflected by the national value of the site as follows:

'Sites of Special Scientific Interest will be subject to a high degree of protection. Development adversely affecting a SSSI, either directly or indirectly, will only be permitted in exceptional circumstances where the benefits of the development, at this site, clearly outweigh the likely impacts on the site and any broader impacts on the national network of SSSIs.'

Richard Wheat, Warwickshire Wildlife Trust

13. Local sites (such as Local Wildlife Sites, Local Nature Reserves and ancient woodlands) have a key role in supporting national and local biodiversity targets and make a significant contribution to a district wide ecological network. Whilst only LNRS afford some statutory protection under the National Parks and Access to the Countryside Act 1949, local authorities have a duty to deliver sufficient protection for all local sites through the planning process to accord with Section 40 of the NERC Act 2006. In turn, to reflect the NPPF, Local Plans should ensure that local sites afford sufficient protection at least equivalent to their value at regional/county level. However, the current criterion for local sites does not achieve this. Permitting development where there is 'good reason' to do so does not provide clarity to any interested party of where exceptions to this protection will be justified. We recommend the following:

'Local Sites (Local Nature Reserves, Local Wildlife Sites and ancient woodlands) will be safeguarded. Development adversely affecting a Local Site will only be permitted where it can be demonstrated that the benefits of the development at this site, clearly outweigh the impacts both on the regional/county value of the site and any broader impacts on the district wide ecological network.'

Richard Wheat, Warwickshire Wildlife Trust

14. Recognising that effective protection for biodiversity and a district wide ecological network cannot be achieved in wildlife sites alone, it is necessary to also include criteria for protection of other features of importance for biodiversity outside of statutory and non-statutory sites. Such protection should take account of, for example, habitats and species listed under the UK and Local Biodiversity Action Plans and features that provide ecological connectivity across the landscape, such as canals, river corridor and hedgerows. Whilst these features do not receive statutory protection, the NERC Act 2006 places a duty on local authorities to further the conservation of these features and so an adequate level of protection should be included within the local plan. For example:

'Habitats and species listed under the UK and Local Biodiversity Action Plan and features that make a positive contribution to the district wide ecological network will be safeguarded. Developments will be required to positively plan for the protection and enhancement of such features within their development proposals, where they are observed on site, unless it can be demonstrated that there is no viable solution.'

Richard Wheat, Warwickshire Wildlife Trust

15. The aim on planning decisions is to conserve and enhance biodiversity, In turn, where an adverse effect on biodiversity is identified it is necessary that the local authority takes reasonable steps to minimise harm or seek appropriate measures to prevent a net loss of biodiversity. The NPPF already sets out the principles for how impacts on biodiversity interests should be addressed and so we believe this hierarchy of avoiding adverse impacts first, followed by mitigation and compensation respectively, should be fully incorporated into policy CS11, Furthermore, in applying this approach a range of factors should be considered, such as:

- *the irreplaceable nature of certain habitat types*
- *the position of the site or features within an ecological unit*
- *the contribution the site or features makes to a district wide ecological network*
- *The contribution the site or features makes towards local ecosystem services*
- *the cost and effectiveness of replacing the features and the ability to secure their interests in the long term.*

The Trust subsequently recommends that these provisions are included in the wording of clause A1 of policy CS11.

Richard Wheat, Warwickshire Wildlife Trust

16. The Trust supports clause A2 in policy CS11. There is a need to secure positive enhancements for biodiversity through habitat creation in order to deliver an ecological network within the district; however we would like this section of the policy to be extended to cover restoration and management of biodiversity sites, habitats and features. A statement outlining that management plans for biodiversity sites and features will be sought for developments should also be included to ensure that the integrity of any possible habitat creation restoration and enhancement will be maintained in the long term.

Richard Wheat, Warwickshire Wildlife Trust

17. We welcome the reference to strengthening networks of habitats and fostering landscape scale areas for biodiversity to address priorities in the UK and Local Biodiversity Action Plans. To provide a deliverable context for these enhancements within the district we advise that the policy aligns such opportunities with existing initiatives such as Biodiversity Opportunity Mapping, the potential Nature Improvement Area (NIA) for Warwickshire, Warwickshire Wildlife Trust Living Landscapes Large Area projects and identified green infrastructure priorities.

Richard Wheat, Warwickshire Wildlife Trust

Policy CS.11B Geological

1. Policy CS11B states: "safeguard these features on a similar basis to...". "Similar basis" needs to be deleted as it's non-specific and the actual specific approach detailed.

J Buckley, Earlswood & Forshaw Heath Residents' Association

2. "Proposals should also seek, wherever possible..." needs to be deleted as this is subjective and replaced with "Proposals must conserve and enhance features of geological interest for the future." If there are to be exclusions from this policy, they must be specifically detailed.

J Buckley, Earlswood & Forshaw Heath Residents' Association

3. Within the policy box would recommend the following inclusion:

"B. Geological...Proposals which affect Local Geological Sites or other sites that contain features of geological interest need to safeguard these features on a similar basis to the approach to safeguarding biological habitats set out in part A above, and with reference to the Local Geodiversity Action Plan."

David Lowe, Warwickshire County Council - Principal Ecologist

Topic: 8.2 Sustainability Appraisal Implications

1. The Sustainability Appraisal Implications section (8.2.2) suggested that a stronger emphasis should be placed on de-fragmentation and connectivity of habitats. The 2011 study on Green Infrastructure conducted by UE Associates identified eight areas where Stratford-upon-Avon could improve its green networks and if these were implemented it would help to rectify the problem of fragmentation.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Topic: 8.2 Explanation

1. I don't like the fuss that is made about bats and newts which seem very well established in our district. I would like to see the district work towards lightening regulation in this area. Initially by discussion with County Council and perhaps beyond.

Ms Rebecca Howes, Mappleborough Green Parish Council, Justin Kerridge

2. The Trust supports the local authority's commitment to adopting Biodiversity Offsetting as a standardised and more balanced approach to securing compensation measures for biodiversity. We believe that where this is effectively implemented, the district can ensure that compensation measures are delivered in a more strategic and effective manner that will secure a net gain in biodiversity and contribute towards the delivery of a district wide ecological network. However, biodiversity offsetting should only be applied as a final option where it has been demonstrated that impacts on biodiversity cannot be avoided or mitigated for. In turn, any reference to biodiversity offsetting in the policy must be clearly linked to the avoid, mitigate and compensate hierarchy detailed in the NPPF and in accordance with the comments above. Biodiversity offsetting should only be seen as supporting sustainable development where it is applied in this manner.

Richard Wheat, Warwickshire Wildlife Trust

3. The Natural Environment White Paper (NEWP 2011) has the following contextual paragraphs that may be useful within the Core Strategy and help support your corporate aims:

- a) Nature is a complex, interconnected system. A healthy, properly functioning natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing (NEWP Executive Summary 2011).
- b) Past action has often taken place on too small a scale (NEWP Executive Summary 2011). We will move progressively from net biodiversity loss to net gain, by supporting healthy, well-functioning ecosystems and establishing more coherent ecological networks. *Our 2020 mission is to halt overall biodiversity loss, support healthy, well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people* (NEWP para 2.8 page 17).
- c) Sustainable Drainage Systems (SuDS), which deal with surface water, are designed to mimic natural drainage as closely as possible. They provide an example of green infrastructure and an illustration of opportunities to achieve multiple benefits from the management of land. During the 2007 floods, two-thirds of homes affected were flooded as a result of surface water. We want to provide opportunities for communities to shape and manage their environment to reduce their exposure to flood risk, release capacity in the sewer and improve water quality. Well-designed systems can increase habitats for biodiversity and provide additional green space for communities to enjoy, as well as increasing the resilience of built areas to a changing environment (NEWP, para 2.82, page 31)
- d) Our natural environment gives us a sense of place, pride and identity. Nature inspires and moves us. Connecting with nature helps children learn, and improves people's health and wellbeing. We know instinctively that we have much to gain by connecting with nature, but evidence points to an increasing disconnection. Our society is bearing the costs. Less outdoor activity and reduced contact with nature have negative consequences for public health and society. Some people have fewer opportunities than others to access a good-quality environment for their personal benefit. More people must have the opportunity for a lifelong connection with nature. (NEWP para 4.1, page 45)
- e) The Government wants to improve access to nature in local neighbourhoods, giving more people the opportunity to gain more benefits from connecting with it. The Government will give communities a wider range of powers which can be used to protect and improve nature in their neighbourhoods through the Localism Bill (NEWP para 4.21, page 49)

David Lowe, Warwickshire County Council

4. The England Biodiversity Strategy 2012 (EBS) entitled "Biodiversity 2020" (Defra 2011) has the following contextual paragraphs that may be useful with the Core Strategy and support your corporate aims:

- a) Despite its importance, biodiversity is under threat. Although there have been some conservation successes in recent years and there are signs that losses are slowing, overall the picture in England remains one of decline (EBS, para 1.3, page 9)
- b) *'Take effective and urgent action to halt the loss of biodiversity in order to ensure that by 2020 ecosystems are resilient and continue to provide essential services, thereby securing the planet's variety of life, and contributing to human wellbeing, and poverty eradication...'*. (Nagoya UN Biodiversity Summit, October 2010)

David Lowe, Warwickshire County Council

5. Local evidence we recommend are clearly cited within the strategy would be the Warwickshire Biological Records Centre, Habitat Biodiversity Audit and the Wildlife Sites Project. These datasets underpin the entire ecological and geological decision making within your Core Strategy. I could not find a reference to this within your core strategy or sustainability assessment. It is widely understood that good data, with good interpretation makes good decisions. It is these bodies' and partnerships' remit to ensure the data they are responsible for meets recognised data standards.

David Lowe, Warwickshire County Council

6. Please note that the Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Study (2011) has not been completed and is expected in June/July 2012 (subject to a reasonable consultation period).

David Lowe, Warwickshire County Council

7. Would suggest the following amendments to the following paragraphs:

"8.2.15 Good developments incorporate biodiversity considerations but can still result in some biodiversity loss when there are impacts that cannot be avoided through design and locations, or mitigated by other measures. National planning policy in PPS9 requires compensation for this loss to be made. The principle of biodiversity offsetting is taking on increasing prominence. This approach is designed to compensate for losses to ecological assets as a result of a development on appropriate biodiversity projects elsewhere in the area. *Stratford-on-Avon is one of 6 two-year pilot project areas for biodiversity offsetting announced within the Natural Environment White Paper from April 2012. Biodiversity Offsetting is to be detailed within the Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Study (2012) and will reflect the outcomes within and after the two-year pilot project.*"

David Lowe, Warwickshire County Council

8. "8.2.16 *The District Council may wish to support this principle as a measure of ecological sustainability within the NPPF criteria for all developments within the District*". Current guidance from Defra and Natural England suggest that Biodiversity Offsetting should not be used on designated sites (this could include local sites), but this is something that is dependent on SDC's level of "safeguarding" afforded by the policy CS11. This would infer that offsetting could be used on all development types and sizes. Therefore, it is recommended to use the more flexible and precautionary wording suggested at the start of this paragraph.

David Lowe, Warwickshire County Council

Topic: 8.2 Development Management Considerations

No comments received for this section

Topic: 8.2 Delivery and Monitoring

1. The Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Study (2012) will be based on "Connectivity Maps" and scores and there is a potential that this will be used as a measure of delivery. This is one outcome of the Strategy so would recommend that it is referenced in the section to future-proof the Core Strategy. It may be prudent to decide upon this wording on the production of the sub-regional GI Strategy.

David Lowe, Warwickshire County Council

2. The Habitat Biodiversity Audit, Wildlife Sites and Warwickshire Biological Record Centre Data and Datasets are very important in enacting and monitoring this policy's delivery. With the revocation of PPS8 it is recommended that the following paragraph (or equivalent) be added to the Core Strategy. This is particularly relevant to the delivery of this policy, which is currently being discussed and developed with SDC Development Control colleagues:

'8.2.xx - Development decisions will be based on current and accurate ecological and geological information. Where reasonable, it is essential that the necessary evidence be collected in order to assess any development proposal. The Council recommends that evidence be obtained from the Warwickshire Biological Record Centre and appropriate surveys are carried out to obtain this evidence.'

David Lowe, Warwickshire County Council

Consultation Question: Q63

1. The policy does not distinguish between the different categories of habitat designation. However, the CLA has reservations as to the degree of protection that would be afforded to local wildlife sites which have a lesser degree of protection than SSSIs. There is also concern over the protection that will be given to areas that are not yet subject for more designation (D) as this policy would appear to give these a degree of designation when they do not appear to reach any local or national criteria. These sites should be offered no protection unless they contain protected species in which case they will be covered by other legislation.

Andrew Shirley, Country Land and Business Association

2. No mention is made of the protection of Sites of Special Scientific Interest. We believe we have 2 of these - Clowes Wood/New Fallings Coppice and the River Blythe, which runs around Windmill Pool. SSSIs need to be protected at all costs.

Mrs J & Mr M Buckley

3. I like this chapter as it is.

Gordon Brace

4. Yes, definition OK.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

5. Natural England is not fully satisfied regarding the categories of habitat designation and suggests that a further list is provided in the appendices, to include: Special Areas of Conservation; Special Protection Areas; Sites of Scientific Importance; Areas of Outstanding Natural Beauty; National Nature Reserves.

Jamie Robert Melvin, Natural England - Land Use Operations Team

6. The protection of important habitats from the effects of development on land near to, but not necessarily on the site of such habitats is important, and the policy should be worded to make this clear.

A J Mann, Eclipse Road Residents Group - Deputy Chairman

Consultation Question: Q64

1. The CLA would argue that non-designated sites are offered too much protection within policy CS11.

Andrew Shirley, Country Land and Business Association

2. Yes

Gordon Brace

3. Natural England agrees that the various aspects of habitat creation are indeed appropriate and particularly support recognition of the depletion of ecologically rich habitats, a lack of sensitive habitat management in the local area, the need to create new habitats and to ensure that appropriate management is secured for both new and existing habitats. The concept of net gain, when considering proposed development, is supported. We recommend the addition of a clear cross reference to green infrastructure.

Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q65

1. Support offsetting in principle but query whether this can be done consistently and sustainably, being related to concern over SDC's commitment to the LBAP at Member level.

Councillor S H Jackson

2. Habitat off-setting is an appropriate measure only where it does not result in a feature being lost that is irreplaceable in the medium term and the off-set habitat results in a net gain in habitat and improves habitat connectivity through the District and beyond. Off-setting can play a crucial role in restoring habitats and connectivity throughout the District. However it must not be used as justification for developing on sites of ecological importance.

Laura Perry, Environment Agency

3. Yes.

Gordon Brace

4. Yes, action is needed to counter the ongoing loss of biodiversity.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

5. Biodiversity off-setting cannot replace adequate biodiversity protection in situ. Biodiversity can also be impacted by neighbouring development.

Councillor S A Juned

6. Natural England is providing advice to LPA in biodiversity off-setting pilot areas and anticipates further discussions with the Council on this matter.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q66

1. The Council should establish a programme of biodiversity connectivity mapping to identify where specific habitats are required to reconnect existing habitats of value and to restore important habitats such as floodplain grazing marsh. In order to establish and maintain these features there should be an up front financial contribution from developers, along with an annual levy charged upon each property to secure long term maintenance, as well as securing long term contributions from businesses that benefit from a more sustainable and healthy environment such as water utility companies, insurance companies etc.

Laura Perry, Environment Agency

2. We believe that the Council should set up its own biodiversity or environmental bank and have developers pay the full cost of reinstating the land. Schemes where the developer has reinstated the land have met with generally unsuccessful results, so we would recommend that an independent specialist business should do the reinstating work.

J Buckley, Earlswood & Forshaw Heath Residents' Association

3. Yes. It is very difficult to give a pat answer to this vital question. There have to be flexible powers for planning committees to treat specific areas individually.

Gordon Brace

4. In principle, biodiversity off-setting has much potential and so is worth investigating. But its application must depend on there being positive results from the pilot studies and agreement and support from the professional conservation organisations. To gain maximum biodiversity benefits, however, it is essential that all existing natural features are thoroughly and properly understood. As acknowledged in the Core Strategy 8.2.5, "policy should be based on up to date information". To achieve this, field survey work should be current and ongoing. When basic information is unknown, incomplete or out of date it is difficult to make meaningful decisions. Furthermore, the initiative should not be used to make it easy to ride roughshod over local designations, such as Local Wildlife Sites, which do not have any statutory protection.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

5. Yes - off-setting should be applied. The general principle that the establishment of gardens greatly enhance biodiversity when compared to conventional farm use is not widely recognised and should be more forcefully promoted. Eco-site designations should be regularly re-assessed - in many instances historical designations have stymied development for years, though in many cases the reason for initial designation may have long since vanished or degraded.

Steve Taylor, Set Design

Consultation Question: Q67

1. I would suggest that Sport and Recreational pursuits need to be addressed in these policies. Some sport can only take place in natural environments eg. sailing, climbing and orienteering. However, through careful management plans and planning conditions any conflicts should be eliminated.

Bob Sharples, Sport England

2. The protection of important habitats from the effects of development on land near to, but not necessarily on, the site of such habitats is important, and the policy should be worded to make this clear.

A J Mann

3. We believe that the independent expert (individual or company) should carry out the reinstating valuation work.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

4. More needs to be done to address and encourage biodiversity in the district as outlined in the Local Biodiversity Action Plan. New habitats should be actively encouraged and funds sought for management. Biodiversity offsetting can never replace what has been lost adequately.

Councillor S A Juned

5. As recognised in the SA, Natural England recommends that the policy is strengthened to include climate change adaptation. The SA states that - *'This policy does not mention climate change. This policy could bring about a positive effect in terms of acting as a carbon store, but adapting to climate change, should be a key part of the policy. The current wording.... should be strengthened to ensure development supports biodiversity adaptation and resilience to climate change.*

To achieve this, policy wording should be strengthened to ensure development maximises habitat connectivity where appropriate. Development should avoid causing or facilitating habitat fragmentation. The policy does, through section A, seek to create new habitats and strengthen networks but a stronger focus on connectivity and de-fragmentation should be made. Linking this policy to the Stratford-on-Avon GI Study and GI policy CS13 would help in interpretation and understanding of this policy'.

Natural England supports this assertion

Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q68

1. Concerned over SDC's commitment to the LBAP at Member level.

Councillor S H Jackson

2. The Council should be talking to universities, almost all of whom are researching biodiversity, biodiversity conservation and other key ecological issues currently.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

Consultation Question: Q69

1. Outsourcing governance handed to an independent private person / body is one way of delivering.

J Buckley, Earlswood & Forshaw Heath Residents' Association

2. Until the overarching provisions of the policy are agreed it is not possible to make recommendations as to the most effective monitoring outcome for policy CS11. However, Warwickshire Wildlife Trust is happy to engage with the local authority as the Core Strategy progresses to determine suitable options.

Richard Wheat, Warwickshire Wildlife Trust

Draft Core Strategy 2012 - Summary of Representations

8.3 Heritage Assets

1. I strongly support the emphasis on protecting Stratford's heritage assets such as Anne Hathaway's Cottage (very important to both residents and tourists), together with proposals to minimise future excessive housing developments which put further pressure on local resources and are unnecessary without a significant increase in local jobs.

Gordon Harrington

Topic: 8.3 Strategic Objective

No comments received for this section

Policy CS.12 Heritage Assets

1. The Cotswolds Conservation Board welcomes and supports this policy.

Malcolm Watt, Cotswolds Conservation Board

2. Object - The Council should look more favourably on reuse of heritage assets where appropriate. It is highly unlikely that housing targets can be met in smaller rural centres without allowing the conversion of redundant rural buildings of all types. Barn conversions are popular and preferable to new-build in most cases.

Mr Paul Harvey

3. We support aspirations relating to safeguarding historic sites

David & Beverlie White

4. This welcome policy would support the conservation of heritage assets, however we would suggest the following changes are considered:

Policy CS12 should also address the relevance and importance of non-designated heritage assets i.e. something of heritage significance that contributes to the character and identity of a place but may not be at a level that would pass the threshold for national designation. They may include buildings of local importance, archaeology, historic field patterns, droveways, commons, greens etc.

In this respect we would highlight the potential role of a Local List as a means of raising the profile of valued local buildings. PPS5 highlights the contribution of local listing to the development of the evidence base used to conserve local heritage assets perceived to be of value to local communities.

5. Mindful of your evident concern for the public realm you may wish to add an additional priority:
(g) The public realm including historic streets and spaces by, for example, reducing the amount of intrusive and excessive signage.

In this respect we would encourage consideration of Streets for All; Manual for Streets; Manual for Historic Streets and the Poles Apart report www.polesapart.info

6. In accordance with PPS5 HE3.4 and HE5.1 the plan should set out how it intends to respond to the District's heritage assets 'at risk' including the 2 Conservation Areas, 2 Listed Buildings and 24 Scheduled Monuments on the national register. These could be referred to in the Area Policy Profiles. The plan could include an indicator that seeks to measure a reduction in the number of assets at risk.

7. The Local Development Scheme refers to an intention to prepare a Conservation Area Policy SPD. What is the role of this SPD and how does it relate to the heritage strategy set out in Policy CS12?

8. Is there a full compliment of up to date Conservation Area Appraisals? If not when will these be undertaken? Will Conservation Area Management Plans be prepared and if so when?

Rohan Torkildsen, English Heritage (West Midlands Region)

9. Support - The new NPPF sets out the need to protect areas of heritage historical importance - Stratford is a town that is dependent on its heritage for its economic sustainability and everything must be done to protect this.

Deborah Griffiths

10. Proposed developments must be well away from heritage sites.

Robin Malloy

11. Policy CS12 is not well drafted in its attempt to propose how new developments might relate to historic buildings. A clear statement is needed to the effect that designs of new buildings in areas dominated by older buildings should reflect the scale and proportion of existing development and that extensions to older buildings should complement the designs and materials of the buildings being extended.

Brian Wright

12. Object - There is no provision for mitigating the effects of sustainable housing on heritage sites. Cutting the size of housing estates to 100 (which I support) will do nothing to make the journey to Anne Hathaways Cottage anything but a chore through urban sprawl. To sit in the gardens there and hear the continual hum of a nearby road will cut short visits.

13. As there are several gateways into Stratford and its historic settlements, it is imperative that the historic spine is preserved and also the gateways to the other archaeological possible discoveries that may be made (eg. Mary Arden's House, Nash's House and lost medieval villages). To fill each gateway with housing estates is counter-productive to tourism, makes living along the main routes intolerable because of the traffic generated and sends the signal to everyone that the town is likely to be over commercialised and jammed full of traffic. However, if the correct emphasis is put on improving access to green infrastructure (CS13) this kind of development would not be considered.

Mrs Elisabeth Brace

14. Development Management Considerations - It should be made clear that when presenting a planning application for a development that could impact on a heritage site a general assessment report should accompany it. However, any need for a detailed study, with an expensive dig and report with assessment of findings is only required after planning of provisional planning authority is given, clearly subject to acceptable findings in the report.

Clive Griffiths

15. Tanworth village is one of the 75 Conservation Areas in the district. We could only find the word 'conservation' three times in the whole 233 pages of the draft document. This is a shameful omission. Perhaps if the Council still had a full time conservation expert that would not have happened.

16. Proper recognition should be given to Tanworth Conservation Area. The one green space and 2 potential brownfield sites in the immediate proximity to the village should be given enhanced recognition and protection. In the spirit of the NPPF any new or replacement houses within the speed limit signs should be subject to more rigorous standards to ensure that in style, proportions and materials they improve the look of the village, not merely do it no harm. Similarly more attention should be paid to the effect on the street scene of developments not strictly in the conservation area, but adjacent to it.

Ms Julie White, Tanworth-in-Arden Parish Council

17. British Waterways welcomes the specific reference to the features associated with canals at Section A (f) giving priority to their preservation and enhancement as heritage assets (whether or not they are designated). The Stratford upon Avon Canal, Grand Union Canal and Oxford Canal are all unique historic environments with many structures, such as bridges, locks etc enjoying Listed Building status and the value of these assets should be protected but not so as to prevent the potential of these historic assets from being fully unlocked. It must be borne in mind that the canals are also a functioning environment, and whilst their heritage value should be properly protected, unduly restrictive policies on new development could stifle their function, and an appropriate balance has to be found.

Ian Dickinson, British Waterways (East and West Midlands)

18. Query need for criteria (c) and (d) in relation to CS15 - see response under CS.12A

CALA Homes (Midlands)

19. There is no reference to how development proposals should deal with the loss of heritage assets and when this is or isn't acceptable. There is also no reference in the policy regarding how development should deal with archaeological remains. The Development Management Considerations touch on this but do not make reference to the ability to record and capture evidence of archaeological remains where their preservation in situ cannot be achieved or justified. This is deemed to be unsound given it is common practice and is a recognised approach in the NPPF.

Ainscough Strategic Land

Policy CS.12A Preservation and Enhancement

1. I agree that particular priority should be given to preserving heritage assets, and that the international importance of Stratford-upon-Avon and sites associated with William Shakespeare should be reflected in planning policy.

Peter & M.J. Donaghue

Dr D. Kalderon

Mrs E. Kalderon

John Armitage

R.K. Fisher

Peter Condron

Miss F. Longmore

R. Burman

Mr and Mrs Fraser and Linda Edwards

Mr and Mrs D.J. Cholerton

Susan Marks

Joan Graham

Gordon Harrington

Bill Tucker

Stephen Parker

Mrs M. Childs

B.E.H. Whitehouse

Mr B. Childs

S.J. Wiseman

Mr and Mrs R.E. Cain

Mrs P. West

Mr D.C.M. Young

Patricia Young

Mrs B. Wood

P. Wiltshiel
Stefan Law
Mrs M.G. Tattersall
Alan Spreadbury
M.B. Lewis
Mrs Valerie Lageard
B.W. & Y.K. Bates
Alan Boddington
Mr and Mrs J.S. Orchard
S. Watts
Mr Peter Pearce
Monica M. Beckett
G.K. Allen
Andrew Davies
J. Steele Nicholls
Peter Dingley
M.J. Bunce
Mrs Helen Petitjean
Andrew Waterhouse
Mrs S.J. Sreeves
Julia Shearing
Mr E.R. Green
John D. Jones
Peter Taylor
Mrs J. Wood
Anna Candy
Mrs D. Geldard
Bernard R. Pumfrey
S. Venus
Mrs Diane Rogers
R.J. Beresford
Mr and Mrs J. Farrar
Mr Clive Wootton
Jean Powrie
Nicholas Smith
Peter J. Hudson
Mrs S.M. Cragoe-Jones
R.D. Heppell
Mrs J. Calvert
Mrs A. Murray Watts
Anna Cooke
S.M. & P.V. Wall
Mr D. & Mrs J.H. Smart
John Priest
Mrs Margaret Ann Smith
Mr Richard L. Smith
Mrs G.M. Reid
Mrs C.A. Cooper
Mr Derrick Burford
Mrs G Pawley
J. Robertson
Paul Kershaw
P.F. Wyatt

T.F.R. Crossley
Mr B.G. Harrison
F. Hodgson
Mr & Mrs D.J. Hammond
Mr & Mrs R. Stephenson
Patricia Jebb
B. Escott
Mr Clifford Rose
Norman and Freda Kitcher
Mrs Vera Hawkins
S.J. Warrilow
Mr & Mrs P.F & M.M. Williams
A.M. Tudor
Mrs D. Bouham
Mrs D.E. Bonham
D. Daniel
Joy Watson
Anastasia & Peter Hunter
Mr J.M. and Mrs J.A. Kent
B. Lomas
Mr & Mrs D.J. Chamberlain
B. Stewart
Mr J.M. Hind
Mrs Barbara Spencer
Michael Crutchley
A. McIntyre
Mr & Mrs G. & W. Mazey
Michael Stockhill
James Pullin
Peter Landsman
David Gooman
Steve Taylor
George W. Sykes
A.L.S. Orr
B. Rossington
Mrs Mary Austin
H. Carragher
A.J. Whiting
W.E. & B.O. Cave
G.I. Chamberlain
J.M. Stocks
Dai Gistiws
Tony & Sue Holmes
Ann C. Curtis
J.C. Edwards-Broome
Mrs M.S. Wade
Caroline Stewart
W. Macdonal
H.R. Beach
Mr R. Dawney
Malcolm J. Wilkes
Dave & Mo Sargent
R. Dyer

R.D. & R.J. Langman
Mary Monteith
Mrs E.J. Allard
Brian P. Edwards
Don Hanson
Mary Jeffery
Carl Conn
Wyndham Perring
B. Littlewood
D.E. Swinbourne
Mr & Mrs R.C. & J.D. Hawkins
W. Alan Head
D. Pearson
Michael & Sheila Mills
Alan & Sharon Morris
Mary & D.A.R. Morgan
E.A. Foster
Mrs Elisabeth Brace
Mrs D. Levets
Edwina Nicholls
R.Green
A.L & J.K.Page
Mr Frank Woodhall
Caroline Abercrombie
Mr C. White
Roger and Susan Blackwell
Mr & Mrs D.A & R.A. Atkinson
P.R. Gilmore
Mr D.J. Ockendon
Syvia J. Cooper
Ken & Mary Ryman
Pat & Michael Bird
George & Bryony Disher
Penny Gildea
Barbara & Peter Dodd
Kevin Gildea
Mrs B.A. Sylvester
Freda Douthwaite
Fiona Mackie
B.H. Richardson
Mrs C.M. Richardson
E.W. Head
Mrs E.M.B. Sellar
Mr & Mrs P. Hill
A. Chaplin
John Miller
Eric Ward
Graeme Ramsey
C.M. West
Maureen & John Hill

2. We welcome the preserving of heritage sites such as Anne Hathaway's Cottage.

Mr and Mrs Zaffignani, Marcus Weaver

3. I agree that 'particular priority' should be given to preserving heritage assets (such as Anne Hathaway's Cottage).

Mrs Caroline Wilks, Terry Brandon, Mrs G. Woodhall, John Alan Finney, Miss Mary Finegan

4. I agree that 'particular priority' should be given to preserving heritage assets (such as Anne Hathaway's Cottage) and their surrounding areas.

David Edward Martin, Michael Whick

5. I entirely agree with the aim to prioritise protection of the town's assets, notably Anne Hathaway's Cottage. The latter is a real gem stone attracting 200,000 admissions each year.

James E Philpotts

6. I disagree that particular priority should be given to preserving heritage assets, and that the international importance of Stratford-upon-Avon and sites associated with William Shakespeare should be reflected in planning policy.

John Harris, Mrs C C Scott, John Oldfield

7. The Core Strategy must major on the maintenance of Stratford District as an important tourist area, tourism being vital to the local economy, which must, therefore, be preserved and the Core Strategy must reflect this.

Alan Marks

8. We strongly support the statement that: "Particular priority will be given to preserving and enhancing the features in subsections (a) and (b) of the policy. The words "particular priority" infers that very strong weight should be applied to this policy. We would like to see this further emphasised such that it becomes a major concern of planning committees when considering all planning applications.

Martin Luscombe, Stratford Voice

9. Suggested revision to the final paragraph of section A:

"Development should be integrated with the historic context and heritage features retained wherever possible. The sensitive design and layout of development proposals should be informed by an understanding of the significance of the historic environment. The publicly available Warwickshire Historic Environment Record which includes Historic Landscape Characterisation and the Extensive Urban Survey is an important source of information".

Rohan Torkildsen, English Heritage (West Midlands Region)

10. The requirement to preserve and enhance the architectural features of the canals and navigations is one which we take very seriously and we are pleased to see that new development will be required to fit in with the historic environment through sensitive design and layout.

Graham Nicholson, Inland Waterways Association (Warwickshire Branch)

11. Paragraph 10.1.3 acknowledges the town's international cultural attractions including the Royal Shakespeare Theatre, but is/are the theatre/s included within Policy CS12 Section A (b) as heritage assets?. Although the theatres are not specifically 'sites associated with William Shakespeare', they do provide a focus for 'the international importance of Stratford-upon-Avon'.

Rose Freeman, Theatres Trust

12. This is supported. The Birthplace Trust properties are prime examples of assets to be protected.

Robin Malloy

13. Preservation of historic sites and localities is important given the architectural vandalism last century. Conservation areas need to be protected, not to make them museum like, but retain the character of properties and settings built up over centuries.

14. There is a substantial number of listed buildings and older properties which require much higher costs of maintenance and upkeep. Owners recognise this for the enjoyment of living in historic surroundings, but get no financial support or tax advantages.

15. It is critical that planning recognises the negative impact on the curtilage of listed and conservation area properties of totally inappropriate and unnecessary construction, as well as the destruction of historic sites. While planning does not take into account the detrimental effect on property values, unacceptable adjacent developments will inevitably impact on owners' willingness to fund upkeep.

Peter Chadwick

16. We believe that a number of policies and paragraphs (including CS.12A) in the Core Strategy support navigation or the extension of navigation in the District towards Warwick.

John Macarthy-Filgate

17. Burton Dassett Hills - response includes a historic description of the area. Having such a wealth of historical assets that are easily visually discernable and, importantly, in well elevated settings, makes these hills a very special landscape and a valuable District heritage asset. They form a unique tapestry of time. Extraordinarily there is little evidence that neither Warwickshire County Council nor Stratford on Avon District Council has made any references or produced any public educational guidance to this very historic area other than to state it was a former quarry.

Mrs Alison Biddle, Bishops Itchington Parish Council

18. Subsection (d) - Too many subjective assessments. We need to know what you really intend.

Mrs J & Mr M Buckley

19. CS12A state "Particular priority will be...", "will" is subjective and needs to be replaced by "must".

20. Subsection (c) - "Distinctive character" needs to be defined as it's subjective. Most areas of this country have coppices, woods, rolling hills, rivers, villages, towns etc. What specifically defines "distinctive character" in SOA District?

21. Subsection (d) - "Distinctiveness" needs to be defined as it is subjective. It also states "choosing appropriate building materials". Again, "appropriate" is subjective and needs to be defined.

22. Section A, last sentence - "should" needs to be changed to "must" as it is subjective.

23. Section A, last sentence - "sensitive" needs to be defined as it is subjective.

J Buckley, Earlswood & Forshaw Heath Residents' Association

24. ASL objects to the inclusion of the need for development to preserve and enhance the distinctive character of market towns and villages under criteria (c) of this policy.

25. The glossary of the NPPF confirms heritage assets can be a 'place' or 'area', but equally there should be some definitive evidence of what is the distinctive character of each market town or village to warrant its character to be defined as a 'heritage asset'. Overall, it is considered this criteria is misplaced, unsound and cannot be justified under this policy.

26. Criteria (d) is also misplaced, unclear and should feature in design related policies if required, as set out in policy CS15, Design and Distinctiveness.

Ainscough Strategic Land

27. Policy CS12 is aimed at protecting heritage assets. Criteria (c) and (d) relate, however, to protecting the character of an area through design. Design and distinctiveness is specifically addressed in draft policy CS15. The inclusion of criteria (c) and (d) in CS12 is therefore repetitive and at odds with the purpose of this particular policy which is specifically to preserve designated heritage assets.

CALA Homes (Midlands)

Persimmon Homes (South Midlands) Ltd

Policy CS.12B Management and Interpretation

1. The "measures" need to be defined and "encouraged" needs to be changed to "mandatory".

Mrs J and Mr M Buckley, J Buckley, Earlswood & Forshaw Heath Residents' Association

Topic: 8.3 Sustainability Appraisal Implications

No comments received for this section

Topic: 8.3 Explanation

1. An English Heritage funded project, the 'Warwickshire Extensive Urban Study' is presently being undertaken by members of the Warwickshire County Council Information and Advice team. The results of this project will contribute to our understanding of the development and character of various towns and villages across the District and will inform the assessment of the likely impacts of proposed developments on the historic environment of the district. We would recommend that the project be referenced in para 8.3.6 and in bullet point 1 under Development Management Considerations.

2. The last sentence of para 8.3.6 states that using the Historic Environment Record data and the results of the Warwickshire Historic Landscape Characterisation project 'it is possible to assess the likely impacts of the proposed development of strategic sites on the historic environment of the district'. Whilst consulting these sources of data will inform an assessment of the archaeological impact of a proposed development, we would recommend that this paragraph states that in some instances it will be necessary to undertake evaluative archaeological fieldwork in order to obtain sufficient archaeological information to enable an informed planning decision to be made. The need for this evaluative fieldwork is noted in bullet point 3 of Development Management Considerations.

3. There are many heritage assets with archaeological interest that are currently not statutorily protected as designated sites, but which are demonstrably of equivalent significance. The absence of designation for such heritage assets does not indicate lower significance (see also policy HE9.6, PPS5, para 139 of the NPPF). We would recommend that this chapter of the draft Core Strategy acknowledges this.

Anna Stocks, Warwickshire County Council - Archaeological Information and Advice

4. Description included of the importance of Burton Dassett Hills. The Hills are a valuable district heritage asset. Neither the County Council nor the District Council has produced any public educational guidance to this very historic area.

John Bolton

Topic: 8.3 Development Management Considerations

1. In some instances, it may be appropriate for archaeological features to be investigated and recorded, rather than conserved (for example, where the significance of the archaeological features are not sufficient to warrant their conservation). This would normally be at the developer's expense. This is not acknowledged or referenced in this section. We would recommend that this chapter be amended to include reference to the need, in some instances, for a developer to fund an appropriate programme of archaeological fieldwork to mitigate the archaeological impact of a proposed development, where this is appropriate.

Anna Stocks, Warwickshire County Council - Archaeological Information and Advice

2. (3) It should be made clear that when presenting a planning application for a development that could impact on a heritage site, a general assessment report should accompany it. However, any need for a detailed study, with an expensive dig and report with assessment of findings is only required after planning or provisional planning authority is given, clearly subject to acceptable findings in the report. The change to process will clearly speed up planning proceedings, have safeguards, and protect developers from the risks of incurring significant, wasted costs.

Clive Griffiths

Topic: 8.3 Delivery and Monitoring

No comments received for this section

Consultation Question: Q70

1. Yes

Graham Musson, Bearley Parish Council, Mr Robert Lees, Claverdon Parish Council, Gordon Brace

2. The CLA is concerned that CS12 tries to roll together both statutory designations eg Listed Buildings, conservation areas and scheduled monuments, and non-statutory designations eg historic parks and gardens, battlefields etc. This means that there will be the same level of protection provided to national designations as non-statutory designations which is not in accordance with current planning policy statements.

Andrew Shirley, Country Land and Business Association

3. I agree that 'particular priority' should be given to preserving heritage assets such as Anne Hathaway's Cottage. These iconic sites are integral to the appeal of the town to tourists which is a major employer in the area. These areas need to be protected from development while there is still the opportunity.

Pat Johnson

4. Yes, landscapes and the views and buildings are what we would like to preserve.

Mrs J. Hancox, Tysoe Parish Council

5. Preservation of the historic environment of Stratford is essential if we are to maintain visitor attraction, hence planning 'spread' outside of the designated arterial roads must be resisted. The principal heritage assets should be more clearly defined and protected. The draft policy should be strengthened. Restrictions should be imposed top-down. Inviting developers to propose measures is likely to result in weak controls or endless negotiations.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Consultation Question: Q71

1. The CLA asks that this policy is reviewed to ensure that there is significant flexibility to allow for the evolution in the use of listed buildings in particular for alternative uses, particularly where these can maintain the historic integrity of the property. All historic buildings need maintenance and the only way that income can be generated to do this is by allowing alternative uses which secure the building into the future.

Andrew Shirley, Country Land and Business Association

2. Yes

Gordon Brace

Consultation Question: Q72

1. Yes

Graham Musson, Bearley Parish Council, Councillor S H Jackson, Mr Robert Lees

2. The CLA only support policies that deal with designations themselves and object to policies that introduce a further buffer around sites for which there is no statutory basis.

Andrew Shirley, Country Land and Business Association

3. Yes, the policy should include the preservation and enhancement of gateways to historic settlements.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

4. Yes, Stratford upon Avon entrances reflects the deplorable attitude of SDC to the town and visitors' first impressions.

W A Lowe

Consultation Question: Q73

1. Consideration should be given to 'enabling development' to support particularly historic features. This would allow some development to take place either on site or nearby that would generate sufficient money to secure the renovation and maintenance of the property into the future.

Andrew Shirley, Country Land and Business Association

2. Whilst the general principles are correct changing needs have to be acknowledged otherwise a straightjacket exists. Do remember that whilst tradition is valuable without innovation it can be a corpse.

Councillor George Atkinson

3. Studies to enable Listed Buildings to be more energy efficient without harming them would be a great benefit.

Gordon Brace

4. The policy should also strengthen the protection for key historic assets especially by excluding heavy vehicle movements.

5. Perhaps, in view of Stratford's unique heritage, state that planning does not allow development in areas adjacent to special heritage sites (eg Anne Hathaway's Cottage).

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

6. The policy should include the preservation and particularly the enhancement of gateways to historic settlements.

Councillor S A Juned

Consultation Question: Q74

1. Yes

Mrs J Hancox, Tysoe Parish Council

Consultation Question:

1. These all look fine but where's the money coming from to implement this policy.

J Buckley, Earlswood & Forshaw Heath Residents' Association

2. More use could be made of the existing Town Civic Societies to develop policies relating to the historic environment, monitor and report back as a statutory consultee on all major planning applications.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Draft Core Strategy 2012 - Summary of Representations

8.4 Green Infrastructure

1. Planning can positively affect the health of residents by shaping and influencing the layout and the open spaces in between developments and securing investment for the public realm. For example, planning policies can include design requirements for housing layouts to encourage safe and pleasant walking short distances to amenities and services.

Jasbir Kaur, Warwickshire County Council

Topic: 8.4 Strategic Objective

No comments received for this section

Policy CS.13 Green Infrastructure

1. The Cotswolds Conservation Board welcomes and supports this policy.

Malcolm Watt, Cotswolds Conservation Board

2. Wilmcote Parish Council considers that the guidance on how to improve and secure green infrastructure features should contain some consideration of the impact on residents' homes. More specifically, footpaths should be removed where they currently pass through drives, homes, gardens. This also applies to establishing new paths which should be located well away from residents' homes.

Mrs E Butterworth, Wilmcote Parish Council

3. Wilmcote Parish Council considers green infrastructure features could be enhanced by ensuring that footpaths are more in harmony with local communities to provide security to those who live in rural areas and avoid embarrassment to those who find themselves in somebody's home. Access to the countryside is important but the Draft Core Strategy 2012 does not strike the right balance between those living in rural communities and those enjoying the countryside.

Mrs E Butterworth, Wilmcote Parish Council

4. Allotment land must be an element in all developments.

Councillor Jenny Fradgley

5. I support this policy but there is a contradiction as elsewhere in the plan there appear to be proposals to replace the Greenway with either a public transport route for the development at Long Marston Depot or reinstate the Stratford to Cheltenham railway line. This policy should make more clear the recreational and health benefits of Green Infrastructure (GI) and include specific provisions that protect the Greenway.

Reuben Bellamy

6. Salford Priors PC supports the retention of Policy CS13 and considers the impact of sustainable energy projects should be incorporated.

Mr Michael J Philpott, Salford Priors Parish Council

7. Opportunity to incorporate measured mile walks to take in the points of heritage interest within the district. Contributes to:

- Four commonly used methods to increase physical activity (PH2)
- Prevention of cardiovascular disease (PH25)
- Physical activity and the environment (PH8)
- Mental wellbeing and older people (PH16)
- Preventing type 2 diabetes - population and community interventions (PH35)
- Promoting physical activity for children and young people (PH17)

Emily Smith, NHS Warwickshire = Health Development Manager (Health Inequalities)

8. National Forest, Cotswolds and Earlswood Lakes - potential opportunities to develop measured miles, green gyms, cycling and walking routes. Contributes to:

- Four commonly used methods to increase physical activity (PH2)
- Prevention of cardiovascular disease (PH25)
- Physical activity and the environment (PH8)
- Mental wellbeing and older people (PH16)
- Preventing type 2 diabetes - population and community interventions (PH35)
- Promoting physical activity for children and young people (PH17)

Emily Smith, NHS Warwickshire = Health Development Manager (Health Inequalities)

9. Gardens get smaller as evidenced by the current planning applications; allotments are an amenity that should be introduced into estates as part of the planning agreement.

Councillor Hazel Wright

10. The first paragraph of this policy does not mention the potential functionality of GI in relation to floods. This is referred to later in both the policy and the detailed explanation. However, given the nature of the district, and the flooding issues which are referred to elsewhere, this could and should be one of the primary functions of the GI network.

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

11. There is no mention of the role of landscape within GI and its potential to deliver a range of connected benefits at a landscape scale and to enhance existing features of landscape interest or include them within development principles. New development should contribute to GI in three ways: protect, enhance and create (potentially in that order).

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

12. Development management plans should be required to ensure the ongoing functionality of the GI, and to secure the long term benefits of both off-site and on-site GI into the future and beyond the lifetime of the development.

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

13. Mention is made of cross-boundary GI links with other Warwickshire authorities and with Coventry and Solihull. This approach could also usefully be extended to neighbouring counties including Worcestershire, through the duty to co-operate and to ensure more collaborative approaches across administrative boundaries and partnerships.

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

14. This policy should strengthen the connection to preceding policies CS 10 and CS 11. The landscape and assets policies seem to have a significant focus on woodland and hedgerows but little recognition of the role of blue infrastructure within the landscape and we would welcome greater reference to this, particularly where there are cross-boundary considerations for Worcestershire. This would reinforce the

need to take account of the emerging Local Flood Risk Management Strategy for Warwickshire (and indeed Worcestershire - even if only a policy 'hook' at this stage).

Ben Horowitz, Worcestershire County Council - Planning, Economy & Performance

15. British Waterways agrees in principle with the support offered by Policy CS 13 to the protection, enhancement, restoration and creation of green infrastructure. The definition of green infrastructure encompasses 'blue infrastructure and blue spaces' such as waterways, towing paths and their environs. Inland waterways therefore form part of strategic and local green infrastructure networks, although we note that the policy does not specifically refer to the role that canals can play as a form of green infrastructure.

Ian Dickinson, British Waterways (East and West Midlands)

16. It is noted that Policy CS 13 provides particular protection for allotments and open spaces, unless "it can be demonstrated that there is an over-provision of that particular type of open space in the local area". This is considered unduly restrictive and is objected to; instead, similar word to that within paragraph 74 of the NPPF should be adopted` which provides for development on open space facilities where there is an absence of need or they are surplus to requirements. This is considered to be more appropriate wording (and could prevent a situation where a facility is the only one of its kind in an area, yet is still not used/required and therefore could suitably be developed). In addition, the policy requires that both criteria are satisfied (ie. that there is an overprovision of that type of open space and the proposal does not make a valuable contribution to the amenity and character of the area. This is also unduly restrictive and should instead be phrased 'or' (again, in line with wording in the NPPF).

Gloucester Diocesan Board of Finance

17. Policy CS 13 states: "...will be enhanced through...". What does this mean exactly?

Mrs J and Mr M Buckley

18. Policy CS 13 states: "...will be enhanced through...". "will" is subjective and needs to be replaced with "must".

J Buckley

19. Policy CS 13 is excellent.

Gordon Brace

20. The policy sounds attractive, but is likely to conflict with a number of current/potential development proposals (eg. Shottery, land north of A46) which would encroach onto greenfield land. How robustly will this policy be applied and are there loopholes in this policy?

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

21. Warwickshire Wildlife Trust welcomes the district's commitment to delivering and enhancing a district wide green infrastructure network. We particularly support the first statement and associated bullet points as we believe this provides the justification for the policy and clearly outlines the local authority's ambitions. The second part of the opening paragraph is less clear and needs simplifying to account for the ways in which green infrastructure assets will be protected and how and where GI opportunities will be optimised. It also needs to recognise that all new development places demands on the district's green infrastructure (GI) and so where GI cannot be provided on site, proportionate contributions towards the network will need to be secured. This link to offsite contributions will be essential if the local authority is to deliver enhancements across the district's GI network and within the sub-region. Suggested wording is subsequently detailed for the second part of the opening paragraph as follows:

Development proposals must demonstrate how they contribute to maintaining and enhancing a comprehensive and strategically planned green infrastructure network. With reference to the sub-regional Strategy for Green Infrastructure and identified local Green Infrastructure requirements,

developments should:

- *Maintain and enhance existing green infrastructure assets;*
- *Optimise opportunities to create links between existing green infrastructure assets within the district and to the surrounding sub-regional networks;*
- *Help deliver new green infrastructure assets where a specific need has been identified.*
- *Where new green infrastructure cannot be provided on site, or where an existing asset is lost or adversely affected, contributions will be sought towards wider green infrastructure projects and improvements within the district or, where appropriate, in the sub-region.*

Richard Wheat, Warwickshire Wildlife Trust

Policy CS.13A Improving Access to Green Infrastructure

1. The network of footpaths is a national asset and does need to be carefully managed. However, the Core Strategy document should acknowledge the impact that footpaths have on local homeowners particularly where the path runs through drive, home, garden. The Core Strategy Document should take some leadership in this area and positively aim to remove footpaths where they do pass through residents' homes. This will establish security and privacy for homeowners and eliminate embarrassment for the footpath user. The document should demonstrate respect for local communities and should avoid giving the impression of discriminating against rural homeowners. There must be a balance shown.

Colin Ray

2. The proposed network linking the existing green infrastructure with new areas of protection and enhancement should prove vital in maintaining attractive communities with a good quality of life and at the same time should increase biodiversity and improve the character of the landscape. The rivers and canals offer some scope for non-vehicular modes of movement and provide sustainable drainage, both of which could improve the carbon footprint of the district.

Graham Nicholson, Inland Waterways Association (Warwickshire Branch)

3. We would comment that the canals do meet the aims set out in criterion (ii) of providing multi-functional green infrastructure, fulfilling a range of roles in addition to being a form of green infrastructure, including:

- An agent of or catalyst for regeneration.
- A contributor to water supply and transfer, drainage and flood management.
- A tourism, cultural, sport, leisure and recreation resource.
- A heritage landscape, open space and ecological resource.
- A sustainable mode of transport.
- A route for telecommunication.

(TCPA Policy Advice Note: Inland Waterways: Unlocking the potential and securing the future of inland waterways through the planning system 2009)

Ian Dickinson, British Waterways (East and West Midlands)

4. Improvements to the accessibility of the canals within the District and measures to encourage their use by people will therefore help to achieve the aims set out in Section A of the policy.

Ian Dickinson, British Waterways (East and West Midlands)

5. Policy CS 13A states: "infrastructure features will be increased...". "will" is subjective and needs to be replaced with "must".

J Buckley, Earlswood & Forshaw Heath Residents' Association

6. CS 13 makes reference to 'Improving Access to Green Infrastructure' and more but does not seem strong enough on 'inclusion' (equality).

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

7. The Trust believes that the theme of clause A of CS 13 should be amended to remove the prominence of access in delivering green infrastructure improvements. Access is only one aspect of GI delivery and should not be seen as the governing principle behind GI provision. For example there may be situations in which access to GI may be restricted where the key aims are for flood attenuation and biodiversity protection. We believe that the subject of this clause should be in promoting how developers are to plan for truly multi-functional green infrastructure when taking account of the requirements to optimise this provision, as detailed above. In turn we recommend the following amendments:

A. Delivering and Optimising Multifunctional Green Infrastructure

In planning for the delivery of green infrastructure, developments will be required to take account of the range of benefits that GI can provide for:

(a) quality of life and attractive communities;

(b) biodiversity and the provision of habitats;

(c) landscape character and quality;

(d) non-vehicular modes of movement; and

(e) sustainable drainage, flood management, carbon sinks and other climate change mitigation and adaptation measures.

(f) providing access to green spaces and the countryside

Developments should provide an integrated approach to green infrastructure delivery and be able to demonstrate how their proposals contribute to at least two or more of these aims.

Richard Wheat, Warwickshire Wildlife Trust

Policy CS.13B Protecting Existing Open Spaces

1. This should be an important part of making new estates/developments sustainable for the people living in them.

Councillor R Cheney

2. Policy CS 13B needs to detail the meaning of "... over-provision of that particular type of open space..." and "it does not make a valuable contribution..." as both statements are subjective.

J Buckley, Earlswood & Forshaw Heath Residents' Association

3. Clause B of CS 13 refers specifically to a single aspect of green infrastructure which is inconsistent with the broad approach applied throughout the remainder of the policy. As this section relates to open space specifically we believe that these provisions are best placed alongside the existing community facilities and amenity requirements in policy CS 27. In turn the Trust recommends deletion of Clause B from policy CS 13.

Richard Wheat, Warwickshire Wildlife Trust

Proposal CS.14 Earlswood Lakes Country Park

1. Support the creation of Earlswood Country Park.

David & Beverlie White

2. I cannot see the benefits of Earlswood Lakes becoming a country park. Visitors will always come to Earlswood Lakes without any official invitation to a Country Park. There are always problems with parking; conflict between fishermen and locals and litter being left. Also the surrounding roads are unsuitable for more traffic.

Vida Davies

3. The creation of a country park involving Earlswood Lakes and the adjacent woodlands is a highly praiseworthy aim, which although of limited navigational importance, is one which we applaud.

Graham Nicholson, Inland Waterways Association (Warwickshire Branch)

4. I cannot see the benefit of Earlswood Lakes becoming a country park without a full study being conducted. There is already conflict between fisher people and locals re parking as there isn't sufficient parking. Also, how much green belt will be destroyed for car parking and retail facilities and offices? The Lakes are already an important habitat as well as much used recreational area and they should be left as they are. The SSSIs around the Lakes haven't been considered at all.

Jeff Perks

5. I do not believe the country park should be pursued without full discussions on the implications to locals and the natural environment.

Michael Andrews

6. National Forest, Cotswolds and Earlswood Lakes - potential opportunities to develop measured miles, green gyms, cycling and walking routes. Contributes to:

- Four commonly used methods to increase physical activity (PH2)
- Prevention of cardiovascular disease (PH25)
- Physical activity and the environment (PH8)
- Mental wellbeing and older people (PH16)
- Preventing type 2 diabetes - population and community interventions (PH35)
- Promoting physical activity for children and young people (PH17)

Emily Smith, NHS Warwickshire = Health Development Manager (Health Inequalities)

7. Creation of Earlswood Lakes Country Park - opportunity to incorporate measured miles, green gyms, cycling and walking routes into the local area. Contributes to:

- Four commonly used methods to increase physical activity (PH2)
- Prevention of cardiovascular disease (PH25)
- Physical activity and the environment (PH8)
- Mental wellbeing and older people (PH16)
- Preventing type 2 diabetes - population and community interventions (PH35)
- Promoting physical activity for children and young people (PH17)

Emily Smith, NHS Warwickshire = Health Development Manager (Health Inequalities)

8. I am a local birdwatcher who visits Earlswood Lakes and the adjoining woods on a regular basis, and gain much enjoyment from doing so. My key concern of the document is the proposal of creating a Country Park based on the lakes, Clowes Wood and New Fallings Coppice, thereby encouraging more people to visit the area. More visitors would mean more disturbance to wildlife, plus put more pressure on habitats. At present, disturbance from dog-walkers, fishermen and sailing means that many of the more unusual bird species that visit the lakes stay only briefly; whilst dog-fouling, dogs off leads and people wandering off the main paths are the three main problems to habitat and wildlife in the woods.

All of these issues would be likely to be exacerbated by the creation of a Country Park, and are certainly some of the points that should be addressed if this particular proposal is to be pursued. I notice that another document entitled "Sustainability Appraisal of the Draft Core Strategy" contains a table that suggests that the biggest positive effect of the Country Park would be for biodiversity, but seems to give no details - I would be interested to know more about these benefits, because at the moment I can't see any advantages to Earlswood's wildlife from this proposal. It is also worth noting that if the lakes became more crowded with visitors, it would likely affect local people's enjoyment of the area.

Matthew Griffiths

9. The Core Strategy details Earlswood Country Park as a possible medium term project without any examination of the effects this will have on the Green Belt or the existing habitat of the Lakes and surrounding areas.

Ms Julie White, Tanworth-in-Arden Parish Council

10. While increased opportunities for recreation are always to be encouraged any Earlswood Country Park must not harm the existing habitat or be used as an excuse for development clusters around it. Cloweswood is a Site of Special Scientific Interest (SSSI) belonging to Warwickshire Nature Conservancy and the Lakes themselves are a Site of Interest for Nature Conservation.

Ms Julie White, Tanworth-in-Arden Parish Council

11. We note the aim to create a Country Park based on Earlswood Lakes, Clowes Wood and New fallings Coppice in conjunction with a range of bodies including British Waterways. Earlswood Lakes are a British Waterways-owned reservoir which supplies water to the Stratford-upon-Avon Canal some 750m to the north. Any development which affects the Lakes needs to be considered in the light of British Waterways' operational requirements, and we would be happy to be involved in all discussions regarding the nature and form of development in the vicinity of the lakes to ensure that it is compatible with our needs and requirements and brings forward the most appropriate form of development here.

Ian Dickinson, British Waterways (East and West Midlands)

12. I strongly object to the development of a Country Park.

Mrs B Brown, M J Brown

13. The Earlswood Lakes Country Park ambitions need communication with residents, in particular infrastructure demands and the shape of any project.

Councillor George Atkinson

14. Proposal CS 14 indicates to us that the main benefit would appear to be a certificate conferring country park status and our view is that it's not worth the cost unless it can be demonstrated that this designation will generate additional income/benefits for the area (with little consequential damage), or that it will add another layer of planning and environmental protection to the area. Country Park status does not confer the latter currently. Would we be able to retain the "tranquil recreation" that is currently our most important safeguard? This would be better served by considering making the whole locale, The Lakes and surrounds, a Local Nature Reserve.

J Buckley, Earlswood & Forshaw Heath Residents' Association

15. The policy proposes the creation of a new recreation attraction based on the Lakes and nearby SSSI and adjoining/straddling the boundary with Solihull. This should provide an improved facility of benefit to people living within Solihull as well as Stratford District. Solihull MBC looks forward to working with Stratford DC and other partners to bring this project to fruition.

Maurice Barlow, Solihull Metropolitan Borough Council

16. Firstly it must be stated that to date there has been no discussion with Warwickshire Wildlife Trust regarding the proposal for a Country Park at Earlswood Lakes in the draft plan. The current statement, referencing the Trust as a stakeholder, implies our agreement to this proposal at this stage, yet this has been put forward without any consultation from the Trust. Whilst the Trust is keen to work in partnership with organisations to fulfil the potential of the Earlswood area for biodiversity and for people, we believe that such ambitious proposals should have been proposed and brought forward with adequate engagement with those stakeholders that are likely to have a significant role in its delivery. Indeed there is already an existing Earlswood Wildlife Partnership of local organisations and individuals taking action to progress similar goals and so it is unclear why they have not been consulted prior to the proposal of such a policy.

Richard Wheat, Warwickshire Wildlife Trust

17. The Earlswood area has been identified by the Local Biodiversity Action Partnership and the developing Local Nature Partnership as a key area to focus for landscape scale conservation in the county, to make an area rich in wildlife and for people to enjoy. The area was subsequently included in the proposal for a Nature Improvement Area funding bid for the county. It is within the landscape character area of Arden, an important historic landscape with remnants of traditionally managed land including many Local Wildlife Sites of county importance for wildlife and a framework of small fields and hedgerows which gives strong connectivity across the landscape.

Richard Wheat, Warwickshire Wildlife Trust

18. The designation of the Earlswood area as a Country Park is not in direct conflict with the current objectives for the area. However, it is important to recognise that primary focus on recreation, as is commonly the case for country parks, could indirectly impact on the sensitive sites, habitats and features of the area. At present the implications for this policy are unknown and are justified only by the designation of the area as a green infrastructure asset in the sub-regional GI proposal. Further engagement with key stakeholders and supporting evidence will therefore be needed to consider if this policy is effective in terms of its deliverability. For example, there is a key need to safeguard and enhance the biodiversity value of the Earlswood Lakes, Clowes Wood SSSI and New Fallings Coppice, along with connecting the hedgerows and farmland in the area, and therefore careful assessment and evaluation of the proposals will be needed to ensure that a balance can be achieved without diminishing the intrinsic and important value of the sites. Warwickshire Wildlife Trust will be happy to liaise further with Stratford District Council to determine the scope and feasibility of such a policy within future revisions of the core strategy.

Richard Wheat, Warwickshire Wildlife Trust

19. Creating a Country Park at Earlswood Lakes will harm the tranquillity and natural environment. Extra traffic generated would put pressure on our roads and lanes. We would feel that a Park and Ride scheme would also create more pressure and have a harmful effect on the area and the Green Belt. We would also like to see reinstatement of the Arden Special Landscape Area.

Freda & Peter Venables

20. The Core Strategy talks about a Country Park in Earlswood. This should not encroach upon Clowes Wood as this is part of the original Warwickshire Woodland and should be preserved for the future. With any development of this kind there needs to be adequate local consultations with regard to the positioning of such a development and above all suitable parking. I am a resident in Earlswood and have been for 9 years and speaking from personal observations I can say that parking is already an issue. There are double yellow lines which act as a deterrent however, because we are in a rural area people know they are reasonably safe to park where they like without being challenged or receiving parking tickets or fines. Thank goodness for the Resident's Association, who have in partnership with the Police, given locals the ability to police bad parking. With a further development being considered more thought needs to go into this issue before Earlswood becomes rammed with cars.

Mr & Mrs J Moore

21. Work needs to be undertaken, in partnership with British Waterways, to secure parking for the people who attend the lakes to fish. The car parking in Wood Lane is not nearly enough and when they park in the car park off Malthouse Lane, they then restrict the parking for those who would like to walk around the lakes and for families visiting the park and the lakes. My question, is this fair?

Mr & Mrs J Moore

Topic: 8.4 Sustainability Appraisal Implications

No comments received for this section

Topic: 8.4 Explanation

1. There is a need to ensure that future development proposals in the District do not adversely impact upon sub-regional green infrastructure assets, for example Earlswood Lakes and linear features such as rivers, canals, old railways and cycling routes. Opportunities should be sought to enhance these assets wherever possible.

John Macarthy-Filgate, The Stratford and Warwick Waterway Trust Ltd

2. Paragraph 8.4.5 where it relates to flood attenuation, recreation and leisure facilities the development of a high quality GI network links to Domain 1 from PH Indicator Framework - Improving the wider determinants of health. Aligns with NICE guidance in relation to increasing physical activity (PH2), prevention of cardiovascular disease (PH25), physical activity and environment (PH8), mental wellbeing and older people (PH16), preventing type 2 diabetes (PH35) and promoting physical activity for children and young people (PH17).

Emily Smith, NHS Warwickshire - Health Development Manager (Health Inequalities)

3. In relation to allotments, 8.4.7 links to Domain 1 from PH Indicator Framework - Improving the wider determinants of health. Aligns with NICE guidance in relation to increasing physical activity (PH2), prevention of cardiovascular disease (PH25), physical activity and environment (PH8), mental wellbeing and older people (PH16), preventing type 2 diabetes (PH35) and promoting physical activity for children and young people (PH17).

Emily Smith, NHS Warwickshire - Health Development Manager (Health Inequalities)

4. In relation to the Green Infrastructure Study, 8.4.8 links to Domain 1 from PH Indicator Framework - Improving the wider determinants of health. Aligns with NICE guidance in relation to increasing physical activity (PH2), prevention of cardiovascular disease (PH25), physical activity and environment (PH8), mental wellbeing and older people (PH16), preventing type 2 diabetes (PH35) and promoting physical activity for children and young people (PH17).

Emily Smith, NHS Warwickshire - Health Development Manager (Health Inequalities)

5. Para 8.4.15.2 states: "Solihull (along with Coventry) has the most significant deficit in terms of sub-regional GI resources. Earlswood Lakes are easily accessible by train from Solihull (Shirley) as well as from various settlements in Stratford-on-Avon District." We do not understand why this statement is made, nor why Earlswood Lakes should have a direct effect on the Green Infrastructure of Solihull. We do accept that there has to be good cross border relationships but it does not appear to us correct that SDC can, in some way gift the Lakes to Solihull. Neither do we understand your assumption that most of Solihull would divert to Shirley to catch a train the 4 miles from Shirley Station to The Lakes Station. Our assumption is that this would increase travelling distances in the majority of cases and cost much more in parking fees and train tickets going directly to The Lakes. Apart from the "outdoor kit" that most people bring (eg fishing gear, walking gear and bikes) it seems to us to be counterintuitive that people would travel further, pay more and carry less than they would by driving directly to the lakes. Our view is that the most likely group of rail users would be from the Birmingham

District and would be likely to be those based within walking distance of stations on the Stratford Line. Further, the fact that The Lakes Station is currently a request stop may give indication as to the volume of rail passengers using the station.

J Buckley, Earlswood & Forshaw Heath Residents' Association

6. We do not understand why "any increase in green infrastructure features should be reported". We do, on the other hand, understand why "losses of green infrastructure features should be reported". If the area is to be required to accommodate a further 8000 new homes over the next few years, we need more green spaces. This conflicts with the pressure on developing the land for housing and commercial premises, so the proposals need to be laid out clearly and rigorously implemented.

J Buckley, Earlswood & Forshaw Heath Residents' Association

7. As the sub-regional GI Strategy is not yet completed it is suggested the following addition to paragraph 8.4.14, *"An initial study investigating Accessibility GI issues identified the GI assets that are of sub-regional importance. An Ecosystems Assessment was undertaken to highlight the areas of the sub-region that had a deficiency in such assets. Deficiencies were identified as either in:"*

Dave Lowe, Warwickshire County Council - Principal Ecologist

8. DEFRA and Natural England are not convinced that CIL is the mechanism for offsetting biodiversity so it is recommended that the following addition to 8.4.17 is used: *"The Community Infrastructure Levy (CIL) and obligations have potentially significant roles to play in delivering local and strategic green infrastructure requirements that are identified by the District Council, with a tariff being set for developer contributions towards specific projects."*

Dave Lowe, Warwickshire County Council - Principal Ecologist

9. The quality and opportunities of the local environment is a contributory factor in shaping health.

Jasbir Kaur, Warwickshire County Council

Topic: 8.4 Development Management Considerations

No comments received for this section

Topic: 8.4 Delivery and Monitoring

1. The Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Study (2012) will be based on "Connectivity Maps" and scores and there is a potential that this will be used as a measure of delivery. This is one outcome of the Strategy so would recommend that it is referenced in the section to future-proof the Core Strategy. It may be prudent to decide upon this wording on the production of the sub-regional GI Strategy

c) The Habitat Biodiversity Audit, Wildlife Sites and Warwickshire Biological Record Centre Data and Datasets are very important in enacting and monitoring this policy's delivery. With the revocation of PPS9 it is recommended that the following paragraph (or equivalent) be added to the Core Strategy. This is particularly relevant to the delivery of this policy, which is currently being discussed and developed with SDC Development Control colleagues:

8.2.xx Development decisions will be based on current and accurate ecological and geological information. Where reasonable, it is essential that the necessary evidence be collected in order to assess any development proposal. The Council recommends that evidence be obtained from the Warwickshire Biological Record Centre and appropriate surveys are carried out to obtain this evidence.

Dave Lowe, Warwickshire County Council - Principal Ecologist

Consultation Question: Q76

1. The aims are admirable but need to be better integrated! Green Infrastructure is vital to Stratford residents' well-being. It is a health and educational resource and as such should merit greater consideration when developers submit plans; when parking charges are proposed...

Rita Kubiak

2. Yes

Graham Musson - Bearley Parish Council, Mr Robert Lees - Claverdon Parish Council

3. It is important that policy CS 13 is implemented in a practical manner. The current economic climate does not necessarily yield the windfalls that have been available in the past and therefore there may be limited resources to fund green infrastructure through Section 106 or community infrastructure levies. There needs to be an assessment made of what is essential and needs to be provided and what is a "nice to have" if necessary funding is available. Green infrastructure policy should also take into account the need for employment and housing.

Andrew Shirley, Country Land and Business Association

4. The role of Green Infrastructure in protecting and supporting *historic and archaeological settings, sense of place and the distinctive landscape and character* of the District is welcomed.

Rohan Torkildsen, English Heritage (West Midlands Region)

5. What we need is what the NPPF lacks, a general policy to protect the undesignated areas of the countryside.

Mr N A M Butler

6. The aims are laudable but there is no way of knowing what "support", "create a more attractive District", "promote" and "protect" actually mean in practice. Adhering to the bare minimum requirements may satisfy the policy but may not satisfy local residents and realistically, it is unlikely that more funding than the bare minimum necessary will be made available.

J Buckley, Earlswood & Forshaw Heath Residents' Association

7. This was felt to include some good proposals. There needs to be a major replanting of trees in Stratford-upon-Avon town centre as too many have been lost. Generally we should firm up green issues and seek a policy for cross town cycling off road to avoid the danger to cyclists of "sharing" space with cars and lorries.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

8. Natural England very much welcomes the inclusion of policy CS 13 on green infrastructure. However, the policy needs to do more to ensure the provision of new green infrastructure, both within new developments and in the wider GI network. We would be happy to discuss this matter further with the Council.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q77

1. It is necessary to consider green infrastructure being delivered in a number of different ways rather than just through the planning system. There are periodic grants available for habitat creation and there is the on-going support through DEFRA's Environment Stewardship Schemes. Under the Common Agricultural Policy reform proposals for a greening payment as part of the payments offered to farmers for the management of their land. It is important that the District Council do not see planning as the only way of delivering green infrastructure but that there is a need to engage with farmers and find ways in which green infrastructure can be voluntarily provided and funded.

Andrew Shirley, Country Land and Business Association

2. An essential part of the Green Infrastructure (GI) strategy should be the retention and enhancement of floodplains and the restoration of river corridors to help deliver the Water Framework Directive (WFD). In order to establish GI networks it is essential to identify where the best place is for the networks, making use of existing GIS data. This will allow developments to target specific areas for GI and biodiversity off-setting.

Laura Perry, Environment Agency

3. It would help if SDC acknowledged the existence of Earlswood and Forshaw Heath. The majority of maps used by SDC do not identify us. Cycle routes should be created.

Mrs J and Mr M Buckley

4. Green infrastructure development could include utilising the national walks database (long and medium walks seem by and large to bypass the north of the area) to encourage more visitors to such areas by advertising on appropriate websites and in journals. Being joined up to local and national cycle routes would also enhance the area. It would also help if SDC acknowledged the existence of Earlswood and Forshaw Heath. The majority of maps used by SDC do either not identify us or cut us off completely eg. page 105 of the draft Core Strategy.

J Buckley, Earlswood & Forshaw Heath Residents' Association

5. All planning applications could have a single mandatory question: "does this application enhance green infrastructure and how?" It has been suggested that existing open spaces with public access should at all times be protected and only subject to planning if the developer provides substantially more space, open to all without charge and protected from future development. It has also been suggested that a minimum percentage of green areas could be set for the town centre. Agree walking and cycling links should be enhanced (8.4.5)

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

6. At the 2010 consultation, Natural England recommended inclusion of the '*Green Space Standards*' which state that each home should be within 300 metres of an accessible natural green space of at least two hectares (ha) which is equivalent in size to two football pitches. Additionally, each home should also have access to at least one accessible 20ha site within two kilometres (km); at least one accessible 100ha site within 5km; and at least one accessible 500ha site within 10km. It is disappointing to see that these standards have not been cited in the current document. Requiring such standards to be incorporated into development schemes as part of the planning process would be a most effective way of enhancing GI features and networks.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q78

1. Yes

Graham Musson, Bearley Parish Council
Mr Robert Lees, Claverdon Parish Council

2. I think the Strategy needs to include protecting the open spaces west of Shottery around Bordon Hill.

Deborah Griffiths

3. Innovative design should always be encouraged in any location.

Steve Taylor, Set Design

4. There should be a presumption that all existing public open space is retained and enhanced unless it can be demonstrated that an area of equivalent or greater area of public open space could be created nearby that offers multi-functional benefits which outweigh the benefits of the existing open space. This should not include simply turning existing areas of high ecological or amenity value into formal open space at the expense of other existing areas.

Laura Perry, Environment Agency

5. It would be better to have a more robust approach to non-greenbelt green spaces and to make particular efforts to utilise brownfield sites, even at the expense of more four storey buildings.

Gordon Brace

6. Concern expressed. For example, developers already own land which they will wish to develop in due time and will pull out at stops to get their way, including pleading financial loss.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

7. Policy CS 13B i) and ii) is an open invitation to reduce the provision of open space.

Councillor S A Juned

8. Natural England is satisfied that sufficient protection is afforded to existing open spaces within the draft policy.

Mr Jamie Robert Melvin

Consultation Question: Q79

1. Earlswood and the surrounding areas are very popular with visitors from the nearby conurbations of Solihull and Birmingham. The creation of a country park would be a good idea providing any enhancements do not detract from the aspect that the area is open countryside. It is the feature which the visitors say they enjoy about Earlswood.

Mr R Eades

2. I cannot see the benefit of Earlswood Lakes becoming a country park without a full study being conducted. There is already conflict between fisher people and locals re parking as there isn't sufficient parking. Also, how much green belt will be destroyed for car parking, and retail facilities and offices? The Lakes are already an important habitat as well as much used recreational area and they should be left as they are. The SSSIs around the Lakes haven't been considered at all in this policy.

Ewen Cunningham

3. What would be the advantages to the district from pursuing this proposal? Would a Country Park require changes to the infrastructure, additional buildings such as toilets, visitor centres, defined paths, rubbish solutions, policing of 'the abuses' of the fishing facilities. The Earlswood Lakes are extensively used as a recreational area and the designation as a country park would need careful consideration so as to assess the advantages and disadvantages. It would need additional road access, parking and facilities. Most of which would be contrary to the policy regarding development in the Green Belt.

Ms Julie White, Tanworth-in-Arden Parish Council

4. If Earlswood Lakes Country Park is pursued particular emphasis should be paid to enhancing the River Blythe SSSI. The Earlswood Lakes Country Park is likely to offer significant benefits to the residents of the Birmingham area, but less so to the majority of residents in the District. Consideration should be given to the creation of a Country Park in the centre of the District that will provide greater benefits to the residents who live in the area and to wildlife.

Laura Perry, Environment Agency

5. Regarding proposal CS 14 we are not clear what the benefits are. The area is well utilised recreationally already by people from a large geographical area. Questions raised by this proposal include -

- How many extra visitors would "Country Park" status generate?
- How would this new group of visitors inter-react with the fisher folk, particularly on weekends when it is most likely that visitor numbers would be highest and the Lakes are already heavily utilised for fishing; on high days and holidays the Lakes pathways are extremely busy.
- What additional infrastructure would be required eg reception area, toilets, car parking, tea room / retail facilities, study centre, staff accommodation, ranger huts etc
- Businesses already established in the locale should not suffer eg Earlswood Lakes Craft Centre, the local pubs and garden centres.
- How much "green" space would this take up?
- How many full and part time jobs would this create?
- How much damage (additional wear and tear / erosion) would this cause?
- Would we be able to retain the "tranquil recreation" that is currently our most important feature?
- Consideration could be given to making the whole locale, the Lakes and its surrounds a Local Nature Reserve preserving the very features which make the area unique.

Mrs J and Mr M Buckley, J Buckley

6. In 2009, Natural England established an Accreditation Scheme to identify and recognise sites that deliver the core facilities and services expected of a Country Park. We suggest that the Council consults the accreditation scheme handbook and guidance which is available at www.naturalengland.org.uk. Until a detailed assessment is carried out, Natural England cannot comment on such a proposal.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q80

1. It is important that a study be undertaken to demonstrate the economic and social benefits of green infrastructure rather than proceeding on the assumption that the delivery of green infrastructure through the local plan is the best method of delivery.

Andrew Shirley, Country Land and Business Association

2. Yes, we would wish to see projected costing calculations and ring-fenced funding to implement these proposals once quantified, costed and agreed. We do not believe that the costs would justify the changes.

J Buckley, Earlswood & Forshaw Heath Residents' Association

3. Due to the unique structures and historical artifices, this area requires careful consideration. Earlswood Lake and surrounds are visited by thousands of people throughout the year. The attraction for these visitors is "tranquil recreation" and a "natural habitat" (note the SSSIs located around the Lakes, which are not specifically identified by the draft). Local businesses have grown around the site and are now dependent on the trade resulting from visitor footfall. Also, conflict arises between fishermen and other users as car parking is limited and lack of such space is already an issue resulting in conflict with residents.

J. Buckley, Earlswood & Forshaw Heath Residents' Association

4. Allotments - The recent Green Infrastructure study commissioned by the District Council makes clear that Stratford has a below average level of per capita allotment provision. The Town Council is well aware of this problem, and is currently seeking to expand the amount of land available as allotments. Policy CS 13 Section A could include allotments as a specific aspect of green infrastructure to be increased.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

5. There should be a commitment to build adequate cycle routes in towns and approach roads to towns to improve green infrastructure.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

6. Riverside towpaths and footpaths should be enhanced.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

7. Sufficient guidance to improve and secure green infrastructure is not given and there is insufficient protection given to existing open spaces.

Councillor S A Juned

8. We recommend the inclusion of Natural England's '*Green Space Standards*' in order to strengthen the policy.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q81

1. The Council must ensure that new development goes on brownfield sites in the first instance and that the green belt is protected at all costs. This will be in line with the NPPF, S9, which is absolutely clear with regard to keeping the green belt undeveloped.

Mrs J and Mr M Buckley

2. It has become clear from feedback from meetings, workshops and forums that discussed the draft Core Strategy that SDC is going to be quite happy to allow new development on green field sites, even before brown field sites have been re-developed. Developers are apparently already submitting plans for the "feeding frenzy" which isn't too surprising as it's much cheaper for them to develop green field sites than brown field sites. The council must ensure that new development goes to brown field sites in the first instance and that the green belt is protected at all costs. This is in accord with the directions supporting preparing a Core Strategy and will also accord with the NPPF, S9, which is absolutely clear with regard to keeping the green belt undeveloped.

J Buckley, Earlswood & Forshaw Heath Residents' Association

3. Equality Act.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Consultation Question: Q82

1. Para 8.4.15.2 states: "Solihull (along with Coventry) has the most significant deficit in terms of sub-regional GI resources. Earlswood Lakes are easily accessible by train from Solihull (Shirley) as well as from various settlements in Stratford-on-Avon District." We do not understand why this statement is made, nor why Earlswood Lakes should have a direct effect on the Green Infrastructure of Solihull. We do accept that there has to be good cross border relationships but it does not appear to us correct the SDC can, in some way gift the Lakes to Solihull. Neither do we understand your assumption that most of Solihull would divert to Shirley to catch a train the 4 miles from Shirley Station to The Lakes Station. Our assumption is that this would increase travelling distances in the majority of cases and cost much more in parking fees and train tickets going directly to The Lakes. Apart from the "outdoor kit" that most people bring (eg fishing gear, walking gear and bikes) it seems to us to be counterintuitive that people would travel further, pay more and carry less than they would by driving directly to the lakes. Our view is that the most likely group of rail users would be from the Birmingham District and would be likely to be those based within walking distance of stations on the Stratford Line.

Mrs J and Mr M Buckley

2. Annual report on protection for the agreed key public assets.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Draft Core Strategy 2012 - Summary of Representations

8.5 Design and Distinctiveness

1. The quality of design should be paramount. I do not want to see further degradation of the character of rural settlements by the influx of developer style housing with no local context. There should be a presumption for good design which should not mean pastiche. We must push for quality using appropriate materials and where possible support contemporary, sustainable design.

Martin Smart

Topic: 8.5 Strategic Objective

No comments received for this section

Policy CS.15 Design and Distinctiveness

1. Policy CS15 offers insufficient local involvement to reduce the impact of new development on the existing settlement both visually and in character. Too many recent schemes in the District have resulted in repetitive 'chosen from a catalogue' designs which do not harmonise with the existing locality. Para 8.5.7 highlights this concern, and para 8.5.8 notes the essential contribution that local residents and communities can make in the design of developments. However, there is no mechanism proposed for their involvement other than a VDS which, by its nature will be high-level, generic and will pre-date and be unrelated to any individual development proposal.

John C Read

2. A good spatial plan is essential to achieving high quality places and good design, Design Council Cobe believes that getting the spatial plan right is one of the most important tasks planners are undertaking, whether that be at the strategic or neighbourhood level. We have run workshops with local planning authorities to look at how design is being embedded in core strategy documents. The workshops offer local authorities independent informal advice from an expert panel and allowed us to identify the strengths and weaknesses of current approaches to spatial planning and how design, functionality and space are dealt with in planning documents. Cobe publication - 'Planning for Places'. Three key messages - tell the story - set the agenda - say it clearly, needs to be a clear priority for design quality and place-making objectives. Also referred to other Cobe guidance.

Mr Graham Fernandez, Design Council Cobe

3. The Cotswolds Conservation Board welcomes and supports this policy.

Malcolm Watt, Cotswolds Conservation Board

4. We support this policy, including the encouragement of innovative forms of design. However, in the context of heritage assets and their settings, innovative design must not result in buildings that are out of sympathy with, or seek to overshadow, those assets. Regarding Stratford-upon-Avon, the integrity of Stratford's historic centre, the Historic Spine, Shottery, Old Town and the riverside area should not be compromised. The paragraph "Proposals that would damage... the scheme" should be deleted. It allows too much scope for developers to argue the 'public benefit' of their schemes. The protection of the distinctiveness of the local area should be absolute.

Martin Luscombe, Stratford Voice

5. Refer to design of new houses on Sheep Street, Shipston. Please do not give permission for lazybuild modern eyesores when you agree to affordable housing! You would get more support when developments were proposed! You can't leave design to architects!

Mr & Mrs Michael & Olivia Brown

6. We are concerned about the intention within Policy CS15 to impose 'Lifetime Homes' standards on new housing which will inevitably increase costs (and hence reduce affordability) for everyone as well as introducing standards and facilities which may be unwelcome. Different people require different facilities from their new home depending upon their age and mobility and the presence (and absence) of any disability. On average people move home every 8 years and hence the notion that they require a home which can be adapted to meet their needs throughout their life is fanciful.

Bernard Alsop, Noralle Traditional County Homes

7. I approve of the aims of CS 15 which seems like a good balance policy to aspire to.

Peter Jackman

8. Design and materials for all developments need to reflect and interpret the vernacular.

Councillor Jenny Fradgley

9. To ensure retention of the characteristics of landscape, architectural heritage and design consistency, adopted Village Design Statements should be material considerations when determining planning applications.

Mrs Janet Blackwell, Long Compton Parish Council

10. We believe that design should be a key issue in the planning process - too many applications are granted which have poor design which impact heavily upon the character of a settlement and/or the street scene.

Mrs Marie Rendell, Snitterfield Parish Council - Chair

11. It is imperative that density is decreased and garden size increased in rural developments - houses in villages are materially different to houses in towns. I feel small scale developments can be better managed and quality and design better scrutinised. An awards scheme needs to accompany this new approach to rural development to attract and raise the profile of the district. Let's build some houses people really want to live in - sustainable development with room and opportunity to develop later in the life of the property as a key indicator of sustainability. National developers are very business driven and maximising site floor space. This has to change in rural developments.

Kelly Stepney

12. Where developments are found not to be appropriate the designs can be modified in later phases. This will encourage developers to be more engaging and responsive to quality not quantity and give a greater investment in the community.

Kelly Stepney

13. A clear statement is needed to the effect that designs of new buildings in areas dominated by older buildings should reflect the scale and proportion of existing development and that extensions to older buildings should complement the designs and materials of the buildings being extended. Design and distinctiveness Policy CS15 deals broadly with buildings and estates but apart from a brief reference to green infrastructure makes no reference to the provision of gardens in new estates.

Brian Wright

14. The use of the Building for Life criteria as a structure and guide for Design and Access Statements is supported provided that the Council do not seek to apply it as a quantitative standard to be met as that is not how the document is intended to be operated. We understand that the Home Builders Federation together with the Design Council are preparing a replacement Building for Life to which the Council will ultimately need to have regard.

Max Whitehead, Bloor Homes

15. With regard to Lifetime Homes standards, it is not clear from this policy, Policy CS 20 and other paragraphs of the document (eg 9.4.9) whether the Council is seeking to apply a blanket requirement for all new residential development to meet these standards. This should be clarified, and if a blanket requirement is not being imposed, the Council should clearly indicate the expected proportion of any residential development that would be required to meet these standards.

Max Whitehead, Bloor Homes

16. In any case the Council will again need to include this as an additional cost to development as part of its overall assessment of the viability of its overall Core Strategy proposals as required by the NPPF.

Max Whitehead, Bloor Homes

17. Innovative design should definitely be encouraged, taking account of changing building techniques and materials.

Martin Smart

18. All too often exceptional housing design and development is unsupported or compromised through a culture of inhibiting rather than an enabling use of planning policy. There should be a presumption in favour of appropriate development - increasing in cases of architectural significance, smaller sized developments, infill within established settlement confines, between existing development and existing or historical boundary locations.

George Stepney

19. Surprised that Parish Plans (re village design / preferences) are not included in Key Drivers.

Councillor S H Jackson

20. Design and Distinctiveness policy considers connectivity, stating that the layout of development should create a network of streets, footpaths and green infrastructure for public and biodiversity benefit across the site and the wider area whilst protecting existing rights of way. Links to Domain 1 - Improving the wider determinants of health. Aligns with NICE guidance in relation to increasing physical activity (PH2), prevention of cardiovascular disease (PH25), physical activity and environment (PH8), mental wellbeing and older people (PH16), preventing type 2 diabetes (PH35) and promoting physical activity for children and young people (PH17).

Emily Smith, NHS Warwickshire - Health Development Manager (Health Inequalities)

21. We note the reference to Building for Life (BfL) in paragraph 8.5.10. We do not feel that the current BfL is an appropriate tool to judge the design standard of homes. Building for Life is a non-mandatory scheme that was devised by the HBF in 2001 to provide a reference tool for housebuilders. It was never intended to be applied proscriptively. The HBF is currently reviewing BfL in conjunction with the DC-CABE as it is recognised that BfL is no longer fit for purpose as a measure of the design quality of developments. This is because not all schemes, owing to their nature and/or their location, will be eligible for marks against all the 20 points on offer that schemes are scored against. This would place some schemes at a significant disadvantage. Both the HBF and DC-CABE agree it is not appropriate for BfL to be applied as a quantitative measure to assess schemes. The HBF with DC-CABE and others is developing a new BfL assessment that we hope to be able to promote as a tool to promote higher quality development.

James Stevens, The Home Builders Federation

22. We note the reference to Lifetime Homes. In accordance with the NPPF the Council will need to assess the impact of this local requirement on the viability of development.

James Stevens, The Home Builders Federation

23. In general William Davis welcomes the Council's intention to improve development design in the District. However we have concerns with some of the requirements proposed in Policy CS15. Part B of the draft policy reiterates the climate change and sustainable energy requirements of Policy CS2. William Davis again object to this potential policy requirement as detailed above.

Robert Jays, William Davis Ltd

24. Part C of the policy seeks the adoption of Lifetime Homes Standards wherever practicable. We oppose this part of the policy as we believe it will add another cost burden to residential development schemes. We consider this requirement to be contrary to several elements of national planning policy. The government currently shows no signs of supporting or encouraging Lifetime Homes as a planning requirement. The revised 'Code for Sustainable Homes: Technical Guidance (2010)' indicated Lifetime Homes standards were not a mandatory element of the code until level 6, targeted for 2016 and the code itself also remains non-mandatory. In the meantime the Government has pursued accessibility and mobility standards via building regulations.

Robert Jays, William Davis Ltd

25. Further to this we consider the requirement to be inconsistent with national planning policy in the form of NPPF. Again paragraphs 173 and 174 (quoted above) are relevant in terms of policy not putting development at risk and not placing unnecessary burdens on development. We consider requesting Lifetime Homes Standards for new housing to be a further barrier which will limit and constrain development and an example of planning policy acting as a burden to development. In his March 2011 ministerial statement Greg Clark indicated that Local Planning Authorities should "*ensure that they do not impose unnecessary burdens on development*". We certainly consider Lifetime Homes Standards to be one such unnecessary burden that should not be included in future versions of the Core Strategy.

Robert Jays, William Davis Ltd

26. Encouraging to see Policy CS 15 identifies the need for effective design and planning measures to help reduce crime, fear of crime and danger from traffic.

Tim Sanders, Warwickshire Police

27. Character should be protected so no more large estates - dot them about and use traditional materials but not necessary design.

Diane Reeve

28. We believe where it exists the design bible for the countryside should be the Village Design Statement and that this should take precedence over the District Design Guide.

Linda Ridgley, Harbury Parish Council

29. We are concerned that the policy uses the terms "attractive", "distinctive" and even more worryingly "innovative". Design should respect the local vernacular. Distinctive suggests "designed to stand out" and this is exactly what is not needed in rural villages. Design should be well-mannered. As for innovative - it could be bad design and design that was not appropriate to the area, but nevertheless classed as "innovative" by the architect!

Linda Ridgley, Harbury Parish Council

30. Policy CS 15 reflects British Waterways' principles for high quality design. British Waterways promotes key urban design principles that could underpin any area specific design policy for local environments within a waterway corridor. We agree that it is important to resist proposals which damage or destroy features which contribute to the distinctiveness of the local area, which includes the canal corridors within the District and the distinctive environment that they create. The urban design principles include ensuring that where development is proposed adjacent to the waterway, development should be sited and orientated to face the waterway and should enhance the waterway's edge and define external waterside spaces. It is important to create attractive mixed use waterfront development, integrate and utilise the waterspace and the towing path, create active edges to the waterspace, respect the topography, relate to the waterspace and design to a human scale, if waterside development is to be successful and maximise the potential benefits arising from the proximity of the waterway. Ensuring that development is attractive, sustainable, adaptable, sensitive, distinctive, innovative, connected, accessible and safe are all applicable to the design of new development adjacent to the canal corridors within the District. We would suggest that the policy could make specific reference to the inland waterway network and the particular design considerations as detailed above which should be followed to ensure that the waterways are appropriately protected whilst realising their full potential.

Ian Dickinson, British Waterways (East and West Midlands)

31. No objection is made to the inclusion of a design policy as it is entirely correct for the authority to be promoting well thought out design. By way of observation the text of the policy is, in parts, subjective and imprecise. For example the use of phrases such as "high quality" in respect of design and development needing to be "attractive" could prove to be too ill defined and ineffective. In short the design of a proposal is either appropriate given the character of the locality or it is not. Likewise what may be considered attractive to one person may not be to another. The policy should be recast to avoid such ambiguous references.

CALA Homes (Midlands) - 2 different responses
Persimmon Homes (South Midlands) Ltd

32. The references to adopting Lifetime Homes Standards are noted. As this policy develops it will be important that this requirement is not applied too rigidly and to all residential development. This is on the basis that the standards are discretionary and whilst a number of housebuilders do meet them voluntarily they should not be compulsory through planning policy. Any policy assumptions regarding the delivery of Lifetime Homes Standards would need to be subject to cumulative viability testing as referred to in paragraph 5.2 of these representations.

CALA Homes (Midlands) - 2 different responses
Persimmon Homes (South Midlands) Ltd

33. The reference to Building for Life criteria are noted. As with Lifetime Homes Standards, Building for Life is a non-mandatory scheme and should not be rigidly applied. It was devised by the HBF in 2001 to provide a reference tool for house builders. It is our understanding that the HBF is currently reviewing BfL in conjunction with the DC-CABE and therefore its continued reference within the policy may no longer be appropriate.

CALA Homes (Midlands) - 2 different responses
Persimmon Homes (South Midlands) Ltd

34. For all its fine words, CS 15 is no more than a wraith of DEV.1 and where the present policy has edge and bite, the proposed one has only aspirations. Use words such as "scale", "height" and "massing" if you want to produce something that will stand up to cross-examination at a public inquiry.

Mr N A M Butler

35. Policy CS 15 states: "...are expected to be...". This statement is subjective and needs to be changed to "must be". Again, "distinctiveness" needs to be specifically defined and "significant public benefit" is also subjective and needs to be defined. "Wherever possible" is a meaningless subjective statement and should be deleted.

J Buckley, Earlswood & Forshaw Heath Residents' Association

36. CS 15 (b, c, g, h, i): "Should" is subjective and needs to be changed to, for example, "must".

J Buckley, Earlswood & Forshaw Heath Residents' Association

37. CS15 (d): "Harsh surroundings" is subjective and needs an objective definition.

J Buckley, Earlswood & Forshaw Heath Residents' Association

38. The two concluding paragraphs need to be amended to remove the subjective auxiliary verbs "should", "would" and "will" and replace them with, for example, "must". Again, "local distinctiveness" needs to be defined as it is subjective.

J Buckley, Earlswood & Forshaw Heath Residents' Association

39. I have no quarrel with any of this.

Gordon Brace

40. The most important principle is to maintain the character and distinctiveness of the town. However, appropriate innovative design should be welcomed to prevent the District being preserved in aspic. It has been suggested that these questions dodge reality, which is that the principles / guidelines are good, but that the delivery in practice often contradicts the intentions. This is due to certain gaps in aesthetic appreciation by planners; developers' ability to present attractive bargaining infrastructure; councillors' hazy understanding of good design in a particular proposals; stress at committee to get something through.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

41. We must stop developers putting up swathes of their standard 'identikit' designs which offer nothing to the character of the town. Innovative, possibly, but more importantly, distinctive.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

42. Parts of this refers to Design and Access Statements but there is no reference to (*Local Plan Review*) DEV.9 Access for People with Disabilities and at the present time the 'access' parts of these are usually ignored. The Lifetime Homes Standard is good but is done to the minimum ie. the ground floor toilet is not large enough for a wheelchair which defeats the purpose.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

43. The reference within the policy and supporting text to Design and Access Statements being structured in accordance with Building for Life is not supported. Building for Life was developed by the HBF and was not intended to be applied prescriptively. Further it is currently under review. We therefore suggest that given the detailed nature of Policy CS 15 there is no need for a reference to Building for Life to be included.

Orbit Homes, Taylor Wimpey UK Ltd, Barwood Developments Ltd

44. There is no logical or practical case for imposing blanket requirements for Building for Life standards for new development. The issue of affordability should be taken into account.

Bernard Alsop, Noralle Traditional County Homes

45. The policy is comprehensive and adequately deals with the principles and issues relating to design and distinctiveness within the District.

Follett Property Holdings Ltd

46. The reference to Lifetime Homes Standards is noted however is addressed in Policy CS 15. Its inclusion in Policy CS 20 is therefore unnecessary and should be deleted. Notwithstanding, it is important that this requirement is not applied too rigidly and to all residential development. This is on the basis that the standards are discretionary and whilst a number of house builders do meet them voluntarily they should not be compulsory through planning policy. Indeed it is important that, when considered cumulatively with other policy requirements, the provision of Lifetime Homes Standards does not threaten viability and thwart development coming forward.

Persimmon Homes (South Midlands) Ltd

Topic: 8.5 Sustainability Appraisal Implications

No comments received for this section

Topic: 8.5 Explanation

1. The police already work well with SDC and the community forums but are concerned that the increase in housing will impact on resources (financial and people) and the style and location of new developments are a key issue for them.

Alan C. Bartlett, Local Strategic Partnership

2. Noralle prides itself on the design and quality of its traditional country homes. Indeed, with regard to paragraph 8.5.9, the company recently won the Single-House award. They do not however consider that it is necessarily wise to impose 'Building for Life' standards to all new homes in the form of a blanket coverage. Higher space standards and additional features for the elderly and disabled may be welcome for specific client groups, but for those households not needing those facilities it will simply impose additional costs and hence have an adverse impact on affordability. House-builders will invariably provide additional bespoke adaptations and facilities where the customer needs them - but age and disability do not follow a standard pattern and hence wasteful expenditure on extra facilities is not a sensible use of scarce resources.

Bernard Alsop, Noralle Traditional County Homes

3. "The involvement in communities..." paragraph should include consultation with local communities not only their pre published statements/plans. This is to get up to date thoughts and wishes. In some instances parish plans etc have been used to support positions not desired by the community. It is impossible to word a document for all eventualities and so consultation is essential.

**Ms Rebecca Howes, Mappleborough Green Parish Council
Councillor Justin Kerridge**

4. Given that the clue is in the heading - Assets, Mappleborough Green Parish Council would like to support the notion that once identified all assets within the district are preserved, and nurtured in the case of organic assets.

Ms Rebecca Howes, Mappleborough Green Parish Council

Topic: 8.5 Development Management Considerations

1. Although I agree with the principle of a Local Design Review Panel I am concerned over the qualifications of those involved. They need to have some training and be objective to ensure we do not experience nimbyism. I am also very concerned about the qualification of representatives of local communities in making decisions about design.

Martin Smart

2. Whilst we recognise the need for a policy which seeks to ensure the highest standards of design which reflects the character and distinctiveness of its surroundings, we are concerned that a reliance on Design Review Panels, as set out in paragraph 8.5.13, could place unnecessary burdens on new development and lead to delays in delivery.

St Modwen Developments Ltd & The Bird Group

3. If there is to be a Design Review Panel then it should include people who know the locality intimately and understand the individual characteristics of each community.

Linda Ridgley, Harbury Society

Topic: 8.5 Delivery and Monitoring

No comments received for this section

Consultation Question: Q83

1. The quality of the built environment whether rural or urban is a priority. With regard to houses they should create an internal environment that improves the well-being of occupants. Natural daylight and decent space provision are essential and impact on the appearance of dwellings.

Martin Smart

2. Yes - Design requirements identified in the current or subsequent village / parish plan and or Neighbourhood Plan which is in force at the time of the planning application, should be clearly stated as part of the policy.

Ms Jane Cove

3. Policy CS15 requires new homes to be built to Building for Life standards. In each instance this will add costs to a project. Whether or not new homes are built to Building for Life standards should be optional as not all people would want to compromise with the internal arrangements that Building for Life implies. Some people prefer to move house when they need the design features associated with a Building for Life. If this requirement is maintained then it will be necessary to take it into account when considering the total burden on any development as recommended in paras 173 - 177 of the new NPPF.

David and Angela Tucker

4. The explanatory text of CS15 (8.5.13) also requires schemes where design is *a key concern* to be subject to a developer funded design review panel process. In all schemes design could be considered by some as a key concern. this requirement will add delay and cost to any scheme. It is not justified and the normal planning process should be allowed to take its course other than in *exceptional schemes of a district wide significance*.

David and Angela Tucker

5. We believe that Village Design Statements (VDSs) and Parish Plans which cover appropriate design for their area should be a major consideration.

Linda Ridgley, Harbury Society

6. New builds must be in keeping with existing housing re character and size.

Mrs J and Mr M Buckley

7. Designs must be sympathetic to their surroundings and new builds must be in keeping with existing housing character and size.

J Buckley, Earlswood & Forshaw Heath Residents' Association

8. This policy should be sufficiently flexible so as to encompass new technologies and building materials to meet with the carbon neutrality targets.

J Buckley, Earlswood & Forshaw Heath Residents' Association

9. While a comprehensive list of key design principles is given, there is no mention of climate change adaptation at point (c) where it is stated that *'a building should be flexible enough to allow changes to be made to meet the needs of the occupier, adopting the Lifetime Homes Standards wherever practical.'* This is a point flagged in the Sustainability Appraisal which states that:

'The section "Adaptable" does not make reference to climate change adaptation. To ensure this policy reflects the need to respond to climate change, the policy wording for criteria C should be amended to incorporate text relating to responding to climate change. For example the layout and orientation of a building could be designed to maximise the potential for natural ventilation and cooling to respond to heat waves associated with extreme weather events. Clearly, citing the need for the design of buildings to respond to anticipated levels of climate change would ensure this policy is robust, when viewed against the aspirations of the SA objectives.'

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

Consultation Question: Q84

1. Yes

Graham Musson - Bearley Parish Council, Stephen Marchant

2. The market will dictate whether innovative schemes come forward.

Bernard Alsop, Noralle Traditional County Homes

3. Stratford District has a distinct heritage and character. Innovative design forms would clash with the existing architecture and therefore should be discouraged.

Mr R Eades

4. Innovative design should definitely be encouraged, taking account of changing building techniques and materials.

Martin Smart

5. Yes, providing they are in keeping with the Village Design Statement.

Mr Robert Lees, Claverdon Parish Council

6. Not unless you can define what "innovative design" is! The phrase is dangerous being open to wide "interpretation". It could be bad design and or design not appropriate to the area but nevertheless still capable of being defined as "innovative".

Linda Ridgley, Harbury Society

7. We should encourage this, especially where local architects and designers invest time and effort in producing empathetic designs that will enhance the area.

J Buckley, Earlswood & Forshaw Heath Residents' Association

8. Appropriate innovative design should be welcomed to prevent the District being preserved in aspic.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

9. Natural England supports the use of innovative design, provided that they are sensitive to the surrounding landscape character.

Mr Jamie Robert Melvin, Natural England - Land Use Operations Team

10. Innovative schemes will come forward in response to market demand. It is not something that policies can dictate.

Bernard Alsop, Noralle Traditional County Homes

Consultation Question: Q85

1. In the housing developments can more space be allocated per dwelling and more greenery. A bus station is a priority for the town.

R. Burman

2. You refer to the Stratford District Design Guide and only later to Parish Plans and VDS which as we have pointed out give a more detailed understanding of the history, design and needs of individual communities. In this you are in danger of demanding "high quality architectural design" without reference to well mannered local vernacular development and worryingly emphasise innovation in design.

Linda Ridgley, Harbury Society

Consultation Question: Q86

No comments received for this question

Consultation Question: Q87

1. You advocate the use of Local Design Review Panels which must include people from the locality being considered.

Linda Ridgley, Harbury Society

Section 9 – Spatial Strategy

9.0 The Preferred Option for Development

1. Paragraph 9.09 should be clarified by adding: "If the number of homes in one of the locations in Table 1 is exceeded then the numbers in the other locations will be reduced pro-rata."

Reason: as currently described, each location number is a target (being a fixed percentage of 5600) meaning that a total of more than 5600 homes could be built if the number of homes in one location is exceeded for any reason. Presumably any reduction to the totals in Table 1 resulting from permissions since 1 April 2011 will be similarly pro-rata.

John C Read

2. We support the new approach being taken here which appears to be a sensible and workable approach.

Waterloo Housing Association

3. Whilst I agree with the approach SUA have taken, I am concerned that the schemes which come forward with the right amount of sports provision, both built and outdoor. I note that there may be policies which will encourage this but I believe that there needs to be strong links to the new housing and other development.

Sport England

4. In 9.012, 41% of the respondents showed a clear preference to a wider dispersion. However, in context the 41% is 132 people out of an electorate of 80,000.

Section 9.03 of the LDF states that the District Council's Cabinet have opted for a housing figure of 8000 this primarily based on a lower net in-migration as Figure A Projection 2 of the Hearn Report.

The GL Hearn Executive Summary recommendation XLI to plan on the basis of housing in the 11,000-12,000 range to create a robust and positive framework for development of the District would also have increased focus on more efficient and determined utilisation of brownfield sites due to its greater environmental impact. Clearly there are significant risk factors associated with under provision by some 30% of the recommended as such any deficit in planning would somehow need to be met somewhere in the region. This in time may well prove to be impossible due to the absence of a regional mechanism.

There are also some important inconsistencies for example, in section 9.03 the findings of GL Hearn Housing Provision Options Study are substantially amended whilst it is listed as a Key Driver in Section 9.1.

Graham Musson, Bearley Parish Council

5. Upon implementation and completion of Option F an immediate stop should be placed on all building within the district! This is essential to retain what little character the area has left.

Bernard R Pumfrey

6. Ufton Parish Council has considered SDC's Draft Core Strategy and requests that the following is noted:

- i) We have agreed that a Housing Needs Survey shall take place during the coming months.
- ii) We believe that this survey may show that there are certain areas within our Parish where limited development may be appropriate.
- iii) Such developments should be a mixture of social, affordable/starter homes for people with village connections plus a small number of medium size family houses.
- iv) It should be infill rather than fringe development.

Clerk to Ufton Parish Council

7. Paragraph 9.03. We support the rationale of the District Council's Cabinet decisions regarding:

- i) Aim for lower net in-migration
- ii) Lack of certainty in the GL Hearn based forecasting
- iii) GL Hearn has not assessed the contribution of Tourism to the local economy where visitors, not residents are the economic driver
- iv) Preserve the special nature of the District
- v) Duty to protect our countryside for future generations
- vi) No need for mass building in Stratford-upon-Avon.

While we do not oppose the housing figure of 8,000 we note the lack of certainty in the forecasts and we believe that more analysis is needed to support this increase over the previous target of 7,500 (which the council has opposed at the RSS examination in public, when it had proposed a figure of 5,600.)

Paragraph 9.04. We support the following policy preferences to provide a new strategic direction for the Core Strategy:

- i) New housing to be dispersed across the District
- ii) Preserve the character of settlements
- iii) Maximum estate sizes of 100 homes, but aim for small developments, especially in rural settlements.
- iv) Re-use brownfield sites, in preference to new greenfield sites.

Paragraph 9.06. We support Option F (preferred option).

Martin Luscombe, Stratford Voice

8. It is very important that the new Core Strategy can be finalised as soon as possible so that the final decision by Eric Pickles on the developers' appeal on the proposed building of 800 houses at Shottery can be made to reflect the new strategy, rather than the out of date top down existing Core Strategy. I hope that the required urgency will be given to this as a decision to support the developers here would be totally against the strongly held views of most residents, contrary to the belief in 'localism' claimed by the Coalition government.

Gordon Harrington

9. From my understanding Stratford Council have backtracked on the previously approved development of 800 new homes west of Shottery. This will mean a larger proportion of new development will be borne by rural villages. This will have a far greater impact on local village infrastructure than has been suggested in the report. The village I live in is not geared for the revised 20% growth on existing dwellings. There are no major businesses or employers in the village. No train station, only a bus service. An extra 150 households commuting in cars from my village daily is the furthest from a green decision that I can think of. Surely building a higher density of dwellings on the

edge of existing towns makes far more sense. The infrastructure, the employment and the shops are already there, available locally. This is a far greener decision, reducing transport by residents and lowering the carbon footprint of Stratford Council residents. Please reconsider your plans for further housing, I do not support my local Council overburdening small villages with superfluous housing.

Thomas Wilson

10. Support Option F - the smaller settlements can not cope with more than this figure.

Paul Harvey - Morton Bagot, Oldberrow & Spennall Parish Council

11. The Council's new Core Strategy represents a clear shift in policy and a welcome emphasis towards supporting local communities rather than stifling development. This can then assist the revival and survival of local communities. Noralle welcomes the new strategic direction within paragraph 9.04; especially the intention to:

- i) Disperse new housing across the District,
- ii) The recognition of the need for a strong growth of family homes,
- iii) The need to encourage building to overcome the deficit of 3 bedroom housing,
- iv) The limitation of estate type development to 100 dwellings - with the size of sites being broadly proportional to the size of settlement,
- v) The emphasis on the re-use of brownfield sites (where possible) in preference to the use of greenfield sites.
- vi) The need to preserve the character of settlements.

We therefore support the adoption of Option F (wider dispersal). However, we do not accept the comment (in paragraph 9.09) that in reality the development totals will be less than stated in Table.1. In practice, despite the housing requirement being eroded by the inclusion of sites which already have planning permission at the base date, these will be offset against those consents which will be required at the end of the plan period to cater for new housing beyond the plan period (2028 onwards).

Noralle Traditional Country Homes

11. STC welcomes the statements on preferred options but would argue that they should be strengthened by reference to them as 'Development Principles' rather than options. With regard to the list of stated 'policy preferences', STC would single out three of being of particular importance to the future development of Shipston:

- i) Strong growth of affordable family homes
- ii) Preserve the character of settlements
- iii) Maximum estate size of 100 homes but aim for small developments especially in rural areas (p 79).

Mrs G Beaumont, Shipston-on-Stour Town Council

12. The document only contains a table of proposed dispersal figures for the planned 5600 homes until 2028 rather than the planned 8000 homes since 2008. It should contain a further table of the dispersal of the full 8000 to make visible the full dispersal across the district 2008-2028.

Councillor Ian Fradgley

13. We do not agree with the wider dispersal approach. The proposal to locate 50% of the housing need in the rural areas lacks sustainable credibility. While some development in local centre villages may help to retain existing facilities the main problem is a lack of employment opportunities. Wide dispersal will not reduce the need to travel. Given the small scale and dispersed pattern of development it will not facilitate sustainable modes of transport and reliance on cars in rural areas will not only continue but will increase to the detriment of emissions. We would prefer a more sustainable approach that provided most housing close to jobs i.e. Stratford-upon-Avon and Main Rural Centres but provided for community-led development in the Local Service Villages and other settlements,

where a local need has been identified. At all levels of the settlement hierarchy there appears to be an insufficient emphasis in the strategy to encourage developers to re-use brownfield sites ahead of greenfield sites.

Councillor D A Stone

14. The suggestion that 50-55% of new housing should be in rural villages is disproportionate. The infrastructure is inadequate. Our school is nearly at capacity and has no room to expand. The sewers at the southern end of the village are only 6". We are in an AONB, the skyline has already been completely altered by huge farm buildings. The only type of housing that I would deem as acceptable would be genuinely affordable housing, enabling younger people to stay in the village. We are one of the villages deemed to be 'most deprived of public transport'. Surely housing should be in easy reach of places of work.

Lindsay Forbes

15. We consider that the draft Core Strategy Housing Strategy is fundamentally flawed because it is based on a housing figure which is too low. The proposed housing figure of 8000 dwellings for the plan period 2008-2028 is contrary to the objective assessment of the District's housing needs contained within the GL Hearn Housing Options Study Report. That report was commissioned in March 2011 and recommended to the Council that a housing target of 11,000 - 12,000 dwellings should be provided over the twenty year period. In coming to this conclusion, the GL Hearn Report pointed out the consequences of accepting a lower housing figure in terms of restricting economic growth.

The 8000 housing figure is based upon Option 3 of the GL Hearn Report which, at the time, was acknowledged as a high risk strategy. It is a housing strategy which makes a reduced allowance for net in-migration. It, therefore, and is wholly dependent upon cross boundary co-operation with neighbouring districts; These discussions have not been held and there is therefore a high risk that the strategy will fail. It assumes that Stratford District Council will be able to deflect some of its housing needs to neighbouring authorities; that assumption has not been tested or proven.

The housing target will not facilitate economic growth and would therefore be at odds with strategic objective No 4 of the draft Core Strategy.

The housing target is a substantial reduction in the annual housing rate in the previous Local Plan (550 dwellings) and is significantly lower than the actual completion rates that were achieved in the period 2001-2006 (545 dwellings per annum).

The housing strategy as currently drafted will place the Core Strategy at risk of being found 'unsound' because it ignores conclusions which have been reached in its evidence base.

Harris Lamb

16. A simple example of the conflict between the Draft Core Strategy and the NPPF relates to the Council's Preferred Option for Development as outlined in Section 9 (Spatial Strategy). In paragraph 9.03 it notes that on 5th September 2011 the District Council's Cabinet opted for a housing figure of 8000 dwellings for the district to cover the plan period from 2008-2028. This was in response to the GL Hearn Housing Provision Options Study Final Report which was published in June 2011. A series of bullet points is then given for the rationale for adopting the figure of 8000 dwellings including an aim for lower net in-migration and 'no need for mass building in Stratford-upon-Avon'. Notwithstanding, at paragraph XIV in the Executive Summary of the GL Hearn Study the following Statement is made in relation to the housing need and demand in the District over the plan period:

"A realistic assessment of housing need and demand taking account of demographic trends and demand arising from anticipated future economic performance within the District would fall between 10,000-13,000 dwelling range for the 2008-2028 plan period". (our emphasis)

On the basis that the Preferred Option for Development in the District proposes just 8000 dwellings there is a clear conflict with the NPPF in that the draft Core Strategy is not planned to meet objectively assessed needs set out within GL Hearn's Housing Provision Options Study. Indeed, at paragraph 47 of the NPPF it states that in order to boost significantly the supply of housing, local planning authorities should:

"Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area....identifying key sites which are critical to the delivery of housing strategy over the plan period".

The draft Core Strategy is unsound on this basis by planning for substantially fewer homes than are actually required.

Rego Southam Limited - submitted by Quod

17. The Strategic Housing Land Availability Assessment (SHLAA) indicates that 2,605 dwellings can be provided on sites that accord with the current local plan policies. Therefore, currently constrained sites will need to be allocated to ensure the housing required for the District can be delivered. Sufficient sites have been identified in the SHLAA to provide up to 18,500 dwellings, if existing policy constraints on greenfield sites are relaxed. Although additional greenfield sites will be required to deliver a higher housing target, this does not have to be at the expense of the District's most valued and protected landscapes or character of existing settlements. There are a number of sites across the District, including the two identified in this letter, where existing policy constraints are not overly restrictive and which are well-related to existing settlements. By undertaking a comprehensive assessment of potential housing sites in the District, appropriate sites can be allocated to accommodate higher levels of housing whilst minimising the impact on the district's landscape and character.

The National Planning Policy Framework requires local authorities to use their evidence base to ensure that their local plan meets the full "objectively assessed needs" in the District. On this basis, the current housing target is clearly insufficient as it fails to meet the identified housing requirement in the District, a requirement demonstrated by the LDF evidence base. the Core Strategy is therefore unsound.

In the context of the above points, the housing requirement should be increased to be reflective of the housing need and demand, and to ensure an enhanced contribution to the growth of the local economy. It is proposed that a housing requirement of at least 10,350 dwellings is outlined in the Core Strategy. A figure in this region would go further to addressing the housing need and demand that has been evidenced, and would enable the Council to achieve a key objective of its Corporate Strategy, which is to address local housing need.

CEMEX - submitted by Drivers Jonas Deloitte

18. Housing Options Study Plan period

In looking in detail at the components included in the Housing Options Study, there are flaws that need correcting. These relate to the plan period which is too short and to the RSS figures used for comparison in Projection 10.

The plan period should be 2006-2028. The study relies on the latest CLG Household Projections 2008 (Revised) and this helpfully updates the evidence base moving on from the RSS Phase 2 Revision Panel Recommendations that relied on 2006 household projections. However, it takes the increase over the period 2008-2028 rather than 2006-2028. Stansgate consider the latter period to be appropriate and over this period the projections show an increase of 15,000 households rather than 14,000 relied on in the Study. As a result the overall conclusion needs to be updated and increased to take account of the 22 year plan period rather than 20 year.

It is also noted that Projection 10 in the Study compares the RSS Phase 2 Revision Panel Recommendations but relies on 7,500 houses over a 20 year period. This fails to take account of the Panels complete recommendation that an additional 2,500-3,000 dwellings are needed in the period 2021-2026 over and above the 7,500 and whilst this may not affect the overall conclusion of the Study it distorts the comparison (Panel Report Rec No.3.1 p87).

The Plan Period

The Plan should make provision for housing for the period from 2006 not 2008. It seems to have lost any reference to the period 2006-2008 and provides no reasoning why the start of the period has been amended.

The effect of this is to ignore two years of housing need and demand. The base date of 2006 originates from the Regional Spatial Strategy Phase 2 Revision (RSS) and whilst it is accepted that following the abolition of the RSS the District can set their own targets, the Localism Act introduces a duty to co-operate to ensure coherence with neighbouring authorities strategies. Adjoining authorities of Solihull, Redditch and South Worcestershire plan from 2006 and Stratford on Avon needs to be in accordance with this.

The figure of 8000 houses is based on a 20 year period and leads to an annual delivery rate of 400 houses (8000/20yrs) and in this event this figure is found to be justified (which Stansgate believe it should not) it needs to be projected over the 22 year period of 2006-2028. This would increase the level of required provision by 800 dwellings.

It is right to extend the length of the plan period to allow for 15 years post adoption and this reflects other plans in the West Midlands but those other plans all retain 2006 as the start of the period.

We support the recognition that even the smallest of settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing.

Linfoot Country Homes Ltd - submitted by Stansgate Planning

19. We support the recognition that even the smallest of settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing.

Taylor Wimpey UK Ltd - submitted by Stansgate Planning

20. We agree with the approach that the Council should maintain a dispersal option as this provides the most appropriate way to meet the Districts housing needs to 2028 and we support the recognition that even the smallest of settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing.

Mr J Warhurst - submitted by Stansgate Planning

21. We agree with the approach that the Council should maintain a dispersal option as this provides the most appropriate way to meet the Districts housing needs to 2028 and we support the recognition that even the smallest of settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing.

Mrs J Kirkham - submitted by Stansgate Planning

22. Housing Options Study Plan period

In looking in detail at the components included in the Housing Options Study, there are flaws that need correcting. These relate to the plan period which is too short and to the RSS figures used for comparison in Projection 10.

The plan period should be 2006-2028. The study relies on the latest CLG Household Projections 2008 (Revised) and this helpfully updates the evidence base moving on from the RSS Phase 2 Revision Panel Recommendations that relied on 2006 household projections. However, it takes the increase over the period 2008-2028 rather than 2006-2028. Stansgate consider the latter period to be appropriate and over this period the projections show an increase of 15,000 households rather than 14,000 relied on in the Study. As a result the overall conclusion needs to be updated and increased to take account of the 22 year plan period rather than 20 year.

It is also noted that Projection 10 in the Study compares the RSS Phase 2 Revision Panel Recommendations but relies on 7,500 houses over a 20 year period. This fails to take account of the Panels complete recommendation that an additional 2,500-3,000 dwellings are needed in the period 2021-2026 over and above the 7,500 and whilst this may not affect the overall conclusion of the Study it distorts the comparison (Panel Report Rec No.3.1 p87).

The Plan Period

The Plan should make provision for housing for the period from 2006 not 2008. It seems to have lost any reference to the period 2006-2008 and provides no reasoning why the start of the period has been amended.

The effect of this is to ignore two years of housing need and demand. The base date of 2006 originates from the Regional Spatial Strategy Phase 2 Revision (RSS) and whilst it is accepted that following the abolition of the RSS the District can set their own targets, the Localism Act introduces a duty to co-operate to ensure coherence with neighbouring authorities strategies. Adjoining authorities of Solihull, Redditch and South Worcestershire plan from 2006 and Stratford on Avon needs to be in accordance with this.

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It is right to extend the length of the plan period to allow for 15 years post adoption and this reflects other plans in the West Midlands but those other plans all retain 2006 as the start of the period.

The Glebe Committee - submitted by Stansgate Planning

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It is right to extend the length of the plan period to allow for 15 years post adoption and this reflects other plans in the West Midlands but those other plans all retain 2006 as the start of the period.

We support the recognition that even the smallest of settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing.

Walton Estates - submitted by Stansgate Planning

24. I remain deeply suspicious about the real need for new housing when it has been reported that there are upwards of 2 million empty, boarded up, potentially derelict houses throughout the UK.

Jeannie Farr

25. Supporting text to Section 9.0 of the Draft Core Strategy clearly identifies that:

- Past versions of the Core Strategy did not allow the potential for rural areas to sustain themselves by encouraging new development and therefore keep key services and community facilities running (paragraph 9.02);
- Cabinet has expressed a preference to disperse housing growth across the District, aiming for small development especially in rural settlements (paragraph 9.04); and
- Past public consultation showed clear preference for a dispersal of housing development across most settlements (paragraph 9.012).

Christ Church

26. Total housing numbers required should not be under estimated by adopting a recession based mindset There are positive knock on affects by allowing builders to build again. Small builders employ local tradesmen using locally sourced materials and build high quality product that will stand the test of time.

27. Wider dispersal is essential to maintain thriving village communities on every level - local shops, schools, transport, pubs all depend on vibrant village life being maintained. The preferred option over the plan period, to maintain growth in LSVs at about the historical trend rate of growth since the

1950s is in my view not sufficient. Support more extensive dispersal to take account of increase internet based working from home, and the likely increase in size of major employers such as Aston Martin and Jaguar Land Rover.

28. The plan should give people a choice where to live. For example why must someone who is recently employed at Gaydon need to re-locate his family to a housing estate in Stratford.

29. Wider dispersal will also mean that affordable housing will come forward at a rapidly increased rate when paid for by the market housing on village developments.

30. Two independent reports show the future requirement to be 12,000 houses across the district. Since the release of the GL Hearn report, Aston Martin and Jaguar Landrover have created an additional 1,000 jobs. In the depths of a recession businesses in the private sector both small and large area responding. This trend is not adequately reflected in Council's projected figure of 8,000.

31. I also have concerns about the 5,600 figure.

Set Design

32. Section 9 of the Spatial Strategy refers to the Localism Act and there no longer being a need for the District to provide the level of housing identified in the West Midlands Regional Spatial Strategy and that a new figure can be determined that is based on more up to date evidence. The most up to date evidence that the Council has is the Stratford on Avon District Housing Provision Options Study report June 2011. Reference is made to paragraph 9.61 that refers to the options and trade offs and the need to give weight to environmental economic and social considerations.

33. A robust framework for development in the District should plan on the basis of housing in the 11,000 - 12,000 range over the plan period 2008 - 2028.

34. District Council's Cabinet decision of 5th September 2011 to opt for a housing figure of 8000 dwellings for the District for the plan period (2008-2028) is based on the following rationale. Aiming for lower net in migration; lack of certainty in the GL Hearn forecasting; GL Hearn not assessing the contribution of tourism to the local economy; the need to preserve the special nature of the District; the duty to protect our countryside and there being no need for mass building in Stratford upon Avon.

35. We consider the reasons are not supported by a cogent and objective evidence base. There is no rational evidence presented to substantiate the assertion that the impact of tourism on the local economy justifies a lower provision of housing. There is also no rational evidence presented that the scale of provision recommended by GL Hearn would harm the special preserve of the District. We are concerned that the contention that greater provision would lead to mass building in Stratford upon Avon is not based on sound and rational planning judgement.

JS Bloor (Tamworth) Ltd, Gallagher Estates & Pettifer Developments Ltd Barwood Developments Ltd

36. There is little scope for a lot of new build or infill in our Parish. Other settlements to the south feel that their infrastructure will be under threat without more houses. The District should ask for volunteers to take on more housing at a level they want. This should be part of a consultation exercise.

Tanworth-in-Arden Residents and Neighbourhood Watch Association

37. Paragraph 9.04 - Policy preferences for the Core Strategy do not include detail highlighting the importance of adequate access to primary health care facilities.

NHS Warwickshire

38. Section 9.03 - The first point of this paragraph is to 'Aim for lower net in migration'. RBC feel this risks being an un-deliverable aspiration as there is no strategy or arrangement to reverse the in - migration.

39. The fourth point of this paragraph is to 'Preserve the special nature of the district'. It could be made clearer which special character this is referring to, is this environmental characteristics? If this is the case it should be supported by the Sustainability Appraisal that suggests insurmountable environmental issues of meeting housing needs where it arises.

Redditch Borough Council

40. Dispersal of housing - To suggest overturning yet another recognised local policy would risk putting local service villages like Earlswood and Tanworth as identified in the Plan in danger of losing some of its Green Belt and Conservation Area Protection. Neither of these villages has the infrastructure or transport facilities to support a large quantity of new housing.

Mr & Mrs J T & CA Waters

41. The Preferred Option for Development - The HBF has reservations regarding Council's approach to the identification of its housing requirement.

42. It is unclear why the Council considers that the figure of 7,500 is an appropriate housing requirement for the district and not the 8,000 identified in the GL Hearn Study.

43. The figure of 8,000 dwellings is also unjustified. It not clear why this is deemed an appropriate housing requirement for the district and not the 11,000 - 12,000 households recommended by the GL Hearn Study. The GL Hearn Report recognises that the lower option 3 (8,200 dwellings) represented a 25% reduction in net in-migration. The report cautioned against the lower target for the following reasons.

- It could only be considered as part of a sub-regional strategy aiming to direct most new housing supply demand elsewhere;
- If not part of such as strategy, then there is a high risk of the option being found unsound at Examination in Public.
- It falls well short of meeting housing need and demand.
- Does least to support the local economy, leading to a significant reduction in the local labour supply / workforce.
- Would hinder the achievement of a more balanced population structure with a reduction in the number of persons under 60 and an increase in the number of people over 60.

44. It is also unclear why the figure of 680 dwellings per year as identified in the SHMA Market Review 2009 study or the 13,600 homes over the 20 year plan period (2008 - 2028) has been dismissed as inappropriate. The latter figure is comparable to the figure recommended by the Cambridge Centre for Housing and Planning Research figure in its 2008 report on the levels of provision in the West Midlands RSS. The 2008 based Household projections indicate a growth of 14,000 households in the period 2008 - 2028 and this is the same figure as the figure recommended by the NHPAU for the district. This needs to be better explained.

45. Paragraph 9.03 explains the reasons for opting for a housing requirement for 8,000 dwellings. One reason is the aim of lower net in-migration. The Core Strategy does not explain how the Council will achieve this aim. Restricting housing supply to discourage migration would not be consistent with the NPPF (paragraphs 17 & 47). The Council could legitimately argue that the protection of the Countryside and character of the district assumes greater importance than new housing supply but we would need to see a better analysis to show that a higher level of house building would be injurious to these objectives.

46. Stating that there is no need for mass building in the district would appear to be contradicted by Council's evidence base in the SHMA Market Review 2009 which indicates the need for 13,600 over the plan period.

47. It is unclear how the GL Hearn Report of June 2011 meets the requirements of the NPPF, in particular paragraph 159 that requires LPAs to prepare a SHMA to assess full housing needs by working with neighbouring authorities where housing market areas cross administrative boundaries. It is not clear why the 2009 SHMA has been discounted in favour of the GL Hearn report even though the latter report does not meet the core requirements of a SHMA.

48. Paragraphs 9.04 - Unclear what the rationale is behind fixing the maximum estate size at no more than 100 homes. This needs to be better justified.

The Home Builders Federation

49. Section 9 Preferred Option for Development - Paragraph 9.04 - This section does not support the likely demographic projections. It would be sensible to develop a strategic approach to care of the elderly to include in migration of the elderly. Children often move parents to be closer to care for them in old age.

50. Paragraph 9.08 - At 1st April 2011 about 2,400 of the 8,000 dwellings were accounted for by having been built, under construction etc in the period 2008 - 2011. How does this relate to the overall dispersal and the ratio of future distribution.

Councillor Hazel Wright

51. Paragraph 9.03 from the Core Strategy is an attempt to provide a rationale for this housing figure, and sets out a number of bullet points, most of which were minuted following the Cabinet meeting. On this basis, there is nothing to suggest the failure to meet the identified need and demand arising in the District is supported by credible evidence. This is particularly important in the context of the statutory requirement placed on local planning authorities, namely the duty to co-operate, introduced by the Localism Act 2011. Other than very limited reference to the duty to co-operate contained in Section 2 of the Draft Core Strategy, there is no evidence produced to suggest that the District has engaged constructively, actively or is doing so on an on-going basis in order to demonstrate compliance with this statutory requirement, in circumstances where it is proposing not to meet need and demand for housing arising.

52. Paragraph 9.08 does not accord with planning policy contained in the NPPF in relation to the identification of deliverable or developable sites. Paragraph 47 of the NPPF and its attendant footnotes is clear as to the appropriate tests to be applied to the supply of sites that the Council believes already exists, and we believe that simply adding all the sites with planning permission or brownfield sites compliant with existing policy as identified in the SHLAA, without any form of careful analysis and therefore appropriate and prudent discounting, to be contrary to these tests.

Bloor Homes

53. The comment 'a significant amount of development within the district over the last years had centred on Stratford-upon-Avon' is not supported by evidence. Indeed, it is quite contrary to evidence.

54. Paragraph 9.04 of the Draft Core Strategy refers to new housing dispersed across the District. There is no evidence to support this policy

55. SDC's reason 1 'no need for mass building in Stratford-upon-Avon' has no basis in reality. SDC is not like the Channel Islands that imposes restrictions on property purchases by non-residents. Development in rural areas is more likely to attract retirees to the district than existing residents

seeking employment in one of the District's urban settlements. The dispersal policy seems to be inconsistent with the aim of lower net in-migration.

56. Housing growth is supported by the GL Hearn Study, that only considered the District at a macro level.

57. It is hard to see what evidence the Working Group had for the idea of dispersed growth. the minutes of the meeting only record the comment about growth having been previously centred on Stratford, and as we have seen, this is completely contradicted by the evidence.

58. Before the SDC Cabinet meeting of 5th September 2011, the GL Hearn Report was considered by the LDF Working group that commented that 'a significant amount of development within the district over the last years had centred on Stratford-upon-Avon', but this is not supported by evidence.

59. SDC reason 4 to justify the housing options, starting with the words 'GL Hearn has not assessed the contribution of Tourism' ...is rather puzzling. Tourists benefit the local economy by coming to the District by buying goods and services. Tourists buy from people providing those goods and services, and if they are not selling the local economy suffers.

60. Housing needs to be where the jobs are, and the dispersal approach does the opposite. The policy will lead to a significant additional strain on infrastructure and transport. It is therefore not surprising that Lepus Consulting found CS16 Spatial Distribution of Development was among the policy options likely to lead to negative effects. The dispersed approach of the Core Strategy is therefore not sustainable and does not meet the aim of the NPPF.

61. Reason 6 (paragraph 9.03) 'no need for mass building in Stratford-upon-Avon' has no basis for reality.

Welford-on-Avon Parish Council

62. Preferred Option for Development - Housing Target

William Davis strongly oppose the preferred option for development outlined in the Core Strategy both in terms of overall housing target identified in the plan period and the proposed approach to the distribution of residential development.

63. The housing target of 8,000 dwellings goes against the recommendations of Council's evidence base (GL Hearn report), but also ignores advice given to Council by officers at the Cabinet meeting of 5th September 2011. The GL Hearn report favours a housing target of between 11,000 and 12,000 dwellings. The report indicates that this is a robust and positive target that would contribute to achieving social and economic objectives. The GL Hearn target would be consistent with the NPPF, particularly regarding meeting the needs for market and affordable housing in paragraph 47. The 8,000 figure proposed in the Core Strategy is considerably lower than this recommended figure and is lower than all three options recommended in the GL Hearn report.

64. Planning Officers at the 5th September 2011 Cabinet meeting identified the robust nature of the GL Hearn report and indicated that going against the recommendations would be difficult to defend in front of a planning inspector. William Davis Ltd agree with this view. If Council continues to ignore this evidence then alternative evidence is needed to disprove the findings of the GL Hearn report. We are unaware that such evidence has been produced. The officers also question whether such evidence could be produced to challenge the work of GL Hearn.

65. Another key point made by both GL Hearn and Council Officers relates to the duty to co-operate in section 10 of the Localism Act. The GL Hearn report indicates that their option 3 (8,230 dwellings) is based on a 25% reduction in net in-migration to the district. the report indicates that should such as

figure be used then agreement would be needed with neighbouring authorities to absorb growth from Stratford-on-Avon District. The 8,000 figure being proposed is lower than option 3 of the GL Hearn report. We note that no mention is made of cross boundary agreement of housing targets and the potential impact that a reduced target in Stratford will have on neighbouring authorities in the list of cross boundary issues in paragraph 2.3.2. We consider that the Council has not adhered to the Duty to Cooperate in terms of the identified housing target.

66. William Davis Ltd object to the proposed housing figure as it is not consistent with the NPPF. It is not supported by credible and robust evidence that supports Council's decision to ignore the GL Hearn evidence document.

67. We support the GL Hearn housing target of between 11,000 and 12,000 dwellings. This figure would support economic growth and would be based on credible evidence. We recognise that such as target will have environmental impacts. Nevertheless GL Hearn's sustainability assessment of the recommendation does not indicate that this level of development would give rise to unacceptable environmental costs.

68. Council's 2009 SHLAA Review identifies a potential housing supply of over 18,000 dwellings. William Davis recognise that not all this land supply can and will come forward for development. Only 60% of potential supply would be needed to meet the lower end of the GL Hearn recommendation of 11,000.

William Davis Ltd

69. The provision of 8,000 homes should be the minimum for the District, but should be adjusted in line with the most recent ONS Household projections.

70. Paragraph 9.04 - encouraging the strong growth of affordable housing is an appropriate aim, but it should be recognised that in providing suitable market housing for aspirational moves, to free up housing which is more affordable at the lower end of the market.

Bluemark Projects Limited

71. RPS strongly objects to the Core Strategy's proposed figure of 8,000 dwellings for the plan period 2008 - 2028.

72. The GL Hearn Housing Option report contains three main options. Option 1 is trend based. Option 2 is economic lead. Option 3 is 25% reduction in in-migration. The consultants recommendation of a minimum of 11,000 net additional houses for the period 2008 - 2028 are a material consideration as it is the most up to date evidence.

73. At a recent Kipling Road appeal, the GL Hearn figure of 11,000 - 12,000 homes was verified by the Chelmer Model that was used to demonstrate a need for 12,125 additional dwellings to meet housing needs. the latest official government population projections indicate a level of household change of 14,440 between 2008 - 2028. The SHMA Review 2009 Study identified a figure of 680 dwellings per year or 13,600 homes over the plan period.

74. The Cabinet chose to depart from the GL Hearn recommendation of 11,000 - 12,000 dwellings and to go for 8,000 dwellings base on the following rationale:

- Aiming for lower net in migration;
- Lack of certainty in the GL Hearn forecasting;
- GL Hearn not assessing the contribution of tourism to the local economy;
- The need to preserve the special nature of the District;
- The duty to protect our countryside; and
- There being no need for mass building in Stratford-upon-Avon

75. The Cabinet figure of 8,000 dwellings is below the 8,200 dwellings proposed in GL Hearn's Option 3 - 25% reduction in net in-migration. The consultant's comments on this option were as follows:

- Would need to be part of a sub regional strategy aiming to direct most housing demand elsewhere;
- Falls well short of meeting identified housing need and demand;
- Does not support the local economy;
- Hinders achieving a balanced population structure;
- Would benefit the environment; and
- Most likely preserve the character of the District overall but would have higher economic and social cost.

76. To identify that there is no need for increased levels of house building in the district would be contrary to Council's SMHA Review 2009 that indicates the need for 13,600 dwellings over the plan period.

Heart of England Cooperative Society Ltd

77. On 5th September 2011, Cabinet opted for a housing figure of 8,000 dwellings. This is based on the following rationale:

- Aiming for lower net in migration;
- Lack of certainty in the GL Hearn forecasting;
- GL Hearn not assessing the contribution of tourism to the local economy;
- The need to preserve the special nature of the District;
- The duty to protect our countryside; and
- There being no need for mass building in Stratford-upon-Avon

78. The reasons are not supported by cogent and objective evidence. There is no evidence to substantiate the assertion that the impact of tourism on the local economy justifies a lower provision of housing. There is also no evidence to suggest that the scale of provision recommended by the GL Hearn report would harm the special preserve of the District. The contention that greater housing provision would lead to 'mass building in Stratford upon Avon' is not based on sound and rational planning judgement.

Brian Lewis

79. We support the figure of 8,000 dwellings for the district in the plan period, as well as policy preferences outlined in paragraph 9.04.

80. Object to paragraph 9.08 that notes 2,400 (brownfield sites) of the 8,000 dwellings have already been accounted for. There is no certainty of delivery of these sites or any indication that they are suitable in site specific terms. The number of dwellings from these sites in the SHLAA (2009) should be added to the 5,600 dwellings. The Core Strategy needs to be clear that more than 5,600 dwellings will need to be allocated in the Site Allocations DPD.

Gloucester Diocesan Board of Finance

81. The Housing provision Options Study represents a robust and credible evidence as to the overall housing provision for which the District should plan over the period 2008 to 2028. The report is clear in concluding that a robust yet positive framework for development in the District would be provided by planning on the basis of a housing requirement in the 11,000 to 12,000 range.

The housing requirement figure of 8,000 is the least robust and credible option, which has not been tested by the Council in respect of setting out the social and economic implications of planning to deliver this level of housing in the plan period. This would mean that the Council are at risk of not seeking to provide the full housing requirements of the District contrary to paras. 14, 156 and 159 of

the NPPF and by constraining housing growth would potentially constrain growth in the economy and/or increasing the level of commuting into the District.

CALA Homes (Midlands), Ainscough Strategic Land, Persimmon Homes (South Midlands) Ltd

82. Sensible policy. Paragraph 9.04 regarding the re-use of brownfield sites is preferable even if it is a one off development. Brownfield presumably means previously developed or lapsed sites which were subject to planning approval.

Councillor George Atkinson

83. Support paragraph 9.03 - 0.05, but do not support numbers 1 and 2 in paragraph 9.011. Favour number 4 and 6 in paragraph 9.011.

Gordon Brace

84. Support the Strategy for spatial distribution away from Stratford-upon-Avon as proposed in the Core Strategy.

85. Object to the proposed development size of 100 homes per estate or 2% of existing housing stock. Council's published figure of 2,800 dwellings for Southam would lead to a maximum of 56 houses per estate, which is an artificial cap. Sites should rather be considered on their merits.

Fisher German LLP

86. No evidence has been provided to warrant a departure from the previous distribution of development. Rather the Sustainability Appraisal (SA) published alongside the Third Draft Core Strategy identifies very obvious potential adverse effects in respect of the Spatial Distribution of Development (policy CS 16), Economic Development (Policy CS22) and Countryside and Villages (CS25) in the following terms:

- Increasing housing within the rural areas will support car dependency as public transport and other sustainable modes of transport are limited in most areas- this is likely to have potential adverse effects in regard to climate change;
- The absence of infrastructure development in the rural areas could lead to adverse effects on the efficiency of existing transport networks throughout the District and on the integrity of the countryside; and
- The cumulative impacts of increased development throughout the rural countryside may result in significant increases in road use.

The potential adverse effects represent a marked difference from the conclusion of the SA of the first and second drafts of the Core Strategy, which found the distributions of growth within both these consultation documents, with a greater proportion of growth at Stratford-upon-Avon, as being wholly appropriate. Moreover, the 'Assessment of Options for Locating Future Development' conducted in conjunction with the 2010 Core Strategy confirmed the suitability of a strategy which 'spreads development around most towns and villages throughout the District; this represented a 'dispersal' of development across the District, albeit with a greater proportion of growth focused at Stratford-upon-Avon (28% of all new development compared with 10% in the Third Draft Core Strategy) than the Third Draft Core Strategy. 'The Assessment of Options for Locating Future Development' document states:

'Overall, a dispersed approach is considered to be most appropriate compared with other reasonable options available, this is known as the 'preferred option'. This includes an element of many other options rather than concentrating most development in a particular settlement or location. However, the manner in which this approach is put into effect should reflect and be sensitive to the specific circumstances of each settlement.'

In light of this evidence, it is clear that the distribution of growth within the Third Draft Core Strategy does not reflect the most appropriate strategy for the District.

87. We also note that on 16 January 2012, the District Council Cabinet resolved to commission additional research in order to establish whether the distribution of growth within the Third Draft Core Strategy could be delivered and to further understand the impacts of such a policy preference. As such, the Core Strategy cannot be considered as being justified and therefore cannot be considered as being sound.

88. A lack of a robust and credible evidence base to support this less sustainable strategy is obviously highlighted on each settlement plan which states that :

' The potential development options are not at this point evidence- based and they are presented for discussion and consultation.'

It is plainly obvious that the distribution of growth outlined in the draft Core Strategy is not supported by a robust and credible evidence base and therefore it is not justified and represents an unsound basis to proceed in future iterations of the Core Strategy. In the absence of a robust and credible evidence base, there can be no certainty that the strategy is deliverable. As such, in its present form the consultation document can not be considered as being effective, which again raises serious concerns over its soundness.

89. The GL Hearn Report stated in relation to Option 3, that they *'foresee significant risks associated with progressing Option 3 in the absence of a regional planning mechanism, in that the District Council might have to identify how the under provision against assessed need/ demand would be met elsewhere in the region.'* The report concluded that a robust yet positive framework for development in the District should plan for a housing provision of between 11,000- 12,000 dwellings. This level of growth was considered achievable. To plan for lower level of housing would be contrary to the robust and credible evidence, would not be justified and would therefore be an unsound proposition. The strategy would risk the identified demand and need within its District not being met. This is in itself contrary to the central tenets of the national planning policy as outlined in the NPPF (paras 47 and 159)

90. It is clear from this analysis that each of the options meets economic, environmental and social objectives to differing degrees. It is however, important to note that the paragraph 152 of the NPPF encourages local planning authorities to meet each of the economic, environmental and social dimensions of sustainable development when formulating Local Plans. In selecting a level of 8000 homes, the Local Authority has placed an increased importance on the environmental considerations at the expense of both social and economic dimensions of sustainable development, at a point where no evidence has been presented which would indicate that a higher level of development could not be delivered. Comprehensive proposals to the west of Shottery, which have been previously identified as being suitable and would contribute towards socio, economic and environmental benefits appear to have been unjustly disregarded in the third draft of the Core Strategy.

J S Bloor (Tewkesbury) Limited and Hallam Land Management, Mrs G Lines

91. Spatial Distributions of Development - Overall housing numbers - object to the 8,000 figure as it is not based on a robust evidence base. Council's own evidence recommends a higher number.

92. Aim for lower net-immigration - In-migration cannot be prevented. Failing to plan for this will simply serve to restrict the supply of housing in the District and as a consequence increase the price of housing. It is usual practice to take a 10 year migration trend and plan on this basis.

93. Lack of certainty in the GL Hearn based forecasting - note sure what more certainty is required. At the S78 appeal at Land South of Kipling Road, Stratford-upon-Avon the Appellants household projection modelling was found to be robust and was not challenged by Council. The Appellants considered 12,125 dwellings to be an appropriate figure over the period 2006 - 2026.

94. Impact of tourism on local economy - It is acknowledged that tourism is a big economic driver, it is not sufficient to simply say that this results in visitors being the economic driver for this sector. Tourism is also a big source of local employment and results in a need for affordable accommodation for the local workforce. Paragraph 8.64 of the WMRSS Panel Report (founded on a robust and credible evidence base) stated Stratford town represents the optimum location for substantial affordable housing to address the local shortage of workers in the tourism, cultural and local services sectors.

95. Preserve the Special Nature of the District - All District's have special natures this does not absolve the District Council from the need to provide sufficient housing and employment to meet its need.

96. Duty to Protect the Countryside - This is not unique to Stratford and does not mean the sufficient housing and employment land should be provided.

97. No need for mass building in Stratford - What is mass building? Proportional development meets housing and employment need and provides suitable infrastructure. Council's evidence demonstrates the need for development in the District.

98. There is no evidence to suggest why the figure of 680 dwellings per annum (13,600 over the plan period) has been discounted.

99. The Phase two WMRSS Panel Report (September 2009) - Stratford-on-Avon should provide 7,500 (net) dwellings between 2006 and 2026.

100. The Panel recognises within its Report that the housing targets for Stratford-on-Avon District depart from the trend based projection of 13,600 dwellings. This is to do with a policy aim of reducing in-migration.

101. ONS population projections have consistently projected a population growth in the order of 1,000 people a year for Stratford-on-Avon District (October 2009). The latter projects a 22,800 population increase between 2006 and 2026.

102. DCLG household projections have consistently projected household growth of 600 - 700 households growth per year for Stratford-on-Avon District (2006 - 2026 - 13,000 households). Stratford-on-Avon District is pursuing a housing requirement well below this range raises concerns.

103. ONS net in migration levels for Stratford-on-Avon District is 1,000 people or more a year. If propensities were to be maintained, the 2008 based projections show that the likely hood is that annual net migration could be expected to increase the figure from 1,200 in 2010 - 11 to 1,400 from 2020-21.

104. The above figures demonstrate that Council is failing to provide sufficient housing over the plan period and that subject to production of further evidence, a figure in the region of 12,000 - 14,000 new dwellings is more appropriate.

Orbit Homes, Taylor Wimpey UK Ltd, Barwood Developments Ltd

105. Paragraph 9.05 - Would like to see Parish / Town Council agreement (or extensive / meaningful community engagement) a requirement for any development above 100 houses or 2% of existing stock.

Justin Kerridge

106. The Draft Core Strategy include a low housing delivery target; in addition, it does not include a contingency to account for the non delivery of sites given that Greg Clarke is quoted as saying that: "not every site that is earmarked for development, turns out in practice to be deliverable. Problems

arise. So you always need to have something of a buffer to make sure that the number you plan for is deliverable." Therefore with the NPPF seeking to include a further 5% buffer so as , "to ensure choice and competition in the market for land", it is considered that in order to provide for this, the housing requirement should be increased accordingly. This will ensure that there is additional flexibility and would ensure that schemes can come forward but do not saturate the market or to over burden local infrastructure and communities.

It is considered that the draft core strategy does not provide sufficient flexibility with regard to future housing growth to be wholly consistent with the NPPF to be considered a sound document.

Codex Land

107. Providing the dispersal approach delivers sustainable pattern of development we would support a dispersal policy.

108. Some villages and Main Rural Centres may benefit from rural growth as this could help sustain local services including local schools. However, in Stratford most of the schools are at or near capacity. A dispersal policy with a 100 homes cap would not assist in the proper provision of school places.

Warwickshire County Council

109. In looking in detail at the components included in the Housing Options Study, there are flaws that need correcting. These relate to the plan period which is too short and to the RSS figures used for comparison in Projection 10.

The plan period should be 2006-2026. The study relies on the latest CLG Household Projections 2008(Revised) and this helpfully updates the evidence base moving on from the RSS Phase 2 Revision Panel recommendations that relied on 2006 household projections. However, it takes the increase over the period 2008-2028 rather than 2006-2028. Stansgate consider the latter period to be appropriate and over this period the projections show an increase of 15,000 households rather the 14,000 relied on in the Study. As a result, the overall conclusion needs to be updated and increased to take account of the 22 year plan period rather than 20 year.

110. It is noted that Projection 10 in the Study compares the RSS Phase Revision Panel Recommendations but relies on 7,500 houses over a 20 year period. This fails to take account of the Panel's complete recommendation that additional 2,500-300 dwellings are needed in the period 2021-2026 over and above the 7,500 and whilst this may not affect the overall conclusion of the Study, it distorts the comparison (Panel Report Rec No 3.1 p87).

111. The Plan should make provision for housing for the period from 2006, not 2008. It seems to have lost any reference to the period 2006-2008 and provides no reasoning why the start of the period has been amended.

The effect of this is to ignore two years of housing need and demand. The base date of 2006 originates from the RSS Phase 2 Revision and whilst it is accepted that following the abolition of the RSS the District can set their own targets, the Localism Agenda introduces a duty to co-operate to ensure coherence with neighbouring authorities strategies. Adjoining authorities of Solihull, Redditch and South Warwickshire plan from 2006 and SDC needs to be in accordance with this.

112. The figure of 8,000 houses is based on a 20 year period and leads to an annual delivery rate of 400 houses (8,000/20yrs) and in the event this figure is found to be justified,(which Stansgate believe it should not) it needs to be projected over 22 year period of 2006-2028. This would increase the level of required provision by 800 dwellings.

It is right to extend the length of the plan period to allow for 15 years post adoption and this reflects other plans in the West Midlands, but those other plans all retain 2006 as the start of the period.

South East Southam Land Owners Consortium, Mrs G Lines, Banner Homes (Midlands), Walton Estates

113. If the housing need is not met in full in the District, then this should be recognised in the cross boundary issues and the 'Duty to Co-operate' as laid out in the Localism Act must be adhered to if the housing provision of the 8,000 is to be justified.

114. The delivery of this level of housing from smaller settlements with limited housing stock on sites that are no more than 2% of the existing stock (as required by Policy CS16) is likely to present an issue with the number of sites required and the ability of those sites to bring forward new infrastructure. For example to deliver the average of 57 dwellings per LSV:

- existing dwelling stock of 200
- each new site would be no more than 4 houses
- about 15 sites would be needed
- no affordable housing would be delivered

In this scenario it becomes clear that affordable housing would not be delivered as the other policies of the plan would not require it on sites of 4 houses. Therefore a substantial proportion of the housing provision would be solely market housing.

Mrs G Lines

115. Some villages have a greater ability to accommodate development than others and a high proportion of the housing provision is therefore appropriate, but to set this in context, there are 39 LSVs which would equate to an average of 57 dwellings to be built in each with a further 560 dwellings to be built in the rest of the rural areas. This is a significant burden for some of the smaller villages, many of which currently have less than 200 dwellings and Pillerton Priors which has just 105 dwellings. It is also a major shift from the 20% (950) proposed to LSV in the 2010 Draft Core Strategy.

Mr R Chabra, Banner Homes (Midlands), Walton Estates

116. The monitoring of planning permissions and completions would enable adjustments to be made so as to ensure that the broad thrust of the preferred approach is achieved.

Follett Property holdings Ltd

117. Strongly object to the proposed 8,000 dwellings for the plan period 2008-2026. The District Council commissioned GL Hearn to undertake a Housing Provisions Options, assessing three main options. The study provides a conservative recommendation that housing provision should be a minimum of 11,000 net additional dwellings. These findings are a material consideration as the most up-to-date evidence base to inform the LDF process and the growth of the district to 2028. The GL Hearn provision of 11,000 -12,000 homes has been further verified by the evidence presented at the recent Kipling Road appeal, which used an alternative model, the Chelmer Model (that demonstrated a need for 12,125 additional dwellings to meet the needs of the additional households which are projected to form by 2026.

Heart of England Cooperative Society Ltd

118. The housing objectives fly in the face of the statement about 2,400 new dwellings already under way and a further 5,600 are to be dispersed throughout the district with a massive 50% to infiltrate 39 small villages and some hamlets risk losing their special qualities, destroying the green belt and the lives of existing residents. How on earth have these figures and distribution ideas been calculated in the first place? They seem totally out of balance.

Mrs J A Hewitt

119. Need to lay down phasing requirements to prevent the whole of the 16 year allocation being built within a few years. The NPPF allows windfalls to be included where there is a record of windfall development. Stratford must surely qualify as having a substantial record of windfall development.

Councillor Peter Moore

120. The Preferred Option is not a significant revision to the RSS figure; the RSS proposed 375 units per annum whereas the Draft Core Strategy proposes only 400 units per annum. The advice from GL Hearn was clearly towards a significantly higher figure; the Draft Core Strategy will fail to adequately meet local needs. The net figure for new sites also assumes that all extant planning permissions and brownfield sites will be developed - an unrealistic assumption.

BNP Paribas Real Estate

121. It is critical that prior to submission the plan is refocused on establishing a robust and increased District-wide housing delivery figure as well as providing a strategy for delivering a suitable level of housing supply across the District as well as within the rural villages and key settlements.

Identifying that there would be no need for increased levels of house building in the district would be contradictory to the Council's produced evidence, such as the SHMA Market Review 2009 that indicates the need for 13,600 dwellings over the plan period. The SHMA also highlights that the affordable housing figures suggested by its modelling are greater than the District's total dwelling requirements and targets, so the consideration of sites for development across the breadth of the District remains pertinent to ensure the delivery of sustainable communities.

Restricting housing supply, whether it be to discourage perceived population migration would not be consistent with the NPPF which requires local planning authorities to identify and plan positively for growth, whilst also more importantly meeting assessed needs. The proposed housing figure is not supported by a robust evidence base and will fail to meet the housing needs of the District. Therefore the Core Strategy should not be considered to be sound as presently drafted.

Trustees of W A Weaver

122. It is critical that prior to submission the plan is refocused on establishing a robust and increased District-wide housing delivery figure and a spatial approach which appropriately focuses on Stratford-upon-Avon as the key settlement in the District.

Whilst it is recognised that regional plans will be revoked, the strategic planning issues addressed in the 2009 Panel Report relating to Stratford still remain an important planning consideration until more up to date evidence is provided.

Miller Strategic Land and Taylor Wimpey

Topic: 9.0 Tab 1 - Options E and F

1. We support Option F (preferred option).

Paragraphs 9.010-9.017 - Background to development of Spatial Options, which cover superseded policies from earlier drafts, add nothing to the document and could cause confusion. They should be removed.

Martin Luscombe - Stratford Voice

2. Support Option F and the wide dispersal of future housing development across most settlements in the District and in particular the allowance for some development in the smaller villages, to provide scope for the needs of these communities to be met and to help sustain the services that they support.

Edward Crookes - Althorpe Estate

3. Dispersal of housing is an excellent idea. It will prevent intensive housing estates, encourage a diversity of design and boost the micro-economies of localities. It will also contribute to making houses affordable for the young and appropriate for the elderly.

Will Hanrahan

4. We support the adoption of Option F (wider dispersal). However, we do not accept the comment in 9.09 that in reality the development totals will be less than stated in Table 1. In practice, despite the housing requirement being eroded by the inclusion of sites which already have planning permission at the base date, these will be offset against those consents which will be required at the end of the plan period to cater for new housing beyond the plan period (2028 onwards).

5. In the context of Napton, it is important that any development at the Brickyards site (near Napton) falls within the *brownfield* category, to avoid the figure coming out of the Napton (Local Service Village) requirement. In any event, the proposed Brickyards development is likely to take the form of live/work units which falls outside the housing use class (C3).

Noralle Traditional County Homes

6. I support the preferred option for development Option F (560 houses in Stratford). It is not just a matter of the number of houses, where they are built is also important. New housing should not be allowed on greenfield sites or where it reduces garden size. New housing should not be allowed where it further erodes wildlife habitat. New housing should be limited to brownfield sites with the proviso that the sites are not of value for wildlife. many species are in decline or threatened with extinction. We should be helping them to recover, not worsening the situation. Such thinking should underpin all development.

Peter Landsman

7. Option F. I believe that no more houses should be built.

Wyndham Perring

8. I agree with the preferred option of building no more than 560 houses in Stratford. Stratford has borne the brunt of too much recent development and is in danger of losing its market town appeal.

Pat Johnson

9. The provision of up to 1,680 dwellings in the main rural centres (which includes Southam) is restrictive and contributes towards the District's housing needs not being met.

Rego Southam Limited

10. We find the proposed distribution under both Option E and Option F has moved too far towards growth in the Local Service Villages and other rural areas, distributing a high proportion of the provision to settlements that in some cases have few existing dwellings and a relatively poor level of facilities that may lead to an unsustainable pattern of development which is contrary to national guidance. This will be even more the case if the housing provision levels are increased (in line with other objections made by Stansgate). A lower proportion of the overall level of housing provision would easily allow scope for the needs of larger villages to be met and to help sustain the services they contain whilst creating a sustainable pattern of development with more growth in the Main Rural Centres.

it would therefore be more appropriate for a proportion of the percentage distribution for the Local Service Villages to be redirected towards the Main Rural Centres and some to Stratford upon Avon as the most sustainable locations. The bulk of the housing which remains for the Local Service Villages should be directed towards the larger, more sustainable settlements, with less for the smaller ones, thus ensuring development complies with national and local sustainability objectives and does not harm the character of individual settlements. It is therefore important that the dispersal option remains, but with a greater focus on larger settlements.

Mrs E Creek, The Glebe Committee, Mr R Chabra & Banner Homes (Midlands)

11. Option F, the Preferred Option, indicates that 10% of the outstanding requirement should be met in the villages below Local Service Villages, amounting to 560 dwellings across the District. Whilst we support the provision of housing to meet identified local needs in those smaller settlements we are concerned that this level of development is not fully justified. The Council should provide evidence that this level of housing is needed to meet local needs and can be accommodated in the smallest settlements without harm to sustainability objectives and the character and appearance of the locality as clearly some settlements are more able to accommodate development than others.

Duchess Dudley Charity

12. Housing dispersal will create pressure on transport infrastructure. For many villages, including my own I am not opposed to housing development but do have serious concerns about the ability of the road infrastructure to take extra traffic in particular the junction of Langley / Warwick Roads as well as the general width of local lanes. Any development in Claverdon must not add traffic to the above junction or to Langley Road which already sees 50-100 vehicles parking at the local Primary School each day. In addition the ex Village shop extension on the corner of Langley Road / Warwick Road increases the danger for vehicles exiting onto Warwick Road. Cars permanently parked on the L/H/S within 100 metres of the junction exacerbate the safety issue. Any development in the village must include alternative road access that takes traffic away from this junction. I can see that this will apply equally to other villages so any dispersal will have to be accompanied by a comprehensive review of the local road network with a commitment to develop the infrastructure to accommodate potential increased traffic volume.

Richard Moss

13. My preferred option would be for the widest possible dispersal, Option E. This is based on the figure of 5600 only. If the figure is revised upwards as I would expect, I suggest that further development could occur in the larger settlements up to the sensible figure of 100 per estate. The distribution ratio for the higher total housing figure of 12,000+ should then reflect the ratio included in the preferred Option F.

Steve Taylor, Set Design

16. Generally, the argument against dispersal put forward by the volume house builders (to protect returns) and every conservation/green lobby group (ideology) is based on preventing/minimising car use. In my view this argument lost credibility the day Sir Tim Berners-Lee invented the internet. Many functions that formerly required car use now no longer apply, replaced by ever increasing levels of online shopping and home delivery, downloading of entertainment (no more trips to the cinema), online banking, working from home, entire rural businesses based on the internet etc. During the last plan period engine technology advanced considerably, almost doubling the urban mpg cycle on the average family saloon. This process will inevitably continue during the new plan period. In my view this is not adequately reflected in the degree of weight applied to this particular element of policy - it is still trotted out as a mantra by every newly qualified planner straight out of college.

This prevailing attitude is not questioned enough - in 50 years time we will look back on our reliance on oil in the same way as we now look back on the steam engine!

Steve Taylor, Set Design

17. Any further increase in pupil numbers in Stratford town does bring significant difficulties in terms of current school capacity. A number of expansion programmes at primary and secondary have already been, or are being, undertaken to address the current projected need from the current population. Any further increase in housing will create a significant challenge for WCC in providing sufficient extra places both at early years, primary secondary level and post 16 (*education*).

Warwickshire County Council

18. Generally support the suggested dispersal of new housing across the District, as this should help to keep small villages more viable, particularly if small scale affordable schemes are increased. However larger developments focussed on Stratford-upon-Avon would undoubtedly be more sustainable than other locations, and should be prioritised, avoiding greenfield land where possible.

Mr J Alderson, Mrs Vivienne Smith, Mrs J M Evans

19. Generally support Dispersal Option E, for the reasons stated in response 18. above.

Mrs Vivienne Smith, Mrs J M Evans

20. Serious concerns have been identified concerning the proposed distribution of growth within the Third Draft Core Strategy. These concerns include:

- The distribution of growth does not relate to the proposed settlement hierarchy;
- The distribution of growth is not founded on a robust and credible evidence base;
- The distribution of growth is not the most appropriate strategy when compared against others; and
- There is no certainty that the strategy is deliverable.

The Sustainability Appraisal accompanying the 2010 Core Strategy confirmed the suitability of a strategy which dispersed growth around most towns and villages, albeit with a greater proportion of growth focused at the Main Town (28% or 2,100 new dwellings compared with 10% or 560 dwellings in the Third Draft Core Strategy). This included necessary development allocations to assist with delivering the strategy and importantly providing housing to address the significant shortage that has manifested itself in the District. No evidence has been presented which would indicate the need to depart from these principles.

J S Bloor (Tewkesbury) Limited and Hallam Land Management

21. The housing development options set out within Table 1 of the Consultation Core Strategy acknowledge the housing requirement set by the WMRSS Phase Two Panel totalling 7,500 dwellings between 2006 and 2026.

Taylor Wimpey UK

22. GL Hearn discredited due to failure to consider economic drivers.

W A Lowe

23. Each of the options includes the figure of 560 potential dwellings for Rural Brownfield Sites 2008-2028. This figure is supported although we have suggested a range of 500-600 dwellings, but we would point out that as the 500 dwellings permitted at Long Marston is already included in the dwellings permitted figure, and there is no potential for additional dwellings at Southam Cement Works until the end of the Plan, and none at Gaydon, the bulk of this potential is at the Harbury site. It is for that reason that we think it is important that the revised policy for the site includes the requirement for a Housing Market Area Assessment so as to define local needs, and ensure that the site can meet this potential requirement including affordable housing. In addition the site can cater for District-wide needs for specialised accommodation. In conclusion, subject to these changes we welcome the introduction of the policy dealing with Large Rural Previously Developed Sites.

Follett Property Holdings Ltd.

24. In terms of distribution of new dwellings throughout the District we would welcome a wider dispersal of development to ensure that development is spread around most towns and villages in the District.

Godfrey-Payton Chartered Surveyors, Ettington Estate

25. In line with the existing distribution of population, consider that 40% of the District's housing needs can be targeted towards the Main Rural Centres without significant adverse impacts. Instead, this would locate people closer to key services and employment opportunities. This would amount to 4,800 dwellings based on the 12,000 requirement. This approach would still allow the Council to deliver housing across the other Local Service Villages and would still represent a wide dispersal approach to development ensuring significant pressure is not placed on Stratford-upon-Avon.

Ainscough Strategic Land

26. Strongly object to the revised approach to the delivery of housing which only seeks to deliver 10% or some 560 dwellings in Stratford-upon-Avon. In reality this figure is significantly reduced due to existing commitments and will result in no growth at the District's principal settlement. The wider dispersal of housing growth is not in line with the principles of sustainable development as it is likely to increase reliance upon the use of the private car and will not provide homes near to services, retail and employment in Stratford-upon-Avon.

A strong case exists for locating a greater proportion (41% as previously advocated) of housing growth at Stratford-upon-Avon (particularly through the redistribution of growth from the less sustainable Local Service Villages) given its principal settlement role.

Miller Strategic Land and Taylor Wimpey

Topic: 9.0A Background to Spatial Options

No comments received for this section

Topic: 9.0 Tab 2 - Options A to D 2010

1. Column C of Table 2 would be more appropriate. No good reason is apparent for a radical change of policy in so shorter a timeframe. This option is also closer to the proposal in 9.05 to limit estate sizes to no more than 2% of the existing housing stock.

Bearley Parish Council

2. The most sustainable pattern of development will result from a higher level of development in larger settlements, that is within and on the edge of Stratford-upon-Avon and the larger rural towns and villages.

Walton Estates

Consultation Question: Q88

1. Of the reasons listed in para. 9.03 in the Draft Core Strategy, 4 and 5 are factors that should be taken into account when considering any housing development. Reason 2 is very sensible, in that the GL Hearn projections are just arithmetic calculations of different assumptions and not really forecasts. Therefore it makes sense to take a conservative view, and I support the proposed housing figure of 8,000 for these reasons.

Richard Jenkins

2. Unclear why the proposed housing numbers have increased from 7,500 to 8,000. The criteria listed in para. 9.03 would appear to support a reduction in numbers.

Cotswolds Conservation Board

3. The GL Hearn Report indicates a requirement of 8230 homes on the basis of lower net in-migration. With the current 1.5% unemployment level, is this realistic?

Bearley Parish Council
Claverdon Parish Council

4. The target figure of 8,000 additional dwellings over the plan period remains significantly below the GL Hearn recommendation of a target of 11,000-12,000 to meet need without putting significant strain on the District's environment and having positive benefits on the local economy. The option adopted will bring significant risk of negative impacts on economic growth and social objectives. A low level housing target is not complementary to the strategic aims of the Council and is not sustainable over the long term. We strongly recommend the Council adopts the recommended figure of between 11,000-12,000 net dwellings. By adopting a lower figure the Council is at severe risk of failing to enable sufficient delivery of affordable housing. By suppressing the overall level of housing growth, housing developments will be prioritised to those areas with the most viable delivery, preventing delivery in more difficult areas where affordable housing is still needed.

West Midlands Housing and Registered Providers (HARP) Planning Consortium
Tetlow King Planning

5. There should be strict adherence to the District Council's Cabinet decisions to limit the total number of houses to be built in the District to actual need.

Alan Marks

6. The overall level of housing provision set at 8,000 is too low and does not correlate with likely economic growth in the District and the need to rebalance the population to ensure a younger demographic structure. Stratford District has a strong economy with great potential to improve the economic prospects of its citizens through inward and local investment in high value and innovative industries as well as tourism. Already the District has more jobs than there are economically active people living in the District, resulting in a net inflow of commuters. Job prospects and therefore prosperity is likely to increase in the future. To meet the growing investment in the economy it will be important that more housing is built. Stratford District cannot rely on adjoining Districts meeting its housing shortfall. We propose that the District sets its housing supply at somewhere between trend based growth (ie. 10,350 homes over the plan period) and economic led housing growth (ie. 12,950) as set down in the GL Hearn Study.

Geoffrey Prince Associates Ltd

7. The number of dwellings should be fixed at 8000 for the period from 2012 to 2028, as a large proportion of the dwellings consented during the last two years are as a result of the moratorium creating a backlog of unsatisfied demand.

Martin Walker

8. The GL Hearn report recommended that the total level of housing provision should be around 11,000-12,000 dwellings over the plan period. There is no clear justification for reducing the housing requirement by a full 3,000-4,000 dwellings. Nor is there any indication where that shortfall in housing is to be accommodated instead. Essentially it would seem the Council is merely paying lip service to the 'Duty to Co-operate' and wishing away up to 4,000 households which will have a significant social and economic impact on the District.

Noralle Traditional Country Homes

9. The 8000 figure should be an absolute maximum in order to preserve the character of this very special, historic area which attracts millions of visitors each year. We genuinely feel that the Stratford area is a very special case that should be protected from further development if we are not going to destroy the very qualities that visitors enjoy and residents cherish.

Jane & Peter Emmerson

10. Stratford District needs to develop. However the infrastructure appears to be quite delicate in a number of areas and the increases must be able to be supported by all the services normally available.

Tim Phillips

11. I think there is now a real need for extra housing across the region, as we are coming out of a period where new housing has been restricted for some time, provided it is sympathetic to its location.

Peter Jackman

12. It appears there are discrepancy issues regarding the housing figure which need to be resolved before the number can be set.

Mr R Eades

13. No figures have been put forward to support the proposed housing figure of 8,000.

Bidford-on-Avon Parish Council

14. The figure seems to be supported by the SHMA but may change/increase when the current updating work is published, particularly when the impact of recession on housing affordability and housing needs is known and fed into the process.

Waterloo Housing Association

15. Strongly support restricting the number of new dwellings built in the District to 8000. Indeed, have seen no compelling evidence to justify and increase over the 7,500 proposed in the Regional Spatial Strategy. This is because GL Hearn did not adequately take account of the historic character of the District's different landscapes and the history and setting of Stratford-upon-Avon, the market towns and villages. Consequently, its recommendations did not fairly balance the need for housing growth against the harm to the environment, the amenity of residents and the probable adverse effects on tourism. New development should be at a lower rate than in past years and the views of local people should be given greater weight than those of developers.

Long Compton Parish Council & Susan & Andrew Vaile

16. I feel there ought to be more. Reports suggest 12,000 are required.

Kelly Stepney

17. It is too low and will clearly not pass the test of soundness. This plan contains many good things and it will be a shame if it is declared unsound because of very poor decision making on behalf of politicians. A study was commissioned which represents an objective assessment of the housing needs of the District and I see no reason why its recommendations should not be followed.

Reuben Bellamy

18. The Draft Core Strategy is inconsistent with national policy in that the objectively assessed housing needs will not be met in full.

Rego Southam Limited

19. The housing target should be set higher to reflect the levels of housing provision required, as indicated by evidence set out in the Housing Provision Options Study and CLG population and household growth projections. The level of housing proposed falls short of addressing evidenced housing need and demand and contributes the least to local economic prosperity of the three options outlined in the Study. Option 3 is reliant on neighbouring authorities and nearby major urban areas providing sufficient levels of housing to accommodate and attract the displaced demand resulting from

a lower net in-migration. It is not apparent how this displaced demand/need will be met outside the district. The ONS 2008-based Household Growth projections indicate that there will be a growth in households of approximately 14,000 over the plan period whilst the ONS 2008-based Population Projections indicate an increase in population of approximately 22,300 between 2008 and 2028.

CEMEX

20. No supporting evidence to justify the restriction in the number of houses required to 2028. The economic led projection shows a target delivery of 13,000 houses, not the 8000 now proposed.

Geoffrey-Payton Chartered Surveyors

21. Challenge the target of 8000 new dwellings by 2028 as being too high. This figure does not seem to take account of any "windfalls" which, according to the NPPF should not be ignored. It is not clear whether the figure takes into account the need to bring the 1000 or so empty homes in the district back into use before building new homes, but this issue should be given high priority over building on greenfield land.

K J Griffin-Gallagher

Mr M Hipkiss

L H Brice

G F Lycett, E Lycett

R N Butler

Mark Hind & Tonia D'Bras

Roger Pamment

Mr & Mrs Godson

Philip Knowles

Mrs Lesley Smith

Mr H Green

Mr J Alderson

Mrs Vivienne Smith

A J Mann

Mrs C J Mann

Julian Davey

Eclipse Road Residents Group

Nina Knapman

Mrs J M Evans

22. History has shown that Stratford is a sought after location with high in-migration, the value of properties alone being a strong indication of that. Furthermore, approx. 2,400 dwellings have been granted approval since 2008. If the demand from in-migration was not high then such approvals would not be sought. There is no reason why the rate of in-migration should reduce and therefore the 8000 provision is too low.

Spitfire Properties LLP

23. The figure is much too high and the number of extra dwellings would inevitably erode green fields and squeeze the green belt.

Michael Andrews

24. Yes, as a maximum figure.

Tysoe Parish Council

25. The Draft Core Strategy does not comply with the criteria for sustainability as dispersal of 50% of new housing to villages means there will be:

- (a) an increase in car traffic and emissions because Long Compton has no public transport suitable for travel to work/school/appointments, yet has no medical facilities, only one small shop, a small primary school and no secondary schooling/childcare/youth facilities.
- (b) more oil use and transport thereof, as there is no gas in Long Compton.
- (c) damage to countryside as there is insufficient brownfield land available for re-use on the scale envisaged.
- (d) problems with electricity supply which is already erratic in the village, problems with drainage as the sewage pipe network is already above capacity and a health and safety risk.

If more housing is added to the village major infrastructure changes will be necessary. It is hard to see how the finance for such renewal will be generated.

Jill Kirby

26. In view of the historic and rural character of the district and the rapid rate of development of all kinds over the last 10 years, it is hard to see how another 7-8,000 dwellings can be justified, without lasting damage to the amenities of the area.

Jill Kirby

27. Strongly object to the proposed housing figure of 8,000 dwellings for the following reasons:

- it is not supported by the evidence base as it is contrary to recommendations of the Housing Options Study prepared by GL Hearn.
- the Housing Options Study should cover the plan period 2006-2028 to be consistent with adjacent authorities and the level of provision should be increased accordingly.
- the plan period base date should be 2006 not 2008.
- Agree with an economic led projection as the only option that brings positive economic growth.

It is not clear what the evidence base is to justify a level of provision of 8,000 dwellings. An entirely arbitrary figure has arisen for which no additional evidence is offered. It is not acceptable to put the Housing Options Study to one side because the recommendations are not liked. The Localism Act in giving power back to local councils to set their own housing targets does not override the national policy basis for plan preparation and a robust and credible evidence base is required to support decisions. GL Hearn's view is that "a robust yet positive framework for development in the District should plan on a basis of a housing [need] in the 11,000-12,000 over the 20 year plan period 2008-2028.

The reduced migration option identified by GL Hearn as the lowest level of provision still requires 8,230 houses. The evidence base is clear in this option that need would be displaced elsewhere and the council would need to demonstrate where displaced demand would be accommodated. No evidence is presented to demonstrate this and the cross boundary section of the plan does not make reference to migration as having any implications for development planning.

The desire to reduce in-migration appears to have overlooked the impact this would have on economic growth in that planning for 8,230 houses leads to a drop in employment of 6%. Tourism as economic driver is unlikely to lead to a diverse and stable local economy in accordance with the vision and objectives of the Plan.

In terms of land available to accommodate development, the SHLAA identifies sites for around 18,500 houses. Even excluding an allowance for windfall and possibly constrained sites detached from the main built up areas, capacity for over 14,000 houses is identified. It is clear from this that there is sufficient land available within the District to accommodate a higher housing provision.

The figure of 8,000 is clearly not justified by a robust and credible evidence base and is likely the plan would be found unsound if this target remains.

Linfoot Homes Ltd

Arrow Developments

Mrs E Creek

Mr J Bradley

Mr & Mrs Dimarco

H G Hodges & Sons Ltd

The Glebe Committee

Walton Estates

South East Southam Land Owners Consortium

Mrs G Lines

Banner Homes (Midlands)

Walton Estates

28. Local authorities have been advised in the new NPPF that the identification of housing requirements must be based on robust evidence in order to prove its soundness. The NPPF sets out guidance on how the level of housing provision should be determined for the purposes of development planning. Account needs to be taken of evidence relating to current and future levels of need and demand and levels of housing affordability derived from a range of sources including national household growth projections, economic growth forecasts, land availability, the need to improve affordability, sustainability appraisal and the impact on infrastructure.

Even on the Council's own figures, 8,000 dwellings is not enough to meet local needs. This low figure is not justified and there is no evidence as required in the NPPF to back it up. GL Hearn concluded that Option 3 of 8,230 dwellings would need to be part of a sub-regional strategy aiming to direct most housing demand elsewhere. We are not aware of this sub-regional strategy being in place and no evidence has been produced to prove it. GL Hearn also concluded that there is a high risk of option 3 being found unsound at Examination in Public, that it falls well short of meeting housing need and demand, does least to support the local economy leading to a significant reduction in the local labour supply/workforce, would hinder the achievement of a more balanced population structure with a reduction in the number of persons under 60 and an increase in the number of persons over 60. This issue is not supporting the local economy and goes against the whole spirit of the NPPF guidance which is targeted at 'building a strong, responsive and competitive economy'.

In order to reject the GL Hearn study findings, the District Council needs to produce a robust alternative evidence base relating to housing need and demand which would point to flaws in the GL Hearn analysis.

The artificially low growth rate proposed will have other drawbacks particularly lack of support for economic recovery and tendency to accentuate the imbalance in population, age and structure and the attendant issues that this creates such as support for local schools and caring for an ageing population.

Constraining population growth by constraining housing supply will also constrain the local economy. The resident labour force will provide little or no capacity for employment growth in the district. More importantly there may not be sufficient employees to support the present level of economic activity in Stratford. Established businesses will find it increasingly difficult to secure or fill the labour gap; there would be an increase in commuting which has implications for sustainability and carbon emissions. The

Core Strategy has a clear policy to build on Stratford's successful local economy. However, there is a fundamental mismatch between this and the proposals for housing growth.

The Core Strategy should consider the full 'journey to work area' in relation to housing supply numbers. Many existing and new residents do and will travel to work in the neighbouring West Midlands conurbation, principally Birmingham and Coventry. This must be recognised in the Core Strategy as it affects both the location of new housing and the provision of public transport facilities.

The District Council needs to review the housing figures if the Core Strategy is to be found sound.

David & Angela Tucker

29. I believe that only 8,000 houses for the plan period is overly restrictive and may hinder the economic recovery of the area, especially rural communities which need to keep key services and community facilities running. I urge that a higher and less cautious figure is adopted, somewhere closer to the GL Hearn recommended 11,000 - 12,000 dwellings.

Robert Brisker

30. We strongly object to the means by which the District Council has arrived at a proposed housing requirement of 8,000 dwellings over the period 2008-2028. Government policy is clear that Core Strategies must be based on evidence in order to be 'justified' and therefore to be considered sound by an Inspector when examining the document. In addition, the NPPF at paragraph 182 sets out a new test of soundness, namely the requirement that a plan is 'positively prepared'.

While there is scope for some disagreement with underlying assumptions contained in the GL Hearn Report, it nevertheless represents robust and credible evidence as to the overall housing provision for which the District should plan for. The Report is clear in concluding that a robust yet positive framework for development in the District would be provided by planning on the basis of a housing requirement in the 11,000-12,000 range. GL Hearn foresee significant risk factors associated with progressing Option 3 in the absence of a regional planning mechanism. It represents under-provision against robustly assessed need and demand and adopting such a housing requirement would in our view render the Core Strategy unsound in the absence of credible evidence to support such a proposal.

Bloor Homes

31. Overall, from a school perspective we welcome the proposal of 8000 dwellings for the District. In some rural areas of the District, village schools are vulnerable to falling pupil numbers. Therefore any new housing is likely to increase the demand for school places and help support the long term sustainability of rural schools in many Local Service Villages. In terms of new build in the Main Rural Centres this is likely to bring challenges in some locations as the opportunities to expand certain schools is limited. However, WCC is confident that these challenges can be met through the pupil place planning process albeit with the need for developers' contributions to be required to support expanded educational provision. Any further increase in pupil numbers in Stratford town does bring significant difficulties in terms of the current school capacity.

Warwickshire County Council

32. Reasons 4 and 5 in para. 9.03 are factors that should be taken into account when considering any housing development. Reason 2 is very sensible in that the GL Hearn projections are just arithmetic assumptions and not really forecasts. Therefore it makes sense to take a conservative view and we support the proposed housing figure of 8000. Reasons 1,3 and 6 are rather more doubtful.

Welford-on-Avon Parish Council

33. The 8,000 dwelling figure is not agreed with and is strongly objected to. It is important that the Council takes stock of the Government's clear planning policy, particularly in respect of housing land supply, prior to proceeding to the submission draft of the Core Strategy. The NPPF advises the Council to boost significantly the supply of housing. It is not following the clear guidance in the NPPF regarding taking on an evidence based approach to establishing the housing requirements.

GL Hearn conservatively recommended that housing provision should be in the range of 11,000 to 12,000 dwellings in the period 2008-2028. These findings are a material consideration as the most up-to-date evidence base to inform the LDF process and the growth of the district to 2028. This figure has been further verified in evidence presented at the recent Kipling Road appeal. This used an alternative Chelmer Model which demonstrated a need for 12,125 more dwellings to meet the needs of the additional households which are projected to form by 2026. The latest official Government projections (2008-based) indicate a level of household change of 14,440 between 2008 - 2028, whilst the SHMA Market Review Study in 2009 identified a figure of 680 dwellings per year or 13,600 homes over the plan period. In our view, the SHMA assesses local housing demand and need and so meeting this figure would be consistent with para. 159 of the NPPF. The Council's decision to reduce in-migration by 25% was taken without any agreement with neighbouring authorities to accommodate this.

The GL Hearn Study indicates a number of implications in applying Option 3:

- it would need to be part of a sub-regional strategy aiming to direct most housing demand elsewhere;
- if not part of such a strategy, then there is a high risk of the option being found unsound at Examination in Public;
- falls well short of meeting identified housing need and demand;
- does least to support the local economy, leading to significant reduction in the local workforce; would hinder the achievement of a more balanced population structure.

It is clearly the case that the NPPF seeks a balance between the three dimensions to 'sustainable development', whereas the District Council is putting far too much emphasis on the environmental role to the detriment of the social and economic ones.

It is therefore recommended that the housing figure should be increased to be in line with the GL Hearn recommendations of 11,000 - 12,000 dwellings as a minimum, albeit the favoured approach is the 13,600 figure identified by the SHMA Market Review.

Miller Strategic Land & Miller Strategic Land and Taylor Wimpey

34. No comments re amount except that we should know what happens if an Inspector says the number should be higher. Will extra houses be distributed on the same formula? There should also be separate targets in each locations for affordable and other specialised housing. However there is a need to identify affordable housing as a number and provision for older persons.

Tanworth-in-Arden Parish Council

35. Strongly object to the proposed figure of 8,000 dwellings for the plan period 2008-2028. GL Hearn conservatively recommended that housing provision should be in the range of 11,000 to 12,000 dwellings in the period 2008-2028. These findings are a material consideration as the most up-to-date evidence base to inform the LDF process and the growth of the district to 2028.

This figure has been further verified in evidence presented at the recent Kipling Road appeal. This used an alternative Chelmer Model which demonstrated a need for 12,125 more dwellings to meet the needs of the additional households which are projected to form by 2026. The latest official Government projections (2008-based) indicate a level of household change of 14,440 between 2008 - 2028, whilst the SHMA Market Review Study in 2009 identified a figure of 680 dwellings per year or 13,600 homes over the plan period.

The evidence base appears to indicate a range between 10,100 and 14,400 dwellings and our favoured approach is the 13,600 figure identified by the SHMA Market Review.

GL Hearn commented that if Option 3 was followed:

- it would need to be part of a sub-regional strategy aiming to direct most housing demand elsewhere;
- if not part of such a strategy, then there is a high risk of the option being found unsound at Examination in Public;
- falls well short of meeting identified housing need and demand;
- does least to support the local economy, leading to significant reduction in the local workforce; would hinder the achievement of a more balanced population structure.

Identifying that there is no need for increased levels of house building in the district would be contradictory to the Council's produced evidence, such as the SHMA Market Review 2009 that indicates the need for 13,600 dwellings over the plan period. The SHMA also highlights that the affordable housing figures suggested by its modelling are greater than the District's total dwelling requirements and targets, so the consideration of sites for development across the breadth of the District remains pertinent to ensure the delivery of sustainable communities.

Restricting housing supply, whether it be to discourage perceived population migration would not be consistent with the NPPF which requires local planning authorities to identify and plan positively for growth, whilst also more importantly meeting assessed needs. The GL Hearn Study identified that if no net migration was to be allowed for, the overall district population would reduce by nearly 6% in 2028 and most importantly will reduce employment by 12,000 employees. The study recognises that growth is required to sustain economic activity and identifies that a housing growth of at least 555 homes a year is required to maintain the district's working population, let alone provide for increased employment levels.

Trustees of W A Weaver

36. This works out at 350 houses per year across the entire district. This seems too few given the size of the housing waiting list and the rate at which households are forming. Any projection is always going to be an estimate, but surely it is better to oversupply than undersupply - the latter will just mean even higher prices and our children can't get on the housing ladder now.

Diane Reeve

37. In order for this Draft Core Strategy to be found sound then it must plan to accommodate the growth requirements of its area, as now required for a policy document to contain the required presumption in favour of sustainable development. The NPPF advises that underperforming house building should be compensated through Councils significantly increasing their supply of housing. There is concern that the District Council is not following the clear guidance of the NPPF in relation to adopting an evidence base approach to establishing the housing requirements. Continued failure to do this is likely to result in the plan being found unsound.

It is critical that prior to its submission, the plan is refocused on establishing a robust and increased District-wide housing delivery figure as well as providing the strategy for delivering a suitable level of housing supply across the District as well as within the rural villages and key settlements.

Whilst it is recognised that regional plans will be revoked, the strategic planning issues addressed in the 2009 West Midlands RSS Phase 2 Revision Examination Panel Report still remain an important source of evidence base scrutiny.

Strongly object to the proposed figure of 8,000 dwellings for the plan period 2008-2028. GL Hearn conservatively recommended that housing provision should be in the range of 11,000 to 12,000 dwellings in the period 2008-2028. These findings are a material consideration as the most up-to-date evidence base to inform the LDF process and the growth of the District to 2028.

This figure has been further verified in evidence presented at the recent Kipling Road appeal. This used an alternative Chelmer Model which demonstrated a need for 12,125 more dwellings to meet the needs of the additional households which are projected to form by 2026. The latest official Government projections (2008-based) indicate a level of household change of 14,440 between 2008 - 2028, whilst the SHMA Market Review Study in 2009 identified a figure of 680 dwellings per year or 13,600 homes over the plan period.

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Identifying that there is no need for increased levels of house building in the district would be contradictory to the Council's produced evidence, such as the SHMA Market Review 2009 that indicates the need for 13,600 dwellings over the plan period. The SHMA also highlights that the affordable housing figures suggested by its modelling are greater than the District's total dwelling requirements and targets, so the consideration of sites for development across the breadth of the District remains pertinent to ensure the delivery of sustainable communities.

Restricting housing supply, whether it be to discourage perceived population migration would not be consistent with the NPPF which requires local planning authorities to identify and plan positively for growth, whilst also more importantly meeting assessed needs. The GL Hearn Study identified that if no net migration was to be allowed for, the overall district population would reduce by nearly 6% in 2028 and most importantly will reduce employment by 12,000 employees. The study recognises that growth is required to sustain economic activity and identifies that a housing growth of at least 555 homes a year is required to maintain the district's working population, let alone provide for increased employment levels.

Heart of England Cooperative Society

38. It is considered that a robust yet positive framework for development in the District should plan on the basis of housing in the 11,000-12,000 range over the plan period. The reasons given for the 8,000 dwellings figure are not supported by a cogent and objective evidence base. No rational evidence is presented to substantiate the assertion that the impact of tourism on the local economy justifies a lower provision of housing. Similarly no rational evidence has been presented that the scale of provision recommended by GL Hearn would harm the special preserve of the District. In particular we are concerned that the contention that greater provision would lead to 'mass building in Stratford-upon-Avon' is not based upon a sound and rational planning judgement, and inappropriately conveys an inaccurate representation of impact of planned urban expansion to the principal settlement within the District.

Brian Lewis

39. Object to the shortfall in the proposed housing target being against the NPPF (paras. 47, 156, 159). Concern is expressed that the implication of a housing number of 8,000 dwellings could have a negative impact on meeting the District's housing supply resulting in pressure on Wychavon's housing market over the Core Strategy period.

Wychavon District Council

40. Any proposed housing must take full account of the water limitations within the District, both in terms of additional water availability and capacity within the existing sewage treatment network and the requirements of the Water Framework Directive.

Environment Agency

41. We object to the overall levels of proposed housing growth because:

- it is not supported by the Council's evidence base and is therefore not 'justified';
- it is not 'positively prepared', where it does not deliver a housing strategy which seeks to meet objectively assessed development requirements;
- it is not 'consistent with national policy' which seeks to significantly boost the supply of housing and meet a range of housing needs.

The policy as drafted is therefore 'unsound'.

The GL Hearn Study, which forms part of the Council's evidence base, considers 'that a realistic assessment of housing need and demand within the District would lie between 10,000-13,000 dwellings over the 20 year plan period. The lower housing requirement of 8,230 dwellings assumes a net in-migration trend that is lower than projected future levels and also lower than previous historic levels. The consequence is that there is a net loss of people of working age. The report therefore advises that this 'would represent a policy driven scenario, rather than an assessment of need/demand.' Para. 159 of the NPPF clearly identifies that any assessment of housing need should be based on a full assessment of need taking into account household and population projections, including migration and demographic trends. The above scenario is clearly not a full assessment of needs where it fails to take full account of migration.

Urban Renaissance Villages and Helical Bar

42. The NPPF sets out that local planning authorities should meet the full objectively assessed needs for market and affordable housing in the area. Of particular note in para. 159 is the need to ensure housing provision over the plan period meets household and population projections, taking account of migration and demographic change. In addition, it should also be recognised that authorities should take into consideration business requirements, which includes identifying and addressing barriers to investment, including amongst other factors a lack of housing.

The District Council has not prepared a SHMA in accordance with the national requirements. It is deficient in that it does not assess the full housing requirements of the District taking into consideration household and population projections, taking account of migration and demographic change. Table 44 of the SHMA Report identifies a net annual housing need of 532. Therefore, based on solely providing for affordable needs, the housing requirement within the plan period should be a minimum of 10,640. Clearly, this is in excess of the requirement of 8,000 identified within the Core Strategy.

It is clear that based on guidance set out in the NPPF, there is concern that the proposed housing requirement is unsound as it is not consistent with national policy, it is not justified or positively planned. The local planning authority should therefore review the proposed approach and increase the housing requirement to take account of the clear need for at least 11,777 dwellings 2008 to 2028 based on evidence using the Chelmer Model, which does not reflect any additional housing growth

required to support economic objectives. This dwelling requirement rises to 14,619 dwellings when including migration assumptions based on the 2008 based sub national population projections. The 2010 based figures may indeed be higher given that it is projected the total population will increase.

It is suggested, based on evidence in accordance with the tests that the policy requirement be increased to provide for arising needs and demands to at least a minimum of 12,000 dwellings, although there are indications it may well need to be considerably higher to achieve economic objectives.

Cala Homes (Midlands)

Ainscough Strategic Land

Persimmon Homes (South Midlands) Ltd

43. We note the process the Council have gone through in arriving at a figure of 8,000 dwellings over the plan period, but this approach is not supported by up-to-date and relevant evidence, as required by para. 158 of the NPPF. The NPPF requires at para. 159 that in preparing Local Plans, planning authorities should have a clear understanding of housing needs in their area, which should include preparing a SHMA to assess their full housing needs over the plan period, ensuring this meets household and population projections, taking account of migration and demographic change.

Whilst the latest SHMA is dated 2009 and is now 3 years out-of-date, this indicates that household numbers (based on 2006-based projections) are expected to increase by 680 dwellings per annum or 13,600 dwellings over the plan period 2008-2028. More recently the Government has published further up-to-date evidence on household projections which are 2008-based and this indicates growth of 14,000 households during the plan period. This data was also used by the GL Hearn report. However, notwithstanding its recommendations that a realistic assessment of housing need and demand taking account of demographic trends and demand arising from anticipated future economic performance within the District would fall between 10,000 - 13,000 dwellings during the plan period, this up-to-date evidence has been ignored. The justification for opting for a housing figure of 8,000 dwellings is not considered to be founded on an appropriate evidence base and therefore conflicts with the NPPF.

As such, we consider that in order to deliver a 'sound' Plan, the level of housing that is proposed would need to be increased significantly to between 13,000 and 14,000 dwellings to reflect the evidence base of housing need.

Quintessential Inns

44. We believe that this figure is too high. We do not believe that land is available for dwellings of the type and quality identified without utilising green field designated land and we oppose this.

Earlswood & Forshaw Heath Residents Association

45. The housing target of 8,000 dwellings is broadly in line with the figure agreed in the RSS Phase 2 Revision Panel Report 2009.

Solihull Metropolitan Borough Council

46. The target of 8000 dwellings is too high and takes no account of windfalls.

Councillor S A Juned

47. The level of housing growth the GL Hearn report recommends in the District is 11,000 - 12,000 dwellings over the 20 year plan period. This quantum of housing is considered to meet local need and demand for housing, with the overall impact in social, economic and environmental terms assessed to be moderate. The Council has failed to produce a robust alternative evidence base for supporting the 8,000 dwelling figure.

Having regard to the NPPF, the quantum of housing proposed fails to meet the four tests of soundness as set out in para. 182:

- The plan is not positively prepared as it will not meet the economic and social dimensions of sustainable development, nor will it deliver the development and infrastructure required within the District to meet the strategic objectives including meeting housing need as set out in para. 4.1 of the Draft Core Strategy.
- The plan is not justified as it is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. In this instance the Core Strategy has ignored the robust, up-to-date and relevant evidence base prepared by GL Hearn. The 8,000 quantum does not take full account of the relevant market and economic signals.
- The plan is not effective as it has not fully taken into account cross boundary issues relating to the growth and overspill of housing from Redditch into the District. The Core Strategy has also failed to address the implications of progressing with 8,000 dwellings with adjoining authorities.
- The plan is not consistent with national policy as it will not enable the delivery of sustainable development in accordance with the NPPF.

It is our view that the higher end of the recommended Hearn range of 12,000 dwellings over the plan period be inserted into Policy CS16. By applying such a quantum of housing it will meet local need and demand for housing and go towards meeting social and economic objectives.

Broadway Malyan

48. In terms of housing supply, the NPPF outlines that to significantly increase the supply of housing, local planning authorities should ensure that their Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area. In the case of Stratford District key considerations in this respect would be the assessment of housing need and demand undertaken by GL Hearn and the latest SHMA. Both documents would indicate the need to provide a higher level of housing than that contained in the Third Draft Core Strategy. Furthermore, neighbouring local authorities are not meeting the under supply of housing proposed.

The GL Hearn Report concluded that a robust yet positive framework for development in the District should plan on the basis of a housing provision of between 11,000 - 12,000 dwellings. On the information available to GL Hearn this level of growth was considered achievable.

To plan for a lower level of housing would be contrary to the robust and credible evidence, would not be justified and would therefore be an unsound proposition. Such a strategy would risk the identified housing need and demand within the District not being met. This is in itself contrary to the central tenets of national planning policy as outlined in the NPPF.

J S Bloor (Tewksbury) Limited and Hallam Land Management Limited

49. Para 9.03 of the Draft Core Strategy is disingenuous as it is stated that the Council arrived at a figure of 8,000 dwellings from the GL Hearn report. However it fails to mention that the recommendations of the GL Hearn report was 11,000 - 12,000 dwellings over the plan period. We have a fundamental objection in principle as this figure of 8,000 dwellings is not based on a robust evidence base (ie. the Council's own evidence base recommends a higher figure).

The Council's rationale for the 8,000 figure is examined below:

- (i) Aim for a lower net in-migration: in-migration across the UK and Europe cannot be prevented. Therefore failing to plan sufficiently for this will simply serve to restrict the supply of housing in the District and consequently increase the demand and further increase house prices. It is usual practice to take a 10 year migration trend and plan on this basis.
- (ii) Lack of certainty in the GL Hearn based forecasting: it is not clear what more certainty in forecasting is required. The appellants for the appeal on land south of Kipling Road, Stratford-upon-Avon commissioned their own household projections modelling and this was found to be

robust and was not challenged by the Council. In that instance the appellants considered 12,125 dwellings to be an appropriate figure over the period 2006 - 2026. This work is now being updated to reflect the plan period 2008 - 2028.

- (iii) Impact of tourism on local economy: whilst it is acknowledged that tourism is a key economic driver, it is not sufficient to simply say that this results in visitors being the economic driver for this sector. Tourism is also a big source of local employment and results in a need for affordable accommodation for the local workforce. The RSS Panel Report stated that Stratford town represents the optimum location for substantial volumes of additional affordable housing to address the local shortage of workers in the tourism, cultural and local services sector.
- (iv) Preserve the special nature of the District: all Districts have special natures; this does not absolve the District Council from the need to provide sufficient housing and employment to meet its need.
- (v) Duty to protect the countryside: again this is not unique to Stratford and does not mean that sufficient housing and employment should not be provided.
- (vi) No need for mass building in Stratford: what is mass building? We are talking about proportional development which meets housing and employment need and provides suitable infrastructure. The Council have not demonstrated the lack of need for development within the District. Indeed all the evidence collated to date presents the polar opposite.

There is no evidence to suggest why the figure of 13,600 dwellings over the plan period has been discounted.

Office for National Statistics 2008 based population projections project a 22,800 population increase between 2006 and 2026. The DCLG 2008-based household projections project a 14,000 household growth between 2006 and 2026. There is a remarkable consistency in the housing projections across each of the most recent base years and the fact that the District Council is pursuing a housing requirement so far below this range should immediately raise concerns.

The recent levels of in-migration into Stratford District, whether a 5-year or 10-year average is taken, show the average net migration level is 1,000 people or more a year. There has been a dip in 2008-09 but a statistic for an individual year is not normally regarded as a basis for projections. The ONS 2008-based population projections show that the likelihood is that annual net migration could be expected to increase from the figure of 1,200 in 2010-11 to that of 1,400 from 2020-21.

The above figures clearly demonstrate that the Council are failing to provide sufficient housing over the plan period and that subject to production of further evidence, a figure in the region of 12,000 - 14,000 new dwellings is more appropriate.

Orbit Homes

Barwood Developments Ltd

50. This is a matter for the District Council to be satisfied that it meets the growth ambitions for the District area.

Warwickshire County Council

51. We agree the housing figure of 8000 dwellings but would caution against deducting planning permissions granted since 1 April 2011 from the development totals, as implied in para. 9.09, because a degree of flexibility needs to be included in the development totals because of site delays and other implementation problems. We are aware that the range 11,000 - 12,000 dwellings has been endorsed, but in line with the objectives of the Localism Act we support the discretion of the District Council to adopt a figure that best balanced housing requirements against the environmental constraints of the District. To adopt a higher figure would in all probability place even stronger growth pressures on Stratford-upon-Avon town.

Follett Property Holdings Ltd

52. In 2007 the Cambridge Centre for Housing and Planning Research produced estimates of future demand for housing in Stratford District to be included within the West Midlands RSS and recommended a requirement of 13,600 dwellings. We therefore believe the proposed reduction in the draft strategy to 8,000 dwellings is significantly flawed and will leave a major shortfall of new dwellings in the district. We would contend that the proposed housing target should be increased to 13,600 in line with previous recommendations.

Godfrey-Payton Chartered Surveyors

53. Question how a figure of 8,000 has been arrived at with two independent surveys identifying a need for 12,000 homes and Stratford District a popular area of the country to reside. The figures quoted should be a minimum not a maximum figure of development, otherwise this will not balance out development over the period of the Strategy.

George Stepney

Consultation Question: Q89

1. There is no evidence provided to support this dispersal policy. It must be noted that the GL Hearn study on housing options was done entirely at a macro level, that is, all the data in the final report relates to the total District, and is not broken down by settlement. Table 1 shows that the dispersal policy in the draft Core Strategy means an increase of housing in Stratford of 4.5%, in market towns of 9.2%, and in rural areas of 12.2%. I would have thought that strong evidence would be required to support such a skewed policy, and there is none.

Table 2 shows that over the thirty years 1981-2010, the number of dwellings increased by 50% in Stratford town, and on average by 49% in the eight market towns in the District. What this means is that the comment "*a significant amount of development within the district over the last years had centered on Stratford-upon-Avon*" is not supported by the evidence.

Indeed, it is quite contrary to the evidence. It is true that housing growth in Stratford town, at 50%, was higher than the for the total District, at 40%, but this is because growth in rural areas was only 29%, no doubt in part due to the decline in agricultural employment over that period. In comparison with other urban areas in the District, Stratford town grew at almost exactly the same rate. Historically, rural areas have grown at just over half the rate of urban areas. Now the dispersal policy proposes that rural areas grow at almost twice the rate of urban areas, without any evidence as to why this makes sense.

74% of the employment in the District is in Stratford and the market towns. The GL Hearn report on housing options identified employment, and the impact of demographic changes on employment, as two key factors in identifying housing need. As the existing workforce becomes older and retires, continuing to live in the District, new housing will be needed for new workers to maintain economic activity. It would seem to be a logical and sensible assumption, therefore, that for the most part new housing would be located in the vicinity of employment.

Housing needs to be where the jobs are, and dispersal policy does the exact opposite of that. It is hard to understand why new housing would be so extremely skewed away from sources of employment. This policy will lead to significant additional strain on infrastructure and transport. It is therefore not surprising that Lepus Consulting, commissioned by SDC to review the sustainability of draft Core Strategy, found that "CS 16 Spatial Distribution of Development" was among the "policy options [that] were likely to lead to negative effects".

This also means that reason 6 in para. 9.03, "*No need for mass building in Stratford-upon-Avon*", has no basis in reality. Reason 1 for choosing the lower option of 8000 dwellings was "*Aim for lower net*"

in-migration". Bearing in mind that Stratford District is not like the Channel Islands, which impose restrictions on property purchase by non-residents, it is far from clear how the District Council will achieve that aim. What one can say is the developments in rural areas are likely to be more attractive

to such people as retirees moving in to the district than to existing residents seeking employment in one of the District's urban settlements. So the dispersal policy seems to be inconsistent with the aim of lower net in-migration.

Richard Jenkins

2. Opposed in principle to the dispersal strategy being pursued. The proposed dispersal of development will result in a non sustainable form of development. In particular it will lead to increased levels of car borne commuting to employment centres and to access other services. There is no evidence to suggest that dispersing open market housing in the way suggested will have any impact in supporting the remaining services in rural areas. The Board could only support the dispersal policy if this was to provide affordable housing to meet a clearly identified local need. Otherwise market housing should be directed to the larger settlements.

Cotswolds Conservation Board

3. There is limitation on traffic through country lanes from expanded villages dangerously beyond their environmental capacity. Also, the limits of foul and storm water drainage and limits on Severn Trent Water, severely restricted by the revenue from builders.

Adrian Bedford-Smith

4. The wider dispersal option establishes specific percentages. What is the rationale to substantiate and back up these proposals? In the Hearn Report, Figure 3.2 Population Structure 2008 for Stratford-upon-Avon indicates that the population in the age bands 20 to 39 falls well below that of the County. The service, leisure and tourist industries need individuals in this age profile and these are predominantly located in Stratford-upon-Avon. Villages which have lost their facilities and do not have adequate public transport for early morning starts and late night finishing do not need more dwellings. In addition villages without a school are totally unsuitable for this age group. If the population is needed in the larger centres, as it appears, and over the years villages have lost facilities, then neither Option E nor Option F are applicable.

Bearley Parish Council

5. The Draft Core Strategy means an increase of housing in Stratford of 4.5%, in market towns of 9.2%, and in rural areas of 12.2%. I would have thought that strong evidence would be required to support such a strategy and I haven't seen any. Why put houses in areas where there are no jobs locally. This means that people will have to travel long distances to find work. Over 75% of local employment comes from Stratford. Historically, rural areas have grown at just over half the rate of urban areas. Now the dispersal policy proposes that rural areas grow at almost twice the rate of urban areas, without any evidence as to why this makes sense.

Jeremy Smith

6. The effect of spreading developments across the District could in fact increase the carbon footprint because more people will want to buy new homes in an attractive area and then commute to nearby towns. Commuters don't generally help the local economy because they shop where they work.

Local Strategic Partnership

7. Do not agree with proposed wider dispersal as this will have a significant impact on a greater number of villages rather than limiting the impact on fewer key areas more able to absorb the impact.

Jane Ainley

8. Broadly support the "wider dispersal" strategy. For too long many rural settlements in Stratford District have seen too little housing development and have witnessed the closing down of shops, public houses, petrol filling stations, etc. on a vast scale over the past 10-20 years or so - partly as a result of lifestyle changes and technology, but also as a result of local communities becoming 'protectionist' and resisting new housing. At the same time job opportunities for local people has dried up. It is certainly time to try and reverse these trends by encouraging investment in these smaller communities.

Geoffrey Prince Associates Ltd

9. Wider dispersal is the most appropriate approach. The additional properties should be consented and built in small allocations to prevent sudden addition causing impact to the existing communities.

Martin Walker

10. Support a wider dispersal approach to development as this is the only option that is likely to address the needs of the rural area. It is important that both housing and employment is delivered to the rural areas in order to have sustainable rural communities.

Country Land and Business Association

11. The shift in approach gives landowners, housebuilders and developers the opportunity to promote a range of smaller sites which will still have a minimal environmental effect of villages, but in aggregate could help to support local services.

Noralle Traditional Country Homes

12. Were existing villages consulted over this proposal? How would the dwellings be distributed if present populations were reflected in the allocation?

Liz & Peter Freeman

13. Agree with the wider dispersal to allow the local service villages to maintain their schools, shops and transport links. We should encourage more home working to reduce the impact on the environment from journeys to work and to encourage the development of small local centres and employment.

Peter Jackman

14. Many Local Service Villages do not have the well established infrastructure as the larger towns.

Mr R Eades

15. Support the general thrust to permit modest developments spread around communities across the District, associated with community needs. Additional dwelling numbers of 50-60 to villages such as Napton over a 15 year period does not seem excessive subject to their character being maintained and relating development to local need.

Nigel Rock

16. Like the way in which the strategy plans to spread developments throughout the district. This, together with limits on the size of each development, should help to preserve the character of the villages, the main rural centres and Stratford itself. The strategy takes a local approach which can only be positive, as long as the money is there to back it up.

Southam Town Council

17. Do not support this approach as it is contrary to the stated aim of the Core Strategy which is to promote sustainable development. Do not accept that allocating 50% or 55% of new development to rural areas is sustainable. The consequences will be damage to the environment and to the character of setting of villages. There would be a significant increase in the use of private cars and longer car journeys as few peoples' needs are met within a village, leading to increased congestion and pollution.

Some Local Service Villages have very few services which meet the daily needs of residents. For instance, Long Compton is within the national list of most deprived communities for public transport, the shop is small, there is no post office, medical facilities, etc. Essential infrastructure is already at capacity, both electricity and drainage have proved inadequate in recent years.

Long Compton Parish Council & Susan & Andrew Vaile

18. It is very clear from our consultations that our village does not support the proposal to further distribute development to the Local Service Villages and to the countryside. We feel that this contradicts the policy of sustainability which is at the heart of the Draft Core Strategy. The scale of any development in LSVs is unlikely to deliver developer contributions to public transport support, so the fundamental principle of dispersion fails the sustainability test. Realistically, private car transport will always be the primary transport mode for widely separated LSVs and adequate provision has to be made for this. Development should therefore concentrate on those centres of population able to sustain necessary facilities and services. Much of the infrastructure in LSVs (particularly sewerage and electricity supply) is old and prone to damage in adverse weather conditions. Neither of these central services make LSVs suitable candidates for significant future development and questions the case for dispersion.

Long Compton Parish Council

19. I believe that dispersal throughout the area is wide and organically generated already. Historically employment in LSVs has stood at 27%, whilst in Stratford and the main market towns at 73%. Housing needs to be where the employment is and where employers require it to be.

Jeff Perks

20. To increase the population of Ettington, bringing with it the potential for added crime, anti-social behaviour and congestion is idiocy. Use land on the edge of Stratford already 'set aside' for housing and preserve our local communities.

G Wells

21. I agree with the wider dispersal approach across the district to deliver its housing needs. The loss of key services in our rural settlements and school closures can be attributed to restricted development opportunities linked to historic planning policy. COM.1 has not been effective in delivering housing in rural settlements, with numerous examples of parish plans identifying housing needs and years on no evidence of development. We have evidence that high density new urbanism has not worked in Stratford town - Trinity Mead estate and others. Housing development does not have to be high density. In rural settlements development sites are available and services with an abundance of capacity.

Kelly Stepney

22. Allowing development in the larger villages will benefit those communities as it will encourage the retention of local services.

Councillor R Cheney

23. Support the wider dispersal approach as it will ensure the rural communities receive the housing required to meet their needs and it provides the most sustainable approach to the delivery of housing within the district.

CEMEX

24. Average of 57 dwellings to each Local Centre Village and with each new site no more than four houses, ie. 15 different sites to each village on which to provide the new dwellings, is not a good solution.

Godfrey-Payton Chartered Surveyors

25. I generally support the suggested dispersal of new housing across the district, as this should help to keep small villages more viable, particularly if small scale affordable housing schemes are increased. However, larger developments focussed on Stratford-upon-Avon would undoubtedly be more sustainable than other locations and should be prioritised, avoiding greenfield land where possible.

K J Griffin-Gallagher

Mr M Hipkiss

L H Brice

G F Lycett

R N Butler

E Lycett

Mark Hind & Tonia D'Bras

Roger Pamment

Philip Knowles

Mrs Lesley Smith

Mr H Green

Mr J Alderson

Mrs Vivienne Smith

A J Mann

Mrs C J Mann

Julian Davey

Eclipse Road Residents Group

Nina Knapman

Mrs J M Evans

26. Development should be dispersed around the district. Many villages are in danger of dying as roles fall in schools for example.

Robin Molloy

27. Housing needs to be mainly in Stratford and the market towns.

Michael Andrews

28. New development in villages which have seen considerable development in the past should be severely restricted to prevent them losing character and in the end becoming small towns.

J A Gascoigne

29. Why is the Core Strategy suggesting abandoning the present sympathetic policy of encouraging all new buildings to be within Stratford which already has the infrastructure to accommodate it?

Consultee

30. There appears to be no rationale for transferring more potential development away from Stratford given the comparison between the level of services available there as against Bidford. Equally, Alcester has substantially more services, but is planned to have a much smaller number of new dwellings proportionately than Bidford. This makes no sense. Stratford and Alcester should be required to accept greater numbers of new build due to current service provision and that proposed.

Peter Chadwick

31. The present policy of concentrating residential development in Stratford town should be retained. It has the necessary infrastructure to support the proposed increased housing development which

cannot be said for the Local Service Villages.

John Eagle

32. Not in agreement with the wider dispersal approach to development throughout the District. The proposals are ill-founded and unrealistic and there is no evidence or justification given for the wider dispersal approach on the scale proposed.

Wilmcote Parish Council

33. The Core Strategy should make clear that the dispersal policy should not apply to villages within the AONB.

34. The dispersal policy makes no sense at all in relation to local employment, since the bulk of jobs are in Stratford and the other urban centres. Dispersing more than half of the development will lead to much greater car travel and associated expense and emissions as well as damage to rural environment.

Jill Kirby

35. Support a wider dispersal approach to development as this is the only option that is likely to address the needs of the rural area.

Country Land and Business Association

36. I understand the need for sustained development within the area, although Long Compton reaches the requirements for a local centre because of the shop, school, public house and village hall. The school is only of limited size due to the site and could not cope with the demands placed upon it with the addition of all these houses that are planned in the area. I understand that there is a need for affordable houses in our community but there also needs to be the jobs to sustain this. The local buses are infrequent and require most people to have at least one car which does not help the greener environment. We are also situated in the Cotswolds which is identified as an area of outstanding beauty and should be protected so I do not see how this distribution supports the above.

Rachel Sellars

37. We agree with the approach that the Council should maintain a dispersal option as this provides the most appropriate way to meet the District's housing needs to 2028 but we object to both the Wider Dispersal Option (E) and Preferred Approach (F).

We find the proposed distribution under both Option E and Option F has now moved too far towards growth in the Local Service Villages and other rural areas, distributing a higher proportion of the provision to settlements that in some cases have few existing dwellings and a poor level of facilities that may lead to an unsustainable pattern of development which is contrary to national guidance. A lower proportion of the overall level of housing provision would easily allow scope for the needs of villages to be met and to help sustain the services that they support whilst creating a sustainable pattern of development with more growth in the Main Rural Centres.

Overall, the dispersal approach has local support and we generally support the principle. The percentage distribution to Local Service Villages and the rural areas has however increased to a level that is unlikely to deliver the housing provision and other objectives of the Plan. Whilst some settlements may be capable of delivering a higher level than others, taken as a whole this 'wider dispersal' distribution is not justified and will not be effective.

Linfoot Homes Ltd, Taylor Wimpey UK Ltd

Mr R Coslett, Mr J Bradley

H G Hodges & Sons Ltd

**The Glebe Committee
Walton Estates
South East Southam Land Owners Consortium
Banner Homes (Midlands)**

38. We agree with the approach that the Council should maintain a dispersal option as this provides the most appropriate way to meet the District's housing needs to 2028 and we support the recognition that even the smallest of settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing. However we are concerned that both the Wider Dispersal Option (E) and the Preferred Option (F) are likely to have a harmful effect on some of the smaller Local Service Villages.

Arrow Developments, Mrs E Creek, Mr & Mrs Dimarco

39. We agree with the approach that the Council should maintain a dispersal option as this provides the most appropriate way to meet the District's housing needs to 2028 and we support the recognition that even the smallest of settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing.

Option F, the Preferred Option, indicates that 10% of the outstanding requirement should be met in the villages below Local Service Villages, amounting to 560 dwellings across the District. Whilst we support the provision of housing to meet identified local needs in those smaller settlements we are concerned that this level of development is not fully justified. The Council should provide evidence that this level of housing is needed to meet local needs and can be accommodated in the smallest settlements without harm to sustainability objectives and the character and appearance of the locality as clearly some settlements are more able to accommodate development than others.

Mr J Warhurst, Mrs J Kirkham, Brasenose College

40. We agree that the wider dispersal approach to development throughout the district is sustainable, justified and sensible as it will allow individual villages to gently grow and breathe, on the precondition that a higher proportion of this growth should be directed to the more sustainable villages in the north of the district where rail and bus services are much better.

David & Angela Tucker

41. This approach is not supported as it would result in a larger proportion of development being directed to areas that are less sustainable in terms of the services, amenities and supporting infrastructure available. As an alternative it is recommended that Stratford-upon-Avon and the Main Rural Centres should accommodate the majority of new housing and employment development in order to continue to support services, community facilities and essential infrastructure. However, this must not be interpreted as an exclusion of sustainable development in lower order settlements (ie. Local Service Villages and other rural areas).

Gladman Developments

42. There should be dispersion but should be limited to small scale developments not exceeding 12 dwellings and should only be undertaken in parallel with development of transport services, etc.

Claverdon Parish Council

43. The spread of housing amongst the villages is not equitably spread in the proposal. More should be centred around Stratford-upon-Avon which has the infrastructure to cope with further housing development. Some housing development does need to take place but Long Compton is in the Cotswolds AONB and any development would have to be on green field sites. This is detrimental to the AONB. The lack of regular public transport, primary school being virtually full, closure of Post Office and sewerage pipe network at capacity means the village does not have the vital services needed to

sustain an increasing number of houses.

Mr N J Sellars

44. The Council are proposing the least sustainable option which as addressed in the Sustainability Appraisal will increase car dependency, reduce delivery of affordable housing and have the greatest impact upon the character of smaller settlements.

Miller Strategic Land

45. I believe that the dispersal throughout the area is wide and organically generated already. Historically, employment in Local Service Villages has stood at 27%, whilst in Stratford and the main market towns at 73%. Housing needs to be where the employment is and where employers require it to be. Stratford itself has a very large tourist industry that's not reflected to the same degree in the west of the District. This option also fails to address the need for added infrastructure, road, schools, community facilities, etc. I would propose the preferred approach to be:

Stratford:	1613 (32%) of new houses
Market Towns:	2066 (41%) of new houses
LSVs and rural areas:	1360 (27%) of new houses

I believe that this is a much more sustainable approach with regard to infrastructure, employment, the environment and protection of the green belt.

Tanworth-in-Arden Parish Council & Ewen Cunningham

46. The wider dispersal approach to development proposed throughout the District could provide a solution to meeting rural housing delivery as long as the housing is delivered within existing service centre locations and that the focus of housing delivery remains as Stratford.

Trustees of W A Weaver, Heart of England Cooperative Society Ltd

47. Do not agree with the wider dispersal approach to development throughout the District. It is not in line with the principles of sustainable development as it is likely to increase reliance upon the use of the private car and will not provide homes near to services, retail and employment in Stratford-upon-Avon. A strong case exists for locating a greater proportion (41% as previously advocated) of housing growth in Stratford-upon-Avon, particularly through the redistribution of growth from the less sustainable Local Service Villages, given its principal settlement role.

Miller Strategic Land and Taylor Wimpey

48. We support the principle of wider dispersal and development of up to 20% of Local Service Villages' existing housing stock over the plan period. We have always advocated greater dispersal because without some growth communities, especially the smaller ones, contract and cannot support essential services. We believe Harbury has made significant progress towards this already, providing much needed homes for local people. What we hope will happen is that much of the total will be taken up with housing like Harbury's Hereburgh Way, for local people.

Harbury Society

49. Wider dispersal brings with it disproportionate allocation of development in the villages. The dispersal policy appears as one of protection of Stratford-upon-Avon at any cost to the rural communities - a political solution rather than one based on clearly argued logic in the Local Development Framework.

P J Boreham

50. We would not be in favour of the proposals in Earlswood. Previous surveys from relatively recent proposals indicate that Earlswood does not have the infrastructure to cope with the maximum number of new dwellings per the proposals. We would wish to see it capped at a maximum of 10% of the

number of dwellings already identified in the "Methodology for Identifying Local Service Villages" document.

Earlswood & Forshaw Heath Residents Association
Mrs J and Mr M Buckley

51. Whilst we are generally supportive of a wider dispersal of housing growth between the separate settlement tiers, we object to the proposed weighting of growth in that too much growth is being directed to less sustainable locations within the District. We would support higher growth levels within the Main Rural Centres (ie. 50%) and a lower level of growth to the Local Service Villages (ie. 30%).

Quintessential Inns

52. Generally agree. However, some concern that relatively low levels of development in Stratford may add to the problem of an ageing population in the town.

Stratford-upon-Avon Town Council

53. The spatial distribution of development should not have a significant impact on migration from Solihull.

Solihull Metropolitan Borough Council

54. I totally disagree with the District Council's policy of increasing the size of local villages. Local villages are having/had services taken away in the form of Post Offices and vastly reduced bus services. Additional housing in villages would also necessitate commuting to work by car, causing more congestion on the already busy approach roads to Stratford.

J Dobson

55. Small scale affordable housing schemes may be required in many villages where there is local support.

Councillor S A Juned

56. Broadly agree with the proposed approach to housing distribution. It is essential that new housing is distributed across rural service centres and local service villages as well as main towns, as this will ensure the creation of sustainable rural communities and secure the future viability of local service centres. It will also ensure that additional affordable housing is delivered in rural areas.

Oakley Mayfield

57. We do not object to the principle of spreading development across the District. However, it is unclear how the focus is on the Local Service Villages and other rural areas rather than on the Main Rural centres which are further up the hierarchy.

Barwood Developments Ltd

58. Opposed to the Preferred Option F as it is considered to be not proven, not desirable and not in line with the NPPF.

Warwick R Roberts

59. Support the need to provide development in the Main Rural Centres and local service centres/villages in order to address affordable housing issues and to help support services and facilities. As such, we support a dispersed approach to housing development across the District. This aspiration, however, should not be at the expense of failing to meet the needs of the Main Rural Centres, Stratford and the District as a whole.

Ainscough Strategic Land

60. We agree this approach because it ensures that Local Service Villages and Rural Brownfield Sites can properly make a contribution to housing needs, and the approach affords greater protection to the

setting and environment of Stratford-upon-Avon.

Follett Property Holdings Ltd

61. In general terms the range of locations to which future development will be directed is supported as sound. In a largely rural District such as Stratford it is important that the policy approach of the Plan ensures that the rural communities are vibrant and genuinely sustainable. A restrictive planning approach would do nothing to address the challenge facing smaller communities such as unaffordable homes, low wages and declining services. The wider dispersal approach responds to the Taylor Review challenge to ensure that planning must not undertake a 'tick box' exercise of assessing the sustainability of communities as they are, and not what they could be. The dispersal approach of the Plan does, in contrast, allow for a mix of housing and employment opportunities that are essential for the sustainability of rural communities. There are, however, some concerns about the rigidity of the housing distribution at this stage.

Cala Homes (Midlands)

Persimmon Homes (South Midlands) Ltd

62. We consider that the policy as presently drafted places too much emphasis on residential growth within the smaller villages across the District (those defined as local service villages and smaller settlements). The proposed distribution of development should focus more on the larger settlements which have the capacity and range of services to accommodate more development.

In the absence of information through an up to date SHLAA, which demonstrates that the smaller villages have capacity to accommodate 2,800 houses without relying on Green Belt and greenfield locations, we are concerned that the spatial distribution policy could be found to be unsound.

Harris Lamb Property Consultancy

63. We agree with the approach that the Council should maintain a dispersal option as this provides the most appropriate way to meet the District's housing needs to 2028 but we object to both the Wider Dispersal Option (E) and Preferred Approach (F).

There are advantages with the dispersal option where development is permitted in a range of settlements of different sizes, subject to consideration of the specific circumstances of each settlement (ie. the amount of development must respect the individual character of each settlement and the level of infrastructure within the settlement or which can be provided to meet the needs arising from development proposed). However the most sustainable pattern of development will result from a higher level of development in larger settlements, that is, within and on the edge of Stratford-upon-Avon and larger rural towns and villages.

We support the recognition that even the smallest settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing.

Stratford-upon-Avon and the Main Rural Centres have clear capacity for further growth and the wider dispersal options fail to recognise this. The wider dispersal option whereby 50% of the housing provision is directed to the smaller villages and rural areas goes beyond what we consider a sustainable pattern of development

Mrs G Lines

Consultation Question: Q90

1. Support option E

Bidford-on-Avon Parish Council

K J Griffin-Gallagher

Mr M Hipkiss

L H Brice

E Lycett

G F Lycett

R N Butler

Eric Ward

Mark Hind & Tonia D'Bras

Phillip Knowles

Mrs Lesley Smith

Mr H Green

Mr J Alderson

Harbury Society

A J Mann

Mrs C J Mann

Julian Davey

Eclipse Road Residents Group

Nina Knapman

Mrs J M Evans

2. Support option E. Stratford already has the range of facilities to support higher housing numbers. It is in the Local Service Villages and rural areas that local young people need to find work and somewhere to live. Such houses can be available only to young people born within a certain distance from the village.

Mary Lindsey

3. Support option E. Do not wish our larger villages to be developed as Stratford.

Kelly Stepney

4. Some support for option E, but we also support directing additional housing away from Stratford-upon-Avon to the Local Service villages and main rural centres. Suggest an alternative option is followed.

CEMEX

5. Option E is the best option for delivering the housing growth as it will spread the benefits and implications of growth more equitably throughout the district.

David & Angela Tucker

6. Support option E. Villages need incremental growth. This has been stopped for the last 15 years. New businesses will start when new young people can move into the community, but they must have somewhere to live.

Diane Reeve

7. Support option F

Councillor Peter Balaam

Waterloo Housing Association

Robert B Freedman

R D & R J Langman

Howard & Helen Grieves

Brian Darnley

Peter & M J Donaghue

Mr & Mrs Zaffignani

Mrs Caroline Wilks

Jeannie Farr

Dr D Kalderon

Mrs E Kalderon

John Armitage

R K Fisher

Peter Condron

Miss F Longmore

R Burman

Mr + Mrs F Edwards

Mr + Mrs D. J. Cholerton

Susan Marks

Joan Graham

Gordon Harrington

Bill Tucker

Stephen Parker

Mrs M Childs

B E H Whitehouse

Mr B Childs

S.J. Wiseman

Mr & Mrs R E Cain

C.M. West

Mr DCM Young

Patricia Young

Mrs B Wood

P Wiltsliel

Mrs M G Tattersall

Mrs Valerie Lageard

B.W. + Y.K. Bates

Mrs Mary Boddington

Alan Boddington

Mr & Mrs J S Orchard

James E Philpotts

Nick Poulton

Russell Jones

Andrew Davies

S Watts

Mr Peter Pearce

Monica M Beckett

G K Allen

J Steele Nicholls

Andrew Waterhouse

Mrs S.J. Sreeves

Mr E R Green

John D Jones

Peter Taylor

**Anna Candy
Mrs D Geldard
Bernard R Pumfrey
S Venus
Mrs Diane Rogers
R J Beresford
Mr + Mrs J. Farrar
Nicholas Smith
Peter J. Hudson
Mrs C C Scott
Mrs S.M. Cragoe-Jones
R.D. Heppell
Mrs A Murray Watts
Harry Nicholls
Anne Cooke
SM + PV Wall
Mr D + Mrs JH Smart
John Priest
Mrs Margaret Ann Smith
Mr Richard L. Smith
Mrs C.A. Cooper
Mr Derrick Burford
Wootton Waven Parish Council
Elizabeth Lang-Sadler
Mrs G Pawley
Brian Summers
Councillor A.R. Dixon
Stockton Parish Council
Jane & Peter Emerson
Waterloo Housing Association
J Robertson
P F Wyatt
Mr B G Harrison
F Hodgson
Mr & Mrs D J Hammond
Mr & Mrs R Stephenson
Patricia Jebb
Norman & Freda Kitcher
Mrs Vera E Hawkins
S J Warrilow
Mr & Mrs P.F & M.M Williams
A M Tudor
Mrs D Bouham
D Daniel
Anastasia & Peter Hunter
Mr J.M. and Mrs J.A. Kent
Mr J M Hind
Mrs Barbara Spencer
Michael Crutchley
A McIntyre
Mr & Mrs G & W Mazey
Michael Stockhill
Sylvia Leighton**

**David Goodman
Steve Taylor
A L S Orr
B Rossington
Mrs Mary Austin
A Chaplin
A J Whiting
W E & B O Cave
Dai Gistiws
Tony & Sue Holmes
Ann C Curtis
J C Edwards-Broome
Ms M S Wade
Caroline Stewart
W Macdonal
Mr R Dawney
Malcolm J Wilkes
Dave & Mo Sargent
R Dyer
R D & R J Langman
Mrs E J Allard
Brian P Edwards
Carl Conn
John Miller
D Pearson
W. Alan Head
Mr & Mrs R C & J D Hawkins
D E Swinbourne
B Littlewood
Alan & Sharon Morris
Mary & DAR Morgan
E A Foster
Miss N Whittard
Mrs D Lever
R Green
Mr Frank Woodhall
Caroline Abercrombie
Mrs Joyce Johnson
Ms Anne Hicks
Elizabeth Hicks
Miss L Cartwright
Mr C White
Robin Malloy
Mr D Townsend
George & Bryony Disher
Brailes Parish Council
Penny Gildea
Barbara & Peter Dodd
Kevin Gildea
Mrs B A Sylvester
Salford Priors Parish Council
Robert Brisker
Claverdon Parish Council**

Napton-on-the-Hill Parish Council
Stephen Marchant
Mrs G Woodhall
Michael Whick
Grove Industries Limited
Fiona Mackie
Mrs C M Richardson
Stratford-upon-Avon Town Council
Cllr Steven Kittendorf
Miss E M B Sellar

8. Support option F, but should be dispersed, not only on one side of town.

M B Lewis

9. Support limiting total new houses to 560 until 2028. Also very positive is the limitation of new sites to 100 dwellings.

Charles P McCormack

10. Option F provides a more balanced approach and takes the pressure off Stratford-upon-Avon.

Councillor R. Cheney

11. Option F would bring less new houses to Stratford town, Option F would be preferred.

Warwickshire County Council

12. Do not support option F.

Alan Spreadbury

John Harris

John Oldfield

T F R Crossley

B Lomas

Mr & Mrs D J Chamberlain

B Stewart

James Pullin

Steve Taylor

G I Chamberlain

H R Beach

Don Hanson

Mary Jeffery

Michael & Sheila Mills

Mrs E A Brace

A L & J K Page

Roger & Susan Blackwell

Mr & Mrs D A & R E Atkinson

P R Gilmore

Mr D J Ockendon

Pat & Michael Bird

Freda Douthwaite

13. Support wider dispersal option

Robert B Freedman

14. Support option C - moderate dispersal

Long Compton Parish Council

15. The preferred option is wrong. Development needs to be located where there are employment opportunities, providing sustainable development. The district must not just be for retirement centres. Need to change it to either option A, B or C, but would prefer option A as this is where the work force need to live in order to stop environmental pollution.

Rob Pitcher

16. It is not just a matter of the number of houses. Where they are built is also important.

Peter Landsman

17. Support neither option. Cross border development identified by Solihull and Bromsgrove will create a huge impact on Earlswood and Forshaw Heath even if no development takes place.

Michael Andrews

18. Object. Stratford and market towns have the best available infrastructure and should take by far the highest proportion of development.

Michael Andrews

19. The distribution under options E and F have moved too far towards growth in the Local Service Villages and other rural areas. Distributing a high proportion to settlements that in some cases have few existing dwellings and relatively poor facilities may lead to unsustainable development that is contrary to national guidance. A lower proportion of overall level of housing provision would easily allow scope for the needs of larger villages to be met and to help sustain the services that they contain whilst creating a sustainable pattern of development with more growth in the main Rural Centres.

Arrow Developments

20. Support neither option. SDC needs to take account of developments proposed on, or very close to, SDC boundaries. Numbers of new houses in Local Service Villages and Main Rural Centres must be adjusted to reflect this. For Tanworth Parish, our neighbouring Councils are proposing to erect 1349 new houses on our Parish borders. Solihull takes no regard of the Green Belt and the Core Strategy does not mention Solihull as a good neighbour or consulting on cross-border issues. The roads in Earlswood are becoming ever more of a motorway short cut 'rat run'.

Ewen Cunningham

21. Support neither. Serious concern that the working group of 6 included 3 Stratford Town Councillors and none from the North of the District.

Tanworth-in-Arden Parish Council

22. 560 houses in Stratford is still far too many.

David Edward Martin

23. Do not comment on a preference for option E or F but it is important that both housing and employment is delivered to the rural areas in order to have sustainable rural communities.

Country Land & Business Association

24. Support the adoption of Option F (wider dispersal). However we do not accept the comment (in paragraph 9.09) that in reality the development totals will be less than stated in Table 1. In practice, despite the housing requirement being eroded by the inclusion of sites which already have planning permission at the base date, these will be offset against those consents which will be required at the end of the plan period to cater for new housing beyond the plan period (2028 onwards).

Noralle Traditional County Homes

25. E preferred to F

Bidford-on-Avon Parish Council

27. We do not support either option and would support the dispersal of growth that would distribute growth more sustainably by focusing higher levels of housing (i.e. 50%) within the MRCs and lower levels of growth (i.e. 30%) within the LSVs.

Quintessential Inns

28. We support option F but the figures are too prescriptive and would be better expressed as a range e.g.

Stratford-upon Avon	500-600
Main Rural Centres	1400-1600
Local Service Villages and other rural areas	2800-3000
Rural brownfield sites	500-600
Total:	5600

Monitoring of planning permissions and completions would enable adjustments to be made so as to ensure that the broad thrust of the preferred approach is achieved.

Follett Property Holdings Ltd

Consultation Question: Q91

1. Consultation question 91 asks what other option SDC should be considering to distribute development throughout the District. I think that the short answer is: one that is rational and sustainable. That means relating housing development to where people work, and taking account of the impact of demographic trends on employment. In rural areas, special factors apply: employment is lower and still affected by increases in agricultural productivity reducing jobs; the GL Hearn study recommends no additional use of land for employment in rural areas. Historically, housing in rural areas has grown at half the rate of the rest of the District. Table 4 shows the SDC proposal that new housing in rural areas be 19% of rural employment, twice the average for the District. A rational policy would be for new housing in rural areas to be closer to half the average, say 5%. This equates to 735 dwellings in rural areas, of which a high proportion would need to be affordable, reflecting the economic differences between rural and urban areas. With 735 houses in rural areas, that leaves 4305 houses to be distributed between Stratford and the market towns, shared in proportion to existing employment. The result is shown in the table below. This is my proposed alternative strategy for the distribution of development. It is consistent with the two studies produced by GL Hearn, and I suggest that if it were to be evaluated by Lepus Consulting it would be found to be more sustainable than the proposal from SDC.

Proposed Alternative Strategy for Distribution of development

	Employed in District 2009	Housing Increase realistic to jobs
Stratford	17500	1907
Market towns	22000	2398
Rural areas	14700	735
Total	54200	5040

Richard Jenkins & Welford-on-Avon Parish Council

2. If significant new numbers are ever needed then we believe a new sustainable settlement with full infrastructure should be created.

Stratford Liberal Democrat Group

3. The proposed split given in Table 1 differs markedly from that given in Table 2 and proposes wider dispersion than even the most extensive option in the 2010 Core Strategy which was developed following extensive public consultation. The pendulum has swung too far away from development in Stratford towards LSV/rural areas. The proposed strategy would result in the maximum adverse impact on the widest area of the District. I propose that the split should be: Stratford 15%, MRCs 30%, LSVs 35%, other rural 10% and rural brownfield 10%. Particular priority should be given to utilising brown field land whether in rural areas, villages or towns.

John C Read

4. The Cotswolds Conservation Board supports option A.

Cotswolds Conservation Board

5. By wider dispersal the pain and resistance is being spread everywhere. Long Marston as an example of brownfield, could meet much of the needs of the District. The adoption of the Hearn Study recommendations with their more substantive impact would have resulted in more robust and determined utilisation of brownfield sites and spared the green areas from the current level of impact.

Bearley Parish Council

6. We need a distribution that is rational and sustainable i.e. relating housing development to where people work, and taking account of the impact of demographic trends on employment. In rural areas special factors apply: employment is lower and still affected by increases in agricultural productivity reducing jobs; the GL Hearn study recommends no additional use of land for employment in rural areas. Historically, housing in rural areas has grown at half the rate of the rest of the District. SDC propose that new housing in rural areas be 19% of rural employment, twice the average for the District. A rational policy would be for new housing in rural areas to be closer to half the average, say 5%. This equates to 735 dwellings in rural areas, of which a high proportion would need to be affordable, reflecting the economic differences between rural and urban areas. With 735 houses in rural areas, that leaves 4,305 to be distributed between Stratford and the market towns.

Jeremy Smith

7. Long Marston must be the best site for development. It is brownfield and would not upset other people locally. Also public transport could easily be improved. There would be plenty of room to build a school, shops etc. (See Dickens Heath Solihull)

B J Bates

8. Before any development can be agreed it must surely identify the size of the community and if the development would improve the lifestyle for those already there. To increase housing in a village with no services i.e. bus or shop, would not create a better society, just more people having to travel.

Tim Philips

9. Before any distribution figures are considered, the no. of dwellings required needs to be established. Dwellings should be placed next to the towns where the infrastructure systems are well established.

Mr R E Eades

10. With particular attention to Kineton, we recognise there is a need for more affordable homes in the UK but feel they should be more appropriately located within existing town centres, on brownfield sites and perhaps in-fill land. If more affordable homes are to be built then surely it would make greater sense to locate them near employment, especially if the occupants are low-income families.

Mr & Mrs Simon Redmile

11. Parish Council prefers the following proposal:

Stratford-upon-Avon	30%
Main Rural Centres	
- Market Towns	20%
- Non Market Towns	10%
Local Service Villages	25%
Rural Brownfield Sites	15%
Total	100%

Bidford-on-Avon Parish Council

12. Developing outlying villages that are poorly serviced by public transport only encourages greater use of private cars which is contrary to the sustainability issues of the core strategy and will substantially increase carbon emissions.

Pillerton Priors Parish Council

13. I support the creation of a new village sized settlement, preferably on previously developed land, that does not interfere with the character of an existing settlement.

Nigel Rock

14. The evidence from the Sustainability Appraisal and environment/landscape studies would appear to justify a maximum of say, 20% of new development in LSVs and the rural area. As proposed, some villages might be required to expand at a greater rate than has been experienced in the District's urban areas with even greater adverse consequences. Employment in the District is concentrated in Stratford on Avon and in order to promote sustainable development, housing should be provided where journeys to work are short and do not need a car.

I propose that the % of new housing allocated to Stratford should be 35%, MRCs 24%, Larger Villages outside the AONB 20%, other settlements including those within the AONB 10%, brownfield sites 105 (possibly increased subject to acceptable master plans in the light of the NPPF).

Susan & Andrew Vaile

15. I would propose the preferred option to be the following as it is a much more sustainable approach:

Stratford	1613 (32%)
Market Towns	2066 (41%)
LSVs and rural areas	1360 (27%)

Jeff Perks

16. Has it ever been suggested that Stratford is left as it is, and a new village/town is built on land adjoining one of the seven roads leaving the town. Letchworth, Harlow New Towns and Welwyn Garden City all such developments and successful. Lets have Stratford Garden Commune with its own schools, medical, industrial, shops, post etc. run by inhabitants - food for thought? or no?

AL & JK Page

17. CEMEX is not supportive of Option F as currently outlined. It is proposed that the following distribution, as an alternative to both option E and F, is pursued instead:

- Stratford-upon-Avon - 10%
- Main Rural Centres - 20%
- Local Service Villages and other rural areas - 60%
- Rural brownfield sites - 10%

This alternative option will ensure that the Local Service Villages receive the levels of housing they require to maintain and provide the services and facilities required to create sustainable communities in the future. If insufficient housing is provided in the local service villages, and too much housing is directed to the main Rural Centres and Stratford-upon-Avon, then the ability for the Local Service Villages to continue to provide vital services to the rural communities would be significantly harmed.

The Draft Core Strategy outlines (paragraph 9.07) how the proposed 50% for the Local Service Villages and other rural areas under Option F would direct 40% to the Local Service Villages and 10% to the other smaller rural settlements. If the alternative option for distribution outlined in this letter is taken forward then it is proposed that the 60% should be divided as follows:

- 52% for the Local Service Villages; and
- 8% for the other smaller rural settlements.

Cemex

18. History has shown that Stratford is a sought after location with high in-migration, the value of properties alone being a strong indicator of that. Furthermore the fact that approx. 2400 dwellings have been granted approval since 2008 i.e. the first three years of the plan period. If the demand from in-migration was not high than such approvals would not be sought. There is no reason as to why the rate of in-migration should reduce and therefore the 8000 provision is too low.

We also consider that Stratford should accommodate more than 10% of the total housing numbers required for similar reasons as outlined above. We believe that limited development should be allowed in the villages to ensure their future vitality but believe that the majority of development should be concentrated in the most sustainable location in main Towns such as Stratford.

Spitfire Properties LLP

19. Option B, or possible consideration of a new settlement

Mrs J Hancox - Tysoe Parish Council

20. There are advantages with the dispersal option where development is permitted in a range of settlements of different sizes, subject to consideration of the specific circumstances of each settlement (i.e. the amount of development must respect the individual character of each settlement and the level of infrastructure within the settlement or which can be provided to meet the needs arising from development proposed.) However the most sustainable pattern of development will result from a higher level of development in larger settlements that lie within and on the edge of Stratford upon Avon and larger rural towns and villages.

Stratford upon Avon and the Main Rural Centres have clear capacity for further growth and the wider dispersal options fail to recognise this. The wider dispersal option whereby 50% of the housing provision is directed to the smaller villages and rural areas goes beyond what we consider a sustainable pattern of development.

It would therefore be more appropriate for a proportion of the percentage distribution for the Local Service Villages to be redirected towards the Main Rural Centres and some to Stratford upon Avon as the most sustainable locations.

This is particularly significant given the high likelihood that the overall level of housing provision will need to be increased to reflect the evidence base... as this means 50% of the increased provision will also be directed to the villages over and above the 2,800 already proposed.

With this in mind, if the distribution were to be justified as currently proposed, any increase in the overall level of provision of housing should be directed to the Main Rural Centres and Stratford upon Avon. Furthermore, delivery of this level of housing from smaller settlements with limited housing stock on sites that are no more than 2% of the existing stock (as required by Policy CS16) is likely to prevent an issue with the number of sites required and the ability of those new sites to bring forward new infrastructure. For example to deliver the average of 57 dwellings per LSV:

- existing dwelling stock of 200
- each new site would be no more than 4 houses
- about 15 sites would be needed
- no affordable housing would be delivered

In this scenario it becomes clear that affordable housing would not be delivered as the other policies of the plan would not require it on sites of 4 houses. Therefore a substantial proportion of the housing provision would be solely market housing.

Overall, the dispersal approach has local support and we generally support it in principle. The percentage distribution to Local Service Villages and the rural areas has however increased to a level that is unlikely to deliver the housing provision and other objectives of the Plan. Whilst some settlements may be capable of delivering a higher level than others, taken as a whole the 'wider dispersal' distribution is not justified and will not be effective.

We generally support a dispersal approach but contend that whilst some villages have the ability to take reasonable levels of growth, others do not. We would propose that a higher proportion of the housing requirement be directed towards the Main Rural Centres and Stratford upon Avon, particularly if the housing numbers for the District are increased (as we believe is necessary). This:

- offers a more sustainable pattern of development
- allows scope for the needs of local service villages to be met
- provides growth to help sustain the services they support without harm to the wider character of the area and conflict with sustainability criteria.

Claire Linfoot McLean - Linfoot Homes Ltd
Taylor Wimpey UK Ltd.
South East Southam Land Owners Consortium
Mrs G Lines
Mr R Chabra
Banner Homes
Walton Estates

22. ...more appropriate for a proportion of the percentage distribution for the Local Service Villages to be redirected towards the Main Rural Centres and some to Stratford upon Avon as the most sustainable locations. The bulk of the housing which remains for the Local Service Villages should be directed towards the larger, more sustainable settlements, with less for the smaller ones, thus ensuring development complies with national and local sustainability objectives and does not harm the character of individual settlements. It is therefore important that the dispersal option remains, but with greater focus on larger settlements.

Arrow Developments, Mr R Coslett, Mr J Bradley, Mr & Mrs Dimarco
& H.G. Hodges & Sons Ltd

23. Stratford upon Avon and the Main Rural Centres have clear capacity for further growth and the wider dispersal options fail to recognise this. The wider dispersal option whereby 50% of the housing provision is directed to the smaller villages and rural areas goes beyond what we consider a sustainable pattern of development.

We find the proposed distribution under both Option E and Option F has now moved too far towards growth in the Local Service Villages and other rural areas, distributing a high proportion of the provision to settlements that in some cases have few existing dwellings and a poor level of facilities that may lead to an unsustainable pattern of development which is contrary to national guidance. A lower proportion of the overall level of housing provision would easily allow scope for the needs of villages to be met and to help sustain the services that they support whilst creating a sustainable pattern of development with more growth in the Main Rural Centres.

It would therefore be more appropriate for a proportion of a percentage distribution for the Local Service Villages to be redirected towards the Main Rural Centres and some to Stratford upon Avon as the most sustainable locations. This is particularly significant given the high likelihood that the overall level of housing provision will need to be increased to reflect the evidence base (for the reasons given in objections to Q88) as this means 50% of the increased provision will also be directed to the villages over and above the 2,800 already proposed.

With this in mind, if the distribution were to be justified as currently proposed, any increase in the overall level of provision for housing should be directed to the Main Rural Centres and Stratford upon Avon

We generally support a dispersal approach but contend that whilst some villages have the ability to take reasonable levels of growth, others do not. We would propose that a higher proportion of the housing requirement be directed towards the Main Rural Centres and Stratford upon Avon, particularly if the housing numbers for the District are increased (as we consider is necessary). This:

- offers a more sustainable pattern of development
- allows scope for the needs of local service villages to be met
- provides growth to help sustain the services that they support without harm to the wider character of the area and conflict with sustainability criteria.

**The Glebe Committee
& Walton Estates**

24. By wider dispersal options the pain and therefore resistance is being spread everywhere. Long Marston as an example being Brownfield could meet much of the needs of the district. The adoption of the Hearn Study recommendations with their more substantive impact would have resulted in more robust and determined utilisation of brownfield sites and spared the green areas from the current level of impact.

Claverdon Parish Council

25. I generally support the suggested dispersal of new housing across the district, as this should help to keep small villages more viable, particularly if small scale affordable housing schemes are increased. However, larger developments focused on Stratford-upon-Avon would undoubtedly be more sustainable than other locations, and should be prioritised, avoiding greenfield land where possible.

**Mark Hind & Tonia D'Bras
Roger Pamment
Mrs Lesley Smith
Mrs C J Mann
Julian Davey**

26.

- I think the allocation for Stratford-upon-Avon should be higher than that proposed: suggest more in the region of 35/40%. It is by far the largest town and has the best infrastructure and support.
- Main Rural Centres: these can be divided into Market Towns (Alcester, Shipston and Southam - which have received a lot of Advantage West Midlands funding these last years) and the others - in particular Bidford and Wellesbourne have seen a great increase in the number of dwellings in the last 20 years, with little or no infrastructure to accompany this development, and neither have a secondary school. In view of this, I believe the allocation to the Market Towns should be higher (20%) than the others (10/15%).
- Local Service Villages: it appears that some of these do wish, and require, some development to ensure they are sustainable. As long as proper consultation takes place and the local communities agree to it, small scale developments of a sympathetic nature should be allocated to these village (20/25%) - these percentages assume that no development has taken place here in a number of years.
- Brownfields: I believe these areas should be used for development as they are normally quite derelict (15/20%).

Elisabeth Uggerlose

27. The option of a new settlement has not been put forward for consideration. Attaching estates to settlements could overwhelm the distinctiveness of many of them.

Councillor Hazel Wright

28. **Set Design - not done - still awaiting EDMS**

29. NPC would prefer to see more development on brown field sites and less in local service villages.

Napton-on-the-Hill Parish Council

30. The Cabinet figure of 8,000 dwellings is slightly below the 8,200 proposed in GL Hearn Option 3 - 25% reduction in net in-migration. The Cabinet's decision to reduce in-migration by 25% was taken without any agreement with neighbouring authorities to accommodate this. As GL Hearn indicates Option 3:

- Would need to be part of a sub-regional strategy aiming to direct most housing demand elsewhere. If not part of such a strategy then there is a high risk of the option being found unsound at Examination in Public.
- Falls well short of meeting housing need and demand
- Does least to support the local economy leading to a significant reduction in the local labour supply/workforce.
- Would hinder the development of a more balanced population structure with a reduction in the number of persons under 60 and an increase in the number of people over 60.
- Most positive benefits as regards the environment with least use of Greenfield land and the least amount of new infrastructure.
- Most likely to preserve the character of the district. Overall 1 would have least environmental impact but would have higher economic and social cost.

It is clearly the case that NPPF seeks a balance between the three dimensions to sustainable development whereas Stratford-on-Avon District Council is putting far too much emphasis on the environmental role to the detriment of the social and economic roles.

RPS therefore recommends that the housing figure should be increased to be in line with the GL Hearn recommendation of 11,000 - 12,000 dwellings as a minimum, albeit the favoured approach is the 13,600 figure identified by the SHMA Market Review. As indicated above Stratford -on-Avon District Council is advised that the identification of housing requirements should be based on sound evidence

of need and demand with policies which are based on robust evidence as part of the Core Strategy's tests of soundness.

Miller Strategic Land

31. [Need to adopt] a solution that is rational and sustainable. This means relating housing development to where people work and taking account of the impact of demographic trends on employment. In rural areas, special factors apply: employment is lower and still affected by increases in rural productivity reducing jobs; the GL Hearn study recommends no additional use of land for employment and placing housing close to employment. Consideration should also be given to a new settlement such as Long Marston where road and rail infrastructure may be easily achievable.

Mrs Julie White - Tanworth-in-Arden Parish Council

32. RPS consider the proposed strategy of the previous consultation 'Directions for Stratford-on-Avon District Consultation Core Strategy' published in February 2010 should be reconsidered. The previous consultation included the following statements regarding Stratford-upon-Avon, its role and the distribution of housing to the town:

- Vision (page 9) - ***"Some urban extensions will have been sensitively developed in ways that protect the town's setting and character."***
- Paragraph 3.2.2 (page 13) - ***"A significant amount of development within and on the edge of Stratford-upon-Avon, being the largest and most sustainable location within the District, but on a scale that is appropriate to the size and character of the town, and which can be accommodated by existing infrastructure or through improvements that can be delivered."***
- Paragraph 3.4.1 (page 14) - ***"The preferred approach is to focus most new development in the main town of Stratford-upon-Avon and the larger rural settlements but also to allow scope for schemes that are intended to meet the needs of smaller settlements."***

The preferred approach of the District Council to the delivery of housing has been significantly revised from the previous version of the Core Strategy. It proposes wider dispersal of housing throughout the District with 10% directed to Stratford-upon-Avon, 30% in the Main Rural Centres, 50% in Local Service Villages and other rural areas, and 10% on rural brownfield sites. The previous consultation document dated February 2010 proposed a strategy which allocated some 41% (2,110) dwellings of the housing growth to Stratford-upon-Avon. RPS strongly object to this revised approach to the delivery of housing, which only seeks to deliver 10% or some 560 dwellings at Stratford-upon-Avon. In reality that figure is significantly reduced due to existing commitments and will result in no growth at the District's principal settlement. The wider dispersal of housing growth is not in line with the principles of sustainable development as it is likely to increase reliance upon the use of the private car and will not provide homes near to services, retail and employment in Stratford-upon-Avon.

Stratford-upon-Avon is the principal settlement and is identified as a Strategic Centre through Policy PA11 of the RSS. It is able to provide balanced opportunities for housing and employment and is clearly a location capable of accommodating strategic growth over the Core Strategy period. The Town had a population of 26,000 people at 2008, which is some 22% of the District's population, and supports an extensive range of services, facilities, employment and is well served by rail links to Birmingham...it would therefore be far more appropriate to recognise this as the location most suitable for delivering the principal focus of the District's strategic housing requirements, with the use of sustainable urban extensions being an integral component of that preferred strategy.

It is RPS's view that a strong case exists for locating a greater proportion (41% as previously advocated of housing growth at Stratford-upon-Avon (particularly through redistribution of growth from the less sustainable Local Service Villages) given its principal settlement role. To imply that it may be appropriate to locate development growth elsewhere in the District, in preference for example

to the Bishopton Lane site, would not only fail to utilise an available, suitable and deliverable urban extension location, it would also represent a less sustainable strategy, contrary to the aims of the National Planning Policy Framework.

Miller Strategic Land and Taylor Wimpey

33. The ability for small infill, and edge of village/town should be permitted where development is of sufficient high quality and sustainable design.

Stephen Marchant

34. Sustainable development can only happen where there is employment and the services that this brings. Building houses in the rural areas will not create employment in those areas nor will it create improved services and facilities. To date there has been a reduction in services and facilities - loss of rural post offices, loss of retail outlets, reduction in public transport - so what is going to happen to reverse this?

P J Boreham

35. We would not be in favour of the proposals in Earlswood. Previous surveys from relatively recent proposals indicate that Earlswood does not have the infrastructure to cope with the maximum number of new dwellings per the proposals. We would wish to see it capped at a maximum of 10% of the number of dwellings identified in the "Methodology for Identifying LSVs" document (created 24 November 2012 by Sue Nash) (she identified 415 dwellings).

Mrs J and Mr M Buckley

36. We consider that the dispersal of growth should be distributed more sustainably by focusing higher levels of housing (i.e. 50%) within the MRCs and lower levels of growth (i.e. 30%) within the LSVs.

Quintessential Inns

37. SDC needs to take into account developments proposed on, or very close, to SDC boundaries. Numbers of new houses within LSVs and MRCs must be adjusted to reflect these. For Earlswood, our neighbouring councils are proposing to erect 1349 homes right on our Parish borders. Solihull in particular appears to have no regard for the green belt and its draft Core Strategy makes no mention of Solihull ever being a good neighbour or consulting on cross border issues. These are:

Solihull MBC

Blythe Valley development:	250	Phase 1
Blythe Valley development:	250	Phase 2
Mount Dairy Farm development:	200	Phase 3
Cleobury Lane development:	185	Phase 3
Griffin Lane development:	50	Phase 2
Braggs Farm/Bricklin farm development:	65	Phase 2
Four Ashes Rd development:	150	Phase 1

Bromsgrove DC

Wythall	199
Total	349

This is squeezing the village and will cause a huge increase in use of the local infrastructure as the roads in Earlswood and Forshaw Heath are becoming ever more of a motorway shortcut "rat run".

Our own extrapolations from your and GL Hearn's work indicate that, using your preferred option, you are going to allocate 41.5% (2800) of all new build housing to LSVs. This represents a 17% (2800/165000) increase in LSV sizes across the District whilst keeping Stratford and the main market towns growth down to 2240 new build houses, which represents growth of 5.7% (2240/39500). However, historically employment in LSVs has stood at 27%, whilst in Stratford and the main market towns at 73%. Housing needs to be where the employment is and where employers require it to be. Stratford itself has a very large tourist industry that's not reflected to the same degree in the west of the District. We would propose the preferred option to be:

Stratford: 1613 (32%) of new houses
 Market Towns: 2066 (41%) of new houses
 LSVs and rural areas: 1360 (27%) of new houses

We believe that this is a much more sustainable approach. We would question whether having a working group of 6 people, with three of them coming Stratford on Avon wards reflects the view of the District fairly when working out a dispersal policy for the future.

We believe that the Council should produce a survey that shows the amount of non-green field land available in the Council's area suitable for domestic development. It should identify all the locations and sizes of land parcels. This needs to be the secondary basis for determining where increases in the housing pool could take place.

Earlswood & Forshaw Heath Residents' Association

38. This draft planning strategy as it relates to the towns of Stratford and Alcester (1) Identifies yet more peripheral potential development sites, all of which would add to urban sprawl, but (2) Assumes that all people who wish to live in these towns must have houses provided there. At that rate, Stratford would become ever larger in area, because it is a favourite place to live. To preserve the nature of these market towns and the historic connections of Stratford, with its economy heavily dependent on tourism, surely a prime strategy objective should be to prevent urban sprawl? If we cannot satisfy housing needs within the boundaries of existing settlements (and that is not demonstrated) then we need to start new settlements, not ruin existing ones, with all the travel and disconnectedness outward expansion entails. Policy CF6 is fine, so far as it goes, but it does not state that after a limit is reached, we need to develop new towns or villages.

Gordon Brace

39. Development of a new settlement should be considered rather than tacking houses on to existing urban areas.

Councillor S A Juned

40. Local housing needs survey must be the main drivers for actual numbers of new dwellings in each settlement.

Councillor S A Juned

41. Assuming the 2,240 dwellings (as set out in Policy CS15) were equally split across each of the Local Service Villages, this would equate to 57 dwellings per settlement. The table below assumes a 70% reduction in housing quantum for those settlements which are highly constrained and a 35% reduction for those which are partially constrained.

Level of constraint	No. of Settlements	Reduction (%)	No. of Dwellings
Highly	12	70	204
Partially	24	35	889
Total			1093

On the basis of the above, this would leave **1,147** dwellings to be delivered across three Local Service Villages. As set out at the start of this section, Policy CS16 and Particularly Section C relating to Local Service villages fails to give the necessary spatial direction having regard to the constraints and should therefore introduce a clear steer as to how the remaining 1,147 dwellings should be distributed within the unconstrained Local Service Villages; the policy is therefore unsound as currently written.

Broadway Malyan

42. We have previously set out that the level of housing growth proposed within the Core Strategy fails to satisfy current national planning policy within the NPPF. Policy CS16 of the Core Strategy fundamentally under-estimates the level of housing growth required to meet future need and demand and is consequently unsound. It is our view, that the higher end of the recommended Hearn range, of 12,000 dwellings over the plan period be inserted into Policy CS16. By applying such a quantum of housing, it will meet local need and demand for housing and go towards meeting social and economic objectives as set out in the NPPF.

At this juncture the Core Strategy does not provide a strategy as to how and where an additional 4,000 dwellings would be distributed. In Section 5 of the representation we have highlighted the critical issues the district faces with regard to national designations and constraints, and how they impact on the distribution of housing.

It is our view that an additional 4,000 dwellings are required but the current settlement hierarchy would not be able to withstand such a quantum 'bolted on' or in filled throughout the district settlements. Therefore, an alternative sustainable approach is required in the form of a focused growth point.

Having regard to the acute housing need within the District, the critical issues it faces through national designations and constraints covering large parts of settlements and the countryside, we believe the council should consider an alternative approach in the form of a new focused growth point in and around Lighthorne Heath.

Lighthorne Heath is not constrained by any national designations or constraints. Lighthorne Heath lies to the east of the District, off Junction 12 of the M40 with good access to the centres of Banbury, Royal Leamington Spa and Warwick. The B4100 that runs through the village provides access to the above centres without having to use the M40.

An approach of locating 3,500 -4,000 new dwellings at Lighthorne Heath would promote sustainable development which could deliver substantial community/local facilities. A development of this quantum could deliver a nursery school; primary school; secondary school; doctors surgery; pharmacy; library; community centre and a significant local centre.

Importantly, Lighthorne Heath has the advantage of a significant district employer, employing over 5,000 people at the Gaydon sites which adjoins the settlement. This hub of highly-skilled employees effectively on 'the door step' of Lighthorne Heath would allow the growth point to be truly sustainable and provide the catalyst for additional high value research and developed jobs ancillary to the world brands already located at Gaydon.

In summary a new growth point at Lighthorne Heath could provide an exemplar 21st Century sustainable mixed use community. It would make a significant contribution in delivering the much needed housing required within the district in a location well served by infrastructure and derived of constraints. A new growth point provides the opportunity to design-in the greenest of technologies

from conception. It would seek to reduce carbon dioxide emissions through promoting a more sustainable way of living, utilising the highest level of environmental technology and by reducing the need to travel.

We urge the Council to consider our alternative approach for a new growth point at Lighthorne Heath in the next round of the Core Strategy.

Broadway Malyan

43. The Council's original proposal for a 'new village' with all amenities west of Stratford makes more sense.

Mr & Mrs Michael & Olivia Brown

44. Allocation proportionate to job growth suggests that most of the development should take place in Stratford and the District's urban areas, so I cannot understand why the Council is proposing the reverse of that. A better allocation would be Moderate Dispersal shown as Option C in Table 2.

Jill Kirby

45. Our village meeting, attended by over 80 people, overwhelmingly supported the option C dispersal proposed in the 2010 Consultation Core Strategy (that is 20% development in Local Service Villages), with 'Local Choice' policies at the centre of development determination.

Long Compton Parish Council

46. The District Council needs to re-define Local Service Villages that have a meaningful public transport infrastructure and if they qualify on this test, then the test needs to identify those villages that qualify on settlement size and then key facilities. Key facilities also need definition. Is a post office that opens for two hours on each of two days a week a key facility? According to your logic, the answer is "yes". I would answer "no" - and that is from our experience of living in a village. More work is needed on this definition.

Jeff Perks

47. We believe that limited development should be allowed in the villages to ensure their future vitality but believe that the majority of development should be concentrated in the most sustainable locations in the main towns such as Stratford.

Spitfire Properties LLP

48. As required by planning policy, to secure a sustainable pattern of development, successive planning strategies have sought to focus development at Stratford-upon-Avon, which was rightfully identified as the pre-eminent settlement within the District. RPG11 identifies Stratford-upon-Avon as a strategic centre and an other large settlement. It is the only settlement within the District afforded such a planning status. Paragraph 218 of the NPPF confirms that Local Planning Authorities can continue to draw on evidence that informed the preparation of Regional Strategies to support Local Plan policies.

The town's role has been maintained in subsequent revisions of the strategic planning framework in the Stratford-on-Avon Local Plan (2006), the West Midlands Regional Spatial Strategy Phase Two Revision Draft (2007) and the West Midlands Regional Spatial Strategy Examination in Public Panel Report (2009).

More recently, the settlement was also afforded a pre-eminent role within the Stratford-on-Avon Issues and Options Core Strategy (May 2007), the Draft Core Strategy (October 2008) and the Directions for Stratford-on-Avon District Core Strategy (February 2010). If properly articulated through planning policy and proposals, such a settlement hierarchy ensures that homes are provided closest to where jobs are most likely to arise, where there is greater potential to secure increased

public transport investment and usage and where development would support the Core Strategy Vision of building healthy, safe, informed and active communities who are able to enjoy local services and employment opportunities.

This approach is firmly based on the NPPF's sustainable development objective of ensuring that patterns of growth are managed to make fullest possible use of public transport, walking and cycling and to focus development in locations which are or can be made sustainable (paras. 17, 30 and 34 refer). It has been considered and supported by independent examinations and sustainability appraisals. There have been no material changes in circumstance to warrant a departure from this spatial strategy, with the Third Draft Core Strategy outlining that:

"Stratford-upon-Avon as the main town provides a wide range of shops, services and jobs for its own population and a large rural area around it, as well as having a national and international role as a tourist attraction" (para 9.1.6. refers).

Accordingly, Stratford-upon-Avon is rightfully identified as the sole main Town in the District and we therefore support that aspect of the proposed settlement hierarchy (i.e. para 9.1.6 of the Third Core Strategy).

As the sole Main Town within the District opportunities to maximise development at Stratford-upon-Avon should be identified as a priority, regardless of the overall level of growth in future versions of the Core Strategy. In accordance with this settlement hierarchy development would then be focused at the Main Rural Centres, followed by a significantly lower proportion of growth at the Local Service Villages reflecting their less significant role and function.

For the reasons outlined above, development opportunities at Stratford-upon-Avon should be afforded a priority over other settlements in the District regardless of the overall level of housing in future iterations of the Core Strategy.

Whilst the settlement hierarchy proposed in the emerging Core Strategy speaks in these terms, it proposes to carry forward a distribution of development which is incompatible with this. Specifically we refer to policy CS16 and the proportion of development to be directed to Stratford-upon-Avon in comparison to the Main Rural Centres, Local Service Villages, within and adjacent to smaller settlements and on previously developed land in the countryside. The Policy directs some 5,040 new dwellings (63% of growth) to these locations, with only 560 dwellings (10%) being directed to the Main Town of Stratford-upon-Avon. This is clearly at odds with the settlement hierarchy and represents a departure from the sustainable distribution of development identified in previous iterations of the Core Strategy. More significantly, it conflicts with the sustainable objective outlined in the NPPF of actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable (paras 17, 30 and 34 refer).

J S Bloor (Tewkesbury) Limited and Hallam Land Management

49. In light of the new NPPF, it might be more appropriate to direct more development towards the main rural centres instead of the local service villages and other rural areas, as the local service villages and other rural areas might not have a large enough range of services to sustain the local population and reduce the need to travel

Oakley Mayfield

50. Larger developments focused on Stratford-upon-Avon would undoubtedly be more sustainable than other locations, and should be prioritised, avoiding greenfield land where possible.

Julian Davey

51. Of the three Options identified in the Housing Options Study, Stansgate supports Option 2: Economic Led Projection as this is the only option that has a positive economic benefit and brings about employment growth. The wider evidence base of the plan demonstrates that public consultation responses put great weight on job opportunities and this aspect should be ascribed great weight in determining which option to support. This targets delivery of 13,000 houses.

In respect of the remaining 2 options: Option 1: Main trend Based Projection of 10,300 houses fails to meet other objectives of the Plan as it does nothing to achieve a more balanced population structure and Option 3: 25% Reduction in Net-in-Migration fails to plan for the identified need and demand.

Mrs G Lines

52. RPS recognises that Stratford-upon-Avon, and to a lesser extent the Main Rural Centre settlements, should accommodate the majority of the additional housing requirement overall in the District (of at least 3,000 dwellings between 2008 and 2028) which is justified by the evidence of household growth

Trustees of W A Weaver

53. Propose distribution of 8,000 houses as follows:

Stratford	20%	1,600
Main Rural Centres	35%	2,800
Local Service Villages	30%	2,400
Rural Brownfield Sites	15%	1,200
Social housing @ 35%		2,800

W A Lowe

Draft Core Strategy 2012 - Summary of Representations

9.1 Distribution of Development

1. Alveston and Tiddington are in my town ward of Alveston and so any decision for these two to be classified as service villages rather than as part of Stratford upon Avon Town should only be taken on the agreement of both communities/residents associations.

Cllr Ian Fradgley

2. Even allowing for the crude dispersal of numbers to Local Service Villages (LSVs) in the draft plan (without taking account of things like the Green Belt) the total lack of infrastructure in the market towns and LSVs can only mean many more car journeys on unsuitable roads around the district. More schools, better sewerage and improved transport to match the dispersal are not in the gift of the District Council

The Chairman - Tanworth-in-Arden Residents and Neighbourhood Watch Association

3. Amend Section 9.1 to provide clarity.

Wellesbourne Airfield

4. As over 2400 new dwellings have already been built or approved in the first three years of the plan period, the establishment and management of phasing is crucial to avoiding over / under provision and a lack of robust comparisons of sites, in terms of relative sustainability. Monitoring the speed of approvals is also important to ensuring conformity with the Strategy.

I generally support the suggested dispersal of new housing across the district, as this should help to keep small villages more viable, particularly if small scale developments focused on Stratford-upon-Avon would undoubtedly be more sustainable than other locations, and should be prioritised, avoiding greenfield land where possible.

Mr H Green

5. William Davis Ltd has continuously supported higher levels of residential development in Stratford-upon-Avon and maintain the view that development in and around the town is the most sustainable option for residential development. Consequently we object to the council's preferred dispersal approach and reiterate our opinion that increased levels of growth should be directed away from rural areas to Stratford-upon-Avon. In the February 2010 Core Strategy consultation document the lowest suggested allocation of housing suggested to go to Stratford was 30%, which is three times higher than the 30% proposed in the Council's preferred option. We consider that the 30% proposed should be considered a minimum for the level of development proposed for Stratford-upon-Avon and that a considerably higher figure should be included in the Core Strategy to ensure the most sustainable development option for development is included in the development plan, in line with national policy.

Robert Jays - William Davis Ltd

6. We do not object to the principle of spreading development across the district. However it is unclear how the focus is on the Local Service Villages and other rural areas rather than on the Main Rural Centres (MRCs) which are further up the hierarchy. In addition, it is not clear where the restriction on new developments (outside Stratford Town) being restricted to a maximum of 100 dwellings or 2% of the existing housing stock is derived from. The size and suitability of the site should be derived from individual site and area circumstances. We therefore strongly object to this proposal. Our preference is for Option B which focuses development on the main Rural Centres (in addition to Stratford Town) which are the more sustainable areas.

Orbit Homes

7. We do not object to the principle of spreading development across the District. However, it is unclear why the focus is on the Local Service Villages and other rural areas rather than on the Main Rural Centres which are further up the hierarchy. Our preference is to focus development on the Main Rural Centres, in addition to Stratford town, which are the more sustainable areas.

Taylor Wimpey UK Ltd

8. As you know Radway have a Parish Plan which was adopted in 2002. The Parish Council decided 2 years ago that the plan should be updated and a village questionnaire was prepared. The results of the questionnaire were analyzed by Stratford District Council in January 2011 and they show that over 73% of residents do not wish to have any development in the village. 9 out of 10 residents value the open spaces and countryside feel within the village and 89% feel that the open spaces within the village are important and wish to preserve and protect them.

Mrs Corinne Hill - Radway Parish Council

Topic: 9.1 Strategic Objective

No comments received for this section

Policy CS.16 Spatial Distribution of Development

1. There are hundreds of vacant properties in towns across the country ready for development with utilities already in place. Sewage systems in villages are old and not big enough to cope with extra demand. With no mains gas supply in many rural villages, electricity is the main source of energy. Last year we were cut off constantly because demand for electric use was more than the substation could cope with.

Building more houses in villages is going to result in people having to use cars to commute to work or shop. Travelling to school, secondary education and colleges from rural villages costs hundreds of pounds a year on a very limited bus route. Most of the small industries in villages have gone, bus routes have been reduced or stopped so it is vital to have a car which is very costly and damaging to the environment. As a nation we have a duty to preserve our planet.

Denise Montgomery

2. We need clarification over whether or not supply from care accommodation does or does not count against overall housing supply for the purposes of CS.16.

3. CS.16 could be significantly strengthened by expressly stating that 'residential institutional development' will not be permitted. We may even wish to consider an outright prohibition against further Class C2 development.

Tim Willis, Warwickshire County Council

4. I would like it to be made mandatory that all developers include up-to-date research information and statistics about the number of empty, unused housing which exists in any area when they wish to develop any planning proposals. I remain deeply suspicious about the real need for new housing when it has been reported that there are upwards of 2 million empty, boarded up, potentially derelict houses throughout the UK - a disgrace!

Jeannie Farr

5. In Section 9.05 compliance with an agreed Masterplan is stated. What does this mean? However, in the Cabinet Notes the addition of *and/or Neighbourhood Plan* is welcome.

Bearley Parish Council

6. We support this policy but recommended that the policy be reworded to state:
- A. Provide for up to 560 dwellings **at** Stratford-upon-Avon
 - B. Provide for up to 1,680 dwellings **at** the Main Rural Centres...
 - C. Provide for up to 2,240 dwellings **at** the Local Service Villages...

This makes greater allowance for the provision of developments at the urban or rural edge of settlements and will bring this policy in line with earlier policies, including CS.6 which makes allowance for developments outside the existing settlement. Controls may be introduced to ensure developments are in proportion with the existing level of development without significantly affecting the character or appearance of the surrounding area.

7. The estate sizes appear arbitrary and should not be included within the final Submission Draft Core Strategy. These would be better replaced with an indication that housing developments will be determined on their merits, taking account of site specific circumstances and the design quality of the proposed development.

Tetlow King Planning, West Midlands HARP Planning Consortium

8. New housing should be organised such that no new development should be more than 100 homes and these must include the appropriate number of affordable homes.

Alan Marks

9. Too high a % of the new housing is allocated to LSVs. A higher % should be allocated to the MRCs where it is more cost effective to expand the infrastructure and centre facilities to both a) enhance the MRCs and b) handle the influx of more residents.

Jane Ainley

10. The proportion of new homes proposed for villages such as Long Compton is too high. Far more should be allocated to Stratford and the larger towns. The homes should go where the jobs and facilities area. You should consider the increased traffic on rural roads and the increase in emissions. Village life means being car dependant. At the same time housing in the villages must increase but only at a level that sustains the required increase in affordable housing. This should be determined by Neighbourhood Plans.

11. It cannot be right to opt for 55% of new homes to be built in locations that force residents to use cars because there is no useful public transport available. The proposal to put this proportion of new homes into the selected villages just increases traffic on dangerous rural roads and increases emissions.

Diana Richardson

12. As far as the village I live in is concerned: Long Compton, I do not agree with the % of new housing to various areas. To allocate 50% of new housing to your "hub" villages in rural areas and only 10% to Stratford is ludicrous. The jobs are not in the villages but in the towns and if the Global Climate is of concern then consider the carbon footprint.

13. I agree that affordable housing for the young is vital and much more is needed and certainly Long Compton should have some. What I do not agree with are your figures.

- a) this is a rural village on the edge of the district, and often overlooked for that reason
- b) we have appalling transport links - a couple of buses a day that would not help anyone gravelling to work or college.
- c) our sewer systems etc. are grossly inadequate to cope with the existing properties and frequently fail, they would not cope with the number of houses proposed

- d) the school has a max of 83 places with 73 already filled and there is no possibility to extend by building on the existing school site
- e) it is in a National AONB and as such large scale housing developments would be wholly wrong.

Lucy Wolff

14. The more houses being built the greater the demand from Birmingham, Coventry, Leamington etc. Where will it all end??

Mrs GM Reid

15. I agree with the preferred option of building no more than 560 homes in Stratford-upon-Avon.

16. I agree with the max estate size in Stratford-upon-Avon of 100 houses (or less).

John Alan Finney

17. I do not agree with the removal of the 30% rule. The abandonment of the present policy of concentrating all new building around Stratford Town where existing infrastructure could support such increases in accommodation. The suggestion of sharing the increases in accommodation with outlying areas where the infrastructure is not sufficient to support such increases is not practical or sustainable.

Jon Rolt

18. As a general principle the key to the location problem is employment. The average of the district is rising. New houses have to be supported by people who pay rents and mortgages. The housing needs to be near the employment or the shops or more car miles will be generated.

Whitchurch Parish Meeting

19. The recommended spread of housing across the Stratford area is too large and will destroy the very essence of rural life e.g. Alcester, Bidford and Salford will possibly have 600 dwellings built within a 3 mile area. Due to a lack of employment and shopping facilities, travel is essential adding to road congestion and with the spiralling cost of fuel most probably unsustainable. Salford Priors a few years ago had a survey and found a need for approximately six dwellings to accommodate future needs. The essence of government policy is to allow local areas to determine their own needs and this should be cascaded down to Parish Council level. Although trying to look after the public at large I would urge you not to forget the local people who have a real fear over development.

John Wright

20. Location for development is best achieved by allowing developers to make an application and for this to be judged against local opinion rather than by arbitrary boundaries.

Morton Bagot, Oldberrow & Sperrall Parish Council

21. More than 10% of houses should be in Stratford-upon-Avon and towns such as Shipston, Alcester, Southam, Kineton, Wellesbourne etc. should also have a larger % of new houses. These places have much better services, transport and employment availability than any of the small villages and are more suited as locations for affordable housing. The LSVs should have a much lower % of the new houses. Many have poor transport links, very few services and already have high demands on their structures such as drainage. Long Compton has no regular bus service, a school which is already near max capacity and poor drainage that already consistently floods. As a village we are in an AONB and as such the village should be preserved and any further building should be in keeping with the village.

Peter Kroner

22. I have lived in Tanworth-in-Arden for 22 years. During that time the village has maintained its rural nature owing to the surrounding greenbelt and the 'conservation area' designation. I cannot understand how a maximum of 2% increase of existing housing stock is going to maintain the rural

aspect of the village as most of the development land is greenbelt. I understand the need for additional housing but a dispersal strategy is not the answer. I support the development by Bloor Homes which is the subject of a public inquiry.

Glenn Holt

23. We support the following proposals:

- No more than 560 homes should be built in the town of Stratford-upon-Avon;
- The max estate size should be no more than 100 homes;
- The option to focus development on large brownfield sites (9.0.11); and
- Priority for development on brownfield land and infill plots including rural areas.

David and Beverlie White

24. I strongly agree with a wider dispersal approach to development. Stratford town should be relieved of further development. Tourism and the Shakespeare connection in Stratford town is a valuable asset and should be nurtured. I prefer Option F to E but believe that the MRCs, particularly Bidford, has adequate infrastructure to support more housing than 30% (i.e. 40%).

D E Harman

25. We consider the 8,000 dwellings, less 2,400 already accounted for, appears reasonable.

26. However, both options E and F are unrealistic. No evidence or data is provided to justify the proposal that 50% of new houses should be in LSVs and other rural areas. Wilmcote Parish Council considers that unless evidence can be produced that justifies dispersed development it should be abandoned.

27. Wilmcote Parish Council proposed that the majority of new houses should be where there are employment opportunities and a range of services including schools, medical and dental practices, shops and public transport. It is proposed that no more than 560 (10%) should be built in LSVs and a large number of these should be affordable family homes. Thus 5,040 should be in Stratford-upon-Avon, the MRCs and the rural brownfield sites.

28. The proposal to put 2,800 new houses in LSVs and other rural locations will have a major impact on rural roads and is inconsistent with Policy CS.25 regarding rural traffic. The Draft Core Strategy acknowledges that increased development in the countryside and rural areas could result in increased car usage with the negative impact of increasing air pollution.

Wilmcote Parish Council

29. Whilst we support the broad distribution of development we do not support the wording of this policy as it currently stands. Specifically we are concerned that development in most settlements will have to wait until sites have been *allocated for development in the Allocations Development Plan Document or the Neighbourhood Plan has been completed, whichever is the sooner*. This will have the effect of imposing unnecessary delays on the bringing forward of potential schemes in local service centres and main rural centres in particular. We wish to see a more positive policy approach to the delivery of such housing. For example the Isle of Wight Council is about to adopt its Core Strategy, and includes a policy (SP1) which states that:

*'The Council will, in principle and in line with its overarching approach to economic led regeneration and national policy, **support development on appropriate land within or immediately adjacent the defined settlement boundaries** of the Key Regeneration Areas, Smaller Regeneration Areas and Rural Service Centres and will prioritise the redevelopment of previously developed land.'*

The East Riding of Yorkshire has included similar wording (supplied).

The key words in these policies are 'support development' and 'support the provision of'. Both authorities recognise that it could take some time to bring forward an Allocations Development Plan Document (DPD) and therefore it will be important that planning applications can be considered favourably before such a document is adopted to ensure a steady supply of houses in a range of settlements by size. Stratford's Policy CS 16 seems to impose a delay on bringing forward potential housing sites in main rural centres and local service centres settlements identified to receive housing development. We would suggest the following wording at the beginning of sections to A, B, C and D of this policy:

'The Council will support planning applications for the development of a minimum ofhomes (number to be inserted accordingly) in select one - Stratford upon Avon, Main Rural Centres, Local Service Centres and other smaller settlements) on appropriate land including land allocated in the Allocations DPD and/or Neighbourhood Plan within or immediately adjoining the existing built up areas (of these settlements).

30. We also wish to object to the reference in Policy CS 16 aimed at ensuring that estate sizes in Local Service Centres are no more than 2% of the existing stock unless accompanied by a Masterplan or by a compliant neighbourhood Plan. Masterplans and/or Design and Access Statements would be expected for any size of housing development in any event, and would need to comply with the District's Design Guide and the Core Strategy policies on design. However by encouraging schemes of no more than 2% of the existing stock the policy will fail to deliver the right type and mix of housing. Of the 38 Local Service Centres 17 settlements currently have only enough dwellings to support development schemes of up to 5 dwellings (2% of existing stock), and another 17 only have enough dwellings to support small development schemes of 6-10 dwellings based on the 2% rule. Effectively this means that:

- It will require between 280 and 560 sites to be identified in these local service centres assuming an average site size ranging from up to 5 and no more than 10 dwellings per site - this is equivalent to between 7 and 15 housing sites per LSC will need to be found and planning permission secured - an almost impossible task given past records of achievement;
- Very few if any affordable homes would be built in these settlements as Policy CS 17 sets a threshold of only having to provide affordable houses on sites with 5 dwellings or more. It is clear that most developers and landowners will aim to come forward with schemes of 4 or less market

We therefore strongly recommend that the reference to estate sizes of no more than 2% of the existing stock be removed.

31. With reference to the list of Local Service Centres (*Villages*) listed at Para 9.1.6 we consider that it is absolutely essential that no settlements are removed from this list of LSCs. We can clearly see situations arising in some villages where there will be strong opposition to housing development. However, if one settlement is removed it will encourage others to seek special treatment. The success of the dispersal strategy depends on all the LSCs meeting their share of housing having regard to existing settlement size, availability of services and the availability of suitable housing sites within and adjoining the settlement boundaries. It will be vital that each Parish Council sign up to this list of LSCs, and is committed to delivering housing within their Parish.

32. Although within the Stratford Town Council administrative area, it will be important that villages such as Tiddington and Alveston are confirmed as Local Service Centres in their own right. These villages have their own character and identity and have different issues to Stratford-upon-Avon, and as such their housing needs should be considered separately. Again it will be important that Stratford Town Council and also the Alveston Association sign up to the designation of both Tiddington and Alveston as Local Service Centres and are therefore committed to encouraging new housing in these settlements in accordance with the policies of the Core Strategy.

We particularly support the comment in para 9.1.8 which states:

*'This classification above derives from the former District Local Plan and **there is no apparent reason why this settlement hierarchy should be called into question.** It has been derived from the number of facilities and services in each of the settlements and has been consulted upon in previous drafts of the Core Strategy. **Responses to previous consultation were in the main supportive of the approach.**'*

Geoffrey Princes Associates Ltd

33. The 8,000 dwellings is way too high and appears to exceed planned growth in other tourist centres in the UK.

34. I would have preferred Option C Moderate Dispersal as this would provide for greater safeguard of green belt and village character.

35. I am concerned that a 2% target for development in rural villages is too ambiguous and could allow multiple developments which would be detrimental to local character. Spreading housing throughout the district cannot be justified as the developments would be isolated from employment centres and transport infrastructure.

David Redfearn

36. I agree with the preferred option of building no more than 560 houses in Stratford and that the max estate size should not exceed 100 houses. I do not see why the Council has published a plan showing possible development sites without having tested them. This will serve only to bombard the town with further planning applications that will lead to further degradation of this area.

37. Continued development of housing on green spaces in Stratford will only serve to irreparably damage a town that is world famous for its historical and aesthetic qualities.

James Greygoose

38. We are heartened that the new Core Strategy encourages more local family housing in the villages as a means of helping to sustain local services and facilities and support rural communities.

Noralle Traditional Country Homes

39. We were surprised to see that the Draft Core Strategy includes a possible 240 new dwellings for Studley yet we have received no notification of this from the Council.

Liz & Peter Freeman

40. As Wixford is not a Service Village any new housing would be limited to around 2% of existing stock which in our case means two houses. The exception to this would be any rural brownfield sites, where Wixford have one. WPC decided that it would be a good idea to voice our approval of the possible development of this site should the business ever move away, as a small housing development would be more beneficial to the village than some other types of business (e.g. distribution).

41. Also there is a potential site by The Three Horseshoes where affordable housing might work, with the focus on three bedroom dwellings.

42. Overall WPC thinks we should encourage limited new development at these sites. We must ensure that the character of the village is maintained.

Wixford Parish Council

43. Grove Industries Limited has land interests at the NCJ site, Birmingham Road, Stratford-upon-Avon which has outline planning permission for a mixed use redevelopment to include a hotel, restaurant, nursing home, crèche, offices and residential accommodation (in addition to the Phase 1 and 2 housing already built by Barratt Homes). The hotel, restaurant and nursing home also have been built/are under construction. There is a subsequent permission for a food retail store and a scheme under determination for 46 residential units and open space. Our comments are against this background of our clients' interests.

The Core Strategy should seek to maximise the development potential of sustainable sites within the defined urban area in contributing to the District's housing land supply, including our sites which already benefit from extant planning permission. We broadly support the policy provision for up to 560 dwellings within Stratford-upon-Avon through the redevelopment and re-use of land and properties within its built up area boundary.

Grove Industries Limited

44. We object to the % of building allocated to villages such as Long Compton. Most should be around areas of employment such as Stratford-upon-Avon and larger towns. Infrastructure in Long Compton is poor, employment very limited, public transport sketchy and useless for getting to and from work, resulting in high car use. There are also problems with drainage, the school is close to capacity and already caters for children from outlying areas. Previous expert advice for moderate development in this sort of village of 20% seems about right. Why employ an expert at rate payers expense and ignore their advice? Long Compton is in an AONB and should be protected for future generations.

Trevor & Mary Brookes

45. 8,000 should be an absolute maximum. We agree with dispersal and support Option F.

Old Stratford & Drayton Parish Council

46. I agree with the details of the Spatial Strategy.

Peter Jackman

47. It is essential that character is fully understood and the relative significance of that character is appreciated and determines appropriate allocations. Evidence should be made available to demonstrate how a robust process of the allocation of strategic sites has been informed by consideration of historic environment, heritage assets and their setting. Conservation of historic environment should underpin the process of site selection and confirm there is sufficient capacity for growth.

English Heritage (West Midlands Region)

48. Is the figure of 8,000 sufficiently robust as it appears not to be based on the collected data?

49. Consideration has not been given to a new settlement to meet housing need.

Councillor Jenny Fradgley

50. The Strategy does not meet the dimensions of sustainable development as set out in the NPPF as the need for housing is largely driven by future employment needs which arise in the main urban areas, particularly Stratford-upon-Avon. It is illogical and not sustainable to only direct 10% of housing to the main centre of employment. National policy seeks to protect the green belt and AONBs from all but essential development but the CS does not do this. The scale of any new development within the AONB should be restricted to affordable housing justified to meet local needs. Policy COM.1, small scale local choice schemes to meet particular needs identified by the community, worked well in Long Compton. It allowed the village to retain a vibrant community with a good mix of housing types and accorded with the principles of the Localism Bill. I would urge that this policy is reiterated in the Core Strategy.

Susan & Andrew Vaile

51. Long Compton Parish Council does not support the dispersal strategy. It contradicts sustainability. Our village meeting strongly supported the option C dispersal in the 2010 consultation with Local Choice policies at the centre of development determination and 20% in LSVs. Having said this, there remains concern within our community with target-led development. For communities like ours sustainability emerges from organic growth through community support and by the achievement of common goals and aspirations. The imposition of development contradicts those goals and divides communities.

Long Compton Parish Council

52. If Alveston and Tiddington are to remain as service villages then they must retain their identity and there should be a green corridor boundary between Tiddington and Stratford.

53. I am against numbered site 15 (top of Banbury Road). An application was withdrawn around 2 years ago after intense discussion. It was felt that due to the limited access and the aircraft landing strip at the back it was inappropriate to build here.

Kate Rolfe

54. I support the principle that housing should be concentrated in a limited number of towns where the infrastructure can accommodate the increased requirements. Dispersal is wrong as villages such as Tanworth in Arden are not able to cope with the required increase in utilities, transport and education. The Green Belt should be retained, especially near small villages such as Tanworth in Arden.

D Lugton

55. A limit on estate sizes to a max of 2% of existing dwellings seems a good idea.

Rob Pitcher

56. Building on the green belt should not be allowed.

57. Houses should be spread throughout the district with a major concentration of social/affordable homes in the areas which really need them, particularly the villages.

F J Power

58. Neither E nor F. SDC needs to take account of developments close to its boundaries and houses within LSVs and MRCs must be adjusted to reflect these. For Tanworth Parish, our neighbouring councils are proposing to erect 1349 new homes right on our borders. Solihull in particular appears to have no regard for the green belt and its draft Core Strategy makes no mention of consultation on cross-border issues. This is squeezing the village and will cause a huge increase in use of local infrastructure as the roads in Earlswood are becoming ever more of a motorway shortcut 'rat run'.

59. SDC must protect the character of existing settlements. The estate sizes proposed could completely change the identity of villages and hamlets. My distribution for LSVs and rural areas is for a max increase to be capped at 10% of existing housing stock. There are approximate 16.5k houses in that bracket and 1360 additions proposed by the above formula, giving an overall increase of 8.25%. The 10% cap will allow for those areas that want a larger increase. Those that want a smaller increase should be able to trade with those that want the larger numbers.

60. Built Up Area Boundaries should be defined by the current green field boundaries.

Jeff Perks

61. The infrastructure is totally inadequate to accommodate this. Certain times of day it is a nightmare getting through our village (Welford) and then travelling into Stratford. The current rat run through the village takes traffic from many surrounding villages already. Surely development on the outskirts of Stratford with adequate new road connections would be more beneficial.

S R Poulter

62. The District has no effective public transport system due to its rural nature that makes running buses too expensive for private operators. That, linked to an incomplete road network means that the location and size of any development has to be carefully planned to ensure that it does not introduce unacceptable levels of traffic to other areas.

63. Any development has to be part of a master plan which is consulted on with everyone it will affect. Any proposal put forward without the agreement of the majority of residents has to be resisted.

64. Any proposals must include school, medical and other facilities that are required as part of village life.

65. No individual development can be taken in isolation - a long term development plan is needed at the start of the Core Strategy, not the end of it. The district has suffered from piecemeal development producing disjointed, incoherent housing estates with no feeling of community belonging. Only by starting with a Master Plan can such mistakes be avoided.

Councillor Paul Beaman

66. We accept a housing figure of 8,000 as having the potential to protect the character of the District and the environment.

Cllr D A Stone

67. We do not agree with the dispersal policy.

Anne & Roger Skyrme

68. I am in favour of wider dispersal (F) but it must be with the consent of local communities. I would also like to see a greater % being allocated to development of brownfield sites.

Deborah Griffiths

69. 8,000 is not enough. 2 reports suggest 12,000 are required.

70. Design, architectural significance and settlement improvement should feature more prominently in the methodology.

71. 2% should be changed to 5%. This will protect the character of settlements but recognising that in smaller settlements limited housing numbers may under utilise the land at a given preferred site. Sequenced or phased development of such sites would also reduce the immediate impact of the development allowing for modifications in later phases.

72. Built up area boundaries should not be rigid or they are likely to be misused. To encompass natural infill and other land that has limited or no other commercial/agricultural use/value or where its development would enhance the appearance of the settlement - appears to be good sense.

73. The LSVs identified should only be added to - none removed. The rural settlements are in more need of development than the MRCs to preserve and stimulate service provision in an effort to reverse the effects of previous policy. Our rural villages are in high demand for families who want a safe community environment and quality distinctive dwellings.

Kelly Stepney

74. Yes, I agree with the more dispersed development pattern proposed. However, CS.16 is confusing and arbitrary. Why 100 houses? What buildings and properties within existing settlements are going to provide for development - employment buildings? gardens? We should be told.

75. What is a 'regeneration opportunity' on the edge of settlements? Is this greenfield development or does it only relate to a run down brownfield use?

76. I do not agree with estate size restriction - it is completely arbitrary and can only be declared unsound and will bring everything else down with it. The size of any urban extension, or extension to a village, needs to be determined by a whole host of factors such as the size and function of that settlement, the characteristics of the site and its location.

77. All LSVs should have Built up Area Boundaries (Q94).

Reuben Bellamy

78. I fully support development in villages. Village growth has been stifled for too long to the detriment of community amenities. Parish Councils are misguided and too protective preventing the evolution of the community to allow sustainability. 'Self Help schemes' should be fast tracked to enable family members to continue to remain in rural areas instead of moving to find more affordable options.

79. I agree with the use of brownfield sites and this should be broadened to include any land being unused including recreation grounds, builders yards, market gardens, tennis courts etc.

80. Parish Plans should be given greater credence and Parish Councils be forced to reflect them rather than rely on Councillors own personal agendas.

81. SDC should make independent rational judgements on local need regardless of local objections.

Richard Woodcock

82. New housing should be in existing towns. People who live in towns do so because they like living in a town with all the amenities so it would not be the big deal it would be for people who chose to live in a small village. Stratford needs young people to make it a vibrant thriving town and attract new industries and jobs. In the 1960's we regarded Banbury as a 'joke' as the few shops were so poor. Over time it has become unrecognisable due to the influx of young professional people firstly from London and lately from Europe. The industries and jobs have been attracted and made it a vibrant thriving town. It seems sad that Stratford will be left to stagnate with just old folks and tourists. There are no jobs in Tysoe - any new houses here will create commuters to Stratford or Banbury. Then there is the price of fuel !!!

Anne Todd

83. I am not opposed to the building of more housing per se, just the volume and location proposed. Long Compton is in the AONB and has qualities that would be lost with significant development (up to c48 new houses is being talked of). This would affect traffic, the school would not cope, the sewers would need overall, and the AONB would be affected. The village could support some development, in single figures, but more than that would be detrimental to character.

Gary Stokes

84. We support 8000 houses but think there should be provision for it to be reviewed if the local economy flourishes and employment expands as a result of policy CS.22. This is because new jobs will be taken by incomers (bringing more housing demand) or commuters with consequent effects on transport.

Other housing considerations are that retired people are increasingly opting to move inland rather than to seaside towns. And an increasing number of people are working either fully or partially from home and have greater choice about where to live. An area with easy access to open country and a major cultural centre with good communication links to London and access to an international airport is clearly desirable. These pressures are likely to be greatest in the immediate area of Stratford-upon-Avon where the neighbourhood plan being prepared by the Town Council may have proceeded through all its stages before the Core Strategy is approved. Failure to address or resolve these issues in the Strategy (especially the apparent contradiction between the proposed housing and economic policies) might result in the plan being rejected on examination thus delaying its adoption and extending the period of uncertainty. We therefore recommend that the housing numbers be reviewed after (say) 10 years in the light of employment and commuting in the District.

Stratford-upon-Avon Society

85. 100 houses and 2% appear arbitrary. How have they been selected and how will they deliver the strategy given the number of houses needed. Also what constitutes a master plan and what mechanism would be used to deal with them?

Mrs E Creek

86. We object to local choice schemes being restricted to small scale. There is no definition of what small scale means why a restriction should apply. Each scheme should be considered on its merits having regard to the circumstances at that time.

Mr J Warhurst

87. We agree with dispersal and support the provision of housing to meet local needs in small settlements but are unsure that the 10% in small rural settlements is justified. SDC should provide evidence that this level of housing is needed to meet local needs and can be accommodated in the smallest settlements without harm to sustainability objectives and the character and appearance of the locality as clearly some settlements are more able to accommodate development than others.

Duchess Dudley Charity

88. Why is Lower Tysoe specifically excluded from LSVs when Middle & Upper are included. They should be viewed as one settlement.

Martin Smart

89. We support the policy of providing housing even in the smallest of villages if it meets an identified local need and that it may be market and affordable.

However, the most sustainable pattern of development will result from a higher level of development in larger settlements, that is, within and on the edge of Stratford-upon-Avon and larger rural towns and villages.

The Glebe Committee

90. Housing in villages needs to be restricted only to meeting local needs. The 8,000 is not explained or justified in the Core Strategy document. It should be reduced to 6,000 to reflect the strong constraints on development in the District. The villages cannot retain their character if they are required to take 'dispersal' housing. The towns are generally already developed to a size beyond which additions would create sprawl into open countryside. The 6,000 could be largely windfalls which are now permitted under the NPPF to contribute to housing supply.

2240 new dwellings in LSVs is very high and would undermine their rural character. It would require loss of countryside and in some cases (e.g. Henley-in-Arden) Green Belt.

560 dwellings in smaller settlements would be far higher than can be accommodated. In some villages no more than 1-2 houses can be accepted without undermining rural and conservation policies. The retention of the criteria that such housing should be 'small scale local choice schemes which meet housing and other needs identified by the local community' is welcome and support. Such needs are

likely to be low, perhaps 300 dwellings across all villages. It is stated in paras 9.1.3 and 9.1.4 that the Sustainability Appraisal finds problems with this policy. Its effect would be 'unclear' on the landscape and character of the district.

CPRE Warwickshire Branch

91. As Head Teacher of the primary school in Napton I strongly feel that the dispersed model has merits and should not be bulldozed by a building company. With under-population in the Southam Area resulting in around 1 in 5 school places being empty, there is a strong argument for additional housing to optimise the already established facilities that exist, especially the schools. With the Free School adding to the surplus of places (this has effectively halved Napton primary's catchment), this problem is potentially even more acute. The sustainability of some rural schools is in serious question over the medium term.

92. It has been indicated to me in previous conversations with the SDC, that potential building plots of an area of 2/3 acres, would be considered as windfall sites and thus dealt with on an ad hoc basis. If such small developments are to be considered around the edge of Stratford and its nearby villages as proposed in the draft, then would this be the way they are dealt with.

Clive Griffiths

93. "Sites allocated for development in the Site Allocations DPD or Neighbourhood Plans, whichever is produced the sooner" offers insufficient community involvement in the determination of location unless and until a neighbourhood plan can be developed. Given a forecast timescale of 2 years for completion of a neighbourhood plan, there should be additional scope to bring local opinion into the DPD.

The scale of any development should not be allowed to exceed a 2% threshold purely on the basis of a masterplan. A developer would be expected to produce such a plan at some stage during the course of an application and therefore this represents a poor control/check.

The impact on local services (e.g. retail or health) of a development (or developments) in excess of 2% at any one time could be immense, and without time for these services to adapt, new residents in the community might find it necessary to source their requirements from elsewhere. Winning customers back into the community then becomes an even greater challenge and struggling local services could be lost rather than flourish.

Phasing is essential to allow integration of new residents into the community other than the latter being over-powered by the former. In Kineton a potential 9% increase in dwelling numbers is proposed which in turn could equate to a more than 10% population shift.

The draft policy should address:

1. Pressure on existing services, particularly health services
2. The confirmation of settlement boundaries for medium rural centres - Kineton Village Plan 2003 refers to these boundaries as 'Village Boundaries' rather than 'Settlement Boundaries'
3. The need to increase employment opportunities in line with rising resident numbers.

Ms Jane Cove

94. On the question of the definition of Built Up Area Boundaries for the Local Service Villages we do not consider this would be appropriate at the present time. In seeking to provide new development within these settlements it is in our opinion necessary to consider the relative merits and capacity of each village and imposing such boundaries at the present time could result in the policy being unworkable

Trustees of Clifford Chambers Charities

95. It appears that the council is proposing to abandon the present policy of concentrating all new housing in Stratford and to build in local service villages.

Would you please register my opposition to this change of policy as the villages do not have the

infrastructure for new housing such as roads, schools, doctors, shops, other facilities etc. The council is proposing to build a substantial number (say 2000) of new houses in the 39 local service villages. However, the strategy also says new homes will be restricted to 2% of the existing houses. I understand that the villages have some 15000 houses and therefore 2% i.e. 300 is significantly less than the proposed 2000 new houses. The policy is not sensible and should be withdrawn. As you know I live in Tanworth-in-Arden which is in the Green Belt. It appears that the proposed policy of increasing new housing in the Green Belt is in conflict with the principle of minimum building in the Green Belt. The proposed policy should be cancelled. I further understand that there is also a proposal to abandon the present local policy that interprets the legal requirement that any new building in the green belt should not be materially greater than the one it replaces as being 30% by volume threshold. This interpretation has worked well and the percentage should not be increased. (If this is not the policy of the council would you please send my objection on this issue to the relevant body)

D P Calcutt

96. Paragraph 55 of the NPPF identifies that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. This principle in turn can make a key contribution to promoting the retention and development of local services and community facilities as required by Section 3 of the NPPF: Supporting a Prosperous Rural Economy. Planning policies should therefore ensure an integrated approach to considering the location of housing, economic uses and community facilities and services (Paragraph 70).

Christ Church

97. Would you please accept the site edged red and put it forward as an allocated site for future residential development within the District Core Strategy. The site is located off the A3460 in Alderminster. The site is a suitable and sustainable location.

Chance & Wildish Architecture

98. Whilst I accept that new housing stock needs to be made available, I am rather concerned of the impact on existing home owners within the local service villages. The Local Service Villages each have their own character and with a large number of small scale developments this could be eroded very quickly with a consequence being that the existing housing stock is devalued from the overdevelopment.

Developers will generally pick sites where they can achieve the maximum amount of profit, not necessarily to the benefit of the community. This is likely to focus on villages where house prices are high and there is a large amount of green space around the village which, in itself, defines the village's character. By infilling the current open spaces and removing the views of the countryside that existing residents have paid a premium for when purchasing their properties, there will be a loss of community spirit.

There will also be an impact on the local primary school where school places will become even more competitive and could result in children living within a short distance of the school not being able to be accommodated.

A solution to this could be to limit the total number of houses that can be built within each Local Service Village and to reduce the numbers allocated to each local service village by increasing the number built within the Main Rural Centres. As a minimum there should be an equal weighting of housing stock between the Main Rural Centres and Local Service Village, although ideally, a slightly heavier weighting should be applied to the Main Rural Centres.

On these grounds I object to the proposal.

David Evans

99.

1. Overall support for Policy and a preference for Option F.
2. I hope that the proposed methodology for defining Local Service Villages will not store up problems for later on due to villages falling out of, or into, this category.
3. Northend does not currently qualify as a LSV (pub closed).
4. Qn 92 - I question/have doubts whether the Category D housing numbers will be attained over the period of the strategy if their development is wholly restricted to the Local Choice Scheme.

Councillor S H Jackson

100.

- I agree with the estate size of 100 houses for the larger settlements.
- I think the limit of 2% for LSVs may be too constricting in some instances and should be increased to 3%.
- The 2% limit in a village of 300 dwellings would mean a maximum development of 6 dwellings, which may constrict the amount of affordable housing coming forward, rendering sites unviable if the affordable percentage is set too high.

Steve Taylor - Set Design

101. Clearly the District Council has not considered the ability of this area of Warwickshire to take on additional housing appropriately in that it has focused on using Green Belt areas as an easy way to meet what it considers Studley & the immediate surroundings should take in terms of numbers of new dwellings.

Charles Farran

102. We note the policy preferences to provide a new strategic direction for the Core Strategy. The policy preference outlined in Policy CS 16 that 'the maximum, estate size of 100 homes' in Stratford upon Avon and less than 100 homes in the Main Rural Centres is not supported by objective assessment. The imposition of an upper limit of 100 dwellings for new development at Stratford upon Avon, and less than 100 homes in the Main Rural Centres are considered to be inappropriately arbitrary thresholds to the scale of new housing development that could be successfully integrated with existing settlements. The Core Strategy provides no evidence to support this position. Indeed, we note that the Council has commissioned consultants to provide a retrospective justification for strategy at the same time that the Preferred Option Core Strategy was being approved for consultation. In posing Question 98 on the 'Spatial Strategy' "**Is there any other evidence that the District should be considering to help the development of this draft policy (CS 16)?**", the Council should be asking itself whether there is actually any evidence to support the draft policy? In the absence of this objective evidence the draft Core Strategy is unsound.

JS Bloor (Tamworth) Ltd, Gallagher Estates and Pettifer Developments Ltd & Barwood Developments Ltd

103.

- Meeting the housing needs of Stratford-upon-Avon through an informed housing target is fundamental to securing growth in accordance with the NPPF.
- The proposed housing target (8,000 dwellings for the plan period 2008 - 2028) is not considered to be sound. There is not a sound evidence base and therefore robust justification for the proposed target
- The Core Strategy should not arbitrarily constrain growth through restrictive policies and insufficient allocations that prevent the housing needs of the District being satisfied during the plan period.
- The Core Strategy should be robust in meeting the 'real' housing need as identified by the Strategic Housing Market Assessment (SHLA) and not have an artificially reduced and therefore artificial housing target.

- Housing targets should be treated as a minimum
- The Local Authority needs to positively manage growth and grant more planning permissions in order to meet housing need.

The Core Strategy promotes a housing figure of 8,000 dwellings for the plan period 2008-2028. This figure was agreed by the District Council's Cabinet on the 5th September 2011 in response to the GL Hearn '*Housing Provision Option Study*' (June 2011).

Despite the recognised robustness of the GL Hearn report the Cabinet did not pursue any of the options presented. In respect of the study the Cabinet concluded that:

- The council should aim for a lower net in-migration level than projected;
- There was a lack of certainty in consultants forecasting;
- The consultants had not assessed the contribution of Tourism to the local economy where visitors, not residents were the economic driver;
- The Council had a duty to protect its countryside;
- There was no need for mass building in Stratford-upon-Avon

The rationale presented by the Cabinet for a 20 year supply for the period 2008-2028 of 8,000 homes comprised of the following policy preferences:

- New housing should be dispersed across the District;
- Strong growth of family homes;
- To encourage building to cover the deficit of 3 bed room housing;
- To preserve the character of settlements;
- To provide for extra care accommodation;
- To set a maximum size of 100 homes, but aim for small development, especially in rural areas;
- To reuse brownfield sites in preference for new greenfield sites; and
- To review the policy of redundant rural buildings.

It is considered that the proposed housing target (8,000 dwellings) has not been justified by the Cabinet and cannot be deemed sound. The proposed target will not meet the level of demand and need within the District.

Delivering at levels any lower than the range proposed by GL Hearn would risk a skills shortage and recruitment difficulties for local businesses. In turn this would restrain the economy (particularly as the District already has an above average jobs density) or create increase of in-commuting into the District to work. Furthermore, the low housing target and consequential impact on the work force would compromise the delivery of the District's Corporate Strategy which seeks to increase economic vitality. The GL Hearn report estimates that around 11,100 (555 dwellings per annum) would be required just to maintain the current size of the workforce (paragraph 9.8).

The population structure is aging over time. The impact of lower levels of housing supply would be a reduction in the levels of in-migration (as sought by the Cabinet). However, with the dynamics of population change within the District, this means that 'natural change' becomes more important and that the working age population does not grow strongly. The lower levels of housing provision relative to trend / economic driven demand are likely to run counter to the Council's ambitions to support a more balanced population structure.

There are risk factors associated with progressing the proposed housing target in the absence of a regional planning mechanism, in that the Council would have to identify how the under provision against the assessed need/demand would be met elsewhere within the region. There is no guarantee that neighbouring authorities would support this option. The Council need to demonstrate where displaced demand will be accommodated.

The Cabinet response highlights that the GL Hearn report does not assess the contribution tourism makes to the local economy and queries the forecasting methods used. However, there is no evidence available to demonstrate how these factors justify the proposed target or compromise the recommendations of the GL Hearn report.

Overall the Council seems to have taken a negative and restrictive approach towards the future growth and development of housing within the District by promoting a housing target that seeks to prevent in-migration, protect the countryside and prevent large scale development within Stratford-upon-Avon. This approach does not concur with the NPPF which states: *'Planning should operate to encourage and not act as an impediment to sustainable growth'* (Paragraph 19).

When assessing the higher housing targets presented by options 1 and 2 of the GL Hearn report it was noted that any impact on the character of the settlement could be mitigated through appropriate design and mitigation measures. However, this was only a potential issue for Option 2 which has the highest housing target (18,300). It is considered that using the preservation of character as a justification for the proposed housing target is not justified. It is unlikely that there would be any significant environmental costs and that couldn't be mitigated if a higher housing target were promoted.

The Cabinet/Council, through its policy preferences, seeks to promote the strong growth of affordable family homes. This will not be achievable by the Core Strategy as the proposed target is not enough to meet housing need within the District. Furthermore, there is a risk that the under provision of housing in the longer term could drive a growth in house prices, further reducing the affordability of market housing.

There is no evidence to suggest that the proposed target accounts for any previous shortfall in delivery. It is imperative that the Core Strategy includes past under delivery from the RSS alongside the objective assessment of future needs in order to determine the full requirements for market and affordable housing. The failure to include for past shortfall in housing delivery in the proposed housing target would be considered unsound. The delivery of any shortfall should be caught up as soon as possible, and in the absence of evidence to suggest a longer timescale, the shortfall should be caught up within the first five years of the plan.

Gladman Developments

104. There are infrastructure concerns with setting a maximum threshold as prescribed, for example an additional 20-30 homes may make infrastructure viable or 100 extra may overload a facility?

Redditch Borough Council

105. Paragraph 9.1.1 states that Policy CS 16 refers to Strategic Objective 4 (Planning to promote and diversify the local economy) and Strategic Objective 5 (Planning to provide for housing needs). However Policy CS 16 (Spatial Distribution of Development) only refers to future housing growth. The title of this policy is therefore misleading and should be amended so that it is clear it only relates to housing growth.

Wellesbourne Airfield

106. I would like to see parish/town council engagement as a necessary requirement for any development of more than 2 houses and for the site allocation DPD

Mappleborough Green Parish Council

107. We support the proposed approach for the wider dispersal of development throughout the District. We note that the Preferred Approach indicates that 10% of the overall figure should be provided on rural brownfield sites, and we would not oppose land at the Long Marston Estate being put forward by the Council.

St. Modwen Developments & The Bird Group

108. SDC must remember this Core Strategy is until 2028 - development must take place in a proper manner so that its impact on the infrastructure of the village/town can be measured as well as the economic, environmental and social changes.

Elizabeth Uggerlose

109. A general point about the Cabinet's decision to disperse housing across the district rather than concentrate housing in Stratford. Certainly a worthy point - if the housing that is proposed for all the settlements is built in a 'sustainable way'. Regarding Wellesbourne, it has had considerable housing without much history of inclusion of significant infrastructure. For example, in the examples cited in the Draft Strategy, Wellesbourne does not even have any public toilets! It seems perverse that only 10% of housing is planned for Stratford when this year two supermarkets are being built and there is pressure to build a third. Sustainability does not seem to operate in actual practice throughout the district.

David & Susan Close

110. I am concerned that existing small scale 'local choice' schemes will be allocated for future development. Within the last 20 years, 22 houses have been built on Sutton lane. It began with 4 shared ownership properties. In 2006 10 social houses were built under the 'local choice' scheme. 6 years later another 8 houses, 3 shared ownership and 5 social are now under construction, all on the same road. This continuation of building 8/9 houses at a time in the same area, will result in large estates attracting group of gangs. These type of developments then become separated from the heart of the village. New developments should be within the village (in-fill) to get a mix of all type of properties.

Building more houses in village is going to result in people having to use cars to commute to work or shop. Travelling to school, secondary education and colleges from rural villages costs hundreds of pounds a year on a very limited bus route. Most of the small industries in villages have gone, bus routes have been reduced or stopped so it is vital to have a car which is very costly and damaging to the environment.

Denise Montgomery

111. I question the fundamental part of the strategy allocating housing numbers to the various districts. Why should housing be dispersed across the district. What was the rational for the preferred change from the previous dispersal plans?

David Preston

112. We object formally to Policy CS 16 - Spatial Distribution of Development on the basis that the requirement to plan for 8,000 dwellings over the period 2008-2028 is not in accordance with the requirements placed on the Council by virtue of the NPPF and a plan proposed on this basis would we believe be found to be unsound.

We also object to the wording of Policy CS 16 in respect of the total numbers of dwellings to be provided is indicated as an approximate total, whereas the requirements set out under each of the sub-headings (A) to (E) are expressed as maximum figures. Notwithstanding our overall objection to the inadequate level of housing provision which Policy CS 16 seeks to provide, we also believe that the number of dwellings set against each of the tiers in the hierarchy is far too rigidly defined. Given the lack of detail contained in the draft Core Strategy as to the locations for development in any of the

settlements contained in the hierarchy, it is inappropriate that the apportionment of numbers between each of the elements is rigidly defined at this stage. We would therefore suggest, alongside a significantly increased housing requirement overall, a greater degree of flexibility, perhaps by indicating a range of dwellings which could be provided in each of the elements of the settlement hierarchy.

Whilst we appreciate the intention of the policy we consider that the 2% figure quoted is arbitrary, not informed by evidence, unnecessary and adds unwelcome uncertainty.

Should each proposal be no larger than a 2% increase? Can there be multiple sites all proposing a 2% increase. What is the baseline dwelling figure and can subsequent development proposals continue to increase the housing numbers by 2% indefinitely?

We recommend that the policy be amended to be criteria based. These could include reference to schemes that are 'appropriate scale to their context' and 'meet identified local need' for example.

This would allow greater flexibility and enable development to address the specific needs of a settlement or site specific opportunities with significant benefits. For example, villages that have employment opportunities may be more able to accommodate growth than other settlements.

Salford Priors has a good range of services and employment opportunities and is just 2 miles from Bidford-on-Avon. We consider that a greater proportion of housing development should be directed to the more sustainable Local Service Villages such as Salford Priors.

We are also concerned with the reference to 'local choice' schemes. The Local Choice SPD seeks to limit housing to occupation by local people. We consider this approach is not appropriate and that 'local' housing has a wider geographical dimension than the SPD considers. We also understand that the previously published Core Strategy confirms that the local choice approach has not worked.

Bloor Homes

113. The dispersal approach included in the draft Core Strategy looks to place the highest levels of development in the Main Rural Centres, Local Service Centres and Other Rural Areas with a significantly reduced figure for Stratford-upon-Avon. This approach will not result in development being located the most sustainable location in close proximity to the highest levels of important services and facilities. The approach is highly likely to increase private car use with the increased population in the rural area needing to travel in to Stratford for employment and the key services available in the Town which are not available in the rural areas. The approach clearly neglects development in Stratford-upon-Avon, the district's most sustainable location.

William Davis Ltd

114. Butlers Marston Parish Council (BMPC) supports the proposals contained in Policy CS 16, and the general principles of Spatial Distribution of Development. BMPC does not wish to include Butlers Marston village in the Local Service Village category.

Butlers Marston Parish Council

115. Local housing needs surveys must be the main drivers for actual numbers of new dwellings in each settlement.

Mr J Alderson

116. NPC are concerned about the concept of a 'masterplan' provided by CS 16. A 'masterplan' must not over-ride the wishes of the local community.

Napton-on-the-Hill Parish Council

117. we consider that Housing Development Option C (Moderate Dispersal) is the most appropriate way of distributing development.

Numbers of housing should reflect the size to the conurbation which it will serve and be sympathetic to the size and features of the site on which the dwellings are to be developed. It is considered that a housing density per hectare would be more appropriate for providing dwellings at Main Rural Centres, we propose a housing density of 30 dwellings per hectare to be more appropriate.

New dwellings should be provided within Main Rural Centres prior to providing dwellings in Local Service Villages.

Stoneythorpe Hall (Jersey) Ltd

118. Importantly in the context of Stratford-upon-Avon the NPPF advises the Council to boost significantly the supply of housing. As addressed within these representations RPS is concerned that the Local Planning Authority is not following the clear guidance in the NPPF regarding taking an evidence based approach to establishing the housing requirements.

It is critical prior to the Submission document the plan is refocused on establishing a robust District-wide figure and a spatial approach which appropriately focuses on Stratford-upon-Avon as the key settlement in the District. Whilst it is recognised that regional plans will be revoked, the strategic planning issues addressed in the 2009 Panel's Report relating to Stratford-on-Avon District still remain an important planning consideration until more up-to-date evidence is provided.

RPS has raised significant concerns over the Council's lack of any credible evidence based approach or justification for both the housing numbers it is proposing and its approach to the spatial distribution. It is concerned that should the Council proceed along the lines of the current consultation the document will be found unsound.

Any logical strategy of focusing growth will focus on the principal settlement of Stratford-upon-Avon and beneath this the eight settlements appropriately identified as Main Rural Centres (MRC), which has rightly included Bidford-on-Avon

Miller Strategic Land

119. We do not agree with the proposed housing figures. The choice of 8000 dwellings for the plan period 2008-2028 will not provide social and economic stability and growth within the district.

GL Hearn assessed 3 growth options in the study ranging between 8,200 to 13,000 dwellings. The Council has gone for the lowest option in terms of environmental impact which is Option 3.

This is not withstanding the fact that the 8000 target is 15% lower than growth trends over the past decade and has a higher potential impact in economic and social terms according to the GL Hearn assessment.

The Report states that GL Hearn "...We foresee significant risk factors associated with progressing with Option 3 in the absence of a regional planning mechanism." para. 9.62.

In particular the Council would, "...need to demonstrate where displaced demand would be accommodated." para XXXVI. The draft Core Strategy does not do this and therefore it is considered will be found unsound at Examination as a consequence.

On the basis of the GL Hearn findings we consider that the housing target should increase to a minimum of 12,000 dwellings over the 2008-2029 plan period.

Gregory Gray Associates

120. SDC must, without exception, protect the character of existing settlements. No LSV or Rural Community should have a development which is not consistent with character of existing housing stock. The estate sizes proposed would/could completely change the identity of villages and rural hamlets.

Ewen Cunningham

121. The proposal to change the new house building policy in the district away from concentrating on Stratford Town, where there are roads, schools and shops, to dispersal throughout the whole district is just not sustainable without massive investment in roads and infrastructure which cannot be financed on the back of small scale residential schemes. We will finish up with compromise solutions negotiated with barristers acting for wealthy developers and resulting in the further deterioration of amenities for local people.

John Whale

122. RPS strongly objects to the Core Strategy's proposed figure of 8,000 dwellings for the plan period 2008-2028.

[GL Hearn] conservatively recommended that housing provision should provide a minimum of 11,000 net additional dwellings in the period 2008-2028. These findings are a material consideration as the most up-to-date evidence base to inform the LDF process and the growth of the district to 2028.

The GL Hearn provision of 11,000-12,000 homes has been further verified by evidence presented at the recent Kipling Road appeal (13 May 2011), which used an alternative model, the Chelmer Model (that demonstrated a need for 12,125 additional dwellings to meet the needs of the additional households which are projected to form by 2026. The latest official Government population projects (2008-based) indicate a level of household change of 14,440 between 2008-2028, whilst the SMHA Market review 2009 Study identified a figure of 680 dwellings per year or 13,6000 homes over the plan period.

The evidence base therefore appears to indicate a range between 10,100 to 14,440 dwellings, and RPS's favoured approach is the 13,600 figure identified by the SHMA Market Review.

The Cabinet figure of 8,000 dwellings is even below the 8,200 dwellings proposed in GL Hearn's Option 3 - 25% reduction in net in-migration. The consultants comments on this option were as follows:

- Would need to be part of **sub-regional strategy aiming to direct most housing demand elsewhere;**
- If not part of such a strategy, then there is a high risk of the **option being found unsound** at examination in Public;
- Falls well short of meeting identified housing need and demand;
- Does least to support the local economy, leading to a significant reduction in the local workforce;
- Would hinder the achievement of a more balanced population structure with a reduction in the number of persons under 60 and an increase in the number of people over 60;
- Most positive benefits as regards the environment, with least use of Greenfield land and the least amount of new infrastructure and;
- Most likely to preserve the character of the district. Overall it would have least environmental impact but would have **higher economic and social cost.**

The SHMA also highlights that the affordable housing figures suggested by its modelling are greater than the District's total dwelling requirements and targets, so the consideration of sites for development across the breadth of the District remains pertinent to ensure the delivery of sustainable communities.

Restricting housing supply, whether it be to discourage perceived population migration would not be consistent with the NPPF which requires local planning authorities to identify and plan positively for growth, whilst also more importantly meeting assessed need. To illustrate the Core Strategy's conflict with the policy aim of the NPPF, the GL Hearn Housing Provision Option Study 2011 identified that if no net migration was to be allowed the overall district population would reduce by nearly 6% in 2028 and most importantly will reduce employment by 12,000 employees. The study recognises that growth is required to maintain the district's working population, let alone provide for increased employment levels.

RPS therefore respectfully recommends that the housing figure must be increased to be in line with the GL Hearn recommendation of 11,000 - 12,000 dwellings as a minimum in order to have any hope of being found in accordance with the thrust of the NPPF and accordingly to be sound. However, our favoured approach is to recognise the previous housing delivery deficiencies within the district by identifying the 13,600 figure of the SHMA Market Review which will be found sound.

Trustees of W A Weaver, Miller Strategic Land and Taylor Wimpey

123. We support the council's policy of housing dispersal across the District which will help sustain rural settlements (Option F). We believe this accords with the recently published NPPF.

We consider that the provision of 8000 homes should be the minimum for the District, but this should be adjusted in line with the most recent ONS Household projections. The plan should meet household and population projections as provided for in the NPPF.

Development should be distributed to the Main Rural Centres, with appropriate levels of development in the Local Service Villages, although development should not be of a sufficient scale, density or type so as to alter the character of the Villages having regard to their size, location and level of services.

Bluemark Projects Ltd.

124. We are not sure where the expected future building figures are derived from and as to some extent they are speculative, great care should be taken not to over burden SDC area with development.

Further development puts pressure on all local infrastructure, such as schools, hospitals, fire & rescue, police and of course energy demands, we would urge caution by putting too high a figure, this just leads to speculation by developers that they can go up to this maximum.

It was mentioned during the workshop the need to attract more families into the area, so three bed roomed houses were high on the agenda. We raise the following, there are different sizes of three bed roomed houses, three bedrooms modest, or three bed roomed huge, with scope to add on more bedrooms if land allows. We feel that this should be carefully considered. Also perhaps the lack of smaller units of accommodation results in the inability of a person who wants to stop in the local community but wishes to downsize, but is unable to do so, due to lack of suitable accommodation and we would like this to be considered please.

Shotteswell Parish Council

125. This latest draft of the Council's Core Strategy proposes a much more positive planning policy framework for the district's rural areas than either the current local plan or previous drafts of the Core Strategy, which imposed an undue degree of restraint on development in these parts of the district.

That much more positive policy framework generally reflects the provisions for rural areas contained in the recently published final version of the NPPF. Those provisions include a requirement to plan housing development to 'reflect local needs' (para. 54) and to "enhance or maintain the vitality of rural communities" (para. 55).

In the main, policy CS 16 accords with these provisions of the NPPF. The one element of that policy that strays beyond those provisions is the requirement in part D of the policy for development within and adjacent to the District's settlements to meet development needs "identified by the local community".

That requirement is more onerous than the NPPF provides for. There may well be instances where development needs are demonstrable (by applicants) but not necessarily identified (or even recognised) by the local community concerned.

Trenport Investments Ltd

126. need for **more acknowledgement and endorsement** of the value of existing Housing Need Surveys; Parish Plans and Village Design Statements in assessing the relevance and appropriateness of development in our villages and small towns

The Village Design Statements especially give far greater detail about the setting, landscape, natural environment, local vernacular building styles in rural communities and the locations suitable for village developments than does the Stratford District Design Guide.

Similarly the Countryside Agency's Countryside Character mapping exercise is much too coarse to be used in specific rural settings. The Warwickshire Landscape Guidelines, which were the pilot project for the CA work, give finer detail and should be the fall back reference if no Design Statement has been produced by the community.

We agree in general terms with prioritisation of brown-field sites but would argue that in rural areas there needs to be some flexibility as not all brownfield sites would be the sustainable option.

Infilling is not always appropriate in rural settings. It can lead to the loss of important green spaces which are an inherent part of village character.

The District should take account of a village's perception of its "natural boundaries" which could include land outside their built up area and should exclude from development the precious open spaces highlighted in Village Design Statement, Neighbourhood and Parish Plans.

We do not want SDC Allocating Sites in our village for development. We do not want it on redeveloped land within the village (risks loss of open space, views etc). We would prefer it also not be "regeneration" inside or on boundaries of village.

Harbury Society

127. It is noted that Policy CS 16 proposes sites that contribute to the strategic housing supply could be identified and brought forward in Neighbourhood Development Plans (NDP). The observation is that NDP may not be the appropriate 'tool' to achieve this form of housing supply as they are intended to provide additional numbers over and above the Development Plan allocation.

Wychavon District Council

128. Policy CS 16 should be amended to include a housing target for 13,000 dwellings which represents the full assessment of need, as required by National Planning Policy and supported by the Council's evidence base.

Policy CS 16 as currently drafted is '**Unsound**' because it is not '**Justified**' as it does not represent the most appropriate strategy, will fail to be '**Effective**' because it will not deliver sustainable development and is therefore '**Consistent with National Policy**'.

To make the policy '**Sound**' it should be amended to remove reference to estate sizes being no more than 2%

We recommend that major brownfield sites in the Green Belt are identified through the Core Strategy, which would assist in the monitoring and management of such sites.

Urban Renaissance Villages (URV) and Helical Bar

129. Objection is raised to Policy CS 16 on the basis that the requirement to plan for 8,000 dwellings over the period 2008 - 2028 is not justified, effective or consistent with national policy. The plan has not been prepared on the basis of a strategy which seeks to meet objectively assessed development requirements and has therefore not been positively prepared in accordance with the tests set out in the NPPF.

We object to the total numbers of dwellings that should be provided in accordance with the settlement hierarchy. The overall total of 8,000 dwellings to be provided in the District is indicated as an approximate total, whereas the requirements set out under each of the sub headings A-E are expressed as maximum figures. We believe that the number of dwellings set against each of the tiers in the hierarchy is far too rigidly defined. Given the lack of detail contained in the Draft Core Strategy as to the locations for development in any of the settlements contained in the hierarchy, it is inappropriate that the apportionment of numbers between each of the elements of the hierarchy is rigidly defined at this stage. A greater degree of flexibility is suggested, perhaps by indicating a range of dwellings which could be provided in each of the elements of the settlement hierarchy.

CALA Homes (Midlands)

Ainscough Strategic Land

Persimmon Homes (South Midlands) Ltd

130. We oppose the proposal to disperse 8000 new houses pro rata across the district. We feel that Green Belt should remain exempt and that Stratford town and the major market towns should shoulder most of the burden. Only they have the schools, roads and other infrastructure to sustain new housing on any scale.

Edward & Annette Drake

131. We support the Council's preferred option to disperse dwellings, with 50% of the dwellings distributed to the rural areas. We agree that Stratford-upon-Avon should continue to be the focus for housing and other forms of development, although this should be supplemented by development elsewhere. The proposed approach would facilitate a sustainable pattern of development which would provide modest growth to the Main Rural Centres and other rural settlements in proportion to their character and function. Such development would maintain the viability and vitality of these places in the long term.

The hierarchy establishes a clear framework for sustainable growth and supported by positively worded policies, development proportionate to the character and function of these locations should be encouraged. In addition to the housing growth there is also a requirement to provide day-to-day facilities, such as retail, to meet the needs of the growing population.

Sainsbury's Supermarkets Ltd

132. In the introduction, "will" is subjective and needs to be replaced with, for example, "must"; "should" is subjective and needs to be changed to, for example, "must".

Earlswood & Forshaw Heath Residents Association

133. We are concerned that the spatial distribution strategy fails to address the critical issues and challenges associated with individual settlements and the district as a whole. Policy CS 16 and particularly Section C relating to Local Service Villages fails to give the necessary spatial direction having regard to these critical issues and the policy is therefore unsound as currently written.

The settlements identified in the hierarchy are variously constrained by national designations, eg. Green Belt, AONB, high agricultural land quality, flood risk. Therefore, the policy should give greater spatial direction as to where development and growth should be directed.

Broadway Malyan

134. I would like to see parish/town council engagement as a necessary requirement for any development of more than 2 houses and for the Site Allocations DPD.

Councillor Justin Kerridge

135. Housing located near or at the premises of rural employment is beneficial to reducing commuting requirements, benefiting the environment and the local economy. The provision of affordable rural housing near to employment bases such as farms is welcomed, particularly where the original farmstead is inhabited and additional family members or farm workers require new housing. This supports the rural economy by creating and securing rural employment.

National Farmers Union

136. We support the recognition that even the smallest of settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing.

Banner Homes (Midlands), Walton Estates

137. Fully support the dispersal proposal of future development to the rural communities in Stratford District.

138. 75% of the population of the District lives in rural communities that have experienced negligible development over the last 10 years as a result of planning policy being town centred, which has had a direct adverse effect on service provision in smaller settlements.

139. The proposal to limit estate size to 100 dwellings unless supported by a Neighbourhood Plan or Master Plan is an excellent suggestion. This can only create a greater variety in the housing landscape and attention to quality and detail by smaller developers with local interests. A choice of quality dwellings, in lower densities will attract people who want to live in our safe rural communities.

George Stepney

Consultees Responding to Bloor Homes Leaflet

I give my full support to Bloor in their quest to build west of Stratford. As a resident of Snitterfield, to add the proposed numbers of new housing would be totally unsustainable - the roads could not support the additional traffic, the local school and amenities could not cope and the Victorian sewerage system would need complete replacement. Please reconsider the Bloor proposals.

N C Moore

I have read the leaflet distributed by Bloor Homes about the dispersal strategy. Larger new estates have not worked well in the past and change the whole character of the surrounding area. The development of a few homes in each allocated village would be more socially advantageous to the

Council, the tenants and the environment. These new residents would be easily absorbed into the existing social organisation and add diversity to the environment at an acceptable rate. The new council stock would be varied and widespread. This would provide a better social solution to the housing problems than a huge development on the edge of existing towns.

Audrey Large

I got the Bloor Homes leaflet and am horrified. Wilmcote is in green belt - where would the 64 houses be built. We were flooded in the house by sewage last summer as housing estates have been built in the village and the existing sewerage system has not been updated to deal with significant increases in housing in the village. Do the plans involve upgrading sewerage and other services put under strain. Mary Arden's house is in the village - will the historic significance of this be taken into account.

Helen Platts

Having received Bloor Homes leaflet, I wish to say that I disagree with their position that a single large development near Stratford would be best. Having lived in local villages for most of my life (currently Harbury), I believe that small developments are vital for the community and local amenities. As a growing family, we need access to affordable larger homes whilst remaining a part of the local community.

Joe Williams

Policy CS.16A Stratford-upon-Avon

1. Agree that estate sizes in Stratford-upon-Avon should be a maximum of 100 homes;

Mark Undery

Stella Golding

Chris Toney

Mrs Sarah Buttrick

Mr Miles Buttrick

Ms Rebecca Sayce

RD & RJ Langman

Howard & Helen Grieves

Brian Darnley

Marcus Weaver

Mr & Mrs Zaffignani

Mrs Caroline Wilks

Jeannie Farr

Peter & M.J. Donaghue

Dr D. Kalderon

Mrs E. Kalderon

John Armitage

R.K. Fisher

Peter Condron

Mr & Mrs P Hill

Miss F. Longmore

R. Burman

Mr and Mrs Fraser and Linda Edwards

Mr and Mrs D.J. Cholerton

Susan Marks

Joan Graham

Gordon Harrington

Bill Tucker

Stephen Parker
Mrs M. Childs
B.E.H. Whitehouse
Mr B. Childs
S.J. Wiseman
Mr and Mrs R.E. Cain
Mrs P. West
Mr D.C.M. Young
Patricia Young
David Edward Martin
Mrs B. Wood
P. Wiltsliel
Stefan Law
Mrs M.G. Tattersall
Alan Spreadbury
M.B. Lewis
Mrs Valerie Lageard
B.W. & Y.K. Bates
Mrs Mary Boddington
Alan Boddington
Mr and Mrs J.S. Orchard
James E Philpotts
Nick Poulton
Russell Jones
S. Watts
Mr Peter Pearce
Monica M. Beckett
G.K. Allen
Andrew Davies
J. Steele Nicholls
Peter Dingley
M.J. Bunce
Mrs Helen Petitjean
Andrew Waterhouse
Mrs S.J. Sreeves
Julia Shearing
Mr E.R. Green
John D. Jones
Peter Taylor
Mrs J. Wood
Anna Candy
Mrs D. Geldard
Bernard R. Pumfrey
S. Venus
Mrs Diane Rogers
R.J. Beresford
Mr and Mrs J. Farrar
Mr Clive Wootton
Jean Powrie
Nicholas Smith
Peter J. Hudson
Mrs C C Scott
Mrs S.M. Cragoe-Jones

R.D. Heppell
Mrs A. Murray Watts
Harry Nicholls
S.M. & P.V. Wall
John Priest
Mrs Margaret Ann Smith
Mr Richard L. Smith
Alastair Child
Gordon Harrington
Maureen & John Hill
Mrs C.A. Cooper
Mr Derrick Burford
Elizabeth Lang-Sadler
Mrs G Pawley
J. Robertson
Paul Kershaw
P.F. Wyatt
T.F.R. Crossley
Mr B.G. Harrison
F. Hodgson
Mr & Mrs D.J. Hammond
Mr & Mrs R. Stephenson
Patricia Jebb
B. Escott
Mr Clifford Rose
Norman and Freda Kitcher
Mrs Vera Hawkins
S.J. Warrilow
Mr & Mrs P.F & M.M. Williams
A.M. Tudor
Mrs D. Bouham
Mrs D.E. Bonham
D. Daniel
Joy Watson
Anastasia & Peter Hunter
Mr J.M. and Mrs J.A. Kent
B. Lomas
Mr & Mrs D.J. Chamberlain
B. Stewart
Mr J.M. Hind
Mrs Barbara Spencer
Michael Crutchley
A. McIntyre
Mr & Mrs G. & W. Mazey
Michael Stockhill
James Pullin
Sylvia Leighton
Peter Landsman
David Gooman
Steve Taylor
George W. Sykes
A.L.S. Orr
B. Rossington

Mrs Mary Austin
H. Carragher
A Chaplin
A.J. Whiting
W.E. & B.O. Cave
G.I. Chamberlain
J.M. Stocks
Dai Gistiws
Tony & Sue Holmes
Ann C. Curtis
J.C. Edwards-Broome
Mrs M.S. Wade
Caroline Stewart
W. Macdonal
H.R. Beach
Mr R. Dawney
Malcolm J. Wilkes
Dave & Mo Sargent
R. Dyer
R.D. & R.J. Langman
Mary Monteith
Mrs E.J. Allard
Brian P. Edwards
Don Hanson
Mary Jeffery
Carl Conn
Wyndham Perring
B. Littlewood
D.E. Swinbourne
Mr & Mrs R.C. & J.D. Hawkins
W. Alan Head
D. Pearson
Michael & Sheila Mills
Alan & Sharon Morris
Mary & D.A.R. Morgan
E.A. Foster
Miss N Whittard
Mrs Elisabeth Brace
Mrs D. Levets
Edwina Nicholls
R.Green
A.L & J.K.Page
Mr Frank Woodhall
Caroline Abercrombie
Mr C. White
Roger and Susan Blackwell
Mr & Mrs D.A & R.A. Atkinson
Mrs E J Hart
P.R. Gilmore
Mr D.J. Ockendon
Syvia J. Cooper
Ken & Mary Ryman

Pat & Michael Bird
Mrs Joyce Johnson
Pat Johnson
Ms Anne Hicks
Elizabeth Hicks
Miss L Cartwright
Deborah Griffiths
Mr D Townsend
Eric Ward
George & Bryony Disher
Penny Gildea
Barbara & Peter Dodd
Kevin Gildea
Mrs B.A. Sylvester
Freda Douthwaite
Sarah McCormack
Luciene Riviere
Terry Brandon
Michael Whick
Fiona Mackie
B.H. Richardson
Mrs C.M. Richardson
Graeme Ramsey
Charles P McCormack
Miss E M B Sellar

2. Whilst the Draft Core Strategy offers some improvements to previous plans (such as smaller developments) it still suffers from the same basic flaws to which I have objected previously. Fundamentally it requires the continued over development of Stratford and clearly none of the authors seem to have understood the basic economic facts that we live in a tourist area. Perhaps a survey of visitors might be undertaken to ask if they need to come to Stratford to see building sites.

M J Hurst

3. No estates more than about 150 houses should be built.

Sarah & Peter Greenway

4. We do not agree that "consideration will be given to larger schemes if accompanied by a detailed masterplan and supported by adequate infrastructure." This appears to undermine the entire concept of localism.

Stratford Voice

5. Concern that the use of masterplans may become a loop hole to get round the 100 house cap on estate sizes.

Stratford-upon-Avon Town Council

6. The figure of a maximum single development of 100 homes is easily circumvented by the concept of a master plan enabling a far larger development.

Councillor Jenny Fradgley

7. The maximum figure of 100 dwellings per estate seems rather arbitrary and should be based on a more explicit and evidenced rationale.

Waterloo Housing Association

8. If the plan suggests no more than 100 houses in one group but then states that it would be acceptable to have more if a proper master plan is delivered is an absolute mockery and will lead to all sorts of problems and possible confrontations.

F.J. Power

9. Any new sites must be properly dispersed - not adjacent to each other - and must not be built in blocks of 100 houses at a time and eventually join up with each other.

Deborah Griffiths

10. I believe the available sites lend themselves better to a maximum estate size of 75 homes.

Robin Molloy

Policy CS.16B Main Rural Centres

1. For Shipston, 2% would mean housing estates with a maximum of 46 homes. The Town Council believes that sustainable development should be based on small estate of 15-45 units spread over the full period of the strategy, ie. up to 2028. The character of the settlement can be preserved by a modest number of developments - one every two or three years - without violating the existing boundaries of the town and at the same time meeting the target of 140-22 new homes set out in Section 10.6. New large scale housing estates of over 50 dwellings are considered to be inappropriate to the future development of the town. Small scale developments spread around the town and over a number of years is the only way forward in limiting the effects on an already over-strained infrastructure, which is already in itself in need of improvements.

Shipston-on-Stour Town Council

2. Not sure what 'Regeneration opportunities within and adjacent to its Built Up Area Boundary' means. Does it always mean within the boundary? Or can it be outside the boundary, as long as the site borders the boundary?

Paul Richardson

3. Use of "will" in introduction is subjective and needs to be changed to, for example, "must".

Earlswood & Forshaw Heath Residents Association

Policy CS.16C Local Service Villages

1. As Head of this small village school I am aware of the vital role it plays in delivering excellent education to the children of Salford Priors and outlying villages and the community support provided by parents. With ever decreasing budgets and fluctuating pupil numbers it is difficult to plan strategically for the school and its long term future. I believe that building a small estate of houses, possibly on the old Sandfields site, including a number of affordable homes, would bring sufficient families to the village to secure pupil numbers at the school, thereby ensuring its future for the children and families of the Salford Priors community.

J Satchwell, Salford Priors Primary School

2. Make clear that the 'size of an estate' to be subject to a 2% cap will include the number of both affordable and market homes. There has been a suggestion that 'estate size' could be defined as being exclusive of affordable homes which would not be a normally understood definition.

John C Read

3. The 2% of existing stock should be vehemently maintained. To avoid this being abused, I suggest that planning for new developments should not be given if joined to the previous development, thus avoiding what would effectively result in one large housing estate in reality whilst posing as a few small ones.

Neil Hourigan

4. Moreton Morrell has no transport, shops or facilities and although we have 304 households, they are not all in the main village so to derive a percentage from the number of households is meaningless. An increase of 45 houses would substantially change the character of the main village.

Mr & Mrs Michael & Olivia Brown

5. The building of more council houses in Lighthorne Heath will reduce the value of my house should I wish to sell in the future. Just recently added new council houses in the village and we don't want more. The tranquil atmosphere of the village could be ruined with this amount of development.

Ailsa Yapici

6. Wilmcote is a small tourist village which already has more traffic rumbling through it at too great a speed than is safe for the people who live here. The possibility of up to 59 new properties being built here and the associated traffic on a daily basis is an extremely worrying thought. Wilmcote has large areas of green belt and conservation areas and new homes would destroy the rural feel to this lovely village. Our countryside needs protecting otherwise Wilmcote will become joined up to the general sprawl of Stratford. I would like to strongly object to the proposed plans for new homes in Wilmcote.

Ms Susan Evans

7. Anything more than a handful of new homes (20-30) in Long Itchington will have a detrimental impact on this beautiful village, turning it into a small town. I am absolutely opposed to any more than 30 new houses.

Kevin Hatherill

8. Full consideration should be made of the support resources available in the villages that this proposal intends extending to. Many of these proposed villages have limited facilities and this will put more pressure on an infrastructure that is clearly already stretched. You should review each of these villages and not extend unless there is a clear presence of local amenities - in particular schools and shops.

Phil Wood

9. The Parish Council support the principle of further development of houses in the Parish although they would not wish to see large scale development taking place.

Alderminster Parish Council

10. Villages must be inset to determine accurate number for existing housing stock but more importantly no developments may be adjacent, otherwise the scale of development would destroy villages. Either a maximum per settlement or some policy change to prevent excessive development.

A R Dixon

11. What is the point of building homes where little or no infrastructure exists? This automatically puts more traffic on the roads.

Mr Alan Oliver

12. Earlswood most definitely does not have the infrastructure to facilitate more housing.

Vida Davies

13. Whilst I am pleased that the council is finally allowing development for small affordable houses, I do not see why this has to be on estates. Perhaps some of the houses already knocked down and earmarked for huge extensions could instead be used for several smaller terraced style houses. However, as Tanworth is a relatively small village, I personally feel that the addition of 200 homes would swamp the village and would have a detrimental effect on the village community. A smaller number of homes would be much more suitable in the first instance, and as the people from newer homes are integrated into the community, then more houses could be planned for a later date.

Sara Wood

14. I have lived in Brailes for twenty years and would like to object to the plan to build quite a number of houses in the village. Brailes and the outlying rural area is an area of outstanding natural beauty and to have a large housing estate in Brailes would upset the natural balance of this lovely village with a real danger of it losing its identity as a village and becoming a town. I do understand that new housing is needed and if the 2% rule as a maximum in any development in any one area could be adhered to then this would not be such a huge impact on Brailes and the village could retain its character.

Judy Young

15. More should have been included about the smaller villages and greater consideration given as to how development is phased, and what infrastructure is in place to make the developments viable.

Councillor Paul Beaman

16. I cannot understand your logic as you talk about preserving the character of main rural centres by having less than 100 new homes in any one estate and then talk about numbers and percentages in local service villages with no restriction on the size of estates. In the case of Tanworth-in-Arden the number of new homes proposed would definitely impact on all the infrastructure such as the access roads into and out of the village as a car is virtually a necessity here, therefore not making it a very green policy; the school is already over subscribed; it would change the character of the village which you state you are trying to preserve; the green belt would also be impacted on as there are no brownfield sites to my knowledge. I understand that more homes are needed and therefore there will be a need to build in every community but cannot understand the logic behind the allocation to Tanworth or the decision to withdraw planning permission for the proposed homes at Shottery.

Thomas Philips

17. Part C of the Policy should outline how sites within and adjacent to the existing settlements will be allocated to accommodate the level of housing proposed. It is recommended that in determining the distribution of housing between the Local Service Villages the Council fully considers the specific circumstances of each village and the characteristics (constraints and opportunities) of potential sites in them. The Council should adopt a comprehensive review approach to ensure well informed decisions can be made moving forward. On this basis, it is recommended that the Council avoids pursuing a proportionate distribution (one that bases the level of housing for each village as a percentage of the existing number of houses) to establish the levels of housing for each of the Local Service Villages.

CEMEX

18. Many of the residents we spoke to were unanimous that they would prefer Brailes to remain a real village and not be expanded into a type of small town. First and foremost Brailes is a village in the AONB. The Parish Council, led by a very strong supporter of development being a builder himself, does not seem to have a balanced focus on the true needs of the village. If the 2% existing scheme will definitely be adopted it has to be assured that any development should be kept secured and not expanded in the future.

Kenneth Young

19. Some villages have a greater ability to accommodate development than others and a high proportion of the housing provision is therefore appropriate but to set this in context there are 39 Local Service Villages which would equate to an average of 57 dwellings to be built in each with a further 560 dwellings to be built in the rest of the rural areas, This is a significant burden for some of the smaller villages, many of which currently have less than 200 dwellings and Pillerton Priors which has just 105 dwellings. It is also a major shift from the 20% (950) proposed in LSVs in the Draft Core Strategy of 2010.

Mrs E Creek

20. The policy lacks clarity as to what a 'detailed masterplan' should comprise. A workable and realistic definition is required.

David & Angela Tucker

21. The production of any masterplan by a developer should be subject to having been prepared in consultation with the local community and must reflect the views and opinions of local residents and also take account of existing parish and neighbourhood plans.

Bishops Itchington Parish Council

Policy CS.16D Smaller Settlements

1. Category D should also allow for small open market development where exists Parish Council / local resident support. This is the preferred route in many small / medium villages.

Mark Blackman

2. Object. No need for further housing development within the boundary of the village I live in. There are a wide range of properties in the village. I moved back because of my lifestyle choice. It would not have suited me 20 or even 5 years ago because of certain restrictions. Intermittent services include power cuts, poor water pressure, slow internet speed, a lack of shops, public transport and entertainment venues, which would be costly to resolve. People put up with these issues to retain a private community. A new housing project two miles from Earlswood, illustrates the suitability of new build country living is Dickens Heath with an array of fore sale signs. If focusing on need, only a small percentage of people would benefit from living here that they could not get from living in Shirley, Redditch, Cheswick Green, Monkspath and Hillfield. The Core Strategy seems to focus on complying with percentages rather than on communities as living, breathing entities. Let locals decide how Tanworth-in-Arden and other areas evolve.

Paul Johnson

3. How many dwellings has COM.1 produced or delivered from those identified in parish plans over what time frame. Built or constructed. What other mechanisms can deliver development - single dwellings in smaller developments or hamlets.

Kelly Stepney

4. Broom - aside from affordable housing, the village has no requirement for any further open market construction. Additional construction would only add to road usage to Bidford etc as there are no services in the village.

Peter Chadwick

5. Input from VSC is essential in the delivery of Neighbourhood Plans. The enabling of local choice schemes (Policy CS 16) will also rely heavily on VSC input. The Core Strategy could recognise the role and value of VCS in these activities.

Voluntary Action Stratford-on-Avon District

6. Restricting section D to local choice schemes is too limiting and will fail to deliver the housing numbers required. Amend the wording as follows:
'Provide for up to xxx dwellings within and adjacent to the smaller settlements of the District through small scale schemes'.

All schemes will be considered against the following criteria: ...

- (iii) the need to ensure that the character of the area affected by the scheme and the settlement as a whole is taken into consideration within the design where feasible.

Gregory Gray Associates

7. There are different sizes of three bedroom houses, modest or huge, with scope to add more bedrooms if land allows. This should be carefully considered. The lack of smaller units of accommodation prevents people who want to downsize in the village from doing so due to a lack of suitable accommodation. This also needs to be given due consideration.

Shotteswell Parish Council

8. Object. Do not support larger schemes if accompanied by a masterplan and supported by adequate infrastructure. This will give Council *carte blanche* to instigate developments of any size it pleases as two of the three criteria for assessing this need are subjective.

Mrs J and Mr M Buckley

Earlswood & Forshaw Heath Residents' Association

9. In respect of those smaller settlements of the District which are not considered Local Service Villages, we support the principle that some additional housing growth can be accommodated in them, although consider the figure of 560 dwellings to be too low. Preston-on-Stour would be an appropriate location for some new housing. A recent residents survey agreed that some new housing would help maintain the village's viability without it adversely impacting on its character. We contend that new development could therefore be brought forward through the refurbishment of vacant buildings, infill and on land within the ownership of the Estate to help meet the needs of the village.

Guidance in paras. 54 and 55 of the NPPF is supportive of the delivery of new market housing in rural areas where it may facilitate the provision of more affordable housing and where it will enhance or maintain the viability of rural communities. If further housing land needs to be identified, we believe that provision in the rural areas either in the LSVs or smaller settlements would be consistent with the guidance in the NPPF.

Alscot Estate

10. We support the recognition that even the smallest of settlements within the District should be able to meet their own needs, noting that such needs will include development for employment, market housing and affordable housing.

South East Southam Land Owners Consortium

11. Policy CS 16 D intro: 'should' and 'will' are subjective and need to be changed to, for example, 'must'.

12. Adequate infrastructure is also non specific and needs to be defined.

Earlswood & Forshaw Heath Residents' Association

13. It is noted that Whitchurch as a smaller settlement will have had its '2%' in 3 or 4 years' time and therefore will require no more approvals until 2028 apart from employment related exceptions. We have had an increase in housing of 40% approximately since 1985 as it is.

Whitchurch Parish Meeting

14. Another mechanism is required to exist alongside COM.1 to deliver a number of dwellings in our smaller rural settlements. Sustainability, architectural significance and enhancement to the appearance of the settlement or supporting someone with a local connection are important considerations. The current COM.1 process is too vulnerable - inhibited by local influence, without independent scrutiny. It is hard to see how anything appropriate can be developed in smaller hamlets.

George Stepney

Topic: CS.16E Policy CS.16E Previously Developed Land in the Countryside

1. Rather focus on brownfield sites with more urgency than green field sites. The document lists four sites: Gaydon, Long Marston and the former Southam and Harbury Cement works. While our knowledge of the Gaydon, Southam and Harbury sites are limited, we are familiar with Long Marston. Few people want to resurrect the idea of the ecotown 'Middle Quinton', but we do feel that there is more scope for further development than the current proposals for use of the brownfield area of the site.

David & Beverlie White

2. Work needs to be undertaken to better understand the profile of these communities to tailor development and ensure this development is sustainable in those communities.

3. Support utilising developed land in the countryside.

Mrs J and Mr M Buckley

Earlswood & Forshaw Heath Residents' Association

Topic: 9.1 Sustainability Appraisal Implications

1. Paragraph 20 of the NPPF states that 'Development Plans must aim to achieve the objective of sustainable development', in our opinion the dispersal approach outlined in the draft Core Strategy is not a sustainable approach to development. For development to be sustainable it should be located in close proximity to accessible local services and facilities allowing a reduction in the use of private cars to access said facilities.

William Davis Ltd

2. Section 3.6 of the Sustainability Appraisal assesses Policy CS 16: Spatial Distribution of Development against the concentration of development. This should rather be assessed against the concentration of development in Stratford-upon-Avon. RPS consider that this would have a much greater beneficial impact.

3. The Sustainability Appraisal identifies Policy CS26 as carrying potential adverse impacts. Paragraph 3.6.6 states: 'This policy has the potential to support a reliance on motor vehicles for those living within rural areas. This may lead to an increase in emissions from the transport sector this does not support reducing Stratford-on-Avon's carbon footprint'.

This is contrary to the NPPF and Core Strategy's aim for sustainable development. Developing from this stage to submission will be necessary to ensure that the Council give proper consideration towards the tests of soundness.

Miller Strategic Land and Taylor Wimpey

Topic: 9.1 Explanation

1. A number of smaller market towns and large villages each support a good range of shops and facilities for a more localised area. These are termed Main Rural Centres and include the following settlements: Alcester - Bidford-on-Avon - Henley - Kineton - Shipston-on-Stour - Southam - Studley and Wellesbourne.

2. Wellesbourne, Bidford-on-Avon and Kineton are all villages with a very much reduced range of shops and services when compared to the other towns on that list. How can you possibly declare that these villages are comparable to the towns listed.

Protect Wellesbourne Group

3. The methodology for Local Service Villages is also flawed in that any village over 100 dwellings with an hourly bus service in the vicinity apparently qualifies.

4. Bearley is split into two distinct areas, the village of Bearley and the settlement of Bearley Cross. The mean distance between the centre of Bearley Village taken as the Church and Bearley Cross is 0.7 miles. Bearley Cross is where the X20 bus stops and the train station is located.

5. The A3400 is a black spot, with fatalities occurring in the crossing points to and from the northbound Bus Stop (X20) and the Train Station. This is a deterrent to villages using both the X20 bus and the infrequent train service. The bus which has the hourly frequency is the X20 whereas the 229 into the village has a much less frequency and does not meet the criteria.

6. In respect of the methodology for identifying Local Service Villages criterion 2 - Key Facilities, Bearley does not meet this criterion. The village has no general store, no primary school and the Golden Cross Public House has closed. The village only meets one of criterion 2 conditions - the village hall. The location of the Golden Cross, even if it was a viable concern, is on the other side of the A3400 for the overwhelming majority of village residents and precludes pedestrians from walking to it from the village at night. Driving to a village pub defeats the purpose.

7. Unless a village is well provided for with key facilities the methodology relies on size and frequency of nearby bus services nearby, albeit 0.7 miles away from the village centre and 1.5 miles away from the properties on the village outskirts and on the opposite side of a busy road in an accident black spot. Given the location of the bus service and the associated inconvenience and risks it is not surprising that only 6% use the bus once a week. Similarly the train service is only used by 1% of residents on a weekly basis and 54% of residents have never used the service.

8. Using criterion 1 and 3 to decide on whether a village is to be considered for additional affordable housing is an imperfect measure.

9. Stratford-upon-Avon has a very low unemployment rate and a shortage of residents in the 20-29 age group. Housing will mainly be needed for this group. By putting development in a village without facilities or minimal facilities, especially with no school, is a formula for social unrest.

Bearley Parish Council

10. Make better use of unused or vacant brown field sites before any other new development proposal is contemplated, particularly if this new proposal is intended for open countryside or green fields.

Alan Marks

11. It is noted that Whitchurch as a smaller settlement will have had its 2% in 3 or 4 years time and therefore will require no more approvals until 2028 but with the exception of employment related exceptions. We have had an increase in housing of 40% approximately since 1985 as it is.

Whitchurch Parish Meeting

12. Absolutely essential that no settlements are removed from this list of LSCs. Some villages will be strongly opposed to housing development. If one settlement is removed other may seek the same treatment. The success of the dispersal strategy depends on all the LSCs meeting their housing share taking into account existing settlement size, availability of services and the availability of suitable housing sites within and adjoining settlement boundaries. Each Parish Council needs to sign up to its village being designated as a LSC, and is committed to working with the local community, landowners and house builders to delivering new homes in the respective LSC. Although within the Stratford Town Council administrative area, it is important that villages such as Tiddington and Alveston are confirmed as Local Service Centres in their own right. These villages have their own character and identify and different issues to Stratford-upon-Avon. Housing needs should be considered separately. Once again Stratford Town Council and the Alveston Association should sign up to both Tiddington and Alveston being designated Local Service Centres.

13. Support the comments at paragraph 9.1.8 about the settlement hierarchy not being called into question.

Geoffrey Prince Associates Ltd

14. Council also voiced serious concern that Tiddington and Alveston have been excluded from the proposed housing numbers for the town.

Stratford-upon-Avon Town Council

15. Object. Why has Pillerton Priors been included as one of these villages? It does not have:

- Shop
- Post Office
- Church
- Public House
- School
- Train Service
- Comprehensive Bus Service
- Any employment opportunities

16. Pillerton Priors cannot provide any key services as it does not have the relevant infrastructure and none of these services currently exist.

17. The sewage / waste water system that serves Pillerton Priors and flows downhill to Pillerton Hersey pumping station is already at capacity and struggling to cope with existing waste levels and liable to flooding, particularly in Kineton Road and in Pillerton Hersey. Any additional development in Pillerton Priors will exacerbate an already intolerable situation.

Pillerton Priors Parish Council

18. Many Local Service Villages have very few services which meet the daily needs of residents. Long Compton for example is one of the most deprived communities for public transport, the shops is small, there is no post office, medical facilities etc. and the recent history of Local Service Villages shows a diminution in service provision despite an increase in the number of houses in these villages.

Long Compton Parish Council

19. Small scale development in areas where little development has taken place in the past should be considered where facilities and current infrastructure are in place. To prevent Dunnington Village which is currently a category 1 village from becoming a stagnant village with the potential loss of services Dunnington should be re categorised as a category 2 village which support considerably more houses.

20. Dunnington is not listed in the report 'Methodology for Identifying Local Service Villages due to the assumption that villages of less than 100 houses only supply very limited services. Currently Dunnington comprises of approximately 60 permanent dwellings and accommodates 50 static caravans and additional dormitory accommodation for 60 workers both of which can be occupied 11 months a year and at times in excess of 250 temporary workers are housed.

21. Dunnington is also a net provider of services to the wider community with Dunnington Primary School and the shops and restaurant in the complex at Hillers Farm not just servicing the hamlets of Iron Cross, Weethley and Wood Bevington which in all essence are just extensions of Dunnington Village but servicing a population within well in excess of a 10km radius.

22. Key facilities - Dunnington Primary School - Mixed Voluntary aided C of E Primary school of around 105 pupils in the age range 4-11 Ofsted describe this school as a good school with a number of outstanding features with all activities fitting into the category grade 1 (outstanding) and grade 2(good). This school is very popular in the local area and unfortunately currently only 2 pupils attending actually live in the village of Dunnington leaving 103 pupils being transported into Dunnington by car or bus every day.

23. Hillers Farm Shop & Complex is situated 350 metres out of the centre of Dunnington accessed by a footpath along side the B4088. The farm shop is well established with customers travelling considerable distances to shops and to enjoy the other facilities. The farm shops is more than what most village shops can provide. The shop is also licensed to sell alcohol. A licensed Bistro, a garden Cafe and other shops are also located in the Hillers complex.

24. Other facilities in Dunnington include the Baptist Hall and Chapel, which provides a meeting room used by village organisations. The room can accommodate over 60 people.

25. Dunnington has an excellent road system. Bus transport in and out of Dunnington includes the 212 flexi bus on Tuesday and Friday and the 351 on a Saturday.

26. In conclusion, Dunnington may be a small village but it provides schooling and retail services to the wider community and has a village hall. Limited housing development in Dunnington would be beneficial and help to maintain and enhance the school, shops and other services. Without limited expansion it is probable that the village will decline and suffer loss of services to villages / towns with higher populations.

J A Gascoigne

27. As ex governor of Dunnington Primary School limited development in Dunnington would give the school a more secure future. If correct measures are followed then additional facilities could be provided for the school and maintain other services in the village. I would support changing Dunnington from a category 1 to category 2 service village to allow limited development in the area.

Denis Gascoigne

28. Some villages have a greater ability to accommodate development than others and a high proportion of the housing provision is appropriate but to set this in context there are 39 LSVs, which would equate to an average of 57 dwellings to be built in each with a further 560 dwellings to be built in the rest of the rural areas. This is a significant burden, particularly for some of the smaller villages,

13 of which currently have less than 200 dwellings and Pillerton Priors has just 105 dwellings. It is also a major shift from the 20% (950) proposed to LSV in the Draft Core Strategy of 2010.

Linfoot Homes Ltd.

Taylor Wimpey UK Ltd

Arrow Developments

Mr R Coslett

Mr J Bradley

H.G. Hodges & Sons Ltd.

South East Southam Land Owners Consortium

29. We support the identification of Newbold-on-Stour as a Local Service Village (LSV) in the hierarchy of settlements identified in the explanation to Policy CS 16 (Paragraph 9.1.6). The settlement has all four of the identified Key Facilities (being a public house, primary school, village hall and post office), and a frequent bus service. As such the settlement clearly fulfils the requirements of a designated Local Service Village. Its size with 225 dwellings and thus not one of the smallest Local Service Villages, also justifies its designation.

The settlement is capable of taking additional development and therefore the approach in Policy CS 16 is to be welcomed.

Arrow Developments, Mr J Bradley

30. We support the identification of Welford on Avon as a Local Service Village (LSV) in the hierarchy of settlements identified in the explanation to Policy CS 16 (Paragraph 9.1.6). The settlement has all four of the identified Key Facilities (being a public house, primary school, village hall and post office), and a frequent bus service. Its size with some 550 dwelling and making it the sixth biggest Local Service Village in the District also justifies its designation. The settlement is capable of taking further development and therefore the approach in Policy CS 16 is to be welcomed.

Mr & Mrs Dimarco

31. Support that even the smallest settlements within the District should be able to meet their own needs. Such needs include development for employment, market and affordable housing.

Walton Estates

32. Would favour more of a middle way on the dispersal policy with greater emphasis on the larger centres of population and perhaps a new settlement such as Long Marston where there are road and rail links.

33. The final Core Strategy needs to incorporate Green Belt safeguards and to reflect the diversity of opinions and aspirations that we have heard at the workshops. One size does not fit all.

Tanworth-in-Arden Residents and Neighbourhood Watch Association

34. Paragraphs 9.1.5 - 9.1.8 - define a settlement hierarchy that includes Wellesbourne as a Main Rural Centre. It is unclear if this includes the retail hierarchy. This requires clarification.

35. Section 9.1 needs to be amended accordingly.

Wellesbourne Airfield

36. Support the nominated 39 Local Centre Villages as the most sensible way to spread the housing needs identified. These are apparently identified by a formula of facilities available. I question whether additional villages could be added if the growth plans included improved facilities. The concept would provide some reassurance for rural communities, that they might gain from housing growth, rather than the current trend to see growth as a threat to rural lifestyles.

Richard Woodcock

37. Wellesbourne is a combination of two settlements. The consequence is a dispersed pattern of shops and services. It does not have the cohesive central structure such as Shipston, Alcester and Southam. Wellesbourne is now placed together with these towns because all four settlements are of a comparable size. However, Wellesbourne only has around half the street facing shops and services of Shipston. Should Wellesbourne therefore be given the designation as a Main Rural Centre?

David & Susan Close

38. Paragraph 9.1.6 - Support the identification of Salford Priors as a Local Service Village. Salford Priors is a sustainable settlement with a (parish) population of about 1,500. The community is served by a range of services and facilities and enjoys excellent access to Bidford-on-Avon and the A46 offers fast and efficient road connections to a number of settlements, including Stratford-upon-Avon.

Bloor Homes

39. Sustainable development in rural villages should reflect the local need for housing in that particular village. Our Housing Needs Survey undertaken in 2008 identified the need for 17 affordable homes in Welford. Re-evaluation of this date has indicated that there may also be an unmet need for a very limited number of market homes for families but the extent of this need is yet to be determined.

40. Our Parish Plan makes it clear that residents only support small scale sites and any development in this village should reflect this.

41. Residents have been alarmed by Bloor Homes suggestion (in the mail shot) that Welford's share of SDC's target of 2,240 homes would amount to 91 new properties. This would be almost a 20% increase in the number of dwellings in the village and would in our view alter the dynamics of the village and would be unsustainable and thus be contrary to the NPPF.

Welford-on-Avon Parish Council

42. SDC needs to re-define LSVs as villages that have a meaningful public transport infrastructure and if they qualify on this test. The test then needs to identify those villages that qualify on settlement size and then key facilities. Key facilities also need definition. If a post office that opens for two hours on each of two days a week a key facility. According to SDC logic the answer is yes. I would say no.

Ewen Cunningham

Earlswood & Forshaw Heath Residents' Association

43. The settlement hierarchy in Policy CS 16 is supported although it is suggested that consideration is given to refining the village hierarchy into categories to ensure sustainable patterns of rural housing in the forthcoming Site Allocations DPD.

Wychavon District Council

44. Support the identification of Welford-on-Avon, Lower Quinton and Long Marston as Local Service Villages and consider that the GDBF sites in these locations are well placed and would be suitable to assist in meeting the housing needs of these villages. We would welcome an opportunity to discuss these sites in more detail with the Council following this consultation.

Gloucester Diocesan Board of Finance

CALA Homes (Midlands)

45. Paragraph 9.1.10 - option 10 states that '50% of new housing will be distributed to the rural areas and 40% of this to the Local Service Villages. It is proposed that 10% of the future growth is directed to the smaller villages and hamlets via the 'local choice scheme'. It is not clear whether the 40% and 10% are of the total new housing or 50% of the total new housing. This need clarification.

46. SDC needs to re-think the definition of an LSV. Earlswood qualifies but has no meaningful public transport infrastructure. There is no bus service. The train service runs hourly during the day but the train stations in both Earlswood and Forshaw Heath are not accessible to the majority of residents. Within a quarter of a mile there are only about 60 homes in total within walking distance. There is no parking at The Lakes station in Earlswood and a limited number of spaces at Earlswood Station. If the majority are expected to walk to the station then pavements would be required for safe transit. Most people won't walk to catch the train, which explains the low usage. The elderly and disabled are unable to use the train because the platform is too low for modern trains, making it difficult / impossible for anybody with even moderate infirmity to mount or dismount. The 'shoppers' bus service is of no use to people going to work or for school children / students getting to schools / colleges. The comments regarding the trains stations goes some way to explain why the Lakes Station is a request stop.

Earlswood & Forshaw Heath Residents' Association

47. In broad agreement with the Spatial Strategy as described and the designation of Shipston as a Main Rural Centre.

Shipston-on-Stour Town Council

48. Why is Alderminster on the list of service villages? The Public House has been an expensive eatery for some years. There has been no shop or Post Office for many years even with passing traffic. There is only the village hall left.

Whitchurch Parish Meeting

49. It seems possible that the list of services on the Methodology for Identifying Local Service Villages is out-of-date in relation to bus services (and other services possibly). In discussion with Public Transport section at the County Council, it was agreed that the proposed level of development on the bus route is not going to encourage existing or new operators to increase the present level of service through Alderminster. I do not think the 'bus service' criteria is very relevant because it is not a key facility to most of the likely occupants either now or in future. Just as important as the criteria used to the new occupants is the road out of the village.

Whitchurch Parish Meeting

50. Long Compton's designation as a Local Service Village is surely incorrect, in view of its lack of public transport, schooling, medical facilities, leisure or shopping facilities. I suggest the designation should be updated.

Jill Kirby

51. Dunnington should be a Local Service Village as it meets 3 of the 5 required criteria and is 600 yards from a 30 minute bus service to Stratford and Evesham.

Councillor Peter Barnes

52. As a resident of Long Compton I am amazed to see it listed as a Service Village because it has the appropriate services. The village has one small shop, the Post Office has closed, there are 4 buses a day to Shipston/Stratford and there are non to Banbury the nearest large town. The village school is constrained by its location and cannot be made larger. There are a number of very specialised but small employers within the village and so most of the locals have to travel some distance to work. Before any additional housing can be entertained the commercial transport links and amenities must be improved or we will end up with more weekenders buying the houses as they do not require commercial transport, schools and shops. It must be better to build in areas with existing facilities such as Shipston and Stratford where work is available and the amenities are already in place. Spreading young people out into far flung villages should only be entertained if work is available and amenities are there from the start.

Dick Ormshaw

53. How does our neighbouring village, Pillerton Priors, come to be designated a Service Village? It has no pub, no shop, no school, no post office and recently limited bus services. If more development takes place in Pillerton Priors it will have a direct effect upon our village to deal with all its sewage and surface water. This is then pumped uphill to Butlers Marston Sewage Plant. The pumping station is small and antiquated requiring regular maintenance from Severn Trent. We consider that it is inadequate to deal with further addition which would result from further development. As such we are very surprised that this has not been a consideration when selecting Pillerton Priors as a Service Village.

Pillerton Hersey Parish Council

54. I am concerned that Alderminster is considered to be a Local Service Village and has facilities that will support further housing. It has no school, no shop, the public house is developing into a hotel rather than a country pub for residents, and the bus service is not hourly but 'within the hour'. To build more houses in Alderminster at the present time will just bring more commuters into the parish which will be of no benefit to either the parish or the environment (ie. more emissions). The employment opportunities in the near area are probably not the type which will attract the new householders, who will more than likely already have their places of work when they arrive in Alderminster.

Michael Moody

55. Ainscough Strategic Land (ASL) support the fact that Shipston is still identified as a settlement that is considered suitable to accommodate growth of residential, employment and retail services in the 2012 Preferred Options Core Strategy. However, Section 9 of the POCS reverts back to the old hierarchy of the Market Towns and simply lists Shipston, Alcester and Southam as being the same as the other five main rural centres which are either smaller or more closely related to a neighbouring larger settlement. ASL object to this reverted change in the hierarchy and have seen little evidence or objection to policy CS2 of the 2010 POCS to warrant this change.

ASL also objects to the fact that the hierarchy is not specifically set out in a Policy within the 2012 POCS. Whilst the settlements are listed in the supporting text to Policy CS 16, they should be specifically listed within the policy CS 16 itself or an additional policy confirming the hierarchy so as to ensure the hierarchy is within a statutory policy.

Ainscough Strategic Land

55. We support the identification of Lower Quinton as a Local Service Village (LSV) in the hierarchy of settlements identified in the explanation to Policy CS 16 (Paragraph 9.1.6). The settlement has all four of the key facilities set out in the Council's background paper titled Methodology for Identifying LSVs. it lacks public transport.

The settlement is capable of taking further development and therefore the approach in Policy CS 16 is to be welcomed.

Mr R Chabra

56. What restraints will be put in place to safeguard the Green Belt. Our villages of Tamworth and Earlswood would face extra demands on the infrastructure and transport. Will consideration be given to access and transport in these villages. It has been suggested that there are key services provided and reasonable access to public transport. As pensioners this is certainly not the case!

Freda & Peter Venables

58. The classification of settlements set out in the supporting paragraphs to Policy CS 16 is considered appropriate. It is right and proper that Stratford upon Avon is at the top of the settlement hierarchy. It is the main town providing a wide range of shops, facilities and services.

CALA Homes (Midlands)

59. Whilst the settlements are listed in the supporting text to Policy CS 16, they should be specifically listed within the policy itself so as to ensure the hierarchy is within a statutory policy.

Ainscough Strategic Land

60. The classification of settlements set out in the supporting paragraphs to Policy CS 16 is considered appropriate. It is right and proper that Stratford upon Avon is at the top of the settlement hierarchy. It is the main town providing a wide range of shops, facilities and services. Support is offered to the identification of Bidford-on-Avon as a Main Rural Centre given its scale and function supporting surrounding villages.

Persimmon Homes (South Midlands) Ltd

61. I was pleased to see the support from the government in the NPPF for new settlements, which seems to be significantly more supportive than in the past. I believe that if significant numbers are needed then a new sustainable settlement, probably on a transport corridor (rail or road), could provide a solution.

Councillor Peter Moorse

Topic: 9.1 Development Management Considerations

1. Broadly support the Development Management considerations that brownfield sites should be considered as a first choice and that the scale and location of new development should be proportional to the range and proximity of local facilities.

Noralle Traditional County Homes

2. Public Health / SWCCG supports SDC's view that community support for larger estate sizes should also be taken into consideration.

3. The provision of new shops in neighbourhood centres and villages is encouraged because of the additional employment generated within an area and also the potential for any new shops supplying affordable healthy food options would also be encouraged.

NHS Warwickshire

4. I would like to see Parish/Town Council agreement (or at least productive community engagement) a requirement for any development above 100 houses or 2% of existing stock. This does depend on what constitutes existing stock - a settlement with only 60 houses cannot have one and a half houses built and yet it may be entirely reasonable that a further 10 houses, for example, might be desirable and not necessarily a subject of great debate.

5. Infill plots should not be prioritised in all cases. Sometimes infill plots are a valued part of the village i.e. as when they offer direct access to or views of the countryside or green space.

Mappleborough Green Parish Council

6. See danger in reducing the loss of greenfield land by infilling and using brownfield land as this urbanises villages. Land at boundaries is often degraded and trespassed upon and could be thought of effectively as brownfield so ought to be considered in the target areas for growth. Some expansion of village boundaries (where there are not sensitive landscape and other consideration) would be more preferable to infilling.

Harbury Society

Topic: 9.1 Delivery and Monitoring

No comments received for this section

Consultation Question: Q92

1. Whilst I fully agree with the overall spatial distribution model, Category D should also allow for small Open Market development where there exists Parish Council / local resident support. In many small/medium villages, this is the preferred route to controlled growth. This would be fully aligned with the 'Neighbourhood Planning' within the Localism Act. It would encourage more consultation with local people and Parish Council and deliver schemes that are needed and wanted, without the tenure and occupancy restrictions required by the current 'Local Choice' SPD.

Mark Blackman

2. 560 houses in Stratford proposed in Option F is too many.

Mrs P West

3. No. Stratford upon Avon and Rural Centres with their facilities and industries need population. Villages with no or minimal facilities that are targeted because of an arbitrary methodology of selection will put young people and their families into locations with few or no facilities and a recipe for potential anti social behaviour. The covering paper comments in more detail on the Methodology for Local Service Villages and it is flawed in this respect.

4. In the Draft Strategy, there are two major concerns for a small village like Bearley:

1. The possibility of additional development and the size of such development; and
2. Fairness, robustness and equitability of the process that decides which village gets the size of development and the decision is based upon full consideration of the character and circumstances of the village. That is what the planning process needs to protect and what matters to people.

5. If Bearley is to be considered a Local Service Village and the methodology stays in place then taking a "pro-rata" approach 74 dwellings (2800/39) would be allocated to Bearley in the period to 2028. However, if a per capita approach is taken then 62 ($300 \times 2800 / 13565$) would be put into Bearley. Since the methodology to be adopted has not been defined, assuming the pro rata approach and the mix of houses is constant across the total number, then 26 dwellings that will be affordable houses would be allocated to Bearley. The need established in the Bearley Housing Needs Survey 2012 is for three affordable houses.

This will result in 23 other houses being available to the Housing Association to bring into Bearley overflow from main urban centres. Putting families into a small village like Bearley with no facilities, an unsatisfactorily located main bus service, a very infrequent train service appears to be counterproductive. The 2012 Bearley Community Village Plan Survey contains many comments from families having to endure the difficulties arising from such placement.

The Local Service Villages are clearly expected to take up the slack for houses not to be built in Stratford-upon-Avon by what in absence of supporting evidence appears to be a subjective decision.

To put 50% of the housing requirement into Service Delivery Villages based on an arbitrary methodology will cause substantial ongoing tension between the SDC and local residents who through contributing to their Village/Parish Plan have made it clear whilst they are in favour of the growth of Bearley in accordance with its own needs, 90% do not want large developments in their Parish.

Rightly or wrongly over the past few years local villages have lost their facilities. Shops, Post Offices and Public Houses are closing and even with the scale of local development as envisaged in the LDF it is extremely unlikely this trend would be reversed.

Graham Musson - Bearley Parish Council

6. Support - no comment

Mrs V J Pratt - Wootton Wawen Parish Council

7. Wilmcote Parish does NOT agree with the distribution of housing development as described in the preferred Option F which proposed that 2,240 new dwellings should be built in the Local Service Villages. This equates to 40% of total of new dwellings to be built in the Stratford District in the period 2012 - 2028 as a percentage which is considered to be far too high. The Draft Core Strategy 2012 does not provide evidence that justifies this proposed allocation of 2,240 dwellings to the Local Service Villages and Wilmcote Parish considers that this is such an important issue that unless the District Council can produce evidence that justifies dispersed development on the scale proposed then the wider dispersal approach to development should be abandoned. It is difficult to comment intelligently on the number of dwellings proposed in Section A-D of CS 16 as the data and evidence that was used to develop the numbers proposed, namely up to 560 dwellings in the Main Rural Centres, up to 2,240 dwellings in Local Service Villages and up to 560 dwellings within and adjacent to smaller settlements of the District are not disclosed.

Wilmcote Parish Council does not agree with the proposed allocation of 2,240 dwellings in the Local Service villages and it is surprising that there is no indication in the Draft Core Strategy 2012 as to how the District Council proposes to distribute these dwellings. It can be calculated that if they were equally spread over the 38 Local Service Villages there would be circa 59 new dwellings per Local Service Village. The calculation can also be done pro rata to the number of dwellings currently in a Local Service Village. In the case of Wilmcote this would mean circa 75 additional new dwellings which is considered to be totally unrealistic and unacceptable. It should, however, be noted that in the Wilmcote and Pathlow Parish Plan of 2004 there was considerable support for starter homes for young people and low cost houses for sale. There are other important points which the draft core strategy should have considered:

- We are dealing with the period 2008 to 2028. Key services and reasonable access by public transport are not set in stone and are changing, generally for the worst. In particular, village shops are closing, the level of public transport is being reduced and it is possible that a number of schools will be closed. It is therefore essential that the District Council project into the future and make an estimate of what the level of services will be in say 2020. There is little point in building a large number of new dwellings in villages if, in 2020, it will not be possible to travel into work or do shopping other than by car due to little or no public transport. On the other hand, limited development in Local Service Villages should be welcomed as the additional residents would help support local facilities such as village schools, shops and public houses.
- A major omission in this exercise is that no consideration is appears to have been given as to whether these Local Service Villages are in the Green Belt. The Draft Core Strategy 2012 is rather vague on the matter of new houses in the Green Belt but the Draft National Planning Policy Framework is more specific and clause 144 states that "A local planning authority should regard the construction of new buildings as unacceptable in the green belt." Exceptions to this include "limited affordable housing for local community needs under policies set out in the Local Plan". A rough estimate indicates that of the 38 Local Service Villages some 9 are in the Green Belt.

Mrs E Butterworth - Wilmcote Parish Council

8. ...broadly support the Development Management Considerations that brownfield sites should be considered as first choice and that the scale and location of new development should be proportional to the range and proximity of local facilities.

Bernard Alsop - Noralle Traditional County Homes

9. Yes

Mr W J Robinson - Stockton Parish Council

10. WRCC welcomes the inclusion for the Main Rural Centres of point B (iv) small scale 'local choice' schemes which meet housing and other needs identified by the local community. WRCC welcomes the inclusion for Local Service Villages of point C (iv) small scale 'local choice' schemes which meet housing and other needs identified by the local community. WRCC welcomes the inclusion for the Main Rural Centres of point D (iv) small scale 'local choice' schemes which meet housing and other needs identified by the local community.

Phil Ward - Warwickshire Rural Community Council

11. No. Building large number of houses spread across the service villages will encourage additional road traffic as they will become commuter belt homes for the large nearby conurbations. This policy goes against the "Green" objectives of the Stratford plan.

Mr R Eades

12.

- Stratford-upon-Avon - as the main town with all the accompanying infrastructure, it should be able to accept more building than other areas. It will also help its economy and sustainability, although care should be taken as to where, how and when.
- Main Rural Centres - these should be divided into the market towns (Alcester, Shipston and Southam) which have more outside support and better infrastructure, and the other villages (Bidford, Henley, Studley and Wellesbourne), which do not receive the same support. Furthermore, in the case of Bidford-on-Avon, it must be noted that there is no secondary school - a unique situation in so large a village.
- Local Centre Villages - Bidford-on-Avon Parish Council is aware that some villages are looking for small developments to help to sustain their economy and supports this, with the caveat that they are all consulted to ensure the developments are of a desired size, that they are built where wanted, and that the infrastructure is improved accordingly.
- Rural Brownfield sites - these should be tastefully developed where possible.

Mrs Elizabeth Uggerlose - Bidford-on-Avon Parish Council

13. More emphasis should be placed on local choice schemes as identified by the local community.

Councillor S Thirlwell

14. We are not aware of any local need as we have only just filled the affordable housing in the village. Without public transport and a local general store it would not be sustainable to build anymore affordable housing. There is limited employment in the village and we have met the local demand identified in our Parish Plan. It would be inappropriate to offer affordable housing to anyone without a local connection given the lack of public transport.

Our main concern is that development in Priors Marston is not sustainable without a frequent public transport service. We have no shops, doctor, dentist, or library in the village. We can only access these services from Byfield/Southam using private transport. Therefore the availability of public transport should carry far greater weight than any other criteria in methodology for identifying a local service village.

We can see that a village hall and public house is important to a community but they do not in themselves make a village sustainable. We consider the facility of a general store should also carry greater weight than other criteria in the methodology for identifying a Local Service Village. The plan refers to Priors Marston having a general store/post office. It does not, it only has a village hall from which the post office operates two days a week for a limited number of hours.

For Priors Marston, given the comments above and the importance of sustainability, we should be viewed as a smaller settlement having small scale schemes only that meet local need.

Mrs Jennie Ellard - Priors Marston Parish Council

15. Yes.

Waterloo Housing Association

16. I'm not in support of the current distribution proposal as I believe the housing should be distributed in accordance with the employment opportunities in a given area as this will help provide sustainable growth. The proposed distribution to 'Local Service Villages' will increase greenhouse gases as people need to commute to work. It is not currently possible to commute to a 9-5 job in Stratford on public transport so this isn't a possible solution to the problem.

Rob Pitcher

17. This is all just a bit confusing and arbitrary. Why a 100 houses? What buildings and properties within existing settlements are going to provide for development, existing employment buildings, gardens? I think we should be told. And what is a 'regeneration opportunity' on the edge of settlements? Is this greenfield development (which doesn't fit the description) or does it only relate to a rundown brownfield use? This is all so poorly thought out that, as stated before, all the good things that this plan contain are in danger of being brought down with such an unsound policy.

Reuben Bellamy

18. Yes. I agree with the policies as suggested in CS 16. I think it especially important to promote the development of local Neighbourhood Plans to ensure the communities get the development they agree to.

Councillor R Cheney

19. No. Suggest a new settlement or Option B

Mrs J Hancox - Tysoe Parish Council

20. In respect of the method proposed to provide dwellings in Sections A-D of Policy CS 16 we object to 'local choice' schemes being restricted to 'small scale'. There is no definition offered as to what 'small scale' means or why a restriction should apply. Each settlement and scheme should be considered on its own merits having regard to the circumstances at the time.

Mrs J Kirkham

21. We agree with the classification of Alveston and Tiddington as Local Service Villages

Kevin Martin - Alveston Villagers' Association

22. We very much support the principle of allocating housing to LSVs. However the methodology and system proposed is too broad brush to be effective and justified. To be sustainable the allocation between the individual LSVs should be proportionate to the size of the LSV and the service that it is able to provide and also take into account the sustainability of the location within the district. This would be in line with NPPF para 95.

Of the 39 service villages the number of existing houses vary from between 140 and 965 - a difference of some 6-7 times. Within the LSVs some villages only have three of the "Key facilities and Public Transport Provision" whilst others, the larger LSVs have five or more. Only three LSVs have all six. For example Hampton Lucy comprises 140 existing dwellings served by only a primary school, community hall and a public house. Compare this with Wilmcote: 465 dwellings, store / post office, primary school, community hall, two pubs, relatively good bus services and a train station. To allocate an equal amount of new housing to each village would not be justified or sustainable.

To be justified and effective the dispersal policy needs to take account of this big variance between the LSVs otherwise the situation could arise where a small LSV with the minimum number of facilities could end up providing the same number of new houses as a village five times its size with in crude terms twice the amount of local facilities.

Secondly significant development in the south of the district would be in a much less sustainable location as the area is not well served by rail or bus services. Much local employment is in the West Midlands conurbation and focusing development in the south of the district will increase unsustainable commuting by the private car. The LSVs to the north benefit from train and bus services and hence are in much more sustainable location and should take more new development accordingly. Allocating 300 new homes to the LSVs over 10 miles south of Stratford on Avon (Ilmington, Tredington, Tysoe, Oxhill, Brailes and Long Compton) is very questionable. In this location there are no train services, bus services are poor and few local employment opportunities so new residents would have no choice but to use a private car.

In order to address this situation the following words should be added to the end of CS 16 C: *'In order to take into account the varying size of the LSVs and the existing available community facilities and public transport facilities favourable consideration will be given to allocating more of the new housing to the north of the district to the larger, better served LSVs'.*

David & Angela Tucker

23. In light of national planning policy and the previous production stages of the Core Strategy Christ Church, Oxford supports the recognised contribution that development in rural settlements can make towards the vitality and viability of such settlements. In **response to question 92** of the Core Strategy, the approach set out by Section C of Policy CS 16 is therefore supported. Likewise, the identification of Fenny Compton as a Local Service Village is supported.

C Mahony - Christ Church

24. I would like to see more dwellings directed to Main Rural Centres, as these already have the infrastructure and community services in place, and therefore offer better prospects of delivering sustainable housing development options, and will ensure that the key services and community facilities remain viable. There could be less reliance on large previously developed land in the countryside, outside the Green Belt, as these opportunities may tend to be less well linked to existing centres for community services and will therefore be less sustainable.

Robert Brisker

25. I question/have doubts whether the Category D housing numbers will be attained over the period of the Strategy if their development is wholly restricted to the Local Choice Scheme.

Councillor S H Jackson

26. Pay closer attention to GL Hearn

Steve Taylor - Set Design

27. The approach towards development is supported as it focuses the reuse of brownfield sites, site allocations, regeneration schemes within built up areas and small scale 'local choice' schemes which meet housing and other needs identified by the local community. However, it is recommended that Policy CS 16 should also promote the development of available, sustainable and deliverable Greenfield sites where there is an identified need.

It is important that the Local Authority has the ability, through effective policy, to deliver residential development in the right locations at the right time. Therefore, greenfield sites should play a more important role in meeting the Local Authority's housing requirements both quantitatively and

qualitatively. it should not be presumed that previously developed land is always suitable and sustainable. In some cases, the development of greenfield sites will prove the most appropriate option as they will be available, suitable and achievable.

Julie Davies - Gladman Developments

28. No. Stratford upon Avon and Rural Centres with their facilities and industries need population. Villages with no or minimal facilities that are targeted because of an arbitrary methodology of selection will put younger people and their families into locations with few or no facilities and a recipe for potential anti social behaviour. The covering paper comments in more detail on the Methodology for Local Service Villages and it is flawed in this respect.

Mr Robert Lees - Claverdon Parish Council

29. The spatial strategy should be informed by robust transport evidence to ensure that the impacts on the surrounding network have been properly identified, and that where necessary appropriate mitigation is identified. If this approach is adopted, there will need to be a clear focus on optimising sustainable transport links between settlements, and on providing adequate facilities to meet day to day needs within the local centres to ensure the prospects of achieving sustainable transport objectives are not compromised.

Neil Hansen - Highways Agency - Asset Development Manager

30. I think the allocation for:

- Stratford upon Avon should be higher than that proposed: suggest more in the region of 35/40% - it is by far the largest town and has the best infrastructure and support.
- Main Rural Centres: these can be divided into Market Towns (Alcester, Shipston and Southam - which have received a lot of Advantage West Midlands funding these last years) and the "other, forgotten" four (Bidford-on-Avon, Henley-in-Arden, Studley and Wellesbourne): in particular Bidford and Wellesbourne have seen a great increase in the number of dwellings in the last 20 years, with little or no infrastructure to accompany this development, and neither have a secondary school. In view of this, I believe the allocation to the Market Towns should be higher (20%) that the other 4 (10-15%).
- Local Service Villages - it appears that some of these do wish, and require, some development to ensure they are sustainable. As long as proper consultation takes place and the local communities agree to it, small scale developments, of a sympathetic nature, should be allocated to there villages. (20/25%) - these percentages assume that no development has taken place here in a number of years).
- Brownfields - I believe these areas should be used for development as they are normally quite derelict (15/20%)

Elizabeth Uggerlose

31. In relation to Section D, we agree that the method to provide dwellings within or adjacent to the smaller settlements, such as Temple Grafton, should be small scale and to meet 'local needs' identified by the local community.

Mrs E Timms - Temple Grafton Parish Council

32. Agree.

Mrs G Bailey - Napton-on-the-Hill Parish Council

33. The principal settlement of Stratford-upon-Avon is identified as a Strategic Centre through Policy PA11 of the RSS and is able to provide balanced opportunities for housing and employment and is clearly a location capable of accommodating strategic growth over the CS plan period. The town has a population of 23,000 people and supports an extensive range of services, facilities, employment and is well served by rail links to Birmingham. It should, therefore, appropriately be recognised as the location most suitable for delivering the principal focus of District's strategic housing requirements (in

direct contrast to the 2012 Core Strategy consultation), with the use of sustainable urban extensions being an integral component of that preferred strategy.

The Core Strategy (Policy CS 16) does however identify a number of Main Rural Centres (MRC) of which Bidford-on-Avon is one. MRCs are required to play a major role in respect of delivering rural housing and mixed use developments within the District as well as in the regional context. The CS appropriately acknowledges that these small market towns and large villages will be the focus of most development in the rural parts of the District.

Bidford-on-Avon meets the requirements of being identified as a Market Town against RSS Policy RR3, especially with regard to the rural hinterland in which it is located. It also has the ability to provide the range of development opportunities particularly in respect of employment, improvements to the natural environment, much needed new homes, shopping and other key services. RPS is therefore supportive of Bidford-on-Avon's identification as a Main Rural Centre, which is a local conclusion given the range of services, facilities, its population size (4,800), its significant local employment base and frequent and attractive half hourly bus service which exist.

Given the recent strategic policy advice for establishing market towns and larger villages in Core Strategies, it is not clear why the eight MRCs have been given different policy status. It would be helpful for the list of available services and facilities for MRC to have been published at this consultation stage (as has been done for the Local Service Villages).

Miller Strategic Land

34. Once again the rationale of the provision of housing is unclear and appears to be based upon unsupported assumptions contrary to consultation results. Despite advice to the contrary the working group has persisted with the dispersal option. An option that ignores the need for employment and associated housing, infrastructure costs and amenities. Costs that will need to come from the public purse, whereas the option for housing in the urban areas would allow SDC to negotiate the developer pays the cost.

Ms Julie White - Tanworth-in-Arden Parish Council

35. The methods proposed to provide dwellings in Section D of draft Policy CS 16 seeks to deliver housing within the Local Service Villages. However, the overall level of housing to be provided in these settlements should be increased in proportion to the overall increase in housing numbers that RPS advises is required to make the strategy sound and based upon a credible evidence base whilst planning for growth. Accordingly the restriction proposed on estate sizes may not be realistic taking into account that some villages such as Stockton are more likely to be able to accommodate a higher level of growth than other villages located within the Green Belt or with landscape restrictions. This is pertinent given that not all of the villages identified as LSV will have a population to enable the level of provision in accordance with the proposed restriction.

Therefore the restriction on development size should be removed and reference should be made to the development being able to be satisfactorily accommodated within the environmental context and that the services and location of the village reflect the size of development proposed. Without removal of the threshold and inclusion of the selected text the Core Strategy cannot be considered to be capable of delivering the strategy of wider dispersal that it proposes.

In addition the method relies upon sites being allocated in the Site Allocations DPD or Neighbourhood Plans, whichever is the sooner. The timescales for both of these documents is unknown, and therefore reliance upon these being adopted will result in a delay in the delivery of dwellings.

Trustees of W A Weaver

36. RPS do not agree with the methods proposed to provide dwellings in Sections A-D of draft Policy CS 16 as it provides insufficient dwellings for Stratford-upon-Avon.

Section A only provides for up to 560 dwellings in Stratford-upon-Avon, which is the most sustainable settlement in the District, with the benefit of existing infrastructure and services. It also limits estate sizes to a maximum of 100 homes. Section B places the same estate limit on Main Rural Centres but in addition requires that they be no more than 2% of the existing housing stocks. It is not therefore clear how the housing figures will be achieved with such a restrictive policy on the scale of development.

The Sustainability Appraisal identifies that Policy CS 16: Spatial Distribution of Development has potential adverse effects as dispersal to the rural areas as proposed will result in an increase in car dependency.

The Core Strategy is therefore considered to be unsound and RPS recommends that Stratford-upon-Avon should be the principal focus for development, with less decentralisation into Local Service Villages. A more sustainable approach to housing growth would be:
Stratford 50%; Main Rural Centres 35%; Local Service Villages & Sustainable brownfield sites 15%.

In addition the method relies upon sites being allocated in the Site Allocations DPD or Neighbourhood Plans, whichever is produced the sooner. The timescales for both of these documents is unknown, and therefore reliance upon these being adopted will result in a delay in the delivery of dwellings. The Core Strategy should consider some strategic housing allocations at urban extensions around Stratford-upon-Avon.

Miller Strategic Land and Taylor Wimpey

37. The methods proposed to deliver dwellings in Section D of draft policy CS 16 seeks to deliver housing within the Local Service Villages. However, the overall level of housing to be provided in these settlements should be increased in proportion to the overall increase in housing numbers that RPS advises is required to make the strategy sound and based upon a credible evidence base whilst planning for growth.

Accordingly the restriction proposed on estate sizes may not be realistic taking into account that some villages such as Harbury are more likely to be able to accommodate a higher level of growth than other villages located within the Green Belt or with landscape restrictions. This is pertinent given that not all of the villages identified as LSV will have a population to enable the level of provision required in accordance with the proposed restriction.

Harbury is a perfect example of a settlement that already has a thriving sustainable community, which has the real potential to accommodate housing growth in a location that has a reliable bus service, a village primary school, community facilities such as library and church alongside everyday provisions relating to a number of supermarkets, general stores, restaurants and public houses. Development at Harbury within walking distance of its High Street would be able to satisfy the sustainable development requirements of the 4 National Planning Policy Framework whilst also positively contributing to the village's growth. The site promoted by Heart of England Co-Operative Society Ltd located off Mill Street beyond the village Conservation Area represents a suitable development opportunity that could accommodate a large number of the dwellings required to be delivered within Harbury (approximately 30 dwellings at a density of 35 dwellings per hectare).

Therefore the restriction on development size should be removed and reference should be made to development being able to be satisfactorily accommodated within the environmental context and that the services and location of the village reflect the size of development proposed. Without removal of the threshold and inclusion of the suggested text the Core Strategy cannot be considered to be capable of delivering the plan of wider dispersal that it proposes.

In addition, the method relies upon sites being allocated in the Site Allocations DPD or Neighbourhood Plans, whichever is produced the sooner. The timescales for both of these documents is unknown, and therefore reliance upon these being adopted will result in a delay in the delivery of dwellings.

Heart of England Cooperative Society

38. The problem of logistics viz machinery, manpower etc, the costs and the 'time to completion' of the Council's dispersion approach, completely invalidate said plan. Schoolboy analysis will prove it to be a non-runner. Likewise any other distribution scheme. The total demand must be satisfied by 'no more than five/six primary locations' if it is to be cost effective and make a real contribution to include roads, new schools, etc, facilities for the communities. The people living in the 'chosen' five locations will have to be cultivated, indeed placated. No one reacts with favour to expansion, be it 250, 60 or only 10 new homes. Everyone recognises the need but NIMBY attitude rules.

Michael H Powell

39. **Distributions:** in simple terms, homes

<u>Area A</u>	Southam	300	Harbury/Ufton	200
	Napton	75	Stockton	75
	L.Itchington/Bascote	100	Bishops Itchington	150

Notes: Typically, if Stockton has 503 homes, then 75 additions is only a 15% increase over the next 20 years.

The area (A) may not warrant/support 900-1000 units as-is today, but same is a cost-effective 'size' and supports those costs etc for other facilities improvements as needed.

Looking alongside the M40:

<u>Area B</u>	Henley-in-Arden	200	Tanworth etc	200
	Claverdon	70	Snitterfield	90
	Others with access to the motorway:			
	Hampton Lucy etc	80		
	Additionally	150		

S Total app 750-800

<u>Area C</u>	Wellesbourne	350	Kineton	200
	Gaydon/Lighthorne		140	

S Total 700

Area D Shipston-on-Stour 250 plus additional 300, within a max - 10 mile radius. The Green Belt/AONB areas must carry a share.

S Total 550

<u>Area E</u>	Bidford on Avon	300	Alcester	350
	Studley	270		
	Within a 10 mile radius of these towns, an additional			200
	This is a prime area for development.			
	S Total	1120		

Note: The 'Shottery' plan - 800 **units** - is not under pressure from area E, which itself should minimise the call on Green Belt.

The **Shottery, plus areas A, B, C, D, E** - sites of growth (in every sense - roads, facilities etc), **will provide 4800 of the required 5600** houses up to 2028.

(The council must have built the balance of 800 units since 2008).

Michael H Powell

40. We strongly oppose this policy approach on the basis that it will fail to deliver sustainable development and meet the Council's housing targets for Local Service Villages.

As set out at section C of policy CS 16, it is intended that 2,250 dwellings are delivered in the Local Service Villages. Supporting paragraph 9.1.6 identified that there is a total of 39 Local Service Villages. Assuming that each Local Service Village takes a proportional share of 2,250 units this would require on average 58 units per village. The policy as currently worded seeks to control development in these locations to preserve the character of the villages to developments no larger than 2% of the housing stock.

Local Service Villages are category three settlements sitting below Stratford-Upon-Avon and the Main Rural Centres. These are therefore typically much smaller settlements with fewer services and facilities. Using Great Alne as a typical example of a Local Service Village, there is a total of 232 households in the village. A development comprising no more than 2% of total households would therefore equate to 5 dwellings (rounded up). Therefore in order to deliver on average 58 dwellings in the village there would need to be 11 developments in the village. Even if the average Local Service Village size had 1,000 households (which is very unlikely) the maximum development size would be 20 dwellings so each village would have to have 3 developments of this size in order to contribute to the average 58 units per village and total 2,240 dwellings.

In principal we do not object to the District Council's aims of wishing to protect the character of the Local Service Villages. However, artificially restricting the number of units in any given development to 2% of the existing households has the potential to cause greater harm, forcing a number of smaller developments to come forward, which cumulatively can be more erosive to the character of the settlements. It will also encourage developments to come forward that fall below the affordable housing threshold and therefore fail to deliver much needed affordable housing in the rural settlements. Additionally, it fails to take advantage of the benefits that larger developments can bring such as delivering services and facilities which could improve the sustainability of the settlements and help better integrate the developments into the rural environment through larger areas of landscaping.

It is acknowledged that the policy does include provisions for larger developments to come forward in the Local Service Villages, but this is not positively promoted as an alternative, with the Council only committing to 'considering' such proposals. The policy emphasis is therefore on the delivery of very small unsustainable developments, which cumulatively will be more corrosive to the character of the villages and the countryside, contrary to the aims and aspirations of Core Strategy Policy CS 1.

Policy CS 16 as currently drafted is therefore '**Unsound**' because it is not '**Justified**' as it does not represent the most appropriate strategy, will fail to be '**Effective**' because it will not deliver sustainable development and is therefore not '**Consistent with National Policy**'.

Iwan Jones - Urban Renaissance Villages

41. Yes, subject to appropriate relaxation of green belt in rural villages where natural growth and economic development would be stifled by preventing suitable small-scale development.

Stephen Marchant

42. Adopted Parish Plans are in use today and there is no indication of an orderly transition plan from Parish Plan to Neighbourhood Plan. Parish communities will produce Neighbourhood Plans to suit their identified local need and doubtless these will include suitable locations for development. Time is not on the side of Parishes to give careful preparation of their plan and to get it adopted, yet CS 16. c)1 talks of "Sites allocated for development in the Site Allocations DPD or Neighbourhood Plans, whichever is the sooner." The policy requires inclusion of Parish involvement in the preparation of the Site Allocations DPD, otherwise this will be seen as an instrument to run roughshod over "localism" contained within a Neighbourhood Plan."

PJ Boreham

43. No. We do not understand the proposals. What, for example, does "To preserve the character of the Main Rural Centres estate sizes should be less than 100 homes and no more than 2% of the existing housing stock. Consideration will be given to larger schemes if accompanied by a detailed masterplan and supported by adequate infrastructure" mean? 2% of what? Is this total anticipated development for Stratford District or is it 2% of, say, the LSV? Would an LSV with, say, 500 dwellings be potentially required to accept 2% of 5600 proposed dwellings (112 new dwellings) or 2% of its current dwellings of 500 (10 dwellings)? A percentage increase is not helpful as every time a new project is completed, that dwelling becomes part of the denominator in calculating the revised number of potential new dwellings.

We require clarity as to the initial proposals as we would view, per this example, 112 new dwellings in an LSV of 200 existing dwellings as ludicrous.

We would not be in favour of the section 9.D proposal "Consideration will be given to larger schemes if accompanied by a detailed masterplan and supported by adequate infrastructure." We view this as giving the Council *carte blanche* to instigate developments of any size it pleases as two of the three criteria for assessing this need are subjective.

Mrs J and Mr M Buckley

& J Buckley - Earlswood & Forshaw Heath Residents Association

44. Broadly I support the Wider Dispersal option. But how will the proposed 2240 new houses be shared out among the Local Service Villages? I agree that estate size should be no more than 2% of existing housing stock. But how many estates might there be in, for example, Brailes where I live? As a member of the local group working on the new Brailes Parish Plan, I see the importance of close liaison with the District Council - and vice versa - if the Wider Dispersal option is to gain general local support.

George Warner

45. I do not have any data to dispute it, but proper distribution is important and perhaps more could be done to encourage the use of neglected or empty existing buildings.

Gordon Brace

46. Agree but, as the 2% "limit" to apply to Local Service Villages is 2% for each application, there should be a further long limit on the number of developments to ensure that facilities such as shops & schools follow the houses. Additionally, to preserve the character of Local Service Villages including Tiddington and Alveston, all development in aggregate during the design period, including larger schemes accompanied by detailed master plans, should also be limited to a maximum of, say, 20 per cent of existing village size.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

47. We agree with the classification of Alveston and Tiddington as Local Service Villages.

Alveston Villagers' Association

48. Our key concern with the Core Strategy is the level of housing that is proposed for the District and the distribution of this. We note the process the council have gone through in arriving at a figure of 8,000 dwellings for the District over the Plan period, but feel that this figure should be treated as a minimum and there is a need to provide additional housing numbers above those currently being proposed. We expect the issue of housing numbers to be the subject of further discussion in response to representations by others and would not propose to comment further at this stage. The National Planning Policy Framework (NPPF) confirms at paragraph 47 that local planning authorities should identify a supply of deliverable sites to provide five years worth of housing against their housing requirements with an additional 5% buffer (moved forward from later in the plan period) to ensure choice and competition to the market. As such, we believe that in order to deliver a 'sound' Plan, the level of housing that is proposed would need to be increased, which would have a consequential increase in the proposed distribution.

Alscot Estate

49. The overall total of 8,000 dwellings to be provided in the District is indicated as an approximate total, whereas the requirements set out under each of the sub headings A-E are expressed as maximum figures. We believe that the number of dwellings set against each of the tiers in the hierarchy is far too rigidly defined. Given the lack of detail contained in the Draft Core Strategy as to the locations for development in any of the settlements contained in the hierarchy, it is inappropriate that the apportionment of numbers between each of the elements of the hierarchy is rigidly defined at this stage. A greater degree of flexibility is suggested, perhaps by indicating a range of dwellings which could be provided in each of the elements of the settlement hierarchy.

Ainscough Strategic Land , Persimmon Homes (South Midlands) Ltd

50. The emphasis on distribution has shifted considerably from larger sites at Stratford Town towards smaller sites spread throughout the District. In our view this gives landowners, house-builders and developers the opportunity to promote a range of smaller sites which will still have a minimal environmental effect on villages, but in aggregate could help to support local services. We therefore welcome the proposal for around 1,680 dwellings in Main Rural Centres and 2,240 in Large Service Centres (such as Napton on the Hill). In addition a further 560 dwellings will be found in or around smaller rural settlements and 560 on brownfield sites within the countryside.

Noralle Traditional County Homes

51. In respect of the method proposed to provide dwellings in Sections A-D of Policy CS 16 we object to 'local choice' schemes being restricted to 'small scale'. There is no definition as to what 'small scale' means or why a restriction should apply. Each settlement should be considered on its merits having regard to the circumstances at the time

Brasenose College

52. Subject to introducing a degree of flexibility, as we have suggested, we agree the methods proposed.

Follett Property Holdings Ltd

53. The Draft Core Strategy 2012 proposes the preferred option F of wider dispersal of development around the district with a concentration of development in Stratford-upon-Avon. Importantly for Harbury this revised strategy now proposes to deliver 50% of housing in Local Service Villages (LSVs) and the rural area, with the majority of 40% of this provision identified for LSVs. RPS supports the distinction between development at LSVs and the wider rural areas, although believes that further clarification should be provided identifying that suitable locations at LSVs with services and realistic development opportunities should be considered in preference to other less well served villages on sustainability grounds.

Harbury is one such location where the development of further housing would benefit the existing community by supporting the Primary School, existing village services and businesses. Despite having two small Conservation Area designations suitable development options do exist on the periphery of the village, such as the Mill Street site promoted by Heart of England Co-Operative Society Ltd and identified by the plan at Appendix 2. Without the consideration of realistic development sites such as that proposed on Mill Street the dispersal strategy as proposed will not be able to be realised.

RPS recognises that Stratford-upon-Avon, and to a lesser extent the Main Rural Centre settlements, should accommodate the majority of the additional housing requirement overall in the District (of at least 3,000 dwellings between 2008 and 2028) which is justified by the evidence of household growth.

The methods proposed to provide dwellings in Section D of draft policy CS 16 seeks to deliver housing within the Local Service Villages (LSV). However, the overall level of housing to be provided in these settlements should be increased in proportion to the overall increase in housing numbers that RPS advises is required to make the strategy sound and based upon a credible evidence base while planning for growth.

Heart of England Cooperative Society Ltd.

54. The methods proposed to deliver dwellings in Section D of draft policy CS 16 seeks to deliver housing within the Local Service Villages. However, the overall level of housing to be provided in these settlements should be increased in proportion to the overall increase in housing numbers that RPS advises is required to make the strategy sound and based upon a credible evidence base whilst planning for growth.

Accordingly the restriction proposed on estate sizes may not be realistic taking into account that some villages such as Stockton are more likely to be able to accommodate a higher level of growth than other villages located within the Green Belt or with landscape restrictions. This is pertinent given that not all of the villages identified as LSV will have a population to enable the level of provision required in accordance with the proposed restriction.

Therefore the restriction on development size should be removed and reference should be made to development being able to be satisfactorily accommodated within the environmental context and that the services and location of the village reflect the size of development proposed. Without removal of the threshold and inclusion of the suggested text the Core Strategy cannot be considered to be capable of delivering the plan of wider dispersal that it proposes.

In addition, the method relies upon sites being allocated in the Site Allocations DPD or Neighbourhood Plans, whichever is produced the sooner. The timescales for both of these documents is unknown, and therefore reliance upon these being adopted will result in a delay in the delivery of dwellings.

Trustees of W A Weaver

55. We welcome the settlement categorisation upon the understanding new development acknowledges the needs of mature residents to have suitable accommodation.

CPRE have stated that the lack of new build in rural settlements has resulted in the loss of services and facilities. Your core policy dispersal will redress that situation.

Mr & Mrs R W Westwood

Consultation Question: Q93

1. The 2% estate limit seems a reasonable limit to protect the character of LSVs, with two provisos. 1) To prevent the situation where a developer makes separate applications for estates of just under 2% on contiguous sites, wording should be included to the effect that 'recent planning applications for estates on adjacent sites will be taken into account'. 2) Where there is a Built Up Area Boundary, the 2% should be based on the housing stock within the Boundary rather than within the entire civil parish because it would be unreasonable for housing perhaps several miles from the village to have an effect on the intensity of its development.

John C Read

2. I support the proposed limit of 100 houses on any given housing development.

Robert B Freedman

3. The Cotswold Conservation Board can see no evidence being put forward to support the estate sizes being suggested.

Malcolm Watt - Cotswolds Conservation Board

4. Given the lack of clear definitions in this section and in absence of supporting evidence what appears to be arbitrary and subjective conclusions more substantive detail is required such that any community which may be impacted can establish the magnitude and extent of the impact of new estates.

The 2% rule in 9.05 should be used to establish the maximum total development in any settlement throughout the period of the proposals otherwise the rule has very little meaning.

Graham Musson - Bearley Parish Council

5. Conversely, under Policy CS17, to meet the established need for three affordable homes identified in the Bearley Housing Needs Survey 2012, assuming a similar floor area basis, some 9 dwellings have to be built. Section 9 of the LDF states that estate sizes should be no more than 2% of housing stock. This for Bearley represents 6 dwellings. Within the village is an already identified area where up to six dwellings can be built, however under the LDF rules Bearley would now have to find two locations.

Graham Musson - Bearley Parish Council

6. Support - no comment

Mrs V J Pratt - Wootton Wawen Parish Council

7. The estate sizes appear arbitrary and should not be included within the final Submission Draft Core Strategy. These would be better replaced with an indication that housing developments will be determined on their merits, taking into account site specific circumstances and the design quality of the proposed development.

West Midlands HARP Planning Consortium

8. Wilmcote Parish Council considers that the estate size proposed (not more than 2% of the existing housing stock) is reasonable but it is imperative that the character of existing settlements is protected.
Mrs E Butterworth - Wilmcote Parish Council

9. Yes **Mr W J Robinson - Stockton Parish Council**

10. Warwickshire Rural Community Council (WRCC) is unclear why it is necessary to propose, for anywhere other than Stratford Town, that the maximum estate size should be less than 100 homes AND no more than 2% of the existing housing stock. WRCC assumes this is an oversight, but, if it is not, would point out the Minutes of the Cabinet on 6 February 2012 refer to a previous Cabinet meeting on 16 January 2012 and states that "it had been resolved that developments outside of Stratford-upon-Avon should be restricted to 2% of the existing housing stock and that proposals for larger developments would be considered but only if compliant with an agreed Masterplan. In addition, the handout at the Draft Core Strategy 2012 Consultation Workshop at Beaudesert & Henley Joint Parish Council on 14 March 2012 gives a "maximum estate size of 100 homes in Stratford or 2% increase in dwellings in Main Rural Centres & Local Service Villages". And finally, according to the Census 2001, outside Stratford Town, Studley has the most households in the District; 2,725. As 2% of the housing stock would limit the estate size to 55 homes, the reference to 100 homes is unnecessary.

WRCC makes no comment on the settlements that should be included in the Local Service Village category (Q95), but would point out that some smaller settlements appear to have higher housing stock than some Local Service Villages.

- Pillerton Priors 112
- Oxhill 133
- Halford 139
- Gaydon 153
- Long Marston 155
- Clifford Chambers 184
- Hampton Lucy 185
- Burton Dassett 561
- Kinwarton 493
- Sambourne 328
- Ullenhall 277
- Lighthorne 237
- Aston Cantlow 234
- Stretton-on-Fosse 202
- Temple Grafton 199
- Cherington / Stourton 197
- Whichford 155
- Ratley & Upton 154
- Loxley 153
- Little Compton 149
- Warmington 143
- Binton 129
- Ladbroke 127
- Farnborough 125
- Radway 114

The implications are that Pillerton Priors, as an example of a Local Service Village, would be restricted to an estate size of just 2 new homes which would not be financially viable to deliver as affordable homes. Whereas Kinwarton, as an example of a smaller settlement, would be restricted to an estate size, if imposed, of 10 new homes. This appears to be inconsistent. WRCC suggests that the size of

'local choice' schemes ONLY are not restricted to 2% of the existing housing stock, but based on the specific housing needs identified by the local community and without the need to be accompanied by a detailed Masterplan.

Phil Ward - Warwickshire Rural Community Council

11. Yes. Estates should not be more than 100 dwellings. Different sites dwellings within a development should be encouraged to introduce character within the estate.

Mr R Eades

12. Masterplans and/or Design and Access Statements would be expected for any size of housing development in any event, and would need to comply with the District's Design Guide and the Core Strategy policies on design. However by encouraging schemes of no more than 2% of the existing housing stock the policy will fail to deliver the right type and mix of housing. Of the 38 Local Service Centres 17 settlements currently have only enough dwellings to support development schemes of up to 5 dwellings (2% of existing housing stock), and another 17 only have enough dwellings to support small development schemes of 6-10 dwellings based on the 2% rule. Effectively this means that:

- It will require between 225 and 450 sites to be identified in these local service centres assuming an average site ranging from up to 5 and no more than 10 dwellings per site - this is equivalent to between 6 and 12 housing sites per LSC would need to be found and planning permission secured - an almost impossible task given past records of achievement;
- Such a policy could have unintended consequences including the loss of valuable open spaces in these settlements, and pressure to over-develop within Conservation areas; and
- Very few if any affordable homes would be built in these settlements as Policy CS 17 sets a threshold of only having to provide affordable houses on sites with 5 dwellings or more. It is clear that most developers and landowners will aim to come forward with schemes of 4 or less market houses.

We therefore strongly recommend that the reference to estate sizes of no more than 2% of the existing stock to be removed. It will be far better to identify medium size sites of say up to 50 houses in size in LSCs which are subject to Master plans and local consultation and where a comprehensive of village improvement measures can be negotiated including the provision of homes which meet local needs.

Geoffrey Prince Associates Ltd

13. Limiting development sites to a maximum of 2% of current stock in villages is welcomed, with the caveat that local communities can determine larger development sites within their own Neighbourhood Plans.

Mrs Janet Blackwell - Long Compton Parish Council

14. The implication of the "2% per development" can be misinterpreted, and requires further clarification to avoid developers taking advantage

D Lugton

15. For a start, we should not be building 'estates'. I do not agree with the estate size restriction. This is completely arbitrary and can only be declared unsound, bring everything down with it. The size of any urban extension, or extension to a village, needs to be determined by a whole host of factors such as, the size and function of that settlement, the characteristics of the site and its location, and son on. and what about the opportunities for building a mix of uses, connections with the existing settlement and its infrastructure?

Setting a 100 dwelling or 2% target just does not make any sense.

Reuben Bellamy

16. Yes I agree that we should restrict the size of individual developments and the suggested restrictions seem sensible.

Councillor R. Cheney

17. The proposal within CS 16 to restrict the size of new residential developments within main rural centres to no more than 100 homes or 2% of the existing housing stock is arbitrary. The sentiment behind this policy is to preserve the character of main local centres. However, those centres differ substantially in terms of size and character. We consider that the appropriateness of a development proposal should be better judged through an assessment of impact on character and local infrastructure on a case by case basis.

The policy to restrict estate sizes to no more than 100 homes may result in 'missed opportunities' to provide for the District's housing needs on suitable sites within its larger rural centres which are more than capable of accommodating resident development on a larger scale. This in turn could put increased pressure on the release of less preferable sites, such as greenfield sites, on the periphery of those towns.

Mr John Williams - Harris Lamb Property Consultancy

18. ...completely disregards the requirements to meet housing needs in full and plan positively. Indeed, caps on estate sizes should not be set in the Core Strategy given it is inflexible and is in direct conflict with paragraph 47 of PPS4. For example, if a significantly greater housing need exists there should be no limit on what estate sizes could be provided as long as those needs are met in full.

Rego Southam Limited

19. Object to the minimum estate size which is unlikely to lead to delivery of the strategy. Do not agree with the 2% figure as there seems to be no sound basis for this argument.

Godfrey-Payton Chartered Surveyors

20. I support estate sizes of 2% maximum the existing housing stock of the settlement. I agree with the safeguards applied to larger schemes, but developments larger than 2% should be phases (minimum 5 years per phase) to ensure settlements can absorb development with minimal adverse impact. Local housing needs surveys must be the main drivers for actual numbers of new dwellings in each settlement.

K J Griffin-Gallagher

& Mr M Hipkiss

& L H Brice

& G F Lycett, E Lycett

& R N Butler

& Mark Hind + Tonia D'Bras

& Roger Pamment

& Mr + Mrs Godson

& Phillip Knowles

& Mrs Lesley Smith

& Mr H Green

& Mr J Alderson

& Mrs Vivienne Smith

& A J Mann - Eclipse Road Residents Group

& Mrs C J Mann

& Julian Davey

& Nina Knapman

& Mr + Mrs Godson

& A J Mann

21. My client welcomes the intention to limit the scale of new development and believes that this will allow for smaller developments of more individual design rather than large housing estates with little or no heart or community spirit.

Spitfire Properties LLP

22. We feel the allocation by 2% should be a bit higher - 3 or 4% - some villages would be able to accommodate more while some may not want any development at all.

Mrs EM Pogmore - Brailes Parish Council

23. Stansgate does not agree with the minimum estate size proposed for Stratford-upon-Avon, the main rural centres and the local service villages which is unlikely to lead to delivery of the strategy making the plan ineffective.

There is no justification for the minimum estate size and figures of 100 houses and 2% appear to be arbitrary with no evidence to support why the figures are necessary, how they have been selected or how they will deliver the strategy given the very great number of houses needed. The percentage figure could equally have been 5% or 10%

Furthermore no definition is given as to what constitutes a master plan that would justify an alternative estate size or the mechanism as how this would be dealt with, for example, will such documents be submitted to the council and put before planning committee to gain approval prior to an application or are they submitted as a supporting document to an application?

It is only when this is looked at in practice that it becomes clear how it affects the delivery of the plan. for example, for 39 local service villages to deliver 2,240 dwellings mean an average of 57 dwellings per settlement. taking a settlement with an existing dwelling stock of 200 as an example:

- each new site would be no more than 4 houses
- about 15 sites would be needed
- they would not build to establish boundaries (such as hedgerows, roads or rivers)
- no affordable housing would be delivered (because other policies do not require affordable housing on sites so small)

A similar situation would occur in the main rural centres where sites would range in size from 20 (in Kineton) to 65 (in Alcester). This would mean the provision of 5 or 6 sites to each settlement. This would not allow for proper planning, and would unreasonably restrict the growth of settlements in the most sensible locations. Much of the necessary infrastructure can only be provided if a larger developments are permitted.

Site size should not be restricted and each site should be considered on its merits having regard to local circumstances and the site specific issues.

Clare Linfoot McLean - Linfoot Homes Ltd

Taylor Wimpey UK Ltd

Arrow Developments

Mr J Bradley

Mr and Mrs Dimarco

H.G. Hodges & Sons Ltd

24. We agree with policy CS 16 C that "to preserve the character of the Local Service Villages estate sizes should be no more than 2% of the existing housing stock."

However, the proposal that "consideration will be given to larger schemes if accompanied by a detailed master plan and supported by adequate infrastructure (CS 16C) could result in large and inappropriate developments which would materially alter the character of a Local Service Village.

It is therefore proposed that to preserve the character of Local Service Villages all development in aggregate, including larger schemes accompanied by detailed master plans, should be limited to a maximum percentage of existing village size. An appropriate percentage for the total plan period might be 20%.

We also consider it essential that individual development larger than 2% of existing housing stock must be fully supported by the community and a Neighbourhood Plan. We understand from SDC that this is the intention. However, this should be explicitly state in the Core Strategy document.

Kevin Martin - Alveston Villagers' Association

25. ...delivery of this level of housing from smaller settlements with limited housing stock on sites that are no more 2% of the existing stock... is likely to present an issue with the number of sites required and the ability to bring forward new infrastructure. For example, to deliver the average of 57 dwellings per LSV:

- Existing dwelling stock of 200
- Each new site would be no more than 4 houses
- about 15 sites would be needed
- no affordable housing would be delivered

In this scenario it becomes clear that affordable housing would not be delivered as the other policies of the plan would not require it on sites of 4 houses. Therefore a substantial proportion of the housing allocation would be solely market housing.

The Glebe Committee, Walton Estates

26. Stansgate does not agree with the minimum estate size proposed for Stratford-upon-Avon, the Main Rural Centres and the Local Service Villages which is unlikely to lead to the delivery of the strategy, making the Plan ineffective.

There is no justification for the minimum estate size and the figures of 100 houses and 2% appear to be arbitrary with no evidence to support why the figures are necessary, how they have been selected or how they will deliver the strategy given the very great number of houses needed. The percentage figure could equally have been 5% or 10%.

Furthermore, no definition is given as to what constitutes a master plan that would justify an alternative estate size or the mechanism as how this would be dealt with, for example, will such documents be submitted to the Council and put before planning committee to gain approval prior to an application or are they submitted as a supporting document to an application.

It is only when this is looked at in practice that it becomes clear how it affects the delivery of the Plan. For example. for 39 Local Service Villages to deliver 2,240 dwellings means an average of 57 dwellings per settlement. Taking a settlement with an existing dwelling stock of 200 as an example:

- Each new site would be no more than 4 houses
- About 15 sites would be needed
- They would not build to establish boundaries (such as hedgerows, roads or rivers)
- No affordable housing would be delivered (because other policies do not require affordable housing on sites so small)

A similar situation would occur in the Main Rural Centres where sites would range in size from 20 (in Kineton) to 65 (in Alcester. This would mean the provision of 5 or 6 sites to each settlement. This would not allow for proper planning, and would unreasonably restrict the growth of settlements in the most sensible locations. Much of the necessary infrastructure can only be provided if larger developments are permitted.

**Walton Estates, South East Southam Land Owners Consortium, Mrs G lines, Mr R Chabra
Mark Booth - Banner Homes (Midlands)**

27. Given that the largest Main Rural Centre has only 3,200 dwellings, then the figure of 100 homes is meaningless as the 2% threshold would mean a maximum estate size in any MRC of 64 homes. If 100 houses is indeed considered to be the largest size of estate that the council considers suitable in a MRC, then it would be logical to set the percentage at 3% as this would still mean a maximum estate size of 96.

Walton Estates

28. With regard to the size of new schemes in the LSVs being limited to 2% of the existing housing stock; this would be an ineffective and very uneconomic way to deliver the new housing. An 'average' LSV would need to accommodate some 57 new homes (2,240 divided by 39). Using an average LSV housing stock of 350 and the 2% limit would result in new developments being limited to some 7 units, meaning that each LSV will have to accommodate some 8 or so new housing developments.

Delivering new housing in such a fragmented form is not a good, practical or sustainable policy because, due to economies of scale, development will be expensive and potential for planning gain and affordable housing will reduce significantly.

Local public reaction to eight or so new schemes will be very adverse resulting in strong local objections and further delay in delivering SDC's much need housing growth.

A much more practical and realistic guide to estate size in LSVs would be 5-10% depending on individual site and LSV circumstances.

David & Angela Tucker

29. Policy CS 16 suggests that in order to preserve the character of Stratford-upon-Avon estate sizes of a maximum of 100 homes will be required. Consideration will be given to larger schemes if detailed by a masterplan and/or compliant with an adopted Neighbourhood Plan and supported by adequate infrastructure.

This approach is unduly restrictive and cannot be supported. It will prevent the delivery of housing where there is an identified need and lead to dispersed and unsustainable development patterns. In turn this approach would compromise the plan's ability to achieve the following Strategic Objectives;

- Planning to provide for housing needs;
- Planning to protect the character of settlements and the countryside; and
- Planning to increase the use of sustainable transport.

Julie Davies - Gladman Developments

30. Given the lack of clear definitions in this section and in absence of supporting evidence what appears to be arbitrary and subjective conclusions more substantive detail is required such that any community which may be impacted can establish the magnitude and extent of the impact of new estates.

The 2% rule in 9.05 should be used to establish the maximum development in any settlement throughout the period of the proposals otherwise the rule has very little meaning.

Mr Robert Lees - Claverdon Parish Council

31. I support the limit of estates of 100 homes to preserve the character of our rural environment. The idea to cap Local Service villages to estates of 2% is sensible, except for cases where the village is smaller, such as Pillerton Priors for example, where the ration becomes all but non-viable. In these cases I note that there is an option for a Neighbourhood Plan to cater for the sensible usage of larger suitable plots.

Richard Woodcock

32. ...overly restrictive and not justified by credible evidence. As an aside we find the reference to the word "estate" as a means of describing new housing development to be somewhat pejorative and dated. Most importantly, however, we do not believe it is right that Policy CS 16 rigidly defines a maximum development size based on an arbitrary level of 100 dwellings in Stratford-upon-Avon, and 2% of the existing housing stock elsewhere.

We believe, in accordance with the indication that sites will be identified formally through either a Site Allocations DPD or Neighbourhood Plans, that the actual size of development should reflect local circumstances and the opportunities and benefits which schemes can bring to the area within which they are situated. The restriction of 2% of the existing housing stock in relation to main rural centres and local villages could well mean that more sites need to be identified than would be the case if proposals were unconstrained by this arbitrary restriction. There may also be a much better opportunity to derive benefits for the local community from new housing development if slightly larger developments are envisaged than those that would be implied by a 2% limit. Given the absence of any evidence in relation to this arbitrary figure of 2% it is not, we suggest, prudent to try and impose a one size fits all approach to the scale of the housing development which could be appropriate in relation to settlements in Stratford on Avon District.

33. Overall, we welcome the dispersal approach, particularly in the villages and Main Rural Centres...In Stratford itself, in terms of pupil place planning the possibility of a number of relatively 'small' developments around the town creates significant challenges in providing extra school places when the Stratford town primary schools are already nearing capacity. In Stratford town, from a pupil planning perspective the WCC would prefer more concentrated residential development sites which bring with them the opportunity to provide new school sites and a focused application of developers' contributions.

Ciaran Power - Warwickshire County Council

34. Yes

Mrs Gill Bailey - Napton-on-the-Hill Parish Council

35. Given the scale of Bidford, its role in serving its rural hinterland and range of services and facilities within the village, it is clearly capable of accommodating more than the suggested 140-200 dwellings. In particular the site at Waterloo Road is clearly capable of addressing this need.

Miller Strategic Land

36. SDC must, without exception, protect the character of existing settlements. No LSV or Rural Community should have a development which is not consistent with the character of existing housing stock. The estate sizes proposed would/could completely change the identity of villages and rural hamlets. My distribution for LSVs and rural areas is for a maximum increase to be capped at 10% of existing housing stock. There are approx 16.5k houses in that bracket in the District and 1360 additions proposed by the above formula, giving an overall increase of 8.25%. The 10% cap will allow for those areas that want a larger increase. Those that want a smaller increase should be able to trade with those that want the larger numbers.

Ewen Cunningham

37. Yes "no more than 2% of the existing housing stock". However, this does not preclude the possibility of the near proximity of another development of not more than 2%, eventually resulting in a sprawl of numerous 2% developments. Attention needed to effect of a number of small developments swamping LSVs in particular

Ms Julie White - Tanworth in Arden Parish Council

38. RPS does not agree with the estate sizes proposed. There is no available or up to date evidence to justify the enforced estate size limits proposed, especially in relation to the restriction of development

within Local Service Villages to 2% of their population size. The text requiring estate size limits should be removed from the policy.

Developments should be judged on their own merits and larger schemes are more likely to be able to provide on-site infrastructure and support existing community facilities in villages such as schools and shops.

The restriction imposed on estate sizes may not be realistic taking into account that some villages such as Stockton are more likely to be able to accommodate a higher level of growth than other villages located within the Green Belt or with landscape restrictions. This is pertinent given that the average supply per village as currently proposed is envisaged to be around 40 dwellings, whilst not all of the villages identified as LSV will have a population to enable that level of provision in accordance with the proposed restriction.

Therefore the restriction on development size should be removed and reference should be made to the development being able to be satisfactorily accommodated within the environmental context and that the services and location of the village reflect the size of development proposed. Without removal of the threshold and inclusion of the suggested text the Core Strategy cannot be considered to be capable of delivering the strategy of wider dispersal that it proposes.

In addition the method relies upon sites being allocated in the Site Allocations DPD or Neighbourhood Plans, whichever is produced the sooner. The timescales for both of these documents is unknown, and therefore reliance upon these being adopted will result in a delay in the delivery of dwellings.

**Trustees of W A Weaver
Heart of England Cooperative Society**

39. The methods proposed to provide dwellings in Section D of draft Policy CS 16 seeks to deliver housing within the Local Service Villages (LSV). However, the overall level of housing to be provided in these settlements should be increased in proportion to the overall increase in housing numbers that RPS advises required to make the strategy sound and based upon a credible evidence base while planning for growth.

Accordingly the restriction proposed on estate sizes may not be realistic taking into account that some villages such as Harbury are more likely to be able to accommodate a higher level of growth than other villages located within the Green Belt or with landscape designations. This is pertinent given that the average level of housing supply per village is envisaged to be around 40 dwellings, whilst not all of the villages identified as LSV will have a population to enable that level of provision in accordance with the proposed restriction others have more sustainable communities at present.

Harbury is a perfect example of a settlement that already has a thriving sustainable community, which has the real potential to accommodate housing growth in a location that has a reliable bus service, a village primary school, community facilities such as a library and church alongside everyday provisions relating to a number of supermarkets, general stores, restaurants and public houses. Development at Harbury within walking distance of its High Street would be able to satisfy the sustainable development requirements of the National planning Policy Framework whilst also positively contributing to the village's growth. The site promoted by Heart of England Co-Operative Society Ltd located off Mill Street beyond the village Conservation Area represents a suitable development opportunity that could accommodate a large number of the dwellings required to be delivered within Harbury (approximately 30 dwellings at a density of 35 dwellings per hectare)

Therefore the restriction on development size should be removed and reference should be made to the development being able to be satisfactorily accommodated within the environmental context and that the services and location of the village reflect the size of development proposed. Without removal of

the threshold and inclusion of the suggested text the Core Strategy cannot be considered to be capable of delivering the strategy of wider dispersal that it proposes.

In addition the method relies upon sites being allocated in the Site Allocations DPD or Neighbourhood Plans, whichever is sooner. The timescales for both of these documents is unknown, and therefore reliance upon these being adopted will result in a delay in the delivery of dwellings.

Heart of England Cooperative Society

40. The policy preference outlined in Policy CS 16 that 'the maximum, estate size of 100 homes' is not supported by objective assessment. The imposition of an upper limit of 100 dwellings for new development at Stratford upon Avon, and less than 100 homes outside Stratford - particularly the Main Rural Centres are considered to be inappropriately arbitrary thresholds to the scale of new housing development that could be successfully integrated with existing settlements. The Core Strategy provides no evidence to support this position. Indeed, we note that the Council has commissioned consultants to provide a retrospective justification for strategy at the same time that the Preferred Option Core Strategy was being approved for consultation. In posting Question 98 on the 'Spatial Strategy' "**Is there any other evidence that the District Council should be considering to help the development of this draft policy?**", the Council should be asking itself whether there is actually any evidence to support the draft policy? In the absence of this objective evidence the draft Core Strategy is unsound.

Brian Lewis - Framptons

41. I agree that the maximum estate size in Stratford should be no more than 100 houses.

Terry Brandon, Michael Whick

42. Object to the arbitrary maximum allocation of 100 dwellings for sites identified under policy CS 16. it is questioned as to how deliverable the criteria would be in practice against the NPPF (para.157;159)

Andrew Ford - Wychavon District Council

43. SDC must, without exception, protect the character of existing settlements. No LSV or Rural Community should have a development which is not consistent with character of existing housing stock. The estate sizes proposed would/could completely change the identity of villages and rural hamlets.

Mrs J and Mr M Buckley & J Buckley - Earlswood & Forshaw Heath Residents Association

44. We object to the proposal to restrict the size of new housing estates and suggest that each proposal should be considered on its own merits. Larger scale development can provide the critical mass to help fund and deliver wider planning benefits compared with smaller developments

Quintessential Inns

45. Yes, but as far as Stratford town is concerned I question the need for any new estates.

Gordon Brace

46. Although there is significant support for keeping new developments small, there is concern that this could make it hard to force developers to contribute substantially to the infrastructure needs and so risks putting more strain on services.

47. Generally agree. There should be very good and truly exceptional reasons linked to substantial additional infrastructure if any estate is to exceed 100 homes. In these exceptional cases, the location of an estate, landscaping and building height should ensure that the character of Stratford upon Avon is preserved. It is a concern that the willingness to support large development applications accompanied by a "detailed master plan" will prove to be a loophole.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

48. The NPPF states that policies in local plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.

Oakley Mayfield

49. The allocation of 2240 new dwellings to the 38 Local Service Villages as proposed in the Draft Core Strategy 2012 has been reviewed. There is considerable confusion re number of dwellings proposed for Wilmcote as the Draft Core Strategy 2012 gives no definite indication as to the allocation of the 2,240 new dwellings to the Local Service Villages. The Draft Core Strategy 2012 does state that estate sizes should be no more than 2% of the existing housing stock and many people have interpreted this to mean that the total number of new dwellings would be no more than 2% of the existing housing stock.

Warwick R Roberts

50. I believe that building estates around Stratford should be limited to a maximum of 30 units. See for example the absolute disaster of Trinity Mead when unlimited expansion is allowed.

C M West

51. 2% limit is reasonable in the Main Rural Centres but in the Local Service Villages this might limit estate sizes to only 2 homes. This is unlikely to be viable on many sites. There should be a threshold of 4 units being acceptable in principle without a Masterplan.

Morton Bagot, Oldberrow & Sperrall Parish Meeting

52. The decision by Cabinet to limit the size of estates will have a drastic impact on the ability of developers to meet the needs of the residents they are building for. Only by considering in depth what will be needed in the future can we plan for today.

Councillor Paul Beaman

53. Not supportive of the restriction in size of new housing estates in Local Service Villages to no more than 2% of the existing housing stock. This figure is too low and is too prescriptive for a strategic policy. With this included, the policy does not provide the flexibility to respond to local circumstances and predetermines decisions that should be made as part of the preparation of the Site Allocations DPD and/or Neighbourhood Plans. Whilst the policy does allow for exceptions to this, it is still considered that the inclusion of the 2% is unnecessary.

CEMEX

54. Do not agree with maximum estate size being limited to no more than 2 per cent of the existing housing stock. Salford Priors already has 3 sizable estates. Consider that another one or two estates with up to 30 to 50 dwellings would not be out of place in our village.

Salford Priors Parish Council

55. In respect of site size we are concerned that a scenario could come about whereby a site is developed which although in itself does not extend beyond the 2% housing stock proposal, it may in fact be close to another site which itself doesn't contravene the same limits. You can clearly see given this scenario that a sizeable field for instance, could be deemed to contain two sites - neither of which contains more than the desired dwellings, whilst from a villager's perspective this could reasonably be deemed to be a single site development. We would like some clear direction from the District Council which identifies and clarifies what constitutes a 'site' particularly in relation to the physical, geographical separation between two or more 'other sites'.

Ms Rebecca Howes - Mappleborough Green Parish Council

56. The maximum figure of 100 dwellings per estate seems somewhat arbitrary and should be based on a more explicit and evidenced rationale.

Waterloo Housing Association

57. Object to the need for housing estates in the Main Rural Centres to be less than 100 units and no more than 2% of the existing housing stock. This is not founded on any robust policy basis and is not implementable.

If the purpose is to ensure variety in design, layouts and character to create distinct neighbourhoods, this can be achieved through the design process without imposing an arbitrary cap on the number of residential units permitted on a site. Whilst the reference to master planned proposals partly obviates this requirement, master planning is common practice on all large development sites and therefore the policy requirement as a whole is not necessary.

The requirement also fails to recognise that larger development proposals have better scope to provide for local services through on site provision or developer contributions.

Ainscough Strategic Land

58. We also find that the restrictions contained in section A, B and C of the policy concerning the maximum size of any individual development to be overly restrictive and not justified by credible evidence. As an aside we find the reference to the word 'estate' as a means of describing new housing development to be somewhat pejorative and dated. Most importantly, however, we do not believe it is right that policy CS 16 rigidly defines a maximum development size based on an arbitrary level of 100 dwellings in Stratford-upon-Avon, and 2% of the existing house stock elsewhere.

Bloor Homes

59. Given the recent strategic policy advice for establishing market towns and larger villages in core strategies, it is not clear what the eight MRCs have been given different policy status. It would be helpful for the list of available services and facilities for MRC to have been published at this consultation stage (as has been done for the local service Villages)

Miller Strategic Land

60. RPS do not agree with the estate sizes proposed.

There is no evidence base to justify a 'one fits all' estate size limit of 100 dwellings and there is no evidence to demonstrate how this would protect the character of existing settlements. The policy should be omitted.

Developments should be judged on their own merits and larger schemes are more likely to be able to provide on-site or secure through contributions significant infrastructure improvements, ie. new schools, community facilities.

Miller Strategic Land and Taylor Wimpey

61. With regard to estate sizes (either 100 dwellings or 2% of the existing housing stock), this wording will need more clarity, as it may reduce the ability of new developments to use land efficiently and effectively. The scale and density of new development should reflect the character and setting of existing settlements. Up to date information would also need to be provided and updated regularly to confirm the size of the existing settlements.

Oakley Mayfield

62. "The RSS sets out requirements on a number of topics, but the key and controversial requirement concerns housing provision. Originally it sought to restrain housing in rural areas away from the main urban areas such as Birmingham and Coventry. This meant providing primarily for local needs and not migration into Stratford-on-Avon district. However, the government is concerned that this would exacerbate problems of affordability and not enough housing would be provided to meet the growth in the number of households"

Barwood Developments Ltd

63. The threshold of the 100 homes, given that a larger estates may be allowed subject to the caveats proposed, appears appropriate, and will protect the character of existing settlements

Follet Property holdings Ltd

64. As set out in the attached response to the core strategy draft policy, RPS considers that the 2% limit on the scale of housing proposals in villages, not with standing the masterplan led exception criterion, is inappropriately prescriptive and does not allow local character and opportunities to be considered properly. A less prescriptive approach will be found sound on effectiveness and justification grounds.

**Heart of England Cooperative Society Ltd
Trustees of W A Weaver**

65. It is also considered that the restrictions contained in sections A, B and C of the policy concerning the maximum size of any individual development to be overly restrictive and not justified by credible evidence. As an aside the reference to the word 'estate' as a means of describing new housing development is somewhat pejorative and dated. Most importantly, however, it is not appropriate for Policy CS 16 to rigidly define a maximum development size based on an arbitrary level 100 dwellings in Stratford-upon-Avon and 2% of the existing stock elsewhere.

In accordance with the indication that sites will be identified formally through either a site allocations DPD or neighbourhood plans, the actual size of development should reflect local circumstances and the opportunities and benefits which schemes can bring to the area within which they are situated and specific opportunities and constraints of each site. the restriction of 2% of the existing housing stock in relation to main rural centres and local villages could well mean that more sites need to be indentified than would be the case if proposals were unconstrained by this arbitrary restriction, there may also be a much better opportunity to derive benefits for the local community from new housing development if larger developments are envisaged than those that would be implied by a 2% limit. the 2% limit may also restrict the delivery of affordable housing. in the regard paragraph 54, NPPF states that: "Local planning authorities should, in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs".

CALA Homes (Midlands)

Persimmon Homes (South Midlands) Ltd

66. Yes. Estate sizes should be no bigger than 2% of existing housing stock. Developments should be holistic and based to accommodate associated infrastructure development.

Alcester Town Council

67. The maximum estate size of 100 units is arbitrary and unrelated to local site and locational factors. There should be no upper size limit. Development across all areas should reflect local needs, the wider sustainability of the location and the need to deliver housing growth.

BNP Parabis Real Estate

Consultation Question: Q94

1. The Cotswolds Conservation Board supports this proposal

Malcolm Watt - Cotswolds Conservation Board

2. No, not unless established in the Parish Plan

Graham Musson - Bearley Parish Council

3. The use of Built Up Area Boundaries may provide minor assistance in the location of local service village settlements but this impact is likely to be minor. The Development Management Process is able

to identify where a development is outside the built up area of settlements and make a balanced judgement against the above policies where for example a Parish Plan setting out the boundary does not exist. We do not therefore recommend defining boundaries for the local service villages.

Meghan Rossiter - Tetlow King Planning, West Midlands HARP Planning Consortium

4. No

Mr W J Robinson - Stockton Parish Council

5. WRCC was not aware that any Local Service Villages currently have a Built Up Area Boundary. The apparent absence of specified boundaries has given flexibility to bringing forward proposals for affordable housing schemes on Rural Exception Sites which should be retained.

Phil Ward - Warwickshire Rural Community Council

6. Villages should remain in the Green Belt. If boundaries are set it will be easier for Builders to argue a case for extensive development within the boundary.

Mr R Eades

7. Generally yes, but always in consultation with the community.

Mrs Elizabeth Uggerlose - Bidford-on-Avon Parish Council

8. Yes, if not already in place.

Mrs Janet Blackwell - Long Compton Parish Council

9. A Built Up Area Boundary could be a useful aid to prevent the spread of development into rural areas but this boundary must be drawn up as part of a Neighbourhood Plan.

Councillor R Cheney

10. Built up area boundary could be decided by each village through a Neighbourhood Development Plan

Mrs E M Pogmore - Brailes Parish Council

11. Yes. Alveston and Tiddington, which are Local Service Villages included within the Stratford-upon-Avon Town Council area, should have Built Up Area Boundaries. This will help preserve the character of these Local Service Villages. Stratford upon Avon should also have a Built Up Area Boundary to prevent encroachment on Local Service Villages including Tiddington and Alveston.

Kevin Martin - Alveston Villagers' Association

12. In an ideal world it would be sensible to define Built Up Area Boundaries for the LSVs particularly those in the Green Belt. However this exercise will take many years because it will need to take account of not only existing development but also allow for the LSV growth anticipated in the CS - an average of 8 new developments per settlement. This will no doubt be a long and controversial process.

As stated elsewhere in these representations the district is already a long way from having a five year land supply and it does not have the time for this lengthy process if new housing supply in the district is not going to totally stall. If it is decided to prepare Built Up Area Boundaries for each LSV then in order to accommodate the time for this to happen the following needs to be included within the CS:

'It is recognised that the Site Allocations DPD and definition of the Built Up Area Boundaries is likely to take 2 to 3 years to achieve adoption status. In the interim, if the Council is unable to demonstrate the existence of a 5 year supply of deliverable housing land then it will give favourable consideration to planning applications for development on land within or adjacent to the existing boundaries of the Local Service Villages that fall within the criteria set out in CS 6 and CS 16.'

David & Angela Tucker

13. On the question of the definition of Built Up Area Boundaries for the Local Service Villages we do not consider this would be appropriate at the present time. In seeking to provide new development within these settlements it is in our opinion necessary to consider the relative merits and capacity of each village and imposing such boundaries at the present could result in the policy being unworkable.

Trustees of Clifford Chambers Charities

14. Site Area thresholds should be abolished and replaced, primarily and on a case by case basis, by consideration of surrounding densities / built form. Currently the site densities adopted by the previous administration are too high and potentially prevent the building of larger family homes with decent sized gardens (essential for growing families, general quality of life and well-being).

Steve Taylor - Set Design

15. Yes as established within a Parish Plan

Mr Robert Lees - Claverdon Parish Council

16. This concept does at first glance appear attractive, to preserve the character of the Local Service Villages, however it also provides an opportunity for distortion of the Core Strategy plans for distribution. Who would draw up such boundaries for example? Were it to be left to the local communities, by perhaps the Parish Council, then there would be a temptation to draw too tight a boundary, stifling the allocation of sites to achieve the new housing stock. There would also be endless accusations of abuse no doubt, with inappropriate influence and impropriety to benefit some members of society to the detriment of others. Should this principle be adopted, it would need robust management from a wholly independent and objective body.

Richard Woodcock

17. We do not consider it necessary to identify settlement boundaries at Local Service Villages. Other draft policies indicate the locations where development can be acceptable or unacceptable to achieve sustainable development. The flexibility achieved by not identifying a settlement boundary is also welcome, in order to allow site specific considerations and the benefits of individual development proposals to be fully recognised. Settlement boundaries represent a point in time and arguably do not best serve the changing need of settlements and do not foresee opportunities that can arise.

Max Whitehead - Bloor Homes

18. No - could ruin the infrastructure and character of the villages.

Mrs Gill Bailey - Napton-on-the-Hill Parish Council

19. Built Up Area Boundaries should be defined by the current green field boundaries.

Ewen Cunningham

20. No. Built up area boundaries will become a focal point for developers to fill with developments and thus risk destroying the character of the village.

Ms Julie White - Tanworth-in-Arden Parish Council

21. Built up boundaries just cause builders to overdevelop. Much better to build decent family houses with gardens for the children. No more flats required.

Diane Reeve

22. We already have an **adopted Village Design Statement** which illustrates the areas of restraint, valued green spaces and viewpoints and determines "natural boundaries".

Linda Ridgley - Harbury Society

23. They should be defined by the current green field boundaries.

Mrs J and Mr M Buckley & J Buckley - Earlswood & Foreshaw Heath Residents' Association

24. Sensible spatial approach to the location of development.

John Clarke - Howkins & Harrison

25. Yes

Gordon Brace

26. Yes. Ideally all Local Service Villages and Tiddington in particular. There should also be a built up area boundary for Stratford.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

27. We would like to see a clear instruction to develop a built up area boundary in the Local Neighbourhood Plan for local service villages. This will prevent urban sprawl and ensure the openness of rural settlements is preserved. Views into and out of these settlements must be protected.

Mrs Marie Rendell - Snitterfield Parish Council - Chair

28. Support the concept of Built Up Area Boundaries following consultation with individual villages to provide scope for peripheral expansion.

Salford Priors Parish Council

29. Built up area boundaries for local service villages. Yes. Alveston and Tiddington, which are local services included within the Stratford-upon-Avon town council area, should have built up area boundaries. This will help preserve the character of these local service villages. Stratford-upon-Avon should have built up area boundary to prevent encroachment on local service villages including Tiddington and Alveston.

Kevin Martin - Alveston Villagers' Association

30. We do not consider it appropriate for the council to define built-up area boundaries for the local service villages. The policies of the core strategy must be sufficiently clear for the land owners and potential developers to understand where and when development will be acceptable. To apply development boundaries may limit acceptable development, and will certainly take up unnecessary time for the council and land owners as they debate where boundaries should be located.

Mr R Chabra

31. Experience has shown that, where used, such boundaries are self-defeating because they preclude the flexibility needed when planning applications are determined. There is no need to waste time and resources in defining boundaries.

Follett Property Holdings Ltd

Consultation Question: Q95

1. Having reviewed the qualifying criteria, we consider that the village of Temple Grafton should be included in the list of Local Service Villages in the 2012 Core Strategy...it meets the criteria (100 dwellings or thereabouts)...It is also to be noted that in the same way that Binton and Lower Binton, and Upper Brailes and Lower Brailes have been consolidated for the purposes of the identification exercise, it would be consistent for "The Graftons" (being Ardens and Temple Grafton) to be treated in the same vein.

Temple Grafton has three of the four list facilities - (Primary School, Village Hall and Public House) and therefore meets this criterion...Temple Grafton does have a bus service but it is not "frequent"...It is also noted that Temple Grafton has additional features that are rare in most villages of this size,

notably a small business park at Croft Court which comprises of 5 commercial units and a cricket club with pavilion.

Mark Blackman

2. No other settlements are suggested for inclusion in the list

Malcolm Watt - Cotswolds Conservation Board

3. No

Graham Musson - Bearley Parish Council

4. Criteria for Local Service Villages should be examined

Mrs J Hancox - Tysoe Parish Council

5. Lower Tysoe should be included as part of the Tysoes

Martin Smart

6. No

Mr Robert Lees - Claverdon Parish Council

7. I support the nominated 39 Local Centre Villages as the most sensible way to spread the housing needs identified. These are apparently identified by a defensible formula of facilities available, and I question whether additional villages could be added if the growth plans included improved facilities? The concept would provide some reassurance for rural communities, that they might gain from housing growth, rather than the current trend to see growth as a threat to rural lifestyles. I am concerned and perplexed as to why there is no identified formula to apply growth? It would seem sensible that a pro-rata figure, based on existing populations and homes would be a good starting point for growth, regardless of localised objections.

Richard Woodcock

8. We agree with the overall settlement hierarchy proposed within the Draft Core Strategy as this is consistent with that adopted by the previous Local Plan. In particular we support the continued recognition that Temple Grafton village remains unsustainable to be identified as a Local Service Village due to a lack of key services or regular bus service. We understand that this approach is supported by an appropriate and up to date evidence base, notably the 'Methodology for Identifying Local Service Villages' which confirms that Temple Grafton fails to meet any of the three criteria. In fact, this assessment demonstrated that Temple Grafton is one of the least sustainable settlements of all the 64 settlements that were assessed within the District.

Mrs E Timms - Temple Grafton

Consultation Question: Q96

1. Phasing is essential - especially for areas where development has been under restraint for many years - to prevent an unseemly 'rush to build' with consequent strain on local communities. Ideally phasing should result in a smooth delivery of new homes across the plan period rather than the inevitable 'front loading' which will surely occur without.

John C Read

2. The phasing of development must be based on forecasting information and established local needs

Graham Musson - Bearley Parish Council

3. In principle we support phased development

Mrs V J Pratt - Wootton Wawen Parish Council

4. Wilmcote Parish Council considers that any development should be evenly spread throughout the period 2012-2028.

Mrs E Butterworth - Wilmcote Parish Council

5. The build of houses should be a steady increase throughout the plan period, not all at once. It may be found that the number of new dwellings required is well below the suggested 8000.

If building is allowed to progress all at once, it could be viewed that Stratford District is an area in which there are unrestrained development opportunities.

Mr R Eades

6. Core strategy should try and ensure developments are finished and have time to "settle in" before the next one starts. It is a 20 year period and should be spaced out accordingly.

Mrs Elizabeth Uggerlose - Bidford-on-Avon Parish Council

7. Phasing of developments is of crucial importance in villages. Villages remain sustainable through organic growth so construction of the full allocation of new housing over a short period would fail the sustainability test. Phasing should be broadly linear in relation to the total allocation unless otherwise informed by a neighbourhood plan

Mrs Janet Blackwell - Long Compton Parish Council

8. It is vitally important that any house building programme should be phased over the period up to 2028.

Councillor Kate Rolfe - Stratford Liberal Democrat Group

9. The phasing of development across the district will allow for good design to be shared and replicated across rural communities. Where developments are found not to be appropriate the designs can be modified in later phases. This will encourage developers to be more engaging and responsive to quality not quantity and give a greater investment in the community.

Kelly Stepney

10. As over 2400 new dwellings have already been built or approved in the first three years of the plan period, the establishment and management of phasing is crucial to avoiding over / under provision and a lack of robust comparisons of sites, in terms of relative sustainability. Monitoring the speed of approvals is also important to ensuring conformity with the Strategy.

K J Griffin - Gallagher

Mr M Hipkiss

LH Brice

G F Lycett

R N Butler

Mark Hind & Tonia D'Bras

Mrs Lesley Smith

Mrs C J Mann

Julian Davey

Roger Pamment

Mr & Mrs Godson

Philip Knowles

Mr H Green

Mr J Alderson

Mrs Vivienne Smith

Mrs J M Evans

11. Should definitely be phased.

Mrs J Hancox - Tysoe Parish Council

12 Development should be phased gradually over the plan period.

Kevin Martin - Alveston Villagers' Association

13. Local employment should be a major consideration ensuring that there is a local requirement for additional housing and infill housing should only be considered in the event that no brownfield sites are possible.

John Brookes

14. The phasing of the development must be based on forecasting information and established local needs.

Mr Robert Lees - Claverdon Parish Council

15. I think development should be phased in each town/village. A 5 year figure which should not be overstepped without town/parish council agreement. It's the opinion of MGPC that five years may be two arbitrary a figure given that the development which could take place over this period could in fact be quite substantial to a village of this size.

Mrs Rebecca Howes - Mappleborough Green Parish Council

16. There should be planned phasing of proposed development through out the plan period. It should have already been clearly outlined. If everything currently being proposed by developers is granted planning permission then it looks as though some towns and villages in the district will have met their targets in the next couple of years. If the targets are quickly met then the question becomes whether there will be a fifteen year moratorium in some parts of the District or, if not will there be an intention to introduce a higher house building targets into the Core Strategy.

Councillor Hazel Wright.

17. Agree with the safeguards applied to larger schemes, but developments larger than 2% should be phased (min. 5 years per phase) to ensure settlements can absorb development with minimal adverse impact. Local housing needs surveys must be the main drivers for actual numbers of new dwellings in each settlement.

Mr and Mrs Godson

Phillip Knowles

Mrs J Alderson

AJ Mann- Eclipse Road Residents Group - Deputy Chairman

Nina Knapman

18. No.

Mrs Gill Bailey - Napton-on-the-Hill Parish Council

19. Spatial Distribution of Development does not currently address phasing housing development through the plan period. RPS considers phasing should be focused on bringing forward deliverable and available sites first during the early part of the plan period. Therefore phasing should focus on providing housing through urban extensions to the principal and most sustainable settlement of Stratford-upon-Avon during Phase 1 and recognise the lead in time for such proposals.

Miller Strategic Land and Taylor Wimpey

20. We would support phasing development through the plan period, as this will give smaller communities such as ours time to assimilate and adjust to growth.

Harbury Society

21. One of the key problems of the strategy is that Stratford District Council does not look at development as a whole. There is no reference to the phasing of development within the document neither does it look at any provision for the elderly.

Mrs Dorothy Mitchell - Studley Parish Council

22. Phasing should be included on a five year basis to avoid the whole plan being rejected by the Inspector as SDC have already granted planning permission for approximately one third of the total number of houses.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

23. Development of a new settlement should be considered rather than tacking houses on to existing urban areas. Local choice should be the exception to meet affordable housing and extra care housing needs that have been identified and supported by the communities concerned. Unless a new development is supported, phasing of housing development should be over the complete plan period.

24. The target of 8000 new dwellings by 2028 is too high and takes no account of windfalls. The establishment and management of phasing is crucial to avoiding over / under provision.

Councillor S A Juned

25. The NPPF contains guidance on what is sustainable development in accordance with the definition of the United Nations General Assembly. Sustainable development is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The NPPF goes on to state the UK sustainable development strategy, which sets out five guiding principles of sustainable development as follows:

- living within the planet's environmental limits;
- ensuring a healthy, strong and just society;
- achieving a sustainable economy;
- promoting good governance;
- using sound science responsibly.

Paragraph 7 of the NPPF provides three dimensions to sustainable development - an economic; social; and environmental role.

One of the core planning principles in the NPPF seek to proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units and thriving local places that the country needs. LPAs should make every effort to objectively identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.

26. Question Q90 in section 9 seeks views regarding the phasing of development through the plan period. With regard to phasing, such as issue can be complex and it should be as flexible as possible, as delivery of new housing often lags behind the initial approval of planning application. a rigid number of new dwellings every year should not be set, however early delivery should be encouraged to remove housing land supply and deliverability problems towards the end of the plan period.

27. policy should also be put in place for such as situation when the LPA comes close to meeting its housing targets for the plan period. A moratorium should be avoided at all costs to ensure continued delivery of suitable sites in a suitable locations, which should be considered on their planning merits.

Oakley Mayfield

28. homes in the district back into use before building new homes, but this issue should be given high priority over building on greenfield land.

Julian Davey

29. Development should be phased gradually over the plan period.

Alveston Villagers' Association

30. There is inherently a degree of phasing built into the policy because the infrastructure requirements and characteristics of sites vary so much that the development of sites will vary. It is more efficient to let the housing market phase the delivery of housing rather than arbitrary planning interventions.

Follett Property holdings Ltd

Consultation Question: Q97

1. It would be very reassuring to the public if the references leading to the base assumptions of the draft policy were included in the document.

Graham Musson - Bearley Parish Council

2. Any new development must be backed up by an improvement in services. To even consider housing people in rural communities in which there is limited work opportunities seems to be environmentally unsound.

Neil Hourigan

3. There needs to be a strategy within the section to reflect the needs of the smaller settlement. Whilst many smaller settlements will not have the necessary services within that particular settlement, often a number of villages come together; one having a shop, another having a pub and a further having a school and they exist in many ways as a community rather than three separate villages. It is also important that the lack of public transport should not be seen as a reason for turning down otherwise good planning applications in a rural area.

Andrew Shirley - Country Land and Business Association

4. Maintaining the character of villages such as Napton is vital and can be achieved by relating development to local need, possibly with somewhat less rigour than a direct numerical association with a Housing Needs survey, but more using this indicator of character. Appropriate in filling and 'pepper potting' small developments is welcome.

Nigel Rock

5. The Core Strategy is ambiguous over the role of 'Local Choice'. As drafted it is one of three policies governing development in LSVs, meaning it has no force, it should be the prevailing policy if the principle of sustainability is to be applied.

Mrs Janet Blackwell

6. It would be very reassuring to the public if the references leading to the base assumptions of the draft policy were included in the document.

Mr Robert Lees - Claverdon Parish Council

7. As over 2400 new dwellings have already been built or approved in the first three years of the plan period, the establishment and management of phasing is crucial to avoiding over / under provision and a lack of robust comparisons of sites, in terms of relative sustainability. Monitoring the speed of approvals is also important to ensuring conformity with the Strategy.

Roger Pamment

8. Napton Parish Council would like to establish areas of restraint around Napton Village. A key characteristic of the village and surrounding area are the open views in and out of the

settlement. NPC would like to see the reinstatement of the Special Landscape Areas as defined in Policy EF.2 of the LDF.

Mrs Gill Bailey - Napton-on-the-Hill Parish Council

9. SDC needs to re-think its definition of an LSV. Earlswood qualifies but has no meaningful public transport infrastructure. There is no bus service. There is a train service that runs hourly during the day but the train stations in both Earlswood and Forshaw Heath are not accessible to the majority of residents. The number of houses within quarter of a mile (our estimate of reasonable walking distance) of these stations will number approximately sixty in total. There is no parking at The Lakes station in Earlswood and a limited number of spaces at Earlswood Station. If the majority are expected to walk to these stations then pavements would be required for safe transit. Most people will not walk so far to catch the train, which explains the low usage. The elderly and disabled are unable to use the train because the platform is too low for modern trains, which makes it difficult/impossible for anybody with even moderate infirmity to mount or dismount. The "shoppers" bus service is just that, of no use to people going to work or for school children/students getting to schools/collages. The comments re the train stations go some way to explaining why the Lakes Station is a request stop, which might also give an indication as to numbers using the station.

SDC needs to re-define LSVs as villages that have a meaningful public transport infrastructure (this is one that's actually useful) and if they qualify on this test, then the test needs to identify those village that qualify on settlement size and then key facilities.

Mrs J and Mr M Buckley

Consultation Question: Q98

1. The Cotswolds Conservation Board would wish the Council to provide evidence that allowing open market housing in rural villages ensures the continuation of services and does not lead to increased carbon commuting to larger settlements.

Malcolm Watt - Cotswolds Conservation Board

2. Only 10% of new housing in Stratford itself should be rigidly adhered to. Don't rely on 2001 jobs census to prove you need more houses for local workers - these figures are well out of date in light of job losses over last 11 years.

Mr DCM Young

3. Evidence on the practicability of implementation and the sustainability and adherence to base policy assumptions would be very useful.

Graham Musson - Bearley Parish Council

4. Looking at the current dispersal policy Long Compton, a 'Local Service Village' is due to get c70 new houses over the next 20 years. There are several reasons why this should not happen. 1 - The school has a capacity of 82 children and it is already at 68 and there is no further room for development of the school site. 2- The public transport system does not allow residents to travel to Stratford (or any other major employment centre) for a normal 9am to 5pm job and therefore pollution will increase as people will have to be driving to work. 3- The current infrastructure can't cope with the current level of houses with the sewers backing up regularly and more housing will mean that major work will be required prior to any development.

Rob Pitcher

5. No

JS Bloor (Tamworth) Ltd, Gallagher Estates & Pettifer Developments Ltd

6. Evidence on the practicability of implementation and the sustainability and adherence to base policy assumptions would be extremely useful.

Mr Robert Lees - Claverdon Parish Council

7. NPC would like to establish areas of restraint around Napton Village.

A key characteristic of the village and surrounding area are the open views in and out of the settlement. NPC would like to see the reinstatement of the Special Landscape Areas as defined in Policy EF.2 of the LDF.

Mrs Gill Bailey - Napton-on-the Hill Parish Council

Consultation Question: Q99

1. An accepted format is to establish Key Performance Indicators, define responsibility and measure them at the predetermined levels to ensure performance.

Graham Musson - Bearley Parish Council

2. A binding mediation/arbitration provision to diffuse conflict between applicants communities and statutory bodies. This will reduce costs in appeals and promote confidence in a more accessible and transparent activity. A clear route of issue escalation and remedy.

Kelly Stepney

3. We wished to be kept informed at every stage.

Mrs J Hancox - Tysoe Parish Council

4. An accepted format is to establish Key Performance Indicators, define responsibility and measure them at the predetermined levels to ensure performance.

Mr Robert Lees - Claverdon Parish Council

5. Delivery of new housing should be monitored closely and reviewed annually.

AJ Mann

6. Monitoring the speed of approvals is also important to ensuring conformity with the Strategy.

Mrs C J Mann

7. SDC must, without exception, protect the character of existing settlements. No LSV or Rural Community should have a development which is not consistent with character of existing housing stock. the estate sizes proposed would/could change the identity of villages and rural hamlets.

Mrs J and Mr M Buckley

8. SDC must, without exception, protect the character of existing settlements. No LSV or Rural Community should have a development which is not consistent with character of existing housing stock. the estate sizes proposed would/could change the identity of villages and rural hamlets.

J Buckley - Earlswood & Forshaw Heath Residents' Association

9. Suggest that the monitoring report should come forward at 5 year intervals and be drawn up after full consultation with Parishes.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

10. Delivery of new housing should be monitored and reviewed annually.

Eclipse Road Residents Group - Deputy Chairman

Draft Core Strategy 2012 - Summary of Representations

9.2 Affordable Housing

No comments received for this section

Topic: 9.2 Strategic Objective

No comments received for this section

Policy CS.17 Affordable Housing

1. Ensure full affordable housing supply from C2 uses.

Warwickshire County Council

2. Social housing provided on new estates should provide homes to buy (not rent) so youngsters can get on the housing ladder.

Mrs P West

3. Spreading affordable housing across the district is welcomed as long as adequate services are provided. For example, there may be a higher proportion of people living in affordable housing without public transport.

4. Support the provision of affordable housing as a way of retaining people on low income so they can find work locally and reduce commuting.

Local Strategic Partnership

5. Affordable housing is what people need - Shared Equity. Different villages need different options.

Weston-on-Avon Parish Meeting

6. The policy must reflect local and family needs.

Wootton Wawen Parish Council

7. Agree with the thresholds, subject to assessment of viability for each scheme. Introduce a definition of viability.

8. Include a local definition of affordable housing, encompassing intermediate, affordable rent and social rented housing and taking into account the relationship between house prices and incomes.

West Midlands HARP Planning Consortium

9. Good example of affordable housing in Sheep Street (town centre), Shipston, stone and brick terraced houses blending in with the towns existing architecture.

Mr & Mrs Michael & Olivia Brown

10. Affordable housing is essential to attract and keep younger members of our community but this must be within the local village plan. Long Compton already has problems with water and sewerage which needs to be addressed in order that sustainable development can take place. Before considering development in the surrounding villages, take into account poor public transport, the school at Long Compton is nearing capacity and a barely fit for purpose postal service.

Warwick Bentley

11. The current threshold of 10 units to trigger affordable housing is reasonable. A lower threshold may affect viability for housing in smaller rural centres. Larger schemes are more likely to be located in sustainable locations where having a private car is not essential.

Morton Bagot, Oldberrow & Sperrall Parish Council

12. Despite a 35% affordable housing threshold, affordable housing will remain an issue in the district. High median house price to median earnings ratio (9.05). The term affordable housing is a contradiction in terms.

Shipston SCAN (Chair and Deputy Chair)

13. Support. It is vital that we allow younger people entry to the housing market.

Will Hanrahan

14. Agree with the proposed minimum site thresholds.

Warwickshire Rural Community Council

15. The policy should be more flexible, responding to local needs. Replace the 35% minimum target (measured against gross internal floorspace) to only include affordable housing as defined in PPS3 (social rented and intermediate housing) but also include extra care housing and other specialised housing. Don't measure the 35% on gross internal floorspace, but rather the total floorspace, based on local needs, on the average floorspace of a 3 bed room semi-detached house. In a 100 house scheme, the minimum requirement would be 35 x 900 sq.m. = 31,500 sq.m. This may involve 35 x 3 bed homes or even 20 x 3 bed and 10 x 4 bed or even say 20 2 bed and 20 3 bed homes.

Geoffrey Prince Associates Ltd

16. Interested in the new build in Bishops Itchington. Not sure if I am eligible.

Alex Spriggs

17. 35% floor space for affordable homes should be mandatory not advisable.

Councillor Jenny Fradgley

18. Object. Should be 35% of the number of dwellings not floor space.

Reuben Bellamy

19. Make a clear distinction between affordable, social and local connection housing and allocate accordingly. Don't allocate affordable housing on developments under 10 dwellings.

Kelly Stepney

20. Agree with the proposed minimum site threshold.

21. Include a definition of viability of schemes. The presumption should be in favour of providing affordable housing.

Councillor R Cheney

26. Agree that there should be minimum site thresholds, but don't agree with what is being proposed. The figure should rather be 10 dwellings or more.

27. A site threshold of 5 dwellings will harm the delivery of affordable housing for the following reasons:

- Housing Associations are reluctant to manage houses on sites with fewer than 5 affordable houses. Small sites of between 5 and 10 houses are unlikely to be developed because Housing Associations will not wish to fund and / or manage only 2 or 3 affordable houses.

- Economies of scale are not achieved on small sites (5 to 10 dwellings). Affordable housing is a disproportional cost on residual land value compared with large residential schemes. Small sites will inevitably be unviable because CIL and other financial obligations. A developer is not obliged to build houses and a 5 dwelling threshold for affordable housing is likely to render many small sites unviable for residential development.
- This threshold will give developers an incentive to deliver 4 large market houses or fewer on small sites. In the absence of a 5 dwelling threshold a applicant could design a scheme of between 5 and 10 small market houses.

Mrs E Creek

28. Affordable housing should be limited to development of 10 or more dwellings.

Martin Smart

29. CS 17 does not accommodate stand alone schemes such as the one in Salford Priors. The policy is based only on adding affordable housing to new developments which can cause a disparity for residents of any mixed development. The policy should therefore reference stand alone schemes.

Salford Priors Parish Council

30. Assessment of viability gives too much freedom to the developer to claim non - viability. By transferring the issue to another party / developer the balance of affordable homes across a number of developments is lost, for example none on one site and 100% on another.

31. There should be no debate about viability. If a developer cannot make a scheme work with these thresholds then they should not consider applying for planning consent.

32. Include a definition of affordable homes. Include a reference to relevant housing needs surveys and a statement for a combination of rented and purchase housing.

Kineton Parish Council

33. Consider other mechanisms along side COM1 to deliver dwellings in rural settlements. COM1 at present is too vulnerable, inhibited by local influence and without independent scrutiny.

34. Recognise reduced housing densities in rural developments with bigger gardens and on property parking areas supporting rural living and lifestyle choices. Introducing a limit to new development linked to existing development will lessen the impact on smaller communities. Affordable housing considerations need to be fixed at developments of 10 or more dwellings to mitigate impacts on smaller settlements. Need to clearly define affordable and social housing.

George Stepney

35. Would like to see a commitment where land in rural areas is sought in partnership with WCC for affordable housing development.

Councillor S H Jackson

36. Abolish site thresholds. This should rather be considered on a case by case basis. Currently site densities adopted from the previous administration are too high and potentially prevent the building of larger family homes. Some local authorities are trying for 40% on sites of 0.25 hectares. This will prevent / reduce affordable housing in rural areas. Disagree that rural development can sustain a higher percentage of affordable housing than in towns. In Local Service Villages the percentage should be 25% on sites of 5 dwellings. Too much affordable housing on one site will depress the value of the market housing.

37. 35% affordable housing by number, not floor space, should be a maximum for larger developments in Stratford and Main Rural Centres.

38. Less affordable housing is more. Lower percentages will ultimately result in more being built.

Set Design

39. Do not support 35% threshold measured against gross internal floor area for residential developments of 5 or more.

40. Only allow developers not to build affordable housing where a viability assessment shows that development would not be viable.

41. There should be the annual monitoring of affordable housing to ensure a continuous 5 year supply.

42. Provide a mix of affordable housing units.

43. Provision of affordable housing in accordance with the policy threshold should be recognised as a significant benefit.

Gladman Developments

44. Don't count re-builds and sub divisions, include barn / garage conversions. Specify this in the policy to avoid confusion.

Mappleborough Green Parish Council

45. We would query the justification for having 35 % floorspace as affordable housing. This figure is not supported by evidence from the viability assessment if 2009. The target is unviable if applying expectations from planning gain obligations.

The Home Builders Federation

46. COM.1 is designed to support affordable housing, to meet the needs of local communities, and families' needs to ensure retention of local communities. This needs to be strengthened to ensure that 'Nimbyism' does not sabotage them. For example in Napton on the Hill there is evidence for 33 homes as recorded in the 2007 Parish Plan. This is based on rigorous consultation, yet not one has been built in the last 5 years.

Richard Woodcock

47. Apply a holistic plan and ensure appropriate numbers and types of houses are required. Home Choice Plus is an appropriate measure for assessing actual need.

Councillor Hazel Wright

48. Consideration must be given to the Area of Outstanding Natural Beauty (AONB). In Brailes they developed 8 affordable homes in the AONB.

Denise Montgomery

49. Support the need to assess viability to determine levels of affordable housing. No evidence to support the proposal that the proportion of affordable housing should be measured as residential floor space. This is a unusual approach and has not been supported by evidence. Don't understand the distinction between sub section A & B of CS17.

50. Section C of CS 17 - object that affordable housing shall be funded without public funding. The policy should rather focus on securing appropriate levels of affordable housing to meet the district's needs. The Core Strategy should not suggest when the use of public subsidy for schemes is appropriate. Don't place funding restrictions on developers in order to deliver affordable housing.

51. Support the provision of 35% affordable housing on sites of 5 or more dwellings in Local Service Villages, subject to a housing viability assessment.

Bloor Homes

52. Inappropriate to have 35% affordable housing to apply to sheltered housing and extra care housing schemes. This will discourage such schemes not encourage them.

53. Welcome flexibility built into the policy regarding viability assessment of schemes where necessary and for potential off site contributions. However, change 'exceptional circumstance' to 'where full justification is provided'. In some case off site contributions may be preferable.

Marson Rathbone Taylor

54. Concerns. 35% is too high. This would instead constrain development. In the current economic climate such favourable circumstances referred to in Baker Associates report are rare. Most affordable housing schemes would not be viable at 35%. National Guidance requires LPAs to have viable targets.

55. Oppose the affordable requirement in the form of floor space and not overall units. 35% of total proposed floorspace of a development is considerably more than 35% of total units on sites and makes meeting the requirement difficult. Also affects the viability of outline applications, especially when the floorspace is unknown. An affordable housing requirement in terms of overall percentage of units and not floorspace is more workable.

William Davis Ltd

56. Include local connection criteria in respect of the allocation of social/affordable housing to be included as a planning condition when/if planning permission is granted.

Butlers Marston Parish Council

57. Not sure why the smallest housing market is propose, while reducing thresholds for when an affordable housing contribution would be required. Counter intuitive given the housing market development is the main driver for delivering affordable housing. Object to go lower than the 5 dwelling threshold.

Gregory Gray Associates

58. Object to SA regarding objective 13. The Housing Strategy identifies a shortfall of 532 affordable homes that hasn't been fully addressed in the Core Strategy.

Trustees of W A Weaver & Miller Strategic Land and Taylor Wimpey

59. Won't meet identified need for affordable housing and growth of housing supply. The wording of CS 17 is not consistent with paragraphs 47 - 50 of the NPPF in respect of delivering a reliable housing supply. The policy is not flexible enough. It should take account of changing market conditions over time and housing requirements, so include text whether or not viability assessments should be included.

Heart of England Cooperative Society Ltd

60. Concern about mechanism for implementation (CS 17) ... applying to all schemes incorporating self contained units of accommodation ... Consider affordable housing alongside the viability of extra care accommodation.

McCarthy & Stone Retirement Lifestyles Ltd

61. The Adlington development differs from the standard extra care model. Communal areas and facilities required to support care means additional affordable housing burden would prevent such schemes from coming forward.

62. Repword CS 17 - 'Specialist accommodation for older people, delivering care and communal facilities and falling within a C2 use class will not be required to contribute towards affordable housing'.

Gladman Care Homes (trading as Adlington)

63. Affordable housing requirements on extra care and other specialist accommodation is not consistent with the approach set out in the NPPF and is not supported by Council's evidence.

64. 35% target does not accurately reflect the proportion of people needing extra care accommodation. 80% of pensioner households are owner occupiers whose needs will be met by the private sector. The 35% affordable housing requirement is therefore not representative for affordable extra care, lower than the need for affordable market housing.

65. CS 17 is inconsistent with para 182 of the NPPF, is not justified and is unsound. Therefore delete the need for affordable housing from self contained units of accommodation, including extra care housing. This should rather be negotiated on a site by site basis.

66. Object to applying affordable housing to specialist housing such as extra care.

67. There is no evidence to suggest that the delivery of affordable accommodation on extra care schemes will be viable. The Development Viability Assessment model prepared by Baker Associates in September 2009 seeks planning obligations to deliver 35% affordable housing for residential sites. However, the model does not consider different mix, development coverage, sales values, build costs and upfront infrastructure costs.

Urban Renaissance Villages (URV) and Helical Bar

68. 35% target has no basis now that PPS 3 has been revoked. Object, there is no justification for this figure.

Gloucester Diocesan Board of Finance

69. CS 17 is at risk of being unsound - refer to paragraph 173 & 174 of the NPPF. The viability of sites will be put at risk. 35% requirement for brownfield sites is too onerous and not viable. The NPPF encourages the opposite.

CALA Homes (Midlands)

70. CS 17A is subjective - replace the word 'will' with the word 'must'.

71. CS 17C the words shall and will are subjective and should be changed to 'must'.

72. CS 17, concluding sentence 'exceptional circumstances' is subjective and needs to be defined.

Earlwood & Forshaw Heath Residents' Association

73. Support having thresholds for affordable housing for new development, but the requirement based on floor area is confusing. Rather suggest as a percentage of the number of dwellings proposed.

Oakley Mayfield

74. The policy is a continuation of Council's current policy. Where is the updated viability evidence factoring in renewable energy / low carbon requirements. Do not support using floor area instead of the number of dwellings. The Council has not assessed examples of where 35% of floor space equates to 38% of dwellings.

Orbit Homes; Taylor Wimpey UK Ltd, Barwood Developments Ltd

75. Don't count re-builds and sub division. Rather count barn/garage conversions - specify in the policy.

Justin Kerridge

76. Proposed scheme to potentially provide 120 affordable units, equating to 40% of the total number proposed. The 35% of gross internal floor space being proposed in the Core Strategy should be the minimum target to ensure parity in dwelling sizes. The scheme will provide sufficient affordable housing to meet local needs with property sizes in line with housing Association requirements.

Codex Land

77. Provision of affordable housing in rural areas is important to maintain thriving rural communities. Concern that reducing thresholds too far could make housing development in rural areas uneconomic. Reducing the threshold will reduce the supply of affordable housing by stifling the development of single market dwellings.

National Farmers' Union - Policy Adviser (Environment)

78. Question measuring affordable housing based on gross internal floor area. Object to a blanket 35% application across all housing types. Applying 35% affordable as part of an extra care development may not be appropriate when the social provider is not willing to accept this level of responsibility at a local level. At a scheme in Shipston WCC have indicated that they only need 25% affordable housing units and do not want 35%.

Ainscough Strategic Land

79. Object to the threshold of 5 dwellings. This may impose onerous obligations on small schemes making them unviable. Need to review this. Contributions for affordable housing would be best sought through CIL payments.

Noralle Traditional County Homes

80. CS 17 is not consistent with paragraphs 47 to 50 of the NPPF - delivering a reliable housing supply that meets community needs. The policy is not flexible enough - take account of changing market conditions over time.

Heart of England Cooperative Society Ltd

81. CS 17 is unsound - paragraphs 173 & 174 of the NPPF. Development viability is being put at risk. 35% floorspace requirement may be too onerous. Council's viability assessment work does not support 35% floorspace requirement. There is no evidence to support the proposal that the proportion of affordable housing to be provided is measured as residential floorspace. Sub section A & B are repeated and should be removed.

82. CS 17 C - object - affordable housing to be funded without public subsidy. The policy needs to secure appropriate level of affordable housing to meet the needs of the District. The policy should not say when public subsidy should be used for affordable housing.

CALA Homes (Midlands) & Persimmon Homes (South Midlands) Ltd

83. Include rules in the policy rather than a guidance note.

84. Clarify the rules around aggregation of adjoining sites.

85. Conditions to secure completion of schemes, not starting of schemes - refer to the Banbury Road Appeal.

86. Clarification needed around viability of schemes to ensure the delivery of affordable housing in appropriate locations.

Councillor Peter Moore

Topic: 9.2 Sustainability Appraisal Implications

1. RPS objects to the sustainability assessment for affordable housing given SDC's shortfall of 532 affordable homes which has not been addressed by the housing growth proposed in the Core Strategy. The GL Hearn study and household projection figure indicate a much higher level of growth.

Heart of England Cooperative Society Ltd

2. Concern about the location of large scale social housing developments in isolated locations further isolating vulnerable communities from supporting services.

Warwickshire County Council

Topic: 9.2 Explanation

1. Give homes to local people. Those with no local connection should not be catered for at all.

Alan Marks

2. Concern about a lack of affordable housing for local residents. The cost of affordable housing is too high, preventing SWCCG workforce from relocating to the south of the County.

NHS Warwickshire = Health Development Manager (Health Inequalities)

3. Lower thresholds are not viable in rural locations.

Mappleborough Green Parish Council, Justin Kerridge

4. Concern that the evidence base of the Core Strategy does not adequately demonstrate close working with the business community to understand changing needs and to identify barriers to investment, including the lack of housing infrastructure and viability.

Coventry & Warwickshire Local Enterprise Partnership

Topic: 9.2 Development Management Considerations

1. The sentence starting with 'lower site size' and ending with local service centres is confusing. Lower thresholds won't be more viable in rural locations. Uncertain about local service centres and why they can have higher affordable housing proportions.

Mappleborough Green Parish Council, Justin Kerridge

Topic: 9.2 Delivery and Monitoring

1. 9.2.10 - add Community Land trust set up by parishes.

Greywell Property Ltd

Consultation Question: Q100

1. Include a projection of the number of affordable houses required, based on paragraph 9.2.4 levels Table 3 Home Choice plus Housing Register.

Bearley Parish Council

2. Support the site size thresholds, subject to assessment of viability on individual schemes.

Tetlow King Planning

3. Support having site size thresholds.

Warwickshire Rural Community Council

4. Yes, this is a standard approach.

Waterloo Housing Association

5. Support having site size thresholds to ensure the continuing building of affordable housing.

Councillor R Cheney

7. Agree that there should be site size thresholds.

Brailes Parish Council

8. There should be site size thresholds, but don't support the proposed thresholds.

Linfoot Homes Ltd, Arrow Developments, Mr J Bradley, Mr & Mrs Dimarco, H G Hodges & Sons Ltd, Walton Estates

9. Agree that there should be site size thresholds, but should be lower on green field land with an agricultural land value compared to previously developed land. Object to the lowering of the affordable housing threshold for previously developed land as proposed in the Core Strategy. This would make schemes unviable and would hamper regeneration.

Greywell Property Ltd

10. Policy is required to ensure the delivery of high quality affordable homes, opportunities for home ownership and greater quality, flexibility and choice for those who rent.

11. The 35% target is not commercially realistic. Such a high requirement is not achievable given that land values are not likely to return to recent levels in the short term and viability will affect many sites.

Gladman Developments

12. A 30% allocation is a realistic proportion of the number of houses. The number should not be restricted to be part of the same site. S106 monies should be used in other sites within the same village.

Claverdon Parish Council

13. Query 35% of floor space figure - not supported by the viability assessment of 2009. Shows that the policy compliant level, and applying current levels of typical expectations for planning obligations, the target is unviable.

Miller Strategic Land & Taylor Wimpey

14. Agree, but closely monitor to ensure compliance.

Tanworth-in-Arden Parish Council

15. Don't agree with the proposed thresholds. CS17 needs to be more flexible, to ensure growth and development in accordance with a dispersal strategy and in rural locations such as Local Service Villages. A site threshold of 5 dwellings for affordable housing is restrictive. A restriction of 2% of the resident population will lead to a larger number of small scale schemes. The policy as worded will fail to deliver affordable housing where it is needed.

16. Remove thresholds in rural villages such as Stockton. Rather identify the Parish or settlement. Each development should be judged on its merits. Larger scale schemes will be more effective in delivering both affordable housing and meeting overall housing requirements.

Trustees of W A Weaver & Heart of England Cooperative Society Ltd

17. Thresholds for rural villages such as Harbury to be removed. Focus instead on housing schemes to target identified needs of the parish or settlement.

Heart of England Cooperative Society Ltd

Consultation Question: Q101

1. Substantiate how the 35% was arrived at. Circumstances of the village should assume priority. 85% of those on the housing register are defined as having low housing need.

Bearley Parish Council

2. Don't include a definition of viability- the approach will be too rigid.

Tetlow King Planning

3. The wording of the policy has an impact on viability of sites. The threshold for the delivery of affordable housing has been reduced to only 5 dwellings. This imposes a considerable financial burden on smaller sites and will mean that other local benefits may be more difficult to achieve.

Noralle Traditional County Homes

4. Yes, 35% should be the minimum and reviewed every 5 years.

Bidford-on-Avon Parish Council

6. Minimum site threshold should rather be 10 dwellings or more. The threshold is higher than that in the Local Plan - 15 or more dwellings for settlements over 3000 population and 10 or more dwellings for settlements of less than 3000.

7. 5 dwelling threshold will harm the delivery of market housing for the following reasons:

- Housing Associations won't manage affordable housing on sites less than 5 affordable houses - cost issues.
- Developers of small sites do not have the benefit of economies of scale enjoyed by developers of larger sites. This puts disproportionate cost on residual land value. Instead financial viability assessment will be prepared by developers for small sites to show that 35% floor space is not viable. Developers won't build houses and a 5 dwelling threshold for affordable housing is likely to render small sites unviable.
- Perceived incentive to design schemes of 4 large market houses on fewer sites, delivering between 5 & 10 small market houses.

Linfoot Homes Ltd, Arrow Developments, Mr J Bradley, Mr & Mrs Dimarco, H G Hodges & Sons Ltd, Walton Estates

8. Object, 10 or more

Martin Smart

9. Minimum threshold should be 7 in greenfield locations and 14 in towns.

Greywell Property Ltd

10. Minimum threshold is too low and could affect the viability of schemes. Affordable housing requirements should rather be assessed locally. A small development of say 10 units should not automatically be required to provide 35% of floor space affordable housing.

Robert Brisker

11. A 5 or more dwellings trigger for affordable housing is unachievable. The trigger should rather be 15 dwellings or more. Do not base the requirement on internal floor space, but rather as a percentage of the number of dwellings. Policy CS17 should specify 30% of residential schemes providing 15 or more dwellings, subject to the viability of the scheme not being compromised.

12. A 35% affordable target is not realistic. This requirement is not achievable and will affect the viability of many sites. The GL Hearn study supports 35% affordable for most circumstances, but 5 of the 12 development scenarios were viable, 5 marginally viable and 4 were not viable at 35%. All the sites were 20 units or more. The study did not consider smaller sites with 15 or less dwellings. On this basis 30% is probably the maximum affordable housing achievable.

Gladman Developments

13. Cut the 35% requirement to 10 or more dwellings. Inappropriate for 35% affordable housing requirement to apply to sheltered housing and extra care housing.

Marson Rathbone Taylor

14. Don't agree with the proposed thresholds. CS 17 needs to be more flexible, to ensure growth and development in accordance with a dispersal strategy and in rural locations such as Local Service Villages. A site threshold of 5 dwellings for affordable housing is restrictive. A restriction of 2% of the resident population will lead to a larger number of small scale schemes. The policy as worded will fail to deliver affordable housing where it is needed.

15. Remove thresholds in rural villages such as Harbury. Rather identify the Parish or settlement. Each development should be judged on its merits. Larger scale schemes will be more effective in delivering both affordable housing and meeting overall housing requirements.

Heart of England Cooperative Society Ltd

16. Affordable housing needs to be built to decent space standards. Even with a 35% affordable housing requirement we could still get executive homes and cramped rented homes.

Harbury Society

17. The minimum threshold should be 10 dwellings, not 5. 17% of new builds already fall within the affordable housing category.

Earlswood & Forshaw Heath Residents' Association

18. Consider some flexibility based on local views as an option.

Stratford-upon-Avon Town Council

19. Object to a threshold of 5 dwellings - too onerous for small schemes - S106 contributions etc.

Noralle Traditional County Homes

20. A threshold of 5 or more is appropriate.

Follett Property holdings Ltd

Consultation Question: Q102

1. Not clear what the schemes are that will have their viability defined.

Bearley Parish Council

2. Definition of viability of schemes may impose too rigid an approach.

Tetlow King Planning

3. Outline key principle - no need for a definition.

Waterloo Housing Association

4. Huge need for rental accommodation. Wider definition of affordable housing is not necessary. Viability of schemes should include rental accommodation, housing association and private.

Mrs Andrea J Blood

5. Yes, include a definition. Explain open market value and agricultural land value, realistic commercial margins and bank lending margin requirements. Focus on commercial issues such as the reality of bank funding, reality of business and reality of property.

Greywell Property Ltd

6. Include a definition of the viability of schemes, but take into account individual site circumstances and planning obligations as set out in CS29 Developer Contributions and CS28 Transport and Communication.

David & Angela Tucker

7. Include further text to identify deviations in affordable housing provision to the 35% level. A definition is difficult to specify. Preferable to have explanatory text to require evidence of impracticalities to be submitted while still requiring minimum levels of affordable housing is delivered.

8. CS 17 is inflexible and won't encourage sustainable growth in the district as required by the NPPF.

Trustees of W A Weaver

9. The words subject to financial viability could have developers wriggling out of the obligation to provide affordable housing. Policies need to be strong enough to ensure the integration of housing, rather than ghetto affordable homes away from posh ones.

Harbury Society

10. Percentage occupancy would be a key indicator as to numbers of properties required and to levels of rental / ownership costs.

Earlswood & Forshaw Heath Residents' Association

11. Support having a definition of viability (affordable housing) schemes. Provide clarity as to how the viability of schemes should be assessed.

Oakley Mayfield

12. Continuation of Council's current policy. No viability evidence that allows the review of this continuation, considering issues such as renewable energy / low carbon requirements.

Barwood Developments Ltd

13. Agree. This would help avoid confusion, negotiation and fee expenditure which typically occurs.

Follett Property holdings Ltd

14. Include further text to identify where deviations to the 35% level of affordable housing will be allowed. Defining viability is difficult, so rather include in the explanatory text to require evidence of impracticalities to be submitted but at the same time delivering minimum affordable housing levels.

15. Lack of flexibility in CS17 won't encourage sustainable growth as required by the NPPF.

Heart of England Cooperative Society Ltd

Consultation Question: Q103

1. Provided the approach is evidence based, then yes.

Bearley Parish Council

2. WRCC agrees with the basic requirement. The policy needs to be flexible enough to accept off site provision in the form of cash in lieu contributions, especially for smaller urban developments, to help deliver rural affordable housing local choice schemes identified by local communities.

Warwickshire Rural Community Council

3. Remove criterion (a) under part C of policy CS17. Viability assessments must include the need for the developer and landowner to make a realistic financial contribution.

Noralle Traditional County Homes

4. Agree with A. Regarding B, off site affordable housing should be permitted where a suitable site or existing property is available.

Greywell Property Ltd.

5. Yes. Need a robust mechanism to ensure the delivery of affordable housing so it is not sold on and ends up as an unaffordable privately developed house.

Tanworth-in-Arden Parish Council

Consultation Question: Q104

1. Strategy needs to specify the ongoing need for sheltered and extra care housing schemes for the elderly.

Bearley Parish Council

2. Establish key performance indicators, define responsibilities and measure them at predetermine levels.

Claverdon Parish Council

3. No, advise how soon the SPD at 9.2.9 will be published.

Napton-on-the-Hill Parish Council

4. No, need assurances that partner Housing Associations had approved the design and floor space of affordable homes. Often developers skimp on these dwellings and off load them for Housing Associations to manage.

Harbury Society

Consultation Question: Q105

1. Project number of affordable homes required based on current levels as in 9.2.4 Table 3 Home Choice Plus Housing Register.

Bearley Parish Council

2. Include a local definition of affordable housing encompassing intermediate, affordable rent and social rented housing.

Tetlow King Planning

3. Ensure development for local people is not precluded. The policy does not seem to address this issue. WRCC believes the policy intention on allocation should be more explicit in the Core Strategy.

Warwickshire Rural Community Council

4. Change the threshold to 10 dwellings - link to the normal definition of larger sites. This will be easier to calculate the proportion of affordable dwellings, giving more leeway to deliver other facilities expected by the community.

5. Change the threshold to 5 dwellings, but reduce the percentage. Do not use floorspace. Rather have a more flexible approach towards assessing viability.

6. Change the arrangements for the assessment and collection of CIL. Focus the delivery of affordable housing through the collection of CIL spread evenly across all development.

Noralle Traditional County Homes

7. Integrate affordable housing within larger developments.

Waterloo Housing Association

8. Recommend more flexibility to the location of affordable housing. Have a clear definition of affordable housing - include open market housing being subject to a Local Choice s106 agreement, subject to public or private subsidy. Parish Council supports the principle contained in the Mathew Taylor report on affordable housing. The policy needs to ensure that Local Choice remains at the heart of policies for rural housing.

Long Compton Parish Council

10. Yes, affordable tenure and the use of restricted price in perpetuity. Where parish plans or neighbourhood plans show demand, carry out affordable housing surveys. Demand for this type of tenure needs to be consulted on. S106 agreements should include a standard clause - low cost market housing units to be sold at a maximum price of 70% of the prevailing market value of similar housing schemes. HM Land Registry should not register the transfer of units until written notification has been received from SDC in terms of a covenant. The clause shall not bind any mortgagee in possession of individual affordable housing units nor 100% ownerships nor people exercising their right to acquire affordable housing from a home ownership scheme.

Greywell Property Ltd

11. The policy should address social mobility. Social housing needs to attract nurses. Affordable ownership would probably not be suitable for teachers who want to move to another area where there are job opportunities. Affordable rent homes would allow a high degree of social mobility. Council needs to provide security for those with poor social mobility. Recommend 80% to 85% affordable housing in the area is affordable rent housing. This model works extremely well in Germany.

Earlswood & Forshaw Heath Residents' Association

Consultation Question: Q106

1. Consider other evidence to help draft the policy. Consider residual appraisals by industry professionals.

- Residual appraisal of a residential development on greenfield land with an agricultural land value
- Previously developed land with a large building with architectural merit, constraints and in a conservation area.
- Two houses of little architectural merit with constraints and in a conservation area. possible redevelopment into 9 2 bed starter homes suitable for first time buyers, providing much needed affordable housing.

Greywell Property Ltd

2. SDC should consider local housing needs surveys.

Napton-on-the-Hill Parish Council

3. The annual need for affordable housing is much more than the total housing requirement in the Core Strategy. Strategic Objective 5 won't be achieved.

4. CS 16 identifies main rural centres, including Bidford-on-Avon which will provide a role in delivering rural housing and mixed use developments. Small market towns and large villages will be the focus of most development in rural areas.

Miller Strategic Land

5. The annual need for affordable housing (532 houses) is greater than the total annual requirement of 8,000 being proposed. Strategic Objective 5 therefore won't be achieved, in contradiction to the aims for delivering growth in the NPPF.

Trustees of W A Weaver, Heart of England Cooperative Society Ltd

Consultation Question: Q107

1. Establish key performance indicators, define responsibilities and measure them at predetermined levels to ensure performance.

Bearley Parish Council

2. Council should monitor the number of households in housing need. Measuring the number of people in housing need does not equate with or translated into outstanding levels of need.

Tetlow King Planning, West Midlands HARP Planning Consortium

3. Paragraph 9.2.10 - Add Community Land Trusts set up by Parishes or through neighbourhood plans.

Greywell Property Ltd

4. Monitor delivery in the same way as stated in the NPPF - delivery of market housing over a 5 year period. The Core Strategy needs to quantify the amount of affordable housing required over the plan period. Establish annual targets. Show what sites have been allocated for affordable housing. Monitoring is an important way of showing that affordable housing is being delivered.

5. In the consideration of planning applications Council should take the above into account. The policy needs to ensure the delivery of sustainable development providing a choice of housing for communities in terms of tenure and price. These schemes therefore need to be supported by local authorities where they can't demonstrate a five year supply of affordable housing.

Gladman Developments

Draft Core Strategy 2012 - Summary of Representations

9.3 Protection of Housing Stock

1. Add Council's Draft Empty Homes Strategy 2012 - 2015
Stratford-on-Avon District Council

Topic: 9.3 Strategic Objective

No comments received for this section

Policy CS.18 Protection and adaptation of the existing Housing Stock

1. Include the better use of empty properties. Review the process before any substantial new build proposals are brought forward.

Alan Marks

2. Consider the compulsory purchase of empty dwellings or renovation of existing buildings to provide the extra capacity before expensive new developments are planned.

3. Keep a ratio between private and social housing in place to avoid unbalancing the community.

Neil Hourigan

4. Welcome the policy to facilitate the extension, sub division, adaptation and replacement of existing dwellings. The guiding principle should be the impact on adjoining properties and design, not the actual size of extensions.

5. The loss of a home through demolition is not an issue. Sometimes a change of use would indeed be desirable. Would like to limit changes of use to village public houses and shops into residential use. The policy should support those living in agricultural dwellings. If after living in the dwelling for 10 years or more and where there is no over-riding agricultural need to retain the house for agriculture, the condition should be removed. Farming has changed over the years with many farming families relatively poor or no longer farm or because the head of household has pass away. The spouse can't move because it is worthless on the open market. In these cases Council should support a change from agricultural dwelling to an open market dwelling.

Geoffrey Prince Associates Ltd

6. Support reusing brownfield land instead of green field land. Disused buildings scattered around detracts from pretty villages in the district. Empty houses have a negative impact on the attractiveness of villages and impacts on tourism. In Studley we want to encourage trade and a flourishing community, and not be let down by disused / derelict buildings.

Mr Page

7. Support protecting existing housing stock, but Council needs to pay attention to sympathetic developments and in particular building being out of character. This issue need to be addressed in the Core Strategy.

John Matthams

8. Should be able to knock down 2 houses and build 1 new one. People should be allowed to build the size of the house they want.

Mappleborough Green Parish Council

9. CS18, replace the word 'will' with the word 'must'. The words 'wherever possible' is subjective and consequently the exceptions need to be detailed.

Earlswood & Forshaw Heath Residents' Association

10. More could be done to encourage the use of neglected or empty existing buildings

Gordon Brace

11. Remove / re-phrase any reference to sub division. People should be allowed to subdivide if they want to create more dwellings. Allow new dwellings to be built as best designed as possible.

Justin Kerridge

12. The policy prevents flexibility to promote new businesses such as small offices, shops or professional services which might wish to convert a house to another use.

Ainscough Strategic Land

Topic: 9.3 Sustainability Appraisal Implications

1. Properties being returned to use should be as thermally efficient as newly builds. In carbon terms it is better to return an existing property to use than to build a new one. Even if the property being returned to use is less thermally efficient than a new one, it outweighs carbon considerations as it will not count towards the development totals as it already exists and is identified on Council's tax base.

Stratford-on-Avon District Council

2. Hard to believe that older properties match sustainability performances of new builds.

Mrs J and Mr M Buckley

3. Reword 9.3.2 as follows: - 'as older properties may not match the sustainability performance a new build would meet'.

Earlswood & Forshaw Heath Residents' Association

Topic: 9.3 Explanation

No comments received for this section

Topic: 9.3 Development Management Considerations

No comments received for this section

Topic: 9.3 Delivery and Monitoring

No comments received for this section

Consultation Question: Q108

1. Yes, but needs support from other policies, such as the Housing Strategy, PSH Strategy and practices.

Waterloo Housing Association

2. Difficult to judge because there is no explanation of measure to be taken to bring empty homes back into use.

Stratford-upon-Avon Town Council

3. Adaptation works will remain subject to the requirements of protected species legislation
Natural England

Consultation Question: Q109

1. Yes, the speedy return to use of homes should be paramount.
2. The draft policy needs to be more effective. Staff need to engage more with owners of property. Government funding may be able to pursue empty housing issues more speedily.

Stratford-on-Avon District Council

3. Those that own homes but are not resident in the community should recognise the damage to the community where landlords have no interest in the property and its surroundings. Add a category 'neglected'. Enforcement should be a priority; ensuring properties are fit for purpose rather than encouraging the conversion to other uses.

Kineton Parish Council

4. Yes if it affords additional protection to existing housing in good condition and available to use.

Tanworth-in-Arden Parish Council

Consultation Question: Q110

1. The policy should also address the issue of controlling replacement dwellings that significantly increase the size of the dwelling. This results in the loss of houses in the overall housing stock.

Cotswolds Conservation Board

2. Look at a mix of housing in rural areas. Ensure a diversity of type and size of housing that provides for the whole age profile or potential age profile. Truly sustainable rural communities can only be achieved by having a diverse housing mix.

Country Land and Business Association

3. Carry out independent housing need surveys and reserve affordable housing for local people.

Harbury Society

4. Policy CS18 should also refer to the need to improve the energy efficiency of the existing housing stock.

Stratford-upon-Avon Town Council

Consultation Question: Q111

No comments received for this section

Consultation Question: Q112

No comments received for this section

Draft Core Strategy 2012 - Summary of Representations

9.4 Specialised Accommodation

1. The policy should refer specifically to extra care housing, as part of affordable housing.
Warwickshire County Council

2. Explore the need for specialised accommodation further, especially as the district has a high proportion of people in retirement age.
Ainscough Strategic Land

Topic: 9.4 Strategic Objective

No comments received for this section

Policy CS.19 Specialised Accommodation

1. CS19 is too vague and does not adequately address care homes vs extra care housing.
Warwickshire County Council

2. The location of extra care housing needs to be carefully planned with the NHS.
Local Strategic Partnership

3. Strongly support using a separate policy for care housing needs. The policy must be implemented in a manner that benefits other forms of specialist accommodation.

4. Include a definition of housing and care accommodation as C2 Use Class and not C3 dwelling houses.

5. The policy would not benefit from being more prescriptive on development standards and delivery mechanisms. As the specialist housing market evolves so to will delivery mechanisms.

6. Where specialist accommodation and care accommodation is not in sustainable locations, development should be self-contained to reduce travel requirements.
West Midlands HARP Planning Consortium

7. We support this policy. Many older people would like to live in smaller accommodation within their existing community, freeing up family housing as older people move out. However, the delivery section of the policy (part c) should be deleted.
Geoffrey Prince Associates Ltd

8. Ensure self-contained units for the elderly are counted towards the housing allocation.
Studley Parish Council

9. More credence to be given to sustainable housing for the elderly in rural communities. More social housing tends to be provided more in towns than in rural areas, denying older people the chance to downsize or from being supported by relatives. Elderly people need to be given a choice, together with the construction of more 2 bed bungalows and self-help builds to suit specific mobility needs. Need to fast track these applications.
Richard Woodcock

10. The policy should make it clear that specialised accommodation is over and above meeting the district's general market and affordable housing requirements.

Bloor Homes

11. Clarify the terms appropriate care and support.

Kineton Parish Council

12. The policy discriminates against rural villages and hamlets and contradicts paragraph 9.4.2 by saying that the policy should provide 'for all'.

Councillor S H Jackson

13. Concerns with the approach to specialised accommodation. Consider where the budget comes from to support the policy.

NHS Warwickshire = Health Development Manager (Health Inequalities)

14. First sentence, add the words 'and / or accommodation' after housing. Add 'adults and children with disabilities' after the words local older people. Add 'housing and supported living after the words 'including extra care'.

Warwickshire County Council People Group, NHS Warwickshire/Warwickshire County Council & South Warwickshire Clinical

15. With a growing elderly population it is important to meet the needs within our community, not just through special needs and care accommodation, but through a mix of small bungalows, granny annexes and other self build initiatives. In this way the aged won't be driven into towns.

Richard Woodcock

16. The draft policy is unsound for a number of reasons. Remove the words ...generally encouraged. The policy needs to actively encourage this accommodation.

17. Part (a) of the policy is unnecessary as Council's SHMA already identifies a need for this accommodation.

18. Part (b) is unclear and should be removed. Not sure what this aims to achieve.

19. Part (c) - care and support needs to be in place but does not require residents to need such care.

20. Suggest rewording the policy as follows:

The provision of purpose built and / or specialist accommodation with care for older people in sustainable locations will be encouraged and supported Stratford-on-Avon, Main Rural Centres and Local Service Villages. Schemes should also be considered in other sustainable settlements where there is proven need.

Apartments should be restricted for occupation by only those with care needs, include minimum compulsory care packages, should also include restrictions and an extensive range of communal facilities.

21. Benefits of care / extra care accommodation:

- Efficient way to deliver care and support
 - Meets the needs of those wanting to live in self contained accommodation but who need care.
 - Residential accommodation with care model provides an alternative to long term institutional residential care homes.
-

- The Government supports independent living with integrated care for people with care needs.
- Helps fulfil unmet demand for this type of care accommodation.
- Creates an environment where there are preventative measures to reduce ill health ...creating an alternative to residential care homes.
- Greater integration between housing, health and social care providers, reducing a burden on local health and social services.
- Contributes to release of existing housing stock widening the choice of open market housing, particularly family housing.
- Provide good quality appropriate housing for older people.
- This type of specialist accommodation offers an alternative to residential care for older people, with the advantage of high quality self contained and secure accommodation, with flexible care services.

Gladman Care Homes (trading as Adlington)

22. Agree that there is an identified need for alternative forms of housing, but delivery is compromised by Council's decision to support a housing target which is not representative of need and demand.

23. Strongly support paragraph 9.04 - provision of extra care accommodation, in line with Council's evidence on identified need and consistent with the NPPF (para. 50) which directs Local Planning Authorities to plan for a mix of housing to meet the needs of different groups in the community, including the elderly. Suggest retaining the need to prioritise the delivery of extra care accommodation.

24. Affordable housing is only required to be provided on residential (C3) developments. The District Council cannot predetermine which use class extra care applications fall in.

25. National Policy does not seek affordable housing provision on extra care developments where they fall within use class C2. Delete reference to extra care housing to be consistent with National Policy.

26. The policy as worded does not relate to the provision of care and nursing homes. The description of specialised accommodation is inflexible and unfit for purpose. The policy is not Justified or Effective because it does not relate to Council's evidence base.

27. The policy needs to be more specific. - paragraphs 9.4.3 - 9.4.5

28. The policy refers to providing specialised accommodation for older and vulnerable people, but the term vulnerable people is too limiting. People that need care and support may not be classified as being vulnerable.

29. The policy as worded is not Justified or Effective because it does not represent the most appropriate strategy. To make the policy sound remove the reference to the word vulnerable and replace it with the words care and support needs - less limiting description that would still allow for the delivery of specialised accommodation.

30 The policy does not clarify what is meant by local needs.

31. Typically a minimum of 50 - 60 extra care units are required to make affordable extra care viable and to keep management costs affordable. In the private sector this increases to 100 - 150 extra care units. Can't just have extra care schemes because it won't always be viable. A restrictive interpretation of local needs would be contrary to the policy aim of delivering affordable specialised accommodation. Part (a) of the policy needs to amend the definition of local needs.

32. Part (b) - no evidence to support this approach. Restricting specialised accommodation could affect

the balance of housing stock. For example, a settlement may be characterised by large houses but there is a need for smaller 1 and 2 bedroom properties. Introducing smaller properties would not maintain the balance of housing stock and would be contrary to part (b) of CS19.

33. Part (b) of the policy needs to be less restrictive.

34. Care and support - part (c) is impractical and unrealistic. Privately funded developments may not have pre-existing care and support arrangements.

35. Care and support must be provided as part of the development proposal. This can be secured through S106 Agreements. This part of the policy is therefore not consistent with paragraph 182 of the NPPF.

36. Suggest amending draft policy CS19 as follows:

- Main text, delete ...the older
- Main text, delete ...other local vulnerable
- (b) Delete ...It contributes to maintaining the balance of.
- Main text after the word people, include ... with care and support needs.
- after the word needs, insert 'in the district'. Add the following at the end... 'This does not include institutional models of care such as nursing and care homes'.
- include ... It does not unacceptably create or exacerbate an imbalance'... in the housing stock
- add the following at the end of the sentence. .. on occupation of the development.

Urban Renaissance Villages (URV) and Helical Bar

37. All homes should not be developed to lifetime homes standard. This is counter productive.

Gloucester Diocesan Board of Finance

38. The policy needs to ensure that self-contained units for the elderly are counted towards any housing allocation.

Studley Parish Council

39. More consideration should be given to housing for the elderly and infirm.

Mrs J and Mr M Buckley

40. As the district's demographics change the over 60s are expected to number 20m by 2030. The aged and infirm need to be afforded more consideration.

Earlswood & Forshaw Heath Residents' Association

41. Homes adapted for each user need would then be relet / sold to anyone. A higher standard would mean that more users are older / vulnerable or disabled.

42. Carrying out the policy into practice falls down. The data needs to be acted on within a certain time frame.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

43. Support a dedicated policy on specialised housing.

44. Object to criteria 1 of the policy. What defines local need? The requirement for a needs test for planning applications is not necessary. National planning policy does not require this. It is in the applicant's interest to demonstrate need if there is no up to date evidence.

45. Local need should be specified in the policy. For example a recent planning application at Great Alne for over 200 specialised care units did not relate to the village's need, but the site was found to be suitable for such development.

46. The policy should recognise the requirement to meet the different social and care needs of individuals. Need to recognise that some people may wish to pay for private sector care.

Ainscough Strategic Land

47. The policy should make clear that a proportion of such development under policy CS19 should be affordable housing units under policy CS17 should not apply to those uses within use class C2.

48. Many specialised accommodation sites are only viable if a significant number of people are accommodated. Site sizes may therefore be large and these sites would not be practical in Main Rural Centres and Local Service Villages. Rephrase the policy to allow for such developments. Allow suitable sites in appropriate locations in Stratford and Main Rural Centres.

49. The requirement about people living independently is vague, and inappropriate in the case of Class C2 accommodation such as extra care accommodation and nursing homes. The whole point is that these people rely on a third party for care.

50. Requirement (b) is vague - explain better in the explanatory text.

South East Southam Land Owners Consortium

51. A strategic approach is needed to determine how many such developments are appropriate. This should take account of medical services and other extra provision.

Councillor Peter Moorse

Topic: 9.4 Sustainability Appraisal Implications

No comments received for this section

Topic: 9.4 Explanation

1. The explanation does not cover the caveats in the policy. Why must local need for development be established? Who will identify this local need? What is meant by balanced housing stock? How will this objectively be assessed? Is it not the role of the planning system to control the management and operation of specialised accommodation.

Bloor Homes

2. Changes in demographics and the way people's housing, care and support needs are met highlight the need for a strategic policy to drive change in the provision of specialised housing or institutional care accommodation. Older models for this provision are sometimes inflexible and unfit for purpose.

3. Many of the District's older and more vulnerable members of society are living in poor housing conditions. The Joint Housing Assessment for South Warwickshire: Housing Needs of Stratford-upon-Avon District for example, recommend that more should be done to support those with disabilities so they may live independently for as long as possible. The Stratford-on-Avon District is facing a shortage of affordable accommodation and specialist housing, for example extra care housing, and accommodation / support for young people and single people of all ages.

4. Care accommodation would be better provided via the extra care housing programme, for all groups and all ages.

5. Supported living units for people with disabilities and other forms of specialised housing are another important considerations.

Warwickshire County Council People Group, NHS Warwickshire/Warwickshire County Council & South Warwickshire Clinical

6. Good to see Stratford-on-Avon District Council acknowledging demographic changes and the associated impact on housing provision.

7. The policy needs to recognise the lack of appropriate provision. For example many of the district's elderly and most vulnerable are living in poor housing conditions. More should be done to support older people and those with disabilities.

8. In support, note the benefits of owner occupied private shelter housing for the elderly and the wider community, and the increasing need for this type of specialist accommodation.

9. Housing Markets and Independence in old Age - Expanding Opportunities highlights that owner occupied retirement housing helps address the challenges of housing an ageing population. Benefits include the provision of much needed family houses. Owner Occupied retirement housing frees up family homes previously under occupied. Private specialised housing for the elderly therefore plays a role in providing a suitable and sustainable mix of housing meeting local needs.

10. A report titled A Better Life: Private Sheltered Housing and Independent Living for Older People shows how retirement living accommodation helps under pin local shops, services and facilities.

11. Other benefits of private sheltered accommodation for the elderly include comfort, security and independent living. Residents have peace of mind while at the same time receive the support they need.

12. McCarthy & Stone developments take account of people's changing life styles. Communal facilities and specific features within apartments are designed to improve quality of life.

13. Residents have a stress free lifestyle, living with like minded people in a communal environment.

14. McCarthy & Stone also provide extra care housing for the frail elderly, typically for the 80+ age group, critically important for the Stratford-on-Avon District as a whole.

15. Extra care includes assistance and domiciliary care tailored to owners individual needs. The choice for the frail elderly enhances their personal welfare over time through fixed nursing and residential care.

16. Note that the NPPF calls for the supply of housing to meet the needs of present and future generations, to widen opportunities for home ownership and planning for a mix of housing taking account of current and future demographic trends and the needs of different groups. In addition local authorities need to have a clear understanding of housing needs in their area. McCarthy & Stone are of the view that more housing for the elderly should be encouraged. The policy should play a part in the delivery of specialist housing to meet an evident housing need.

McCarthy & Stone Retirement Lifestyles Ltd.

Topic: 9.4 Development Management Considerations

No comments received for this section

Topic: 9.4 Delivery and Monitoring

1. Add the Clinical Commissioning Group and local GPS.

Warwickshire County Council People Group, NHS Warwickshire/Warwickshire County Council & South Warwickshire Clinical

Consultation Question: Q113

1. Supported housing for older residents to include units for those with dementia. For young single people, need housing for those with mental health and addiction issues.

Rita Kubiak

2. Be mindful of additional costs and impacts on site viability. Support attempt to ensure that private and public housing should be on parity with regards to standards.

Waterloo Housing Association

3. The policy is vague regarding the different types of specialised accommodation.

Warwickshire County Council People Group, NHS Warwickshire/Warwickshire County Council & South Warwickshire Clinical

4. The policy should be more prescriptive and explain how specialised accommodation should be provided.

Napton-on-the-Hill Parish Council

5. Support extra care housing in Local Service Villages, but don't include where there is insufficient local need.

Harbury Society

6. The policy should exclude forms of care provision such as nursing homes and care home provision.

7. A wide spectrum of specialised accommodation supports independent living. To be more specific, risks excluding models of accommodation not prevalent or still being developed. The evidence base shows what forms of development should not be facilitated. A more precise approach would exclude these forms of development from the definition of specialised accommodation.

8. A prescriptive description of specialised accommodation would make the policy inflexible to deal with a change in circumstances.

Urban Renaissance Villages (URV) and Helical Bar

9. Criterion (a) does not specify what constitutes local. Specialised accommodation is only viable with a significant number of residents (50+). In the main part it would be impractical for these developments in Local Service Villages and even some Main Rural Centres if they only meet local need. The requirement to meet local needs precludes the ability of such accommodation to meet needs not identified.

South East Southam Land Owners Consortium

10. The approach is too prescriptive and does not refer to the wide range of choices. Retirement villages and care retirement communities need to be acceptable in planning terms. The need for

specialised accommodation should be assessed on a district wide basis. Large brownfield sites such as Great Alne which is outside a built up area boundary could play a part in providing specialised accommodation. This needs to be reflected in the policy.

Follett Property holdings Ltd

Consultation Question: Q114

1. Support using a separate policy to give weight to housing and care needs of the District's elderly population. Reference other forms of specialist accommodation, including Continuing Care Retirement Communities and residential care homes.

Tetlow King Planning

2. No, this will change over time.

Waterloo Housing Association

3. The policy should clarify that specialised accommodation falls into two categories - housing and institutional care such as residential care homes. Accommodation needs to be geared towards local need rather than the imported population.

4. Ensure that 9.4.6 is robust. The policy needs to have an explicit requirement for Stratford District Council to formally consult Warwickshire County Council People Group, the Clinical Commissioning Group and local GPs. In this way services will be planned in advance.

5. Use key performance indicators, define responsibility and measure them at predetermined levels to ensure performance.

Warwickshire County Council People Group, NHS Warwickshire/Warwickshire County Council & South Warwickshire Clinical

6. It is not clear what categories of accommodation apply. The policy does not refer to other forms of specialised accommodation that meet the needs of the elderly and vulnerable. Specifically refer to these other forms of accommodation in the policy, such as:

- Specially adapted housing, e.g. units suitable for the disabled
- Sheltered warden assisted housing
- Assisted living units
- Extra care accommodation where the use falls within Use Class C2
- Full care accommodation (C2)
- Residential care homes (C2)
- Nursing homes (C2)

South East Southam Land Owners Consortium

Consultation Question: Q115

1. The policy would not benefit from being more prescriptive with regards development standards and delivery mechanisms. As the specialist housing market evolves so to will standards and delivery mechanisms. The policy should not impose standards that will become outdated.

Tetlow King Planning

2. The policy needs to be in line with WCC Service Specifications and NHS Estates policies, e.g. quantifying a financial contribution to underpin the delivery of local health services.

Warwickshire County Council People Group, NHS Warwickshire/Warwickshire County Council & South Warwickshire Clinical

3. The policy itself is not wrong, but how will it be put into practice? The data needs to be acted upon within an appropriate time frame.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

4. Development standards vary according to the market, the type of accommodation and standards imposed by outside bodies. It is therefore unnecessary for Council to be more prescriptive. The policy adequately deals with development standards and delivery mechanism and no additions are necessary.

South East Southam Land Owners Consortium

5. No, because the market is changing for this type of accommodation and the policy needs to rather be flexible.

Consultation Question: Q116

1. The policy would not benefit from being more prescriptive with regards development standards and delivery mechanisms. As the specialist housing market evolves so to will standards and delivery mechanisms. The policy should not impose standards that will become outdated.

2. Where specialist housing and care accommodation are not in sustainable locations, developments should aim to be self-contained to reduce travel requirements and reliance on public transport.

Tetlow King Planning

3. The policy should reflect the need for dependent relative accommodation, especially in rural areas where moving to town is not an option. A degree of care from relatives could then be provided that would otherwise have to be provided by health providers.

Country Land and Business Association

4. The policy needs to address the C2 vs C3 issue. C2 use classes are being applied to individual dwellings which then become institutional if they provide accommodation for vulnerable people.

5. The issue is care home vs extra care housing. The preferred model is independent living with access to 24/7 care rather than admission to res care. The problem is res care being delivered ahead of extra care. If the number of beds in the market hits overall required places, there would be little need for extra care if res care has already been delivered.

Warwickshire County Council People Group, NHS Warwickshire/Warwickshire County Council & South Warwickshire Clinical

6. Consider young single persons accommodation, not flats.

Napton-on-the-Hill Parish Council

7. The draft does not specify how villages will meet local needs. Only accept on completion of independently run local needs surveys.

8. If homes are not based on the needs of indigenous people, there is a danger that developers will build more than local need to attract people into the area, putting more pressure on the County's resources.

9. No, local housing need surveys must be undertaken and developments should see to provide for the identified need. The District claims there is a need for 3 bed homes, a mix of 3 & 2 bed homes, bungalows and 1 bed flats, but we argue that each community should build whatever is the local need.

Harbury Society

10. The draft policy should address the lack of infrastructure. WCC offer no hope of improving accessible transport for all.

Earlswood & Forshaw Heath Residents' Association

11. Include the affordable requirement policy for specialised accommodation. The requirement will be different to standard affordable housing.

Ainscough Strategic Land

12. Allocate suitable sites in appropriate locations in Stratford and Main Rural Centres for specialised accommodation. Include land at Southam identified for a care village.

South East Southam Land Owners Consortium

13. Yes, explain that the market is changing rapidly and that a wide range of market choice provision is required.

Follett Property holdings Ltd

Consultation Question: Q117

1. Include information on need from GPs, SSG, NHS Warwickshire and WCC. All these partners directly support and commission services for vulnerable people with health and social care requirements.

Warwickshire County Council People Group, NHS Warwickshire/Warwickshire County Council & South Warwickshire Clinical

2. One bedroom flats are not desirable. Small houses for single people are more preferable.

Napton-on-the-Hill Parish Council

3. Use the document 'Draft Extra Care Housing Strategy for Older People in Warwickshire by WCC.

4. Contact Consulting have established a shortfall of 1,845 units in elderly accommodation to meet current benchmark standards, let alone not future requirements. Council should use this document in the Core Strategy evidence base.

Ainscough Strategic Land

5. Contact organisations such as the Retirement Housing Group or the HBF to better understand the range of market choice being proposed.

Follett Property holdings Ltd

Consultation Question: Q118

1. Consider a SPD that places a moratorium on C2 applications. Introduce a two stage process, i.e. a preliminary panel at pre-application stage. This could include SDC, WCC, CCG and NHS officers to consider specialised accommodation. This is important as the District attracts private developers who would like to build specialised accommodation for those with money. The implications for both health and social care are:

- NHS health care budgets being used to fund services for an imported population rather than local residents. These new care homes provide an attractive solution to meeting the needs of the private funder, but those that can't afford them move away from their communities. This also leads to a drain on local GP and nursing resources.
- Extra care housing struggles at planning stage, while care home application seem to get an easier ride as planning guidance for institutional developments (C2) as opposed to individual dwellings (C3).

A development proposal could progress to formal application for planning consent only after being approved by the panel.

Warwickshire County Council People Group, NHS Warwickshire/Warwickshire County Council & South Warwickshire Clinical

Draft Core Strategy 2012 - Summary of Representations

9.5 Housing Mix and Type

1. The elderly must be catered for by providing a wide variety of housing options, including living near relatives in their own adapted or specially built houses.

Will Hanrahan

Topic: 9.5 Strategic Objective

No comments received for this section

Policy CS.20 Housing Mix and Type

1. Affordable homes should be dispersed within any development.

Wootton Wawen Parish Council

2. The policy as worded won't achieve its requirement of meeting the full range of local and district housing needs. The policy should reflect the need for housing developments to meet the range of housing needs, including site and viability constraints. Individual proposals need to demonstrate how they reflect local need.

3. Note the need to provide a range of housing tenures, specifically referring to social rented, affordable rented and intermediate rented housing.

4. No need to set out development standards. The Core Strategy is a high level document. The Council should rather implement policies through SPDs.

West Midlands HARP Planning Consortium

5. The policy should encourage Parishes and local communities to commission Local Needs Surveys to identify the specific housing mix needed in developer-led schemes outside Stratford Town.

Warwickshire Rural Community Council

6. Generally support the policy which is not too prescriptive in terms of housing mix for new housing schemes. The market should have the strongest influence on the optimum mix for open market housing. Settlements will vary in terms of size and type of dwellings which are needed and which demand exists.

Geoffrey Prince Associates Ltd

7. Elderly people should have their applications fast tracked. In addition there should be more 2 bed bungalows and self - help builds to suit those with mobility needs. There should be a natural presumption that sustainable and affordable housing for the elderly is approved, save for exceptional circumstances. S106 agreements should acknowledge the accommodation needs of the aging.

Richard Woodcock

8. The Council should not specify the number of 4, 5 and 6 bedroom houses to be built. It should rather be up to the market to determine this. It is different for affordable housing where it is appropriate to specify mix.

Reuben Bellamy

9. The policy should include an assessment of viability.

Bloor Homes

10. Support for 1, 2 and 3 bedroom accommodation as no more large / executive properties are needed. Additions to the availability of affordable housing should be a priority.

Peter Chadwick

11. Not appropriate to apply the policy to all residential development. Smaller sites cannot provide a range due to their location, size and surrounding development. The intention of the policy is good, but each site needs to provide for the needs of a particular locality.

Linfoot Homes Ltd; Taylor Wimpey UK Ltd; Mr J Bradley; Mr & Mrs Dimarco; H G Hodges & Sons Ltd.

12. SDC has not thought about bungalows. The need is to build bungalows. A site for 2 houses could take 3 or even 4 bungalows.

Patrick Clancy

13. Need to complement the deficit of three bedroom properties in the district. Younger families are finding it harder to find affordable accommodation in rural communities, so they look for work and accommodation elsewhere in rural south Warwickshire. People need to be given the option of accommodating aging and infirm relatives in their family home.

George Stepney

14. The policy should include live / work accommodation / units.

Councillor S H Jackson

15. Housing mix, type and tenure should be agreed on a site by site basis in order to meet need. Housing mix must be determined in accordance with the Strategic Housing Market Assessment.

Gladman Developments

16. Consider a limit on 4 & 5 bedroom houses.

Mappleborough Green Parish Council

17. The policy should not be overly prescriptive. Recognise the need to indicate deficiencies in housing mix identified in the SHMA, but it needs to be more flexible to avoid undue constraints on housing developments.

18. Oppose the requirement to build lifetime homes.

William Davis Ltd

19. Sensible mix.

Diane Reeve

20. Need a range of accommodation to support a diverse population. The policy seeks to facilitate the delivery of a balanced portfolio of housing, but it should rather avoid certain types of housing, implying that other types of housing would not be appropriate. Delete specific housing types from the policy.

21. Unnecessary to include lifetime home standards. Don't apply lifetime home standards too rigidly to all residential development. The standards should rather be discretionary. The provision of lifetime standards should not threaten viability and stop development.

CALA Homes (Midlands) & Persimmon Homes (South Midlands) Ltd

22. Change the word 'should' to 'must' - too subjective.

Earlwood & Forshaw Heath Residents' Association

23. Delete the bullet points. Need and demand will change over the plan period. The inclusion of one bedroom flats is a prime example. The policy identifies this as a requirement, but Council's Meeting Housing Needs SPD advises against the provision of one bed flats.

Orbit Homes; Taylor Wimpey UK Ltd & Barwood Developments Ltd

24. There is a need for 3 bedroom homes with scope to add more rooms. The lack of smaller accommodation units and inability to downsize is a result of the lack of suitable accommodation.

Shotteswell Parish Council

25. Consider banning 5 bed homes and limiting the number of 4 bed home.

Justin Kerridge

26. Proposal near Long Marston includes potential for 2 & 3 bedroom homes.

Codex Land

27. Object to including Lifetime Homes Standards. The policies on housing mix and type should be more prescriptive.

Noralle Traditional County Homes

28. This policy is not appropriate for all residential development. Smaller sites are often restricted due to location, size and surrounding development. For each site to provide for the needs of that locality depends on the market at that time.

South East Southam Land Owners Consortium; Mrs G Lines; Mr R Chabra; Banner Homes (Midlands) & Walton Estates

29. Approve the phrase 'meeting the full range of identified local and district housing needs'.

Follett Property Holdings Ltd

Topic: 9.5 Sustainability Appraisal Implications

No comments received for this section

Topic: 9.5 Explanation

No comments received for this section

Topic: 9.5 Development Management Considerations

1. Consideration of Parish Plans and Village Design Statements need to be given more prominence in the design of new developments.

Harbury Society

Topic: 9.5 Delivery and Monitoring

No comments received for this section

Consultation Question: Q119

1. Provision needs to be made for larger houses. Each of the mix should be quantified over the period covered by the Core Strategy.

Bearley Parish Council

2. The Council needs to provide a range of housing tenures, with specific reference to social rented, affordable rented and intermediate affordable housing.

Tetlow King Planning

3. Local Needs Surveys undertaken by Parishes and the local community is important evidence to inform the policy.

Warwickshire Rural Community Council

4. Need 1 bedroom homes / flats and 2 & 3 bedroom family homes, not executive houses.

Bidford-on-Avon Parish Council

5. The policy does not cover issues such as under / over occupation or accommodation for various stages of life or needs for first time buyers.

Waterloo Housing Association

6. Include supported living / sheltered housing.

Kineton Parish Council

7. One bedroom flats are not desirable. Small houses for single people are preferable.

Napton-on-the-Hill Parish Council

8. Yes, it does adequately identify housing need.

Tanworth-in-Arden Parish Council

9. No, the policy does not adequately identify housing need. The annual need is greater than the total annual housing requirement. The policy will not deliver strategic objective 5 - planning for housing need & contradicts with the aim for growth delivery in the NPPF.

Trustees of W A Weaver; Miller Strategic Land; Taylor Wimpey & Heart of England Cooperative Society Ltd

10. No, local housing needs survey must be undertaken. Contrary to the policy, it should be up to each community to determine what should be built or what is local need.

Harbury Society

11. Housing need can be misunderstood. The demand for housing is always growing. Local need will grow if the population is increasing, and attempts to meet it will lead to ever increasing development. Unless limits are placed on growth, Stratford will continue to grow until it is unrecognisable.

12. Social mix of housing is a question of social & economic values. One needs to be sensitive to the needs of the less wealthy. The less well off have the right to live close to wealthy neighbours.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

13. The policy that identifies housing needs is supported, but the house types also need to be supported, to be flexible enough and responsive enough to supply housing to meet the needs and aspirations across the district.

Oakley Mayfield

14. The policy does not adequately deal with housing need. The policy does not deliver on strategic objective 5 - planning for housing needs, in direct conflict with the NPPF.

Heart of England Cooperative Society Ltd; Trustees of W A Weaver & Miller Strategic Land and Taylor Wimpey

Consultation Question: Q120

1. There is a need for larger houses. Each of the mix should be quantified over the plan period.

Bearley Parish Council

2. Do not support prescriptive restrictions being placed on the blend and mix of dwellings of each site. This must surely be the providence of the developer. The wording of the policy needs to reflect this. There is also concern about imposing lifetime home standards.

Noralle Traditional County Homes

3. Policies should reflect the types of houses required.

Bidford-on-Avon Parish Council

4. Yes, add more detail from the SHMA that is under way.

Waterloo Housing Association

5. Rather note 1 bedroom accommodation than flats. Changes to the benefit system will necessitate the creation of smaller units. Consider the merits of including bed-sit accommodation.

6. The policy should not specify the mix and tenure of housing to be provided. Alternatively the mix, type and tenure should be agreed on a site by site basis, taking account of the character of the surrounding area, accessibility of the location and availability of services and evidence from the SHMA. This then allows for the meeting of the district's changing needs over the plan period.

Gladman Developments

7. No, there is a need for smaller family homes, both affordable and private sale. Don't restrict planning rules to a specific definition of housing need.

Stephen Marchant

Consultation Question: Q121

1. It would be useful to set out development standards. Implement such policies through a SPD.

Tetlow King Planning

2. The policy should prescribe development standards, but rather give greater flexibility on a site by site, settlement basis to ensure the character of the settlement is preserved while at the same time delivering the correct mix of housing.

Country Land and Business Association

3. Do not support the idea that a home can be adapted to meet ones needs throughout their life. Families expand and contract over a lifetime, so few households would find that the same house satisfies their need.

Noralle Traditional County Homes

4. No, need to allow flexibility.

Waterloo Housing Association

5. Yes, it should reference the village plan, neighbourhood plan and housing needs survey.

Kineton Parish Council

6. The policy should not be more prescriptive with regards to development standards. This could compromise the viability of potential schemes and stifle the supply of housing during the plan period.

Gladman Developments

7. Yes, modern houses do not tend to have enough amenity space and the size of rooms are too small.

Napton-on-the-Hill Parish Council

8. Yes, take into account Parish Plan and Village Design Guidelines providing homes of an adequate size.

Harbury Society

Consultation Question: Q122

1. The policy should reflect need for housing developments to seek to meet a range of housing needs, subject to site and viability constraints. Introduce an element of flexibility to allow for individual proposals to demonstrate how they reflect need.

Tetlow King Planning

2. Encourage Parishes and local communities to commission local housing needs surveys to identify the housing mix needed in local choice schemes outside Stratford town.

Warwickshire Rural Community Council

3. Permitting the extension of homes originally designed as affordable has reduced the number of smaller affordable homes. The 30% rule used in the green belt should be applied across the whole district.

Nigel Rock

4. Council needs to be clearer regarding the proportions of each dwelling type required on an area by area basis. Those promoting development need to have certainty that their proposals will comply with the overall aims of the policy.

Bloor Homes

Consultation Question: Q123

1. Yes, have regard to Village Design Statements, Parish Plans and Neighbourhood Plans and space standards for affordable homes and Housing Association properties.

Harbury Society

Consultation Question: Q124

1. Establish key performance indicators, define responsibilities and measure them at predetermined levels.

Bearley Parish Council

2. Difficult to comment as the policy says that housing mix and types shall be further tested through a revised SHMA and additional evidence.

Earlswood & Forshaw Heath Residents' Association

Draft Core Strategy 2012 - Summary of Representations

9.6 Gypsies and Travellers

1. Critical need for small properly managed and supervised traveller sites in the district.

Peter Chadwick

Topic: 9.6 Strategic Objective

No comments received for this section

Policy CS.21 Provision for Gypsies, Travellers and Travelling Show People

1. The net number of traveller pitches should be dispersed. Pitches need to be located where they won't cause blight on the landscape.

Robb Kightley

2. The broad locations are too vague.

Julian Burnell

3. Delete the words if funding should become available. Funding for pitches is available from S106 contributions. The affordable housing policy should include contributions for affordable gypsy & traveller pitches.

4. Broad locations should be resisted as they restrict sites coming forward through the planning process. The approach is not flexible. Using broad locations is not consistent with national policy. This may lead to sites being located in wrong locations.

5. The proposed criteria are too restrictive. Delete the first two criteria as they are inconsistent with paragraph 51 of circular 01/2006.

6. Don't specify the number of pitches in the policy. Support small private sites. Don't have a blanket approach for all sites as some larger sites may work.

Derbyshire Gypsy Liaison Group

7. Support Draft Policy CS.21

Wootton Wawen Parish Council

8. Sites for gypsies and travellers need to be found as soon as possible. Stratford-on-Avon District Council needs to take a pro-active approach in the identification of sites.

Morton Bagot, Oldberrow & Sperrall Parish Council

9. Regarding criteria 3 the special circumstances need to be very special circumstances.

Mr A Dixon

10. Recognise the need for sites but they need to be located where there is minimal impact on existing houses. Limit numbers to 2 % of existing housing stock.

Wixford Parish Council

11. The description of the buffer is unclear. The site must have rules / properly run with access to services. Pitches must not be allowed to multiply.

Tim Phillips

12. Criteria (viii) should include the historic environment.

English Heritage (West Midlands Region)

13. The broad locations are inadequate. The broad locations are the whole County not designated Greenbelt or AONB. In addition the buffer needs to be specified in more detail.

14. The whole section needs to be more specific. Sites located outside Shipston would need to have a significant buffer.

Shipston-on-Stour Town Council

15. The policy is supported, but concerns still remain about illegal sites.

Graham Medley

16. The criteria needs to refer to private sites. More emphasis needs to be placed on sustainability or safety issues. The size of sites needs to be limited to prevent uncontrolled expansion.

Snitterfield Parish Council

17. Disagrees with the proposed pitch numbers. The GTAA should have been prepared in conjunction with neighbouring authorities. The GTAA is therefore incomplete as it examines need in isolation from surrounding areas.

18. The provision of 52 pitches would result in immigration from other areas. 26 households on the waiting list should not translate to 26 pitches. The waiting list should be examined in more details as it could include people on unauthorised sites, from neighbouring areas or on other waiting lists. Joint working with neighbouring authorities would create a better understanding of waiting lists.

19. There does not appear to be a difference between zones 1 and 2.

20. Suitable sites could be located in location 2 and unsuitable sites in location 1. New sites need to be restricted in the open countryside. The broad location criteria would not help the decision making process and will hinder the delivery of sites.

21. There is no need for Council to produce a DPD and broad locations for growth.

22. The criterion is too lengthy and too prescriptive. There appears to be repetition in the criteria. AONB is a nationally recognised designation so there is no need to repeat the designation. Retain criteria i, iii, iv, v, vi, viii & x.

23. The size of traveller sites is a site specific issue. The ability to assimilate into existing communities is important, so some locations will be able to accommodate large sites and others will only be able to accommodate a small number of pitches.

24. The policy needs to reflect the NPPF and new national Planning Policy for Traveller Sites.

25. Include the words 'from the period 2011 to 2016... an extra 10 pitches every five years thereafter.

Mr John Dews

26. Same comments as 17 - 21 and 23 - 25 above.

Croft Property Development

27. The policy needs to reflect the NPPF and new national Planning Policy for Traveller Sites.

28. Include the words 'from the period 2011 to 2016... an extra 10 pitches every five years thereafter.'
Temple Grafton Parish Council

29. The Parish Council accepts the need for additional sites, but is concerned about the large transient population and the resulting impact. The policy should address transient workers.

30. Amend the policy to include a statement to the effect that applications will only be considered in the open countryside with a visual impact assessment. All sites must only be for residential use, to ensure that business activities are controllable.

Salford Priors Parish Council

31. 52 pitches is likely to be too high. Once one or more additional sites have been approved, then close the temporary sites in the open countryside. After a new site has been approved, then close the sites at Darlingscott and Ardens. The land then needs to be returned to agriculture.

CPRE Warwickshire Branch

32. A total of 72 pitches will be required by 2028 if the projections are correct. Will this be in addition to existing permanent pitches and if so where is the evidence to support this.

Councillor S H Jackson

33. Access to primary health care is an important issue for gypsies and travellers. Newly proposed sites must be developed in consultation with both Public Health / South Warwickshire Clinical Commissioning Group and CCG's to ensure adequate access to health services.

NHS Warwickshire - Health Development Manager

34. Don't treat gypsies any different to anyone else. If possible don't provide permanent sites. SDC needs to change their policy to a non differential approach.

Mappleborough Green Parish Council

35. Support a larger number of smaller pitches with a maximum of 12 pitches per site instead of 1 or 2 large sites. Easier to keep a small site tidy and for the travellers to integrate with the existing community. Sites need to be fit for purpose. Stratford-on-Avon District Council must ensure that development is economically, environmentally and socially sustainable. The lack of rural transport and facilities affect the first two.

Elisabeth Uggerloese

36. All new sites need to be transient in nature.

Harbury Society

37. No problem with the proposed numbers or locations subject to flooding being considered. All sites need to be sequentially tested.

Environment Agency

38. Provide more pitches to prevent for example what is happening at Temple Grafton. National legislation needs to change to ensure that occupants of caravan sites at Temple Grafton are treated the same as those at Dodwell.

Mr N A M Butler

39. Concern that the area allocated is almost anywhere in Warwickshire.

Ladbroke Parish Council

40. Adverse impacts needs to be defined as it is open to interpretation
Earlswood & Forshaw Heath Residents' Association

41. Clarification is required on the proportion of chalet type permanent residences compared to temporary pitches for the travelling community.
Stratford-upon-Avon Town Council

42. The policy makes full provision for the needs identified in the GTAA 2011.
Solihull Metropolitan Borough Council

43. What is meant by broad location 1 and 2?
Wellesbourne Parish Council

44. Don't treat gypsies any different to anyone else. If it were possible I would not want any permanent gypsy sites. If National Policy changes then SDC should change their policy to a non differential approach.

45. Local residents and gypsies and travellers need to have access to goods and services
Warwickshire County Council, Councillor Justin Kerridge

Topic: 9.6 Sustainability Appraisal Implications

No comments received for this section

Topic: 9.6 Explanation

No comments received for this section

Topic: 9.6 Development Management Considerations

No comments received for this section

Topic: 9.6 Delivery and Monitoring

No comments received for this section

Consultation Question: Q125

1. The net number of pitches seems reasonable but should rather be dispersed. Pitches should be placed where they are not a blight on the landscape.

Robb Kightley

2. Pitch number seem reasonable, but will the numbers and timing proposed prevent problems at appeal. 52 pitches need to be provided as soon as possible.

Wilmcote Parish Council

3. 52 pitches are too many. Rather locate gypsy and traveller sites on brownfield / industrial sites.
Stockton Parish Council

4. Where is the evidence to support this figure? The figure appears to be very fluid.
Bidford-on-Avon Parish Council

5. The 52 pitch requirement - the GTAA is flawed.
Temple Grafton Parish Council & Croft Property Development Ltd

6. The 52 pitches seem to have a balance of the local need including in migration. The need for 25 pitches is questioned. If taken off the 52 pitches leaves very little expansion when taking into account the temporary permission's.

Warwickshire County Council

7. Specify the size and number of pitches per site in the policy.

Napton-on-the-Hill Parish Council

8. There is no justification for the AONB and Green Belt to be excluded from the areas of search for Traveller sites as these areas are traditionally resorted to by the Gypsy community. Small strictly managed sites could be accommodated in the countryside, but not permanent sites.

9. Don't agree with the proposed number or locations for traveller sites. Travelling people have traditionally resorted to the Arden and Cotswolds more than areas in SDC.

Harbury Society

Consultation Question: Q126

1. The map isn't specific enough. More detail should be provided to specifically identify the proposed sites. SDC should clarify how retrospective planning permission will be dealt with. Disperse small sites across the district with sites having a smaller number of pitches.

Jason Hurwood

2. Take account of information in Parish Plans. Measures need to be put in place to ensure the proper management and retention of sites. What are the cost implications over the Core Strategy period?

Bearley Parish Council

3. There will be problems with what certain of the criteria mean from a planning point of view. For example the criteria referring to the green belt includes the words special circumstances. Clearly these need to be very special circumstances. What is a reasonable proximity to services? The criteria need to be properly defined.

Wilmcote Parish Council

4. No, there should be an extra condition covering local facilities such as schools.

Stockton Parish Council

5. Yes.

Bidford-on-Avon Parish Council

6. Sites need to be close to facilities - close to towns and villages. Sites should be small in scale, say 7 pitches and incremental expansion prohibited.

Nigel Rock

7. The criteria are too vague. Words such as reasonable and unacceptable and good give too much scope for planners to reject applications.

Eric Ward

8. Traveller sites should not be allowed on land that impact on the environment of existing properties. New locations should be spread across the district.

Peter Chadwick

9. The site criteria are too long and unduly prescriptive. Some concepts are too vague. What are internationally recognised designations? AONB is a national recognised designation so to repeat the designation is not necessary. The more important criteria will therefore carry less weight. The following criteria should be retained - i, ii, iv, v, iv, viii & x.

Temple Grafton Parish Council & Croft Property Development Ltd

10. The 52 pitches have a balance of local need including migration. The need for 25 pitches is questioned. If taken off the 52 pitches this leaves very little expansion when looking at temporary permission's already allocated. The policy should rather state that 25 social pitches are required. The HCA is unlikely to have any funds available over the next 5 years.

Warwickshire County Council

11. NPC believes that the site drawing is not specific enough.

Napton-on-the-Hill Parish Council

12. Need to consider cross boundary siting of gypsy sites in any decision.

Mrs J and Mr M Buckley & Earlswood & Forshaw Heath Residents' Association

13. The size of the site should be in relation to the neighbouring built environment otherwise the policy could allow a large site next to a very small settlement.

Wellesbourne Parish Council

14. viii - also include adverse impact on the local ecology, landscape character, historical use of the site, business, tourism and visual amenity.

Cllr Steven Kittendorf

Consultation Question: Q127

1. Sites should be restricted to smaller numbers and dispersed across the whole district, with maximum pitch numbers of 10- 15.

Jason Hurwood

2. Demand needs to be quantified along with the average number of pitches per site before meaningful comments can be made.

Bearley Parish Council

3. There should be a limited number of sites with an average of say ten pitches each. These sites should be spread evenly across the district.

Wilmcote Parish Council

4. Maximum of 10 pitches.

Stockton Parish Council

5. Specify the number of pitches per site. BPC supports a larger number of sites with smaller number of pitches. BPC does not support 1 or 2 large sites to accommodate all pitches.

Bidford-on-Avon Parish Council

7. Size of sites is a specific matter. Take into consideration the ability to assimilate with their surroundings. Some locations can accommodate a large number of pitches and other locations a small number.

Temple Grafton Parish Council & Croft Property Development Ltd

8. Small family size sites are more preferable. Each application needs to be taken on its merits and no limits should be placed in the policy.

Warwickshire County Council

9. Yes, no more than 5 pitches per site.

Napton-on-the-Hill Parish Council

10. Only provide transit sites as they have a travelling lifestyle.

Harbury Society

11. A traveller site should be no larger than 7 pitches.

Cllr Steven Kittendorf

12. Small family sized sites are preferable. It will be difficult to argue against their human rights if the family is too big to have a site. Therefore each application needs to be assessed on its merits.

Warwickshire County Council

Consultation Question: Q128

1. The broad locations are acceptable. SDC do need to identify and establish permanent sites in the near future otherwise losing appeals will continue.

2. Concern that SDC will take the easy option and extend the Pathlow site. WPC asks for an undertaking that no additional pitches will be sited in Wilmcote or Pathlow. In October 2010 temporary planning permission was granted for a single pitch 300 metres from the Pathlow site.

Wilmcote Parish Council

3. The views of the local community should be paramount.

Stockton Parish Council

4. The policy needs to include non public pitches to ensure they are well managed.

Bidford-on-Avon Parish Council

5. The policy needs to be consistent with the NPPF. In addition the policy needs to be more explicit about dates as the Core Strategy will not be adopted until 2013.

Croft Property Development Ltd

6. The question is who manages the sites is crucial. Well managed sites can gradually become integrated into the local community. Poorly run sites will continue to be a problem.

Harbury Society

7. Cross boundary siting of gypsy sites must be considered in any decision.

Earlswood & Forshaw Heath Residents' Association

8. Amend criteria (i) as follows: - The site will not be located within or immediately adjacent to an international environmental designation.

9. Amend ii to minimise any adverse impact on the AONB. Suggest some level of visual impact on the AONB would be acceptable. Reword ii as follows: - Where the development that forms part of a gypsy or traveller site may result in an adverse visual impact on an Area of Outstanding Natural Beauty (AONB), mitigation shall be employed to ensure that the site conserves and, where possible, enhances the character and quality of the landscape and natural environment.

10. Add clarity and definition to ix for example what is meant by a good residential environment.

Natural England

Consultation Question: Q129

1. The number of pitches must reflect the most recent up to date evidence.

Derbyshire Gypsy Liaison Group

2. SDC must be confident that the number of pitches proposed, their locations and timing will stand up to rigorous examination at appeals.

Wilmcote Parish Council

Consultation Question: Q130

1. Sites should be equally dispersed within broad locations 1 and 2.

Bidford-on-Avon Parish Council

2. Through the bi-annual caravan count the increase or decrease of pitches can be monitored as well as using the County's unauthorised encampment data base.

Warwickshire County Council

Topic: Map 1 - Gypsies & Travellers Recommended Broad Locations

1. Map 1 is vague and meaningless and not at all useful.

Julian Burnell

2. Don't agree with the proposed locations for traveller sites.

Linda Ridgely

Draft Core Strategy 2012 - Summary of Representations

9.7 Economic Development

1. It is essential that policies promote sustainable economic growth, especially in the main rural centres to prevent them becoming dormitory villages/towns. This is neither economically, nor environmentally nor socially sustainable. Policies to date appear not to take these issues seriously and Bidford-on-Avon has already become a dormitory village with 70% of its working residents commuting to work and not contributing to the local economy.

Bidford-on-Avon Parish Council

2. The evidence for the need for significant amounts of additional office space over the period suggested by Policy CS 22 is open to question. The selection of the "Convergence Scenario" represents an "aspirational" target for economic growth. This is admirable and I fully support that. However, in the context of developing land in the Green Belt I do not think that this assumption should be used as it does not provide sufficient evidence of demand to justify "very special circumstances".

Stephen Ollerenshaw

3. The Employment Land Study suggests that there will be a surplus of industrial and warehouse land during the Core Strategy period of 44.5 - 69 hectares. These are the very "brownfield" sites that the Council should be looking at to drive economic development to meet its objective of "sustainable development".

Stephen Ollerenshaw

4. It is noted from the plan that Redditch provides a significant amount of employment to Stratford residents. Accordingly, it would be appropriate that some employment land need generated by Redditch should be accommodated in a suitable location within Stratford District.

Redditch Borough Council

5. The terminology is ambiguous. The document talks about "local centres" but there is no definition as to what a "local centre" is.

J. Buckley

6. We will support the strategic employment sites of the strategy.

Warwickshire County Council

7. We will support planning policies that support a competitive economy for inward investment.

Warwickshire County Council

Topic: 9.7 Strategic Objective

1. Paragraph 9.7.1 makes reference to Strategic Objective 5 - Planning to promote and diversify the local economy. This is in fact Strategic Objective 4.

Aston Martin Lagonda Ltd, Jaguar Land Rover Ltd

Policy CS.22 Economic Development

1. Welcome employment provision generally to improve the economic stability of the District
Stratford Local Strategic Partnership

2. Object to the paragraph that states "An existing employment sites should not be redeveloped or converted to non-employment uses unless it is no longer viable or appropriate for that purpose." It is considered that the wording of this policy is too restrictive and should be removed as it does not accord with the government's advice provided in the NPPF. It states that planning policies should avoid the long term protection of employment land or floorspace and applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses.

Codemasters Software Co Ltd

3. We would dispute the need for another business park on land off the A46 west of Birmingham Road. The document seems to contradict itself when it states that 25-30 hectares of land is needed for industrial development (para. 9.7.13) but then says there is a potential surplus of 44.5 - 69 hectares (para. 9.7.14). A walk around the Masons Road/Bishopton industrial zone shows no shortage of empty units and even vacant land. Would it not be better to utilise land already set aside for this purpose and not blight another greenfield site? If industrial sites remain vacant for a period over one year, would it not be better to redesignate their use for residential purposes?

David & Beverlie White

4. We note the importance of a flexible approach to the provision of employment in appropriate locations within the District and support the reference within the policy to viability and appropriateness in regard to the redevelopment of existing employment sites.

Grove Industries Limited

5. Given that the surplus of industrial land is double that of the shortfall of land needed for Class B1a and B1b activities, would it not be appropriate to release industrial land to meet that shortfall before consideration was given to its release for no-employment purposes, ie. housing?

Shipston-on-Stour Town Council

6. We broadly welcome this policy which will facilitate economic growth and the creation of new jobs across the District. Given that a key aim of Stratford District Council's Corporate Strategy is "A District where business and enterprise can flourish" and that at para. 9.7.8 the Core Strategy notes that Stratford District has experienced a greater increase in in-commuting than other parts of Warwickshire, then it is disappointing that the Council has not endorsed a housing strategy which is economic growth led.

Geoffrey Prince Associates Ltd

7. Development or expansion of business in the Green Belt should be supported to ensure employment in rural areas will be maintained and expanded to benefit the local work force. Changes in working practice such as home working from tele-cottages need to be defined and supported.

Snitterfield Parish Council

8. Small specialist businesses need to be encouraged.

A L S Orr

9. I support the thrust of this policy but there seems to be little tie in with the housing strategy for the District. This should be spelled out.

Reuben Bellamy

10. Policy does not refer to the scope for encouraging new small office development in town centre.

Stratford-upon-Avon Society

11. It is not clear from the document how much additional employment land is proposed for Southam. It would appear sensible to make provision for a modest extension to the existing Kineton Road industrial estate up to the proposed HS2 route as proposed by the Clubs as part of the enabling development associated with the Southam Sports and Community Hub. This would allow for the needs of existing and new businesses to be met should demand arise in the future.

Southam United Football Club

12. There is a clear need to ensure that maximum use is made of current site availability, although this inevitably is impacted by the current economic situation. Industrial type activities should be contained within appropriate locations and not allowed to encroach on rural sites. Commercial activities, as at Wixford Lodge, should be considered beyond industrial sites as long as developed sympathetically.

Peter Chadwick

13. The policy and related explanation should be redrafted in line with the Ministerial Statement given in March 2012 'Planning for Growth' and the NPPF. The emphasis should be on the maintenance and growth of the economy. At the moment the wording of the policy does not necessarily provide sufficient scope and flexibility to drive the local economy forward.

Aston Martin Lagonda Ltd, Jaguar Land Rover Ltd

14. The Parish Council recognises the importance of the businesses in the parish.

Salford Priors Parish Council

15. The policy gives exaggerated weight to economic development. Stratford District has a large amount of employment. Additionally its residents have easy access to employment in urban areas within commuting distance. This means that there is no need to 'promote' economic development. The population is to a large extent well-educated and economically active, so that there is little or no role for the planning authority in creating employment. Nor does it have any role in changing the character of the economy or types of employment. There is adequate employment land in the District, some not taken up. Further allocations as proposed in the policy will risk adding to the surplus.

CPRE Warwickshire Branch

16. Policy CS 22 implies that retail development is an 'employment generating' use. Supporting paragraph 9.7.4 then refers to retail as 'economic development'. For the avoidance of doubt the terminology used should be consistent throughout the document. In assessing the potential for alternative economic development on Class B1-B8 sites, the policy should distinguish between the following:

- existing employment sites in active B1-B8 use. These should be protected in accordance with Policy CS 22; and
- sites with unimplemented or partly implemented planning permissions, for which other economic development (ie. non Class B1-B8 use) may be appropriate. A more flexible approach as referred to in Policy CS 22 should be adopted for such sites and would accord with paragraph 22 of the NPPF.

The latter applies to land at Wellesbourne Airfield.

Wellesbourne Airfield

17. An inappropriate emphasis is placed upon development falling within Class B1(a) offices and Class B1(b) research and development. The Employment Land Study has not fully considered the wide range of job opportunities that are increasingly provided within the logistics industry. There has been a rapid expansion of the logistics sector. With this expansion has come a marked increase in the demand for high quality buildings within Class B8. The form and character of employment generating uses on employment sites should be determined by the individual characteristics of sites, rather than being unduly influenced by an unsubstantiated policy preference within the Core Strategy. The most important provision within the Core Strategy is to provide a wide range of job opportunities.

Barwood Developments Ltd

18. Paragraph 4 - should be removed as the countryside should not be targeted for business development. Paragraph 5 - remove "...in rural areas." or remove entirely for the same reason.

Mapleborough Green Parish Council, Councillor Justin Kerridge

19. In considering the reuse of existing employment sites we believe that the Council should take a more flexible approach to considering alternative uses for the site, as advocated in paragraph 22 of the NPPF, treating individual applications on their merits having regard to the prevailing market conditions and the need for different land use to support sustainable communities.

St Modwen Developments

19. The Long Marston Estate is well placed to accommodate additional employment uses (if required). The site already benefits from planning permission for the retention of approximately 80,000 sq. metres of floorspace for Class B1c and B8 uses and there is potential to accommodate additional floorspace.

St Modwen Developments

20. Sites which are accessible by sustainable transport choices would be the preferred locations for such uses with opportunities to improve public transport links and to foster smarter travel choices.

Highways Agency

21. A flexible approach should be taken to existing employment sites and consideration should be site specific. For instance the knowledge based sectors will not have the same requirements as manufacturing. The character of the site and location of the site should also be considered in the context of required housing to support employment. The concept of increasing the proportion of residents that can find work in the district thus increasing the economic viability is supported. This aspect should be encouraged as part of neighbourhood plans.

Councillor Hazel Wright

22. The strategy should make clear that no encroachment in the Green Belt of any kind is desired at Junction 3 (M42) for any future Portway Business Park.

Tanworth-in-Arden Parish Council

23. We need small scale employment in our villages to improve our economic base. We would not want to see the loss of existing business premises, but need policies to ensure that if these do wish to expand they do not create nuisance or congestion or add to inward commuting. Expansion plans in villages should not be nodded through without a thorough consideration of their impact.

Harbury Society

24. We welcome the Council's acknowledgement that policy should be flexible in its approach towards accommodating a wide range of employment generating uses on existing industrial sites. The Council's acknowledgement that retail is not only an employment generating use but also a key driver of economic growth is positive. We suggest that instead of imposing strict policy criteria against which applications should be assessed, such criteria is used as guidance. Applications for development which include the change of use of industrial land always present different challenges and issues and each should be assessed on their own merits. This would provide a truly flexible approach to the release of industrial land for other purposes.

Sainsbury's Supermarkets Ltd

25. The Council's ambitions to develop a knowledge economy over the plan period is understood but this should not be at the expense of proposals put before the Council which also provide prospects for economic growth and job creation more immediately. The NPPF (paragraph 75) indicates that long term protection of land for employment should be reconsidered where other uses, particularly those which also generate employment opportunities are proposed. In reaching decisions on releasing such land, councils should have regard to market signals and acknowledge that retail is an employment use.

Sainsbury's Supermarkets Ltd

26. There is no definition of "local centres".

Mrs J and Mr M Buckley

27. "Should" is subjective and needs to be changed to, for example, "must".

Earlswood & Forshaw Heath Residents Association

28. The re-use of existing industrial estates needs clarification. Concern expressed that this could encourage more out-of-town shopping, additional car use and potential for unsuitable expansion of these sites. Concern also expressed over implications of loss of employment land to housing.

Stratford-upon-Avon Town Council

29. In considering the reuse of existing employment sites we believe that the Council should be sufficiently flexible in considering alternative uses for the site, particularly where an alternative use such as housing may be better suited to the location or the use which was previously there. This is particularly relevant if the site is located in a Local Service Village or smaller settlement where in many instances reuse for housing may be a more acceptable use.

Alscot Estate

30. In line with the NPPF glossary definition, the policy should encompass all elements of economic development which includes retail and leisure development. Wider recognition must be given to these uses in promoting economic development and job creation and further regard should be had towards other evidence based reports including the Council's Retail Studies.

Ainscough Strategic Land

31. Policy is too narrow in its scope in stating that the primary purpose of the additional 25-30 hectares of employment land is to provide "opportunities for businesses falling within Class B1(a) offices and Class B1(b) research and development. The Local Enterprise Partnership (LEP) is concerned that the Employment Land Study has not adequately addressed the needs of businesses operating within the District and the market opportunity for major development sites to attract new inward investment and jobs. As an illustration, a major opportunity is available for the redevelopment of Wellesbourne Distribution Park. Having regard to its good quality access to the M40, the primary activity for new investment is likely to be mainly within Class B8, providing modern logistics and warehouse accommodation, and Class B2 general industrial development. The LEP is concerned that the emphasis on the 'primary purpose' of new employment being with Class B1(a) and B1(b) will unnecessarily frustrate new job opportunities that should be welcomed across a wider range of Class B uses, and other uses that provide for economic development.

Coventry & Warwickshire Local Enterprise Partnership

32. The LEP considers that the potential for additional investment and jobs at Jaguar Land Rover at Gaydon should be identified separately to the level of employment land provision under Policy CS 22, as the land at Gaydon will not generally become available for investment outside the activities of JLR.

Coventry & Warwickshire Local Enterprise Partnership

33. The LEP is concerned that the opportunity to attract new investment and jobs through the provision of high quality land and premises is not unnecessarily restricted by an inadequate provision of new employment land during the Plan period to meet the needs of business as presently located within the District and those that wish to invest in the District.

Coventry & Warwickshire Local Enterprise Partnership

34. The policy has not adequately addressed the employment opportunities that can increasingly be secured from investment other than within uses in Class B. In particular the LEP holds evidence of investment opportunities within Class C2 uses, and other uses that may be regarded as being 'sui generis' experiencing difficulty in obtaining planning permission on land allocated for employment purposes. The policy should be written in a more positive form to recognise that other opportunities for economic development may be suitable on employment land, beyond uses within Class B.

Coventry & Warwickshire Local Enterprise Partnership

Topic: 9.7 Sustainability Appraisal Implications

1. The Sustainability Appraisal identifies Policy CS 22 as carrying potential adverse effects. At paragraph 3.6.19 it states: "The development outside of urban areas may result in adverse effects upon the efficiency of transport networks throughout the district, by increasing the load on infrastructure with limited capacity, increasing car dependency in rural areas and increasing the need to travel." This is contrary to the NPPF and the Core Strategy's aims for sustainable development. Therefore in developing from this stage to submission it will be necessary to ensure that the Council give proper consideration towards the tests of soundness.

Miller Strategic Land and Taylor Wimpey

Topic: 9.7 Explanation

1. The Codemasters Campus site at Stoneythorpe in Southam is set in a rural location and is an important high technology local employer. As such, support is given to the wording of paragraph 9.7.16, as it recognises that rural employment sites in the District are generally well occupied and actively used, and play an important role in supporting the rural economy. Furthermore, support is given to the fact that the District Council believe that planning policy should support the sustainability of the rural economy in permitting the re-use and possible replacement of farm buildings for employment-generating activities.

Codemasters Software Co. Ltd.

2. Paragraph 9.7.13 states that "Limited additional employment allocations are appropriate to support higher value economic growth in Class B1a offices and B1b research development sectors." It is unclear exactly what is meant by this; further explanation and evidence could be provided to demonstrate why allocations are limited.

Redditch Borough Council

3. Paragraph 9.7.14 states that "there is a potential surplus of between 44.5 - 69 hectares of land across the District for the plan period to 2028. This land is currently primarily used for industrial activities (Class B1c and B2)." It is considered that all surplus land should be vacant unused land, whereas this section states that surplus land is actually in use, and therefore cannot be considered as surplus.

Redditch Borough Council

4. Business development should not be pushed in the countryside. Whereas it should not be prevented if the business will not have a harmful effect on the enjoyment of the countryside, paragraph 9.7.16 is too supportive. Suggest put "considering" instead of "permitting" and add the oft used "...dependent on the nature of the activities involved, the character of the site..." etc.

Mapleborough Green Parish Council, Councillor Justin Kerridge

5. It is recommended that the District Council consider mechanisms to support and deliver local employment and training support and opportunities as part of the development process. In addition and where appropriate, pre-employment training to on-site construction training through to local supply chain and procurement initiatives.

Warwickshire County Council

6. Note that paragraph 9.7.12 recognises that one of the economic weaknesses or threats to the District includes housing supply/affordability, which if not addressed could result in longer distance commuting and could potentially constrain economic growth and have an adverse impact on the public transport and highway network. This reinforces the objection to the Council's approach towards housing supply.

Ainscough Strategic Land

7. The fact that the Employment Land Study has identified a potential surplus of between 44.5 - 69 hectares (net) over the plan period that is primarily used for Class B1(c) and B2 purposes should not be determining factor in the provision of new employment land. As the Core Strategy recognises some of this land is of poor quality and hence does not meet the current needs of businesses.

Coventry & Warwickshire Local Enterprise Partnership

8. Companies no longer will locate onto sites that do not suit their marketing image and presentation, or fulfil environmental objectives within corporate social responsibilities. These locational requirements increasingly focus attention towards sites that are of high quality, where bespoke buildings can be provided, and where sites are well located to the principal transport network.

Coventry & Warwickshire Local Enterprise Partnership

Topic: 9.7 Development Management Considerations

No comments received for this section

Topic: 9.7 Delivery and Monitoring

No comments received for this section

Consultation Question: Q131

1. The figure 25-30 hectares is derived from Recommendation 0.58 viii in the Employment Land Study. Recommendation 0.58i in the Employment Land Study "Address weaknesses in the economy namely housing supply/affordability and transport infrastructure" seems to be avoided elsewhere in relation to housing development.

Bearley Parish Council

2. The CLA welcomes policy CS 22, particularly in the reference to the use of rural brownfield sites and also the recognition of the need for firms to expand in their existing location which is particularly important especially in rural areas.

Country Land and Business Association

3. The Parish Council considers that the aim of the Plan, as far as the town of Stratford upon Avon is concerned, should be to support a healthy economy and to provide employment opportunities for the existing residents (including the planned increase of 560 homes). Development must be consistent with the town's status as a world class tourist destination. Development must not destroy the market town "feel" of the town by making it a magnet for large businesses (eg. by promoting itself as a location for head offices, etc.) which will only have the effect of increasing the demand for net in-migration. As far as the development of the town's economy is concerned, Stratford should play to its strengths as an international cultural centre by promoting the development of creative industries (media, IT, etc) in smaller units as close as possible to the town centre that will encourage workers to take advantage of the shops, cafes, etc. in the town, this helping the town's economy.

Old Stratford & Drayton Parish Council, Jane & Peter Emerson

4. AML welcome the promotion given in Policy CS 22 to the provision of a wide range of business and commercial activity in order to maintain the health and economic competitiveness of the District. AML consider however that the policy should not just seek to 'maintain' economic health and competitiveness, it should also support and foster economic growth within the District to provide more jobs and improve the vitality of the local business environment.

Aston Martin Lagonda Ltd, Jaguar Land Rover Ltd

5. Encouraging economic activity is at the forefront of Central Government policy and at the heart of the new NPPF. The Core Strategy misses the opportunity to encourage small scale local employment schemes within the Local Service Villages that could offer sustainable local employment to existing and new residents thus reducing the need to travel. The policy should state that consideration will be given through the Site Allocations DPD to the allocation of sites in these villages for small scale local employment purposes.

David & Angela Tucker

6. There is no way of knowing. If the economy continues to stagnate, then yes but if the economy suddenly starts to grow again, it may not. The Council should be prepared to meet a sudden demand.

Earlswood & Forshaw Heath Residents Association

7. Policy implies that only on existing industrial or designated employment areas will a flexible approach be taken. Such an approach is inconsistent with paragraph 21 in the NPPF which states that "Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances."

The Bird Group of Companies

8. We welcome the statement that a wide range of opportunities for business development will be provided in the countryside. We support the fact that further opportunities for development or redevelopment of existing commercial properties to enhance or attract new occupiers to them will be supported. Similarly we support the re-use of previously developed sites in rural areas for business uses and believe that this could help deliver new employment opportunities and help sustain the rural economy.

Alscot Estate

9. We are in particularly agreement with the support for business uses to be provided on previously developed sites in rural areas.

Follett Property Holdings Ltd

Consultation Question: Q132

1. The figure 25-30 hectares is derived from Recommendation 0.58 viii in the Employment Land Study. Recommendation 0.58i in the Employment Land Study "Address weaknesses in the economy namely housing supply/affordability and transport infrastructure" seems to be avoided elsewhere in relation to housing development.

Bearley Parish Council

2. Are not able to comment on the amount of additional employment land to be provided over the plan period. However, we are concerned to note that the policy is limited to business uses falling within Class B1a and B1b. This restriction is undesirable, unnecessary and inconsistent with the remainder of the policy in terms of providing for a wide range of employment uses. Further it is inconsistent with the stated desire to adopt a flexible approach to meet the needs of business. Whilst supporting the need to encourage companies within the knowledge-based and high value-added sectors, the District Council must not turn its back on the value of and need to support manufacturing and other industries. The Core Strategy must therefore make suitable provision for proposals falling within Class B1c and Class B2 uses.

Aston Martin Lagonda Ltd, Jaguar Land Rover Ltd

3. This is a very narrow range of purposes. We feel that any opportunity to provide new jobs should be given consideration on its own merits.

Earlswood & Forshaw Heath Residents Association

Consultation Question: Q133

1. If required.

Bearley Parish Council

2. There is no justification for the phasing of additional employment land over the plan period. Adequate and suitable employment land must be readily available to meet the needs of a wide range of businesses, whenever those needs arise during the plan period, so that they can respond to changes to market conditions and circumstances. Unnecessary phasing of the provision of employment land may fetter the growth and development of businesses and is inconsistent with the District Council's stated objective of adopting a flexible and positive approach to the needs of business and commerce.
Aston Martin Lagonda Ltd, Jaguar Land Rover Ltd

3. Reports have indicated that there is sufficient employment land and the need is not more but rather more strategically located.
Tanworth-in-Arden Parish Council

Consultation Question: Q134

1. This seems madness; having watched what has happened to Stratford town centre for the last decade, why would you propose this?

2. JLR support the provision of a wide range of economic and community uses on existing industrial estates but consider that this should be extended to cover large rural brownfield sites such as Gaydon which already provide employment and could provide community uses in a sustainable manner. Moreover the provision of a broad range of other compatible uses, such as tourism, should also be permitted on existing sites. This is more sustainable than the development of new sites.
Jaguar Land Rover Ltd

3. Yes, providing it supports local shops and not large retail outlets to the detriment of smaller outlets.
Tanworth-in-Arden Parish Council

4. We see no reason why vacant employment units should not be used for retail purposes and community uses.
Earlswood & Forshaw Heath Residents Association

Consultation Question:

1. Yes, but unfortunately past practices have not matched these aspirations in that bigger and bigger developments have been allowed to the detriment of the identified housing needs.
Tanworth-in-Arden Parish Council

Consultation Question: Q136

1. We concur with the view that increasing the provision of high technology jobs would help to address the loss of traditional employment, reduce the amount of out-commuting and maintain the District's economic competitiveness.
Codemasters Software Co. Ltd

2. The District Council is right to place emphasis on attracting high technology companies to the District but should also ensure adequate and suitable land is available for manufacturing and other businesses which remain crucial to the economic base of the District and which can still provide significant employment opportunities.

Aston Martin Lagonda Ltd, Jaguar Land Rover Ltd

3. Yes, and such companies should be encouraged to settle in the same general area so as to replicate the 'valley' type development, enabling support, innovation and competition.

Tanworth-in-Arden Parish Council

4. There should not be an emphasis, at the expense of supporting home-grown industry, on "attracting" the high technology sector in the countryside. Such firms would either bring with them their own highly qualified staff who would commute daily adding to congestion, or such staff would relocate and settle here, causing still greater pressure on housing stock and further inflating house prices. There should be more emphasis on support for rurally-based and indigenous businesses because they have been proved to add greatly to the local employment base and generally do not encourage long distance commuting.

Harbury Society

5. In principle, yes. However, we do not understand what "Schemes involving companies in the knowledge-based and other high value added sectors will be encouraged" means, which makes meaningful comment difficult. We believe that attracting highly skilled jobs to the area is hugely beneficial to the local economy but we need to ensure that the skill sets are in place to accommodate such incoming businesses.

Earlswood & Forshaw Heath Residents Association

6. It is important to encourage high quality employment to drive economic growth and prosperity. This does not need to be limited to high technology companies but could extend to other knowledge based businesses.

Stratford-upon-Avon Town Council

Consultation Question: Q137

1. Commuters don't generally help the local economy because they shop where they work. Therefore plans to provide employment opportunities wherever possible near to new developments can only be welcomed. Given escalating fuel costs we thought this must be a "win, win" situation.

Stratford Local Strategic Partnership

2. We do so the need for planning support and advice for micro businesses and start-ups.

Stratford Liberal Democrat Group

3. Where a significant increase in housing is expected there should be a proposed numerical linkage to increase employment provision. New residents will otherwise all be leaving the community by private transport to another place of work.

Kineton Parish Council

4. Any speculative development must be justified by an independently researched local needs survey.

Harbury Society

5. The Strategy will support the expansion of existing firms but does not address the cumulative effects of such moves - problems with traffic, noise and environmental impact.

Harbury Society

6. There should be stronger policies to deal with problems that can occur when rural firms out-grow their sites.

Harbury Society

7. Ensuring that school curricula and college courses produce students with the correct skill sets to fill jobs generated by this policy.

Earlswood & Forshaw Heath Residents Association

Consultation Question: Q138

1. The policies do not directly link the Motorway box to the increased commuting (in and out) that we suffer from, but do understand its influence on "housing affordability". The policies acknowledge the importance of local businesses to the rural areas but accept that re-use and redevelopment of farm buildings can support their growth.

Harbury Society

Consultation Question: Q139

1. Paragraph 9.7.20 has it covered, provided reported on a regular basis.

Claverdon Parish Council

2. We believe that a land register would be useful, identifying land areas, activities that the particular parcels are suitable for and the potential numbers of jobs each parcel might generate for each different use. Parcels so identified would then be reviewed at a local level under a Local Development Order (LDO).

Earlswood & Forshaw Heath Residents Association

Draft Core Strategy 2012 - Summary of Representations

9.8 Retail Development and Town and Local Centres

1. Since there is an identified demand for future specialist retail floorspace such as that provided by garden centres and nurseries, and there is up to date Government support for local authorities to include policies relating to retail uses with specialist locational requirements, it is considered essential that the Council's draft Core Strategy should include a policy which recognises the appropriateness of certain retail uses such as Garden Centres to be located within the countryside.

Garden Centre Group

2. It is essential that policies promote sustainable economic growth, especially in the main rural centres to prevent them becoming dormitory villages/towns. This is neither economically, nor environmentally nor socially sustainable. Policies to date appear not to take these issues seriously and Bidford-on-Avon has already become a dormitory village with 70% of its working residents commuting to work and not contributing to the local economy.

Bidford-on-Avon Parish Council

3. We will support planning policies that sustain the key town centres. These in turn support sustainable communities.

Warwickshire County Council

Topic: 9.8

Strategic Objective

No comments received for this section

Policy CS.23 Retail Development and Town and Local Centres

1. The Council's 'town centre first' approach adopted in Policy CS 23 is recognised as being broadly consistent with the aims of adopted PPS4 Planning for Economic Development. However, it fails to recognise the specialist nature of certain retail uses which render them unsuitable for town centre locations. Garden centres and nurseries comprise one such retail use being distinct in character and having specific locational requirements which make them best suited to countryside sites. The Council's Comparison Goods Retail Study 2011 established that there will be a demand for 8,000 sq.m of floorspace for the sale of bulky comparison goods within the District before 2028. Such goods would include those commonly found at Garden Centre.

Garden Centre Group

2. The Convenience Goods Retail Study ignored the growth of internet shopping and home delivery - a significant growth area of shopping in the town in recent times.

Shipston-on-Stour Town Council

3. The council welcomes the change in the February 2012 document to support Scenario 2 and not encourage the development of out-of-town supermarkets in the Main Rural Centres.

Shipston-on-Stour Town Council

4. Policy should resist the closure of local and village shops.

Nigel Rock

5. There must be more creative thinking about the retail future of our market towns to understand the impact of changing patterns of consumption, merely adding more retail floor space will not ensure a vibrant town centre.

Councillor Jenny Fradgley

6. The Council needs to protect the town centre by making sure existing businesses and leisure facilities are not driven out by new developments.

Deborah Griffiths

7. Stratford-upon-Avon town centre has been totally ruined by the ever expanding Maybird Centre, Morrison's and no doubt be kicked-when-it's-down when Waitrose opens. A truly shocking performance under the last lot of town centre protection policies. This policy needs to set out the positive measures, as well as the controls, that will revitalise our town centre.

Reuben Bellamy

8. If 13,000 dwellings were to be provided to meet the full needs of the District the number of persons would substantially increase, thus resulting in the identified need for non-bulky and bulky comparison goods, along with convenience goods, being significantly understated. Draft Policy CS 23 is therefore in conflict with the NPPF in that it does not plan positively for meeting these needs.

Rego Southam Limited

9. The policy is restrictive and inflexible with any developments of over 1,000 square metres which are not located within Stratford-upon-Avon town centre having to first discount sites within and on the edge of that centre. This policy base does not reflect the fact that greater needs might exist in other centres including Southam which may mean that proposals of over 1,000 square metres may be entirely appropriate. Moreover, contrary to paragraph 23 of the NPPF, a range of suitable sites has not been allocated in the plan to meet the scale and type of retail development needed within the District's town centres. Limited site availability should not stop these needs from being met and our site at Southam may be entirely appropriate if the town centre cannot meet those needs.

Rego Southam Limited

10. We are astonished that in discussing retail prospects there was no mention of e-retailing and other key changes that are taking place in the retail sector, such as the Portas Report. Whilst we expect that Stratford will do better than comparable market towns there will be a need for major innovation to ensure the long-term future.

Stratford-upon-Avon Society

11. It is considered that as drafted the policy could have effects contrary to its stated aim, and would be in conflict with the Council's Draft Core Strategy Vision Statement. The general principles of a 'town centre first' to the location of retail development are not contested and continue to flow through the NPPF. However, Policy CS 23 seeks to go further than this, and in so doing departs from established practice and guidance, including that contained in both the NPPF and the Government's published guidance note on 'Planning for Town Centres' whose status is unaltered by the recent publication of NPPF.

St Francis Group

12. The use of the 1,000 sq m threshold to define 'large-scale retail development' appears to be an arbitrary one. It is based on the Comparison Goods Retail Study's conclusions with regard to non-food. Such a conclusion was not reached with regard to food retailing. The two types of retailing have very different characteristics and potential impacts. It would be inappropriate to apply thresholds for non-food retailing to the food retailing sector. In any event, Policy CS 23 does not use the figure of 1,000 sq m as a trigger point for the production of Retail Impact Assessments as was suggested by the

Comparison Goods Retail Study. Rather, the policy uses it as a definition of what constitutes 'large-scale retail development'. No such definition is supported by either of the Council's retail studies. It is not considered that the use of such a blanket approach is the appropriate benchmark to be applied. The Convenience Goods Retail Study concludes that new main food stores within the District should be sized between 2,000 sq m to 2,900 sq m gross. Below these figures, the evidence of the study is that stores perform only a top up convenience function. This would infer that for food retailing, the definition of 'large scale' should be amended to a minimum of 2,000 sq m.

St Francis Group

13. The application of the sequential approach or 'test' is inappropriately interpreted in sub section (a) of draft Policy CS 23. This seems a very perverse requirement which could have the consequence of encouraging unsustainable locations for development, and which could run counter to the vision of the Draft Core Strategy. The Council's own evidence base says that stores of less than 2,000 sq m gross will not serve a main food function. Therefore, if in a town like Bidford a store of approximately 1,500 sq m gross is being promoted to serve a local convenience need, then if there are no town centre sites available (and in a compact centre such as Bidford this is likely to be the case), the policy would firstly require the provision to be met at an edge of centre site in Stratford-upon-Avon if a site were available, before it is met locally. This has the potential result of local residents seeking to meet their top up shopping needs by travelling to Stratford-upon-Avon.

St Francis Group

14. The Society supports Policy CS 23, and particularly the shift away from the strategy based on Scenario 1 of the Retail Study which was based on the centres retaining an unrealistic share of local expenditure in the Main Rural Centres (MRCs). We would like to see more diversity in the MRCs but development on this scale could easily lead to less. The MRCs are fragile commercially and the development of a 1000 sq m retail unit on the edge of one of the MRCs could have a profound impact on the vitality and viability of its commercial centre. We consider that the size of units should be reduced to 500 sq m and the policy needs to indicate that retail development should be in the commercial core of the MRCs. To this end para 9.8.15 gives inadequate guidance and there is a need to define centres on a plan.

Midcounties Co-operative Society Ltd.

15. There is no justification for setting a 1,000 sq.m gross threshold in relation to Stratford-on-Avon and it is not supported by the evidence base. Retail development larger than this may be appropriate in the Main Rural Centres. In the case of Wellesbourne there is significant leakage of expenditure outside of the town. A foodstore greater than 1,000 sq m gross would be appropriate to compete effectively with other provision further afield, providing it complies with the sequential and impact tests. In this respect, Policy CS 23 requires a sequential and impact assessment to be undertaken for any retail proposal above 1,000 sq m gross that is not in, or on the edge of, Stratford-upon-Avon town centre. The 3rd paragraph of the policy is therefore not justified and is unnecessary. It should be deleted accordingly.

Wellesbourne Airfield

16. For planning applications, it is appropriate to consider the catchment area of the proposal and identify potential alternative sites within the catchment. It may therefore be inappropriate to assess sites in Stratford-upon-Avon town centre where a new retail proposal over 1,000 sq m gross is intended to serve a more localised catchment, such as the Main Rural Centres. Any reference to Stratford-upon-Avon town centre should therefore be removed from criteria (a).

Wellesbourne Airfield

17. The policy should define the hierarchy of Centres. If this is the same as the settlement hierarchy identified at paragraphs 9.1.5 to 9.1.8 then this should be made clear.

Wellesbourne Airfield

18. Sites which are accessible by sustainable transport choices would be the preferred locations for such uses with opportunities to improve public transport links and to foster smarter travel choices.

Highways Agency

19. The wording of the policy implies that retail development over 1,000 sq.m in the Main Rural Centres is not acceptable in principle. This is overly negative ahead of reviewing the respective merits of such proposals and it is at odds with national policy. All proposals should be assessed on their own merits and the impacts of the development balanced against the positive effects such development may bring. Stratford-upon-Avon cannot be the sole focus for increase retail development in the District, especially for convenience goods provision. This approach would inevitably force people to drive further distances than would otherwise be necessary. This is particularly true given that other policies seek to disperse housing across the district. For the Main Rural Centres and Large Service Villages to remain competitive and to maintain their position in the hierarchy, more significant convenience goods retail development (over 1,000 sq.m) may also be suitable in such locations.

Sainsbury's Supermarkets Ltd

20. The restriction on development outside Stratford-upon-Avon does not accord with national and local policy and should be reworded. The Retail Study (2008) recommends that the Main Rural Centres receive an increase in convenience goods floorspace sufficient to clawback trade lost to competing destinations and to maintain their roles as key centres in the district. We do not think the current wording of the policy sufficiently reflects this recommendation. Applications for convenience goods retail development in these locations should be considered on their own merits.

Sainsbury's Supermarkets Ltd

21. In relation to proposals for retail development in the Main Rural Centres and elsewhere in the District, we disagree with the policy requirement to demonstrate that there are no available sites in, or on the edge of Stratford-upon-Avon town centre. The sequential test should be undertaken on the basis of the catchment area for the proposal and Stratford will not always fall within the catchment areas for other settlements in the District.

Sainsbury's Supermarkets Ltd

22. "Should" is subjective and needs to be changed to, for example, "must". "Will be resisted unless it is demonstrated to be unviable" is a meaningless statement and needs to be rewritten to define this.

Earlswood & Forshaw Heath Residents Association

23. There is some concern that the policy is based on old data and the Neighbourhood Plan Town Centre Working Party would therefore welcome the opportunity to engage with the District Council over the next few months.

Stratford-upon-Avon Town Council

24. ASL strongly believes the approach to meeting identified retail needs is unsound and therefore object to Policy CS 23 which fails to recognise the recommendations of the Council's 2008 Retail Study. It also fails to plan positively for identified retail needs as set out in this evidence base, as required by the NPPF. Paragraph 23 in the NPPF confirms that local planning authorities should positively plan for retail development and that the lack of in centre and edge of centre sites should not be a reason not to meet identified local needs. The Council simply rely on spurious and unfounded views to omit previously recommended allocations such as SHIP.1 The Council has omitted the reference in the NPPF that "It is important that retail and leisure need are met in full and are not compromised by limited site availability."

Ainscough Strategic Land

25. ASL object to the blanket acceptance of retail development of less than 1,000 sq m outside of Stratford and within the Main Rural Centres, and the requirement for developments over 1,000 sq m to be located in or on the edge of Stratford. This fails to recognise the recommendations of the Council's 2008 Retail Study, which confirmed the Main Rural Centres of Shipston, Southam and Alcester would benefit from supermarkets of a larger scale than this.

Ainscough Strategic Land

26. Paragraph 27 of the NPPF confirms that there must be 'significant adverse impacts' to withhold planning permission. Paragraph 14 also reconfirms planning permission should be granted unless any adverse impacts would 'significantly and demonstrably' outweigh the benefits. This terminology must be used if the Core Strategy is to be in accordance with the NPPF and to be found sound.

Ainscough Strategic Land

Topic: 9.8 Sustainability Appraisal Implications

1. There is confusion in this section as to whether the strategy means the Main Rural Centres (Market Towns) or Local Service Villages - like Harbury. Paragraph 9.8.2 refers to both "local rural centres" and "main rural centres".

Harbury Society

2. Clause 9.8.2 is confusing as drafted.

Stratford-upon-Avon Town Council

Topic: 9.8 Explanation

1. Strongly in favour of a supermarket in Shipston for the following reasons:

- would spend more time in Shipston rather than going to other towns.
- local people have been totally overlooked in the development of Shipston. We now need good value shopping locally which we do not.
- we desperately need a petrol station, with no competition petrol is more expensive than in other towns.
- we have seen no infrastructure improvements in Shipston despite a housing explosion.
- Shipston is simply not a practical location for grocery shopping.

Nick Roberts

2. There is a need to replace Somerfields with a medium-size town centre supermarket for residents who walk into town to do their shopping. It is not the case that "there is no apparent requirement to provide further convenience goods floorspace in Stratford-upon-Avon."

Peter & M.J. Donaghue

Jeannie Farr

Dr D. Calderon

Mrs E. Calderon

John Armitage

R.K. Fisher

Peter Condron

Mr & Mrs P Hill

Miss F. Longmore

R. Burman

Mr & Mrs Fraser and Linda Edwards

Mr & Mrs D.J. Cholerton
Susan Marks
Joan Graham
Gordon Harrington
Bill Tucker
Stephen Parker
Mrs M. Childs
B.E.H. Whitehouse
Mr B. Childs
S.J. Wiseman
Mr and Mrs R.E. Cain
C.M. West
Mrs P. West
Mr D.C.M. Young
Patricia Young
Mrs B. Wood
P. Wiltsliel
Stefan Law
Alan Spreadbury
M.B. Lewis
Mrs Valerie Lageard
B.W. & Y.K. Bates
Mrs Mary Boddington
Alan Boddington
Mr and Mrs J.S. Orchard
S. Watts
Mr Peter Pearce
Monica M. Beckett
G.K. Allen
Andrew Davies
J. Steele Nicholls
Peter Dingley
Mrs Helen Petitjean
Andrew Waterhouse
Mrs S.J. Sreeves
Julia Shearing
Mr E.R. Green
John D. Jones
Peter Taylor
Mrs J. Wood
Anna Candy
Mrs D. Geldard
Bernard R. Pumfrey
S. Venus
Mrs Diane Rogers
R.J. Beresford
Mr and Mrs J. Farrar
Mr Clive Wootton
Nicholas Smith
Peter J. Hudson
Mrs C C Scott
Mrs S.M. Cragoe-Jones
R.D. Heppell

**Mrs J. Calvert
Mrs A. Murray Watts
Harry Nicholls
Anna Cooke
S.M. & P.V. Wall
Mr D. & Mrs J.H. Smart
John Priest
Mrs Margaret Ann Smith
Mr Richard L. Smith
John Oldfield
Mrs G.M. Reid
Stratford Voice
Maureen & John Hill
Mrs C.A. Cooper
Mr Derrick Burford
Mrs G Pawley
J. Robertson
Paul Kershaw
P.F. Wyatt
T.F.R. Crossley
Mr B.G. Harrison
F. Hodgson
Mr & Mrs D.J. Hammond
Mr & Mrs R. Stephenson
Patricia Jebb
B. Escott
Mr Clifford Rose
Norman and Freda Kitcher
Mrs Vera Hawkins
S.J. Warrilow
Mr & Mrs P.F & M.M. Williams
A.M. Tudor
Mrs D. Bonham
Mrs D.E. Bonham
D. Daniel
Joy Watson
Anastasia & Peter Hunter
Mr J.M. and Mrs J.A. Kent
B. Lomas
Mr & Mrs D.J. Chamberlain
B. Stewart
Mr J.M. Hind
Mrs Barbara Spencer
Michael Crutchley
A. McIntyre
Mr & Mrs G. & W. Mazey
Michael Stockhill
James Pullin
Sylvia Leighton
Peter Landsman
Steve Taylor
George W. Sykes
A.L.S. Orr**

B. Rossington
Mrs Mary Austin
H. Carragher
A Chaplin
A.J. Whiting
W.E. & B.O. Cave
G.I. Chamberlain
J.M. Stocks
Dai Gistiws
Tony & Sue Holmes
Ann C. Curtis
J.C. Edwards-Broome
Mrs M.S. Wade
Caroline Stewart
W. Macdonal
H.R. Beach
Mr R. Dawney
Malcolm J. Wilkes
Dave & Mo Sargent
R. Dyer
R.D. & R.J. Langman
Mary Monteith
Mrs E.J. Allard
Brian P. Edwards
Don Hanson
Mary Jeffery
Carl Conn
Wyndham Perring
John Miller
B. Littlewood
D.E. Swinbourne
Mr & Mrs R.C. & J.D. Hawkins
W. Alan Head
D. Pearson
Michael & Sheila Mills
Alan & Sharon Morris
Mary & D.A.R. Morgan
E.A. Foster
Miss N Whittard
Mrs Elisabeth Brace
Mrs D. Levets
Edwina Nicholls
R.Green
A.L & J.K.Page
Mr Frank Woodhall
Caroline Abercrombie
Mr C. White
Roger and Susan Blackwell
P.R. Gilmore
Mr D.J. Ockendon
Syvia J. Cooper
Ken & Mary Ryman
Pat & Michael Bird

George & Bryony Disher
Penny Gildea
Kevin Gildea
Mrs B.A. Sylvester
Freda Douthwaite
Fiona Mackie
B.H. Richardson
Mrs C.M. Richardson
E.W. Head
Graeme Ramsay
Miss E M B Sellar
David Goodman

3. Compared with many towns, Stratford is well placed to deal with the internet/out of town shopping trends. The best way to ensure the success of the town centre is to preserve the features of the town that attract visitors and bring improvements, like pedestrianisation and improved rail services, that help us compete with other tourist destinations.

Stratford Voice

4. In pursuing a 'town centre first' approach there should be greater support (both financial and promotion) for traditional town centre independent shops and no further encroachment of cafes, bistros and takeaways, which are already over-subscribed.

Stratford Voice

5. South Warwickshire Clinical Commissioning Group supports the points covering integration of community facilities, safeguarding against the unnecessary loss of valued facilities and ensuring that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community.

NHS Warwickshire

6. South Warwickshire Clinical Commissioning Group supports the proposed development of appropriately sized food stores within the centre of rural market towns. This will support the local economy through increased competition and in turn the cost of healthy food options and provide increased access to healthy food options to local residents.

NHS Warwickshire

7. In undertaking the Convenience Goods Retail Study, the capacity of additional convenience goods floorspace in Wellesbourne and other Main Rural Centres was not assessed, neither was the potential impact of a new foodstore in the towns tested. Any planning application will need to be assessed on its merits, including its compliance with the retail impact test. In this respect, Policy CS 23 required an impact assessment to be undertaken for applications over 1,000 sq m gross. This provides the LPA with sufficient control in assessing the potential impact of future retail proposals. The comments in paragraph 9.8.17 are not therefore justified against the evidence base, are unnecessary and should be deleted.

Wellesbourne Airfield

8. Bulky comparison goods should be sold at an out of centre location with good car parking and transport links to town centre. The existing area opposite the Maybird Centre seems perfect. If people could park at the Maybird and/or more cohesive bulky goods retail park on the other side of Birmingham Road and take a bus to town, that might be the best of all possible worlds.

Mappleborough Green Parish Council
Councillor Justin Kerridge

9. ASL object to the policy explanation at paragraphs 9.8.16 and 9.8.17 regarding the recommendations of the Council's 2008 Retail Study. Whilst the Study did present two scenarios, the final recommendations of the Study clearly advocate Scenario 1 which focuses on increasing the market shares of the three main rural market towns.

Ainscough Strategic Land

Topic: 9.8 Development Management Considerations

No comments received for this section

Topic: 9.8 Delivery and Monitoring

No comments received for this section

Consultation Question: Q140

1. More protection needed and positive measures to get Stratford-upon-Avon town centre revitalised. There needs to be a specific policy stopping any more growth of the Maybird Centre and the new Waitrose.

Reuben Bellamy

2. The community must have the right to call for a Retail Impact Statement on proposals less than 1000 sq m which the policy states would be 'acceptable in principle'. A retail unit of 999 sq.m could be just as damaging as one of 1001 sq.m.

Kineton Parish Council

3. The policy does not provide sufficient protection to the vitality and viability of local centres. Perversely, it could result in local centres being harmed by locating new retail development in Stratford-upon-Avon. It should be amended to reflect an appropriate definition of 'large scale development', and be amended to remove the blanket use of Stratford-upon-Avon as a default sequential assessment location.

St Francis Group

4. There should be greater support for High Streets and reflect the individuality of the town or village. A policy of a town centre first approach should be sent to developers and skilfully worded in the Core Strategy. To try and ensure the survival of local shopping centres no retail building or the conversion of a building to retail should be outside the envelope of the village or town boundary. For some applications a proven need test should apply, this is pertinent for take-aways in villages as well as large food stores on the edge of towns.

Councillor Hazel Wright

5. The lack of accessible transport links downgrades the viability of town centres.

Mrs J and Mr M Buckley, Earlswood & Forshaw Heath Residents Association

6. The problems faced by retailers in Stratford-upon-Avon town centre seem to have been recognised. It also acknowledges the need to encourage retail investment. No mention is made of the restraints put on potential shoppers by high car parking charges or the possibility to change car parks to pay-on-exit.

Stratford-upon-Avon Town Council

7. There should be a specific policy statement stating that any proposed retail development outside the town centre which would have a negative impact on town centre retail would not be permitted.

Stratford-upon-Avon Town Council

Consultation Question: Q141

1. The definition of large scale development being over 1,000 sq m is not supported. There needs to be a differentiation between food and non-food uses. The Council's own evidence base suggests that the figure for food retailing should be at least 2,000 sq m gross.

St Francis Group

2. This seems a rather open ended statement as no cap has been put on the number of 1,000 square metre developments that might be permissible - could be open to abuse by planning by stealth.

Stratford-upon-Avon Town Council

Consultation Question: Q142

1. I think the boundary is too wide. It should not include Grove Road, Arden Street, Rother Market, train station, hospital, Bridgeway, leisure centre, hotel, etc. Crossing or interacting with the gyratory system, Guild Street, Grove Road, Arden Street, etc. is not pleasant and these major transport routes must surely be the outermost possible limits to the town centre.

Mappleborough Green Parish Council, Councillor Justin Kerridge

2. We support the Council's intention to extend the town centre boundary of Stratford-upon-Avon to include the Bridgeway site. We agree with the rationale that the town's expanding commercial core and increase in significance warrants the inclusion of this area. We note that the land included within the extended town centre boundary is presently within an area of restraint. To make the site attractive to private sector investors, the area of restraint must not affect the development site and the Council will need to adopt a degree of flexibility in respect of the development proposals to ensure they are viable.

Sainsbury's Supermarkets Ltd

3. There is a strong argument to suggest that the town centre boundary should be extended to include the Maybird Centre (and possibly Western Road) to create an enlarged town centre. This edge of town development arose in response to the lack of suitable available floor space within the town centre and contains a significant amount of comparison and convenience goods (traditionally found in town centres) as opposed to bulky goods. This would underpin the necessity to improve the connectivity between the two, currently disjointed retail components (pedestrian links, social integration, etc), and encourage further retail/leisure development between the two areas. Another view is that the town centre does not extend beyond the bottom of Bridge Street or the western end of Greenhill Street. Redefining the boundary would not change public perceptions or habits, and crossing busy roads (Arden Street/Grove Road and the gyratory) is a disincentive to moving outside the perceived central area.

Stratford-upon-Avon Town Council

Consultation Question: Q143

1. They are appropriate but it should perhaps be extended to include the whole of Henley Street and The Minories. It has also been suggested that some of the non-eatery premises will be upset not to be included.

Stratford-upon-Avon Town Council

2. Should the line that delineates Sheep Street (on Map 2) be on both sides of the street?

Stratford-upon-Avon Town Council

Consultation Question: Q144

1. The Police and NHS are concerned about the growth in the number of takeaways, eg. Studley.

Stratford Local Strategic Partnership

2. Policy should also look at rural shops and address the potential for farm shops selling a range of their own and local goods which are important for the agricultural business, tourism and, in many cases, the local community.

Country Land and Business Association

3. The policy may need to consider the means by which local services (including retailing) can be both promoted and protected in the Local Service Villages - whether through the provision of housing or through the provision of new Localism Act (dealing with Community Assets).

Noralle Traditional Country Homes

4. We need to promote small individual independent shopping areas.

Stratford Liberal Democrat Group

5. Homes above shops would encourage population of shopping areas providing viability and vitality at night.

Councillor Hazel Wright

6. Specific definitions - we do not know what the definition of a "local centre" is as it is not specified in the document.

Earlswood & Forshaw Heath Residents Association

7. Town centre retail would be enhanced by:

- the introduction of a robust car parking policy aimed to support the retail element whilst discouraging long term parking. Parking is one of the most negatively perceived aspects of the town centre.
- discouraging temporary planning permissions for competing uses (such as markets) being located on the primary shopping streets as well as the relocation of the two fairs from these streets.

Stratford-upon-Avon Town Council

8. The clause relating to the predominant activity of Class A1 on primary shopping streets could become a problem if it were capable of being applied to a particular street (eg. Sheep Street which has a significant amount of A3 restaurants and cafes). The particularly strong weighting of A3 in Sheep Street works well. Further A3 use could improve the street's ambience and desirability for both tenants and consumers and it could easily be pedestrianised.

Stratford-upon-Avon Town Council

Consultation Question: Q145

1. Is there evidence to determine there is the capacity within this area for such a large development to ensure the conservation of heritage assets in accordance with Policy CS 12?

English Heritage

2. The NPPF will now be material to the evidence base. The PPS4 Practice Guidance 'Planning for Town Centres' has not been cancelled and remains relevant guidance in the context of this policy. Guidance contained at paras 6.21-6.26 therein is pertinent to the issue of identifying Stratford-upon-Avon as a default search area for a sequential assessment for developments in excess of 1,000 sq m.

St Francis Group

Consultation Question: Q146

1. Carrying out an annual health check of the town based on qualitative and quantitative analysis designed to assess the retail and leisure needs of the town (analyse current and future retail capacity split between convenience and bulky goods). This could be used to identify opportunities for policy development.

Stratford-upon-Avon Town Council

2. Other relevant parties (eg. Stratforward BID, Stratford Vision, Stratford Society and Stratford Voice) should be consulted in relation to monitoring delivery of the policy.

Stratford-upon-Avon Town Council

Map 2: Stratford-upon-Avon Town Centre

No comments received for this map

Draft Core Strategy 2012 - Summary of Representations

9.9 Tourism Development

1. The whole district should be catered for not just Stratford or the market towns.

Bidford-on-Avon Parish Council

Topic: 9.9 Strategic Objective

1. Paragraph 9.9.1 incorrectly refers to Strategic Objective 5. This should rather be Strategic Objective 4.

Jaguar Land Rover Ltd

Policy CS.24 Tourism Development

1. Clause (b) is too weak. Tourism developments around Stratford-upon-Avon should only be permitted where they contribute to the special character of the town or the peaceful enjoyment of the countryside.

Peter & M J Donaghue

Jeannie Farr

Dr D Kalderon

Mrs E Kalderon

John Armitage

R K Fisher

Peter Condron

Mr & Mrs P Hill

Miss F Longmore

R Burman

Mr & Mrs F Edwards

Mr & Mrs D J Cholerton

Susan Marks

Joan Graham

Gordon Harrington

Bill Tucker

Stephen Parker

Mrs M Childs

B E H Whitehouse

Mr B Childs

S J Wiseman

Mr & Mrs R E Cain

C.M. West

Mrs P West

Patricia Young

Mrs B Wood

P Wiltsliel

Stefan Law

Mrs M G Tattersall

Alan Spreadbury

M B Lewis

Mrs Valerie Lageard

**B W & Y K Bates
Mrs Mary Boddington
Alan Boddington
S Watts
Mr Peter Pearce
Monica M Beckett
G K Allen
Andrew Davies
J Steele Nicholls
Peter Dingley
M J Bunce
Mrs Helen Petitjean
Andrew Waterhouse
Mrs S J Sreeves
Julia Shearing
Mr E R Green
John D Jones
Peter Taylor
Mrs J Wood
Anna Candy
Mrs D Geldard
John Harris
Bernard R Pumfrey
S Venus
Mrs Diane Rogers
R J Beresford
Mr & Mrs J Farrar
Mr Clive Wootton
Nicholas Smith
Peter J Hudson
Mrs C C Scott
Mrs S M Cragoe-Jones
R.D. Heppell
Mrs J Calvert
Mrs A Murray Watts
Anne Cooke
SM & PV Wall
Mr D & Mrs JH Smart
John Priest
Mrs Margaret Ann Smith
Mr Richard L Smith
Mrs G M Reid
Maureen & John Hill
Mrs C A Cooper
Mr Derrick Burford
Mrs G Pawley
J Robertson
Paul Kershaw
P F Wyatt
T F R Crossley
Mr B G Harrison
F Hodgson
Mr & Mrs D J Hammond**

Patricia Jebb
B Escott
Mr Clifford Rose
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S J Warrilow
Mr & Mrs P F & M M Williams
A M Tudor
Mrs D Bouham
Mrs D E Bonham
D Daniel
Joy Watson
Anastasia & Peter Hunter
Mr J M and Mrs J A Kent
B Lomas
Mr & Mrs D J Chamberlain
B Stewart
Mr J M Hind
Mrs Barbara Spencer
Mr & Mrs G & W Mazey
Michael Stockhill
James Pullin
Sylvia Leighton
David Gooman
George W Sykes
A L S Orr
B Rossington
Mrs Mary Austin
H Carragher
A Chaplin
A J Whiting
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H R Beach
Mr R Dawney
Malcolm J Wilkes
Dave & Mo Sargent
R Dyer
R D & R J Langman
Mary Monteith
Mrs E J Allard
Brian P Edwards
Don Hanson
Mary Jeffery
Carl Conn
Wyndham Perring

B Littlewood
D E Swinbourne
Mr & Mrs R C & J D Hawkins
W. Alan Head
D Pearson
Michael & Sheila Mills
Mary & DAR Morgan
E A Foster
Miss N Whittard
Mrs E A Brace
Mrs D Leuets
Edwina Nicholls
R Green
A L & J K Page
Mr Frank Woodhall
Caroline Abercrombie
Mr C White
Roger & Susan Blackwell
Mr & Mrs D A & R E Atkinson
Mrs E J Hart
P R Gilmore
Mr D J Ockendon
Sylvia J Cooper
Pat & Michael Bird
Eric Ward
George & Bryony Disher
Penny Gildea
Barbara & Peter Dodd
Kevin Gildea
Mrs B A Sylvester
Freda Douthwaite
Fiona Mackie
B H Richardson
Mrs C M Richardson
E W Head
Miss E M B Sellar

2. No ferris wheel thank you. The building of 5 screen cinema will bring enough extra town centre problems.

Mr DCM Young

3. Don't agree that CS 24 is too weak.

Mr & Mrs J S Orchard, John Oldfield, Mrs Vera E Hawkins, Michael Crutchley, Peter Landsman, Graeme Ramsay

4. Recognise the benefits of tourism and the need for new attractions, but need strict conditions for large scale visitor attractions close to Stratford-upon-Avon. Tourism needs to be appropriate for the special character of 'Shakespeare's town. Only approve if they enhance the town. Recognise the role hotel beds play in allowing people to stay in or near town. For example Premier Inn and Travelodge hotels have a positive impact through the marketing of Stratford. The Core Strategy should provide policies which will ensure that suitable accommodation is available to meet targets for increasing overnight stays, through a mix of budget, quality and boutique hotels, and B&Bs.

Stratford Voice

5. Spread tourism across the District.

Wootton Wawen Parish Council

6. Continue to support the tourist industry - preserve the heritage assets such as the area around Anne Hathaway's Cottage.

Elizabeth Lang-Sadler

7. Safeguard historic sites and strengthen the protection of areas of outstanding natural beauty. Protect the unique nature of the district.

David & Beverlie White

8. Support CS 24, but need to encourage the use of the Oxford Canal as a tourism and economic resource. The sensitive development of marinas and related canal development could broaden the tourist offer, providing jobs and supporting local services.

The Althorp Estate

9. Use the Avon and associated canals to broaden the range of tourism. Avon Navigation Trust (ANT) will offer its expertise should Council have any plans for marina development along the Avon. Any new facilities must not compromise the safe operation of the locks and must have access to transport links and shops. Council needs to work with the Canal and River Trust and ourselves to support heritage and tourism along the canal corridor.

Inland Waterways Association (Warwickshire Branch)

10. Shipston is well located to be a tourist base, but it has limited infrastructure and hotel and bed and breakfast accommodation. Past experience has shown that marketing the town is problematic. Shipston is unlikely to draw hordes of tourists attracted to the Cotswolds or Shakespeare's birthplace, but people are drawn in by walking tours, cricket tours, bowls tournaments and followers of the Cheltenham Festival. Shipston does have potential tourist opportunities.

Shipston-on-Stour Town Council

11. Consider the Stratford Railway Station and Toll House as tourist destinations.

Ian Fradgley

12. Encourage new attractions and disperse them throughout the District to support the local economy and for the local community to enjoy the benefits.

The Stratford and Warwick Waterway Trust Ltd

13. Support small scale development to encourage visitors to the area that benefit the local community.

Bishops Itchington Parish Council

14. Support Policy CS 24 provided the transport infrastructure has capacity.

Councillor S H Jackson

15. Support accessible tourist sites where there are sustainable transport choices.

Highways Agency

16. The policy should take into account the needs of the tourist industry and the work of the Tourism Strategy Group.

Councillor Hazel Wright

17. Support the policy. Inland waterways can make a significant contribution to the visitor economy and are important tourist visitor destinations and attractions. Waterways also provide links to key markets and other visitor destinations. Other benefits of waterways are the provision of infrastructure that the leisure marine business depends on. Waterways support regeneration and recreation.

18. Criteria (a) - Also acknowledge constraints on inland waterways. Waterways have a fixed alignment and this dictates the essential infrastructure and facilities such as marinas and moorings. Can't always put these facilities in urban areas - site development constraints.

19. Agree that the district's canal network can play a role in broadening the tourism offer, providing jobs and supporting local services.

British Waterways (East and West Midlands)

20. Policy CS 24 change the words 'should' and 'will need' to 'must'. The words 'may be justified' are non specific and should be deleted. The words 'appropriate control' needs to be given a definition, as does 'particular qualities'.

Earlwood & Forshaw Heath Residents' Association

21. Broadly support CS 24. Large scale schemes for visitors should be located close to Stratford-upon-Avon. Not sure if the criteria would support large scale schemes beyond Stratford-upon-Avon and main rural centres, but close to urban areas. Large scale schemes should not be subjected to the same criteria for assessing proposals on sites elsewhere in the District.

22. The Core Strategy should encourage tourism facilities that are closely related to the main urban areas. Tourism acts as a catalyst for economic growth and employment.

23. CS24 - include reference to facilities being located close to Stratford-upon-Avon. Place large scale conference facilities on an equal footing with large scale schemes for visitor attractions or overnight accommodation.

The Bird Group of Companies

Topic: 9.9 Sustainability Appraisal Implications

1. Paragraph 9.9.1 refers to Strategic Objective 5. This in fact should be Strategic Objective 4.
Jaguar Land Rover Ltd

Topic: 9.9 Explanation

1. Stratford-on-Avon District Council needs to take account of our proposals that will be a significant tourist attraction.

2. In 1995 the Upper Avon Navigation Trust Ltd presented a case for the protection of the River Avon navigation to Warwick. The Inspector at the time recommended that it should be considered on its merits. This was subsequently incorporated into the new plan.

3. Wide range of tourist attractions in the countryside, including country houses, parks and the canal network. These attractions play an important role in broadening tourism and providing jobs and supporting local services.

The Stratford and Warwick Waterway Trust Ltd

4. Smaller scale tourist activity outside Stratford-upon-Avon provides opportunities for cycling and walking while incorporating them into particular heritage sites. This has a wide range of health benefits.

NHS Warwickshire

5. The implications of the innovative nature of tourism and the need for locational flexibility need to be better explained.

Follett Property holdings Ltd

Topic: 9.9 Development Management Considerations

1. Only support new moorings and marinas where there is sufficient access and other facilities such as transport links or shops, and where they won't compromise the operation of the waterways.

The Stratford and Warwick Waterway Trust Ltd

Topic: 9.9 Delivery and Monitoring

No comments received for this section

Consultation Question: Q147

1. Laudable ambition. Encourage packages that ensure longer stays in the District. The tourism centre will still be Stratford-upon-Avon. Competing on a world stage means that a world class approach needs to be maintained. This won't be achieved by spreading it throughout the District.

Bearley Parish Council

2. Support spreading tourism activity across the district as the benefits are employment creation etc. Rural areas around Stratford-upon-Avon have significant tourism opportunities that won't compete with Stratford-upon-Avon itself. Concern that CS 24 should not specify that tourist facilities should only be located close to public transport. Most visits to rural areas are done by car.

Country Land and Business Association

3. Support spreading tourism across the District to assist local business and the local economy. Specific support for large scale conference facilities.

Councillor S Thirlwell

4. Agree that tourism should be spread across the District instead of focusing on Stratford-upon-Avon. Direct this towards existing developed sites that support visitor attractions.

Jaguar Land Rover Ltd

5. Happy to support tourism being promoted at existing tourist destinations outside Stratford-upon-Avon. Don't agree with the tourism obsession - mainly lowly paid employment.

Harbury Society

6. Yes, provided particular features that justify the designations are conserved.

Mrs J and Mr M Buckley, Earlswood & Forshaw Heath Residents' Association

7. Agree, but the locational criteria of large scale schemes for visitor attractions or overnight accommodation are too prescriptive. Large rural brownfield sites have a role to play in this tourism strategy.

Follett Property holdings Ltd

Consultation Question: Q148

1. Large scale tourist developments in rural areas need to be carefully assessed. There are however tourism opportunities in the countryside and the policy should support this by amending criteria (a) recognising that it is appropriate for visitor attractions on and adjacent to developed sites in rural areas and (c) take account of the wider benefits of development at a national and regional level.

Jaguar Land Rover Ltd

2. Not sure about the value of supporting new large scale sites in rural areas or conference facilities.

Harbury Society

3. Differing views on this ranging from keeping Stratford the way it is to support enhancing tourist and conference facilities.

Stratford-upon-Avon Town Council

4. Approach is too prescriptive. Can't have a complete list of criteria for assessing proposals. PPS4 acknowledged that extension to visitor accommodation in rural areas can be permitted. Too much emphasis is being placed on access to public transport. Many tourism attractions are in the countryside in areas that do not have good public transport. Define what is large scale and small scale.

Follett Property holdings Ltd

Consultation Question: Q149

1. Conference and exhibition facilities near centres of tourism do well.

Bearley Parish Council

2. Use an existing building.

Wootton Wawen Parish Council

3. Not sure about large scale sites in rural areas and more conference facilities.

Harbury Society

4. Acknowledge that large conference facilities will be encouraged to support business tourism - consistent with the District's tourism strategy. One of the objectives of the Strategy is to support business tourism by taking advantage of existing networks and working partnerships.

The Bird Group of Companies

5. Support the policy but it needs to be more flexible and better explained.

Follett Property holdings Ltd

Consultation Question: Q150

1. Keep existing attractions and retail units viable, but at the same time protect the district's countryside. Create certainty for residents.

Mrs J and Mr M Buckley, Earlswood & Forshaw Heath Residents' Association

2. Enhance cross referencing between Section 9.9 (Tourism Development) and Section 8.4 (Green Infrastructure). Section 9.9 focuses too much on economic and built form implications of economic development. Outline the benefits of the natural environment and the role it can play in linking tourist attractions throughout the District.

Natural England

Consultation Question: Q151

1. More contact is required with key stakeholders such as the hotel groups.

Follett Property Holdings Ltd

Consultation Question: Q152

1. Large scale schemes should be delineated into key performance indicators.

Bearley Parish Council

2. Collate baseline data for tourism in rural areas and how it contributes to tourism delivery in the district. This will help demonstrate the impact of a policy.

Country Land and Business Association

Section 10 – Area Policy Profiles

10.1 Stratford-upon-Avon Area Policy Profile

1. It is assumed the Area Profiles have been informed by the gathering of evidence that considers the characteristics and qualitative condition of the historic environment in accordance with national planning policy.

English Heritage (West Midlands)

2. Some of Section 10 comes under the scope of the Neighbourhood Plan rather than the Core Strategy. This should be clarified by the NPPF. We therefore suggest that Stratford District Council and the Neighbourhood Plan team meet to discuss our respective scopes.

Stratford-upon-Avon Town Council

Topic: 10.1 Stratford-upon-Avon Context

1. Paragraph 10.1.5 should embrace the town as a whole, so that its market town scale and attractive landscape setting are retained.

Stratford-upon-Avon Society

Topic: 10.1 Stratford-upon-Avon Policy Principles

No comments received for this section

Topic: 10.1 Stratford-upon-Avon Environmental Principle

1. Particular priority should be given to preserving heritage assets (such as Anne Hathaway's Cottage).

Howard & Helen Grieves, Ms Anne Hicks, Elizabeth Hicks, Mrs Joyce Johnson, Lisa Cartwright, Mr D Townsend

2. A number of heritage related bullet points might be combined.

You may wish to rephrase the 10th bullet point to read 'Improve the ways in which the town's historic environment and cultural heritage is conserved, interpreted and presented.

An additional principle could also be employed 'To enhance the town's historic townscape and improve its public realm.

English Heritage (West Midlands)

Topic: 10.1 Stratford-upon-Avon Social Principle

1. Imagine that most of the general public don't see the need for a replacement leisure centre if the present one can be improved and any money used for a better purpose.

Mapleborough Green Parish Council, Councillor Justin Kerridge

Topic: 10.1 Stratford-upon-Avon Economic Principle

1. We need to keep shoppers in the town so that small individual shops can prosper. Empty shops are a great disappointment to visitors.

Joan Graham

2. At the current time with a large amount of empty space we see no need for further industrial (B1 use) space within the town or adjacent.

Stratford Liberal Democrat Group

3. We are not convinced that at the current time there is any significant demand for further retail in the town centre in an historic market town.

Stratford Liberal Democrat Group

4. We need an up-market supermarket.

James Pullin

5. Do not think one more medium supermarket is required in the centre of the town.

Sylvia J Cooper

6. Stratford upon Avon town centre has been totally ruined by the ever expanding Maybird Centre, Morrisons, and no doubt will be kicked when it's down when Waitrose opens.

Reuben Bellamy

7. The canal can contribute significantly towards the vitality and viability of the town. Waterways contribute to regional and local economies through providing tourist/visitor attractions and supporting SMEs and jobs within the marine sector in manufacturing, tourism and services and can act as a focus for urban renaissance, regeneration and diversification.

British Waterways

8. The town centre would be enhanced by co-ordinated planning of development along the Birmingham Road so that there is a better tie-up between the town centre and the Maybird Centre.

Stratford-upon-Avon Town Council

9. It is difficult to see why a further 5 to 10 hectares of land for B1 uses is needed, bearing in mind the large amount of empty space at the current time. If any site is promoted for this use in the town it is important that phasing is employed to ensure no such development comes about until at least a significant part of the current empty space is used.

Councillor Peter Moore

10. I am highly sceptical of the need for further shopping space in the town, of either bulky or non bulky comparison goods. The economic climate together with increasing use of internet selling suggests that extra space will not be needed for years to come, if at all. Thus if further space is put aside for this purpose phasing becomes important to ensure that new development does not merely create more vacancies in the existing retail stock, and that further development only follows proven need.

Councillor Peter Moore

11. In secondary areas it should be made easier for conversion of retail premises to other uses, including residential.

Councillor Peter Moore

Topic: 10.1 Stratford-upon-Avon Transport Principle

1. Increasing the number of houses in the Stratford area is going to exacerbate the problem of too many vehicles trying to access the town.

Brain Darnley

2. I believe that pedestrianisation of the main town centre streets would be an enormous improvement.

R K Fisher

3. Traffic is a disgrace. Loading/unloading in the town centre should be 19.00-07.00.

Peter Condron

4. District and County Councils need as a priority to deal with traffic by removal of vehicles from historic core and pedestrianisation, protection of residential streets from becoming car parks and a rabbit run for traffic, move bus stops out of Bridge Street.

Stephen Parker

5. The proposed Parkway Station is a waste of money. It would be better spent on existing railway station, reclaiming land next to station from Redrow and developing a bus station there.

S J Wiseman

6. Until the centre of Stratford is pedestrianised, little improvements in other ways will be effective. Retail deliveries should be at certain times and, if possible, coaches not permitted through the town centre. Foreign countries have succeeded in towns far larger than Stratford. Pedestrianisation is probably the most important action.

Noel Shaw

7. There must be a proper holistic approach to cycling around the town rather than an 'enhancement wherever possible'.

Councillor Jenny Fradgley

8. Stratford Railway Station must be protected and when up grades are available they should be sympathetic to its history. The DDA compliant footbridge must be carefully considered re its impact on the fabric and appearance of the station.

Councillor Jenny Fradgley

9. Clopton Bridge needs a weight restriction, consideration to HGV routes and proper consideration must be given to a complete 'ring road' for Stratford.

Councillor Jenny Fradgley

10. The issue of bus layover at Bridgefoot must be resolved with an appropriate bus station.

Councillor Jenny Fradgley

11. No extra, out of town Parkway. I can see new station will draw from the old. Preference is for opening a new route to London.

B Escott

12. Stratford urgently needs a bus station. It is unbelievable that tourists and residents have to stand around in busy streets waiting for buses and it is difficult to find out when and where your buses go from.

E A Foster

13. Build a proper bypass around the town. Prohibit heavy lorries from using Clopton Bridge. Not only do the lorries add to the congestion, but they tear up the road surface and pollute an area where there are lots of tourists. The lorries should be diverted over the Seven Meadows bridge, or via Banbury Road, Ettington and Wellesbourne.

Mr D J Ockendon

14. Historic Spine Project, which includes a form of shared space to be brought in, will play a key role in regenerating the town centre.

Stratford-upon-Avon Society

15. Land has been set aside on both sides of the railway in Timothy's Bridge Road and the housing estate off Birmingham Road to create a pedestrian /cycle link. This should remain in the plan.

Councillor Peter Moore

16. In line with government recommendations in the NPPF parking facilities and charges should be used to encourage town centre use and shopping.

Councillor Peter Moore

17. Cannot see any call for a Parkway Station or for a Park & Ride south of the town.

Pat & Michael Bird

Topic: 10.1 Stratford-upon-Avon Future Development Strategy

1. Stratford will need to expand and continue to provide affordable houses with good facilities and transport links. However, are all available efforts being made to utilise empty properties/brownfield sites? The strategy of distributing development across the area and limiting the size will help to maintain Stratford's unique appearance and tourist appeal. Green belt and buildings of historic importance must be protected. Traffic flow, infrastructure, flood risk must be considered.

Rita Kubiak

2. Stratford has a unique opportunity in the Timothy's Bridge Road area to improve employment, grow business and reduce congestion and noise problems for residents. Businesses in the area cannot expand due to space limitation. Moreover site access for big lorries is poor and creates noise and unnecessary pollution for residents. Suggest sell the site for residential development and use the money to purchase and develop a new site by the park and ride on the A46.

Charles Goody

3. It is essential to keep house building in Stratford to the minimum, without excessively large developments (as proposed at Shottery) which are unnecessary. These will destroy the special character of the area, cause further traffic congestion, over stretch local resources and damage tourism vital to Stratford's economy.

Gordon Harrington

4. For any future large scale plans to succeed it is vital that the road/traffic problems are addressed.

Mr B Childs

5. Why aren't we using more brown sites and derelict buildings around Stratford? Development companies are making profits so use to clear sites. We don not need any more of our countryside being taken up. We are a market town, not Birmingham and like.

Mr & Mrs R E Cain

6. My ideal vision for Stratford in the future would be a town that reflects a tasteful and contemporary showcase of its history.

Stefan Law

7. With the low unemployment rate and the need for individuals working unsocial hours in the tourism and service industries then the need is for substantial increase in dwellings in Stratford-upon-Avon.

Bearley Parish Council

8. Stratford is a beautiful historic town. A large part of its appeal is its relatively compact size and beautiful rural surroundings. I urge you to keep these factors in mind when planning future developments and wherever possible look to develop brown field sites and disused buildings near the centre of town to increase the number of homes.

Nick Poulton

9. The ongoing disastrous planning policies have destroyed most entrances to Stratford. Any further over-development will totally ruin the historic beauty of Stratford and will ultimately destroy the tourism.

Julia Shearing

10.

- We disagree with 10.1.27 and 10.1.28.
- 10.1.30 - quantity as well as quality of hotel offer.
- 10.1.31 - it is extremely unfortunate that the redevelopment of Town Square has received planning permission, even though the scheme totally failed to meet any policy aspirations
- 10.1.33 - preferred option is 560 dwellings.

Stratford Voice

11. I hope that Councillors will realise in time the irreparable damage that would be caused to Shottery and Stratford by allowing extra building to go ahead. Traffic has worsened greatly over even the last few years and the town cannot take any more before it is grid-locked, which must drive people away from the town rather than encouraging them to come and enjoy the very special qualities and experience it has always had to offer. It was originally built as a small market town and if care is not taken will be spoiled for ever.

Miss Mary Finegan

12. It appears that with current planning permissions and infilling and windfall sites Stratford can reach target numbers without any of the numbered sites (on Plan 1) being built on. The current infrastructure would not support any more of these sites being built on.

Stratford Liberal Democrat Group

13. Stratford, as an historic town, sits in a bowl on the northern side and so the rim of the town should be respected, and on the southern side low density and low rise buildings should feather in to meet the countryside. In order to achieve this structured local input is vital.

Stratford Liberal Democrat Group

14. Planning permission for 169 houses on Birmingham Road could have a major effect on visitor's perceptions of the town. Various developments on northern side of town within the last 10 years completely violate the third environmental principle. A business park north of the A46 gives further suburban sprawl. The business park should be by the parkway station, elsewhere would be extremely short sighted. We are currently planning for future slums with no community services or playing fields of any type on the north side of the town. There has to be greater consideration given to the north side of the town.

F J Power

15. When on holiday in France, any town with history is protected by a bypass or restricted vehicle access, etc. Tourism is the main reason for the town's reputation. Do not lose it, or what is the town?

Steve Taylor

16. Please find a way of getting heavy traffic off the bridge. Either on new bridge or ring road.

Mrs E J Hart

17. Areas of natural beauty and those areas used for public walking and leisure must be so designated and protected. Bordon Hill for example should be a Green Belt site.

Robin Molloy

18. Development should as far as possible be located as close to the existing centre as possible. It appears that all of the sites which have been identified are on the outskirts of Stratford and thus expanding Stratford as a settlement into the countryside and increasing the need for people to travel by car.

Spitfire Properties LLP

19. The new Draft Core Strategy is a little more cautious about the town centre but is, by and large, still fairly complacent. It does not really touch on the effects of external pressures and, in particular, e-retailing. It is important to recognise that the town centre is about more than retailing. It plays a vital social role, especially as other functions that bind a community together become redundant or faded. It is also a key part of the town's identity. One area of hope is the Historic Spine, which is not mentioned in the document. The full implementation of the Spine proposals will make a major contribution to the future of the town centre. The Society demands that the planners pay attention to the general and wholesale changes that are taking place in retail and plans are drawn up to promote changes in the town centre that will ensure its long-term future. This may include allowing mixed development, including more residential units and the development of new shopping facilities that encourage new businesses through lower rents and overall cost. A long shot may be a covered market on the lines of the one in Oxford but perhaps with greater flexibility.

Stratford-upon-Avon Society

20. Opportunities for environmental improvements and regeneration exist, such as Timothy's Bridge Road, Masons Road area and the canal corridor through the town.

The Stratford and Warwick Waterways Trust Ltd

21. It is important the Council adequately reflects what local residents see as the problems. Not only is the town just about full, the infrastructure is very poor. Given the impact this has on the tourism sector, I'm surprised that more attention isn't paid to roads and traffic. For a town which attracts so many visitors there is inadequate car parking, very poor traffic flow which cannot be countered anymore by tinkering with traffic lights and altering road priorities. The appearance of the town seems to deteriorate weekly.

John Matthams

22. I feel that all so called 'brown sites' should be exhausted before any 'green belt' development is considered.

Alan Percivall

23. Given the expected surplus of brownfield sites referred to it is unclear why the report recommends that 5-10 ha of Green Belt land be used for a business park.

Stephen Ollerenshaw

24. Has concerns around the Avon Valley lying within Flood Zone 3a which has a high probability of flooding.

NHS Warwickshire

25. Welcome the designation of the whole of Stratford-upon-Avon as an Air Quality Management Area and as a result, development proposals in the town need to show that air quality would not deteriorate. Would be keen to be involved in any decisions around development proposals which may have an adverse impact on air quality.

NHS Warwickshire

26. I would like to see amendments to this section to reflect:

- Stratford has an international reputation for performing arts and specific encouragement should be given to locate creative industries to the town centre.
- development land will be sought and prioritized close to the town centre to improve sustainability to connect business communities to retail/food businesses and accommodation areas.
- specific sites meeting the above criteria will be sought and encouraged to create a hub for creative industries.

Stephen Ollerenshaw

27. The Core Strategy should seek to maximise the development potential of sustainable sites within the defined urban area in contributing to the District's housing land supply, including sites which already benefit from extant planning permission for other uses, eg. ex-NCJ site on Birmingham Road.

Grove Industries Limited

28. Draft strategy identifies yet more peripheral potential development sites, all of which would add to urban sprawl. It assumes that all people who wish to live in the town must have houses provided there. At that rate, Stratford would become ever larger in area because it is a favourite place to live. To preserve its nature and the historic connections, with its economy heavily dependent on tourism, surely a prime strategy objective should be to prevent further urban sprawl.

Gordon Brace

29. Some of the sites along Masons Road which are no longer suitable for business use could be released for house building - close to employment, town and schools.

Stratford-upon-Avon Town Council

30. In terms of pupil place planning the possibility of a number of relatively small developments around the town creates significant problems in providing extra school places when the Stratford town primary schools are nearing capacity. From this perspective, the County Council would prefer more concentrated residential development sites which bring with them the opportunity to provide new school sites.

Warwickshire County Council

31. We need more facilities for young people - maybe an ice rink or more up to date leisure centre. Any new development should be sensitive to the surroundings and to include green spaces and tree planting.

Miss E M B Sellar

32. Given that Stratford-upon-Avon is the District's most significant and sustainable settlement, we do not support the indication in paragraph 10.1.33 of the overall level of housing that should be provided during the plan period.

Persimmon Homes (South Midlands) Ltd

33. Much of the town's infrastructure, including roads and schools, is reaching capacity. This should be borne in mind when considering any future large scale development. The nature of the roads in the town centre and the fact that most traffic has to pass down them means that it is difficult to see any measures that could be put in place to allow significant expansion.

Councillor Peter Moorse

34. The 'canal quarter' has the potential for becoming a major feature in the town, but present plans seem unlikely to realise this. A more ambitious scheme is needed.

Councillor Peter Moorse

35. The canal side area in Bishopton Lane was previously classified as being for public open space. This should be continued. The area has the potential for being an extremely attractive facility for residents and canal borne visitors. Housing development here would be a tragic waste of an area with enormous potential.

Councillor Peter Moorse

36. Although significant housing expansion is proposed for Stratford this will clearly not be needed if the Shottery development goes ahead. If Shottery does not go ahead then it seems unlikely that any major estates will be needed as significant numbers are likely to arise from infilling, windfalls, re-use of unwanted industrial land and conversion of retail sites, together with sites that now have planning permission.

Councillor Peter Moorse

37. Welcome the news that the new Draft Core Strategy limits the total house building in Stratford to 560 homes and restricts individual sites to no more than 100 houses.

Paula Owen

38. All local authority resources to do with planning should concentrate on positive ways to increase tourist revenues which mandatorily requires less development with a positive approach to providing the type of environment that visitors expect of Stratford. This neither more building sites nor rows of empty shops in the town centre.

M J Hurst

39. Edge of town developments must be firmly controlled. Stratford sits in a dip with rising land to the north. This area is significant to the identity of the town and rising land must not be developed. Warwickshire market towns merge into the countryside with low rise structures, grass verges, mature trees. This must be respected and there should be no 3 storey structures, over steep roofs or gateway buildings.

Councillor Jenny Fradgley

40. With more houses we are going to need more schools, doctors, etc. Why do we need another business park when Timothy's Bridge Road and all round there most of the buildings are empty?

Tony & Sue Holmes

41. Care is needed with the identification of long term development sites. We ask for transparency but only when it suits us!

Mrs Elizabeth Brace

Consultation Question: Q153

1. The first principle under (d) transport, we should bite the bullet and beef this up to include a definite statement of intent to pedestrianise Bridge Street, High Street and Chapel Street.

Councillor Peter Balaam

2. A bus station should be provided next to the railway station.

Mrs J Wood, Anna Candy

3. Not convinced of the case for the allocation of an additional 5-10 hectares of land for Class B1 uses at Stratford-upon-Avon. The allocation of such a large area to a business park on the northern outskirts of the town is inappropriate.

Old Stratford & Drayton Parish Council, Jane & Peter Emmerson

4. With regard to the transport principles, an addition might be: 'In response to the status of the town as an international destination, future highway maintenance and transport works will be designed to complement the historic environment and improve the public realm experience by employing national design good practice.'

English Heritage (West Midlands)

5. Stratford is potentially an ideal town for cyclists and more safe and segregated cycle ways need to be promoted.

Stratford Liberal Democrat Group

6. Heavy goods vehicles should be prohibited from the centre of town within a 5 year timescale and meanwhile a weight restriction should be placed on Clopton Bridge.

Stratford Liberal Democrat Group

7. A further study is needed to decide whether a ring road is needed.

Stratford Liberal Democrat Group

8. Shops and business with rear access should only accept deliveries to the back of their properties and not from doors which front onto the main shopping streets.

Stratford Liberal Democrat Group

6. Stratford town railway station should become a destination station including a museum. Great care should be taken with making it DDA compliant.

Stratford Liberal Democrat Group

7. The importance of the Air Quality Management Area needs to be reflected in the policy principles. There should be a specific policy that new development must not make the air quality worse.

Reuben Bellamy

8. Due to the Core Strategy's proposed wider dispersal of growth to the rural areas and the limitation of the size of estates, it is considered that some of the policy principles will not be achievable, for example, to "increase the number of suitable and affordable homes" and "provide for an increasing supply of primary and secondary education in the town".

Miller Strategic Land and Taylor Wimpey

9. Reference should be made to restoring natural river banks. The majority of the river bank in Stratford, as well as in other towns and villages, has been heavily modified. Whilst there is a need to retain some of this for mooring purposes there are opportunities to restore a more natural river bank in many locations.

Environment Agency

10. I would like to see improved and safe cycle access within the town.

Fiona Mackie

11. Through journeys of HGVs should be banned altogether with banning all HGVs from using Clopton Bridge. Provision should be made for safe, off road cycle links across town.

Stratford-upon-Avon Town Council

12. There should be an explicit statement about improving the energy efficiency of buildings in the town.

Stratford-upon-Avon Town Council

Consultation Question: Q154

1. The issues are covered but there doesn't seem to be much in the way of suggested solutions. My particular concerns are: air quality - how is new development, especially south of the river, going to be accommodated without making this worse; cycling - let's have some real commitments and policies to improve cycling in the town.

Reuben Bellamy

2. A further increase in pupil numbers in Stratford town brings significant difficulties in terms of current school capacity. A number of expansion programmes at primary and secondary have been, or are being, undertaken to address the current projected need. Any further increase in housing will create a significant challenge in providing sufficient extra pupil places. In relation to Stratford itself in terms of pupil place planning, the possibility of a number of relatively 'small' developments around the town creates significant problems in providing extra school places when the Stratford town primary schools are nearing capacity. In Stratford town, from a pupil planning perspective we would prefer more concentrated residential development sites which bring with them opportunity to provide new school sites.

Warwickshire County Council

3. Stratford-upon-Avon is the principle settlement in the District and is the most sustainable with its existing infrastructure and services. It is therefore essential to balance this with the town also being the focus for housing growth, any other strategy will be unsound. It is considered the scale of housing proposed by the Core Strategy falls significantly short.

Miller Strategic Land and Taylor Wimpey

4. Employment land should be maximised to avoid large numbers of residents using the town as a commuter centre. Rising fuel costs should encourage work/home/school/play in the same location.

Stratford-upon-Avon Town Council

5. Any major developments of retail floor space in the town centre would need to be combined with improvements to existing car parking.

Stratford-upon-Avon Town Council

Consultation Question: Q155

1. Against proposed development on Milestone Meadow (Site 15) for a range of reasons:
 - it is a quiet culs de sac with a small amount of traffic.
 - it is not suitable for a high amount of traffic.
 - local children are able to play in the roads around the area safely.
 - inappropriate to build close to the existing airstrip.
 - it is a greenfield site; brownfield sites should be exhausted first.
 - land is classified by DEFRA as Grade 2. This land should be protected as much as possible.
 - there has been over-development south of the river in recent years.
 - should limit development to within the existing boundary of the town.
 - would destroy a safe and pleasant place to live.
 - poor visibility at Milestone Road/Banbury Road junction
 - alignment of Milestone Road would cause issues for the free flow of traffic due to large delivery vehicles.
 - road infrastructure across the river is wholly inadequate and is increasingly leading to long waiting times
 - an alternative access should be sought to serve the site off Banbury Road
 - protect the amenity of the neighbourhood of Avon Crescent and its link to open countryside.

Mrs Heather Shipley, Mrs Deidre Alder, Keith Pound, Stephen Buckel, Rupert & Clare Welch, Councillor Kate Rolfe, Graham Snarr, Graeme Ramsay, Joanna Pound, Andrew Mould, James Hodgson, James McFarlane, Alan Percivall, David Pedley, Anthony Hartley, Mrs Brooks

2. Location 2 is totally unsuitable for development. The Draft Core Strategy acknowledges the unacceptable nature of the current state of congestion on the Birmingham Road. To build yet more housing on this road would further exacerbate the problem. One of the principles in the Draft Strategy is to "Improve the quality and image of the main corridors and gateways to the town centre." Development of location 2 would fly in the face of this principle.

Councillor Peter Balaam

3. No major developments should be allowed on the outer edges of Stratford-upon-Avon as this severely limits the appeal of the town to visitors. The Landscape Report identified Bordon Hill as an area that would be significantly harmed if building and road changes (such as a roundabout) took place on the hill. (Sites 9 & 10)

Earle Webster, S E Webster

4. Against proposed development west of Shottery (Sites 7, 8 & 9) for a range of reasons:
 - too much traffic already causing congestion, more homes bring more congestion.
 - senior school capacity is insufficient currently and will deteriorate with more demands.
 - rural areas will be eroded and the countryside will disappear.
 - impact on leisure walks.
 - impact on local wildlife, including bird population.
 - area is in floodplain so would increase the risk of flooding.
 - would destroy the heritage of Stratford and its related tourist industry.
 - proximity of sites to Anne Hathaway's Cottage.
 - impact on the character of the area.

Marcus Weaver, Mrs Jocelyn W Hancock, Robin Molloy, Lucien Riviere

5. Land at Stratford Rugby Club on Loxley Road should be identified for housing development.

Stratford-upon-Avon Rugby Football Club

6. Object to the inclusion of Sites 15 and 16 for a range of reasons:

- greenfield sites recorded as high quality Grade 1 agricultural land which should not be developed unless there are exceptional circumstances
- many existing suitable alternative brownfield sites that should be utilised before damaging the local countryside
- sites are outside the current town boundary
- dramatic increase in traffic will add to already frequently grid-locked town centre.
- breach of safety of local private aircraft flight path

Jonathan Price

7. When the various Parish Plans are considered, a number with their lack of facilities will require only minimal development. The additional dwellings required in Stratford-upon-Avon will require additional potential locations.

Bearley Parish Council

8. A new industrial estate should be on the north side of the town to give good connections to the road network via the A46.

Whitchurch Parish Meeting

- 9.
- Of the 16 sites identified, all but site 1 would have a detrimental effect on the approach to the town and its unique character.
 - Sites 2 and 3 would impinge too closely on the green belt.
 - Sites 4 and 5 would destroy the important buffer zone between Bishopton Lane and the A46, while site 4 is also far too near the flood plain.
 - Sites 6-9 would have a major detrimental effect on the rural nature of Bordon Hill and are too near the Grade 1 listed major tourist attraction of Anne Hathaway's Cottage.
 - Site 10 would have an impact on the rural and separate identity of Luddington.
 - Site 11 impinges on the Welcombe Hills.
 - Sites 11-16 further encroach into the countryside to affect the approach and character of the town.

David & Beverlie White

10. No fewer than eight of the sixteen locations identified on Plan 1 lie within the boundaries of Old Stratford and Drayton Parish. The views of the Parish Council should therefore be given considerable weight.

Location 3. The A46 northern bypass should remain the northern edge of the built up area of the town. Any development is opposed on the following grounds:

- a) Landscape and visual amenity. The open landscape viewed from the A46 looking northeast and from the A3400 looking south forms a fine setting for the town when approached from the north. The Birmingham Road is recognised in the Strategy as a 'key route' into the town, giving many visitors their first impression of the town. The unspoiled landscape setting of this key gateway into the town is a key part of this impression and should remain untouched. The proposed business park at this location represents an unacceptable urban intrusion into this landscape.
- b) Need. The case for a business park is not clearly made in the Employment Land Study and is predicated on greater housing growth in the town than the District Council now envisages. The Parish Council doubts the need for this type of commercial development on this scale. Similar units are currently standing empty in the Timothy's Bridge Road area.
- c) Transport. The argument for this location is based on the proximity of the site to the proposed Parkway Station. This is based on one brief mention in the Employment Land Study and is not supported by any research on likely train use. Presumably, the intention would be to encourage

workers at the business park to travel by train, thus reducing the use of the car. However, this is completely illogical if the intention is to provide for the employment needs of existing residents. The Parish Council considers it unlikely that users of the business park would largely travel by train and for train travellers the existing bus service already provides easy access to other existing under-used sites, eg. Timothy's Bridge Road. The development would increase traffic congestion on the A46, A3400, Bishopton Lane and Bishopton roundabout, which are already heavily congested at peak travel times.

- d) Economic development. A business park in this location will do absolutely nothing for the economy of the town centre, eg. to encourage retail activity, cafes, etc.
- e) Encouraging further development. The proposed development would breach the boundary of the A46 Northern Bypass as the limit of the built up area of the town. This would make it much more difficult to resist other bids to develop north of the A46, thus encouraging urban sprawl.
- f) Existence of alternative more suitable locations. If it is decided that a new business park to the north of the town is required, the Parish Council strongly prefers Location 6. Another site closer to the Parkway Station and worthy of consideration is Langley Farm, east of Birmingham Road. It is a brown field site which already has a range of commercial activity taking place in a haphazard way. Although it would be impossible to provide a direct pedestrian link with Parkway Rail Station, it would be close enough for occupants of a business park to provide a dedicated shuttle bus for rail travellers. Alternatively, commercial development could be located south of the river, where there are virtually no employment opportunities but which has been the focus for much of the recent residential development. In this case, consideration should be given to further enlarging the existing business park south west of Banbury Road.

Location 4. Should remain earmarked for open space for community use, in order to provide recreational opportunities for Bishopton residents and to safeguard what remains of the setting of the historic buildings of the Victoria Spa and to enhance the setting of this part of the Stratford-upon-Avon canal.

Location 5. Would prefer to see it retained as open farmland, which has long been the Council's policy.

Location 6. If it is decided that the economy of the town requires a business park on the north of the town, the Parish Council considers this location to be more suitable than Location 3 for the following reasons:

- a) The landscape views to the southwest of the A46 at this location are less attractive than those to the north east of the A46. The lie of the land means that it would be easier to blend a development of the scale proposed into the landscape at this location.
- b) The area already has non-agricultural commercial buildings at the Wildmoor Spa.
- c) The A46/Alcester Road roundabout is quieter than the Bishopton roundabout and only has three exits to the five at Bishopton. It would therefore be easier and safer to provide a direct spur from the roundabout into a new business park at this location. If the land west of Shottery appeal fails, we see no reason why the lack of a Western Relief Road should render this site unsuitable.

Old Stratford & Drayton Parish Council, Jane & Peter Emerson

11. Locations 7, 8, 9, 10. The Parish Council is an objector to the application to build 800 homes on land west of Shottery, which is currently subject to appeal. However, it would not necessarily object to smaller scale housing developments at any of these locations. If these sites are included in the Draft Core Strategy, the Parish Council will respond to individual planning applications on their merits.

Old Stratford & Drayton Parish Council

12. Site 11 - the Town Trust administers on behalf of the College Estates land identified as Site 11. It considers that part of this land, namely that to the east of the properties in Avenue Road would be suitable for housing development.

Stratford-upon-Avon Town Trust

13. I would like to express my strong support for housing development west of Shottery for the following reasons:

- it takes heavy traffic away from the narrow accesses to Anne Hathaway's Cottage and provides alternative access.
- at long last, a western relief road becomes viable.
- reducing commuting and improved vehicle energy use compared with dispersed new housing.

Reginald Monk

14. Testing of the potential development options is obviously critical to our ability to comment on site suitability. We anticipate a robust process is adopted that is informed by this correspondence and we look forward to a refined schedule of suitable sites in due course.

15. We are not yet convinced of the case to build industrial development north of A46.

Stratford Liberal Democrat Group

16. The proposed sites around Tiddington would undoubtedly break the boundaries between Stratford and Tiddington. Any development around Tiddington should have a green corridor around.

Councillor Kate Rolfe

17. Any housing development/business development such as might take place in locations 1, 4 and 5 would destroy the beautiful rural landscape to the north of Bishopton Lane.

Mr C White

18.

- Until there is a solution with regard to air quality and safe and convenient cycling link to the town centre there should be no sites allocated for housing south of the river (sites 12-15).
- Site 13 - is too remote from Stratford and on rising land. It does not relate well to the town and would have an unacceptable landscape impact. Any development here would increase the damage to the road past Alveston Hill Farm
- Sites 12 and 14 - would not object provided they did not result in coalescence between Stratford and Tiddington and there were measures in place to make sure there was no worsening impact on the Air Quality Management Area and that safe cycling routes were provided over the river to the town centre.

Rueben Bellamy

19. Land at Shottery Hall would provide for circa 40-50 dwellings, a scale that would blend into and enhance the character of the area without compromising that character. The site already has a mature landscape setting which would be retained and would protect the setting of the development and the village. The site would allow for a substantial number of affordable units to be built, in an area where few have been delivered. The site is centrally located within the urban area and is only one mile away from the town centre and all its facilities. Main bus routes are only a short walk away on Evesham Road and Alcester Road. The scale of development allows for more individual design rather than mass house building with bland design and therefore more in keeping with the unique character of Shottery and Stratford.

Spitfire Properties LLP

20. Object to the identification of the sites below for development:

- Site 1 - this will involve the encroachment into an area of countryside which frames the setting of the town. It is an area of land which provided for recreation for the town and ultimately supports the well being of the town's residents. Furthermore, this area plays an important role for tourists who come to the area.
- Sites 12, 13 & 14 - represent an encroachment into the open countryside, extending the urban sprawl of Loxley Road. This road is already seem as a linear form of development, a finger stretching out into the open countryside. To allow further sites beyond the line of development would exacerbate the linear form and create a long hard edge of development harmful to the setting of Stratford. Furthermore, these sites are some distance from local facilities and services that will encourage people to drive rather than walk or cycle and there is no local bus service which would serve them.
- Site 16 - encroaches into the open countryside and again creates linear development along Banbury Road. The entrance to Stratford at this point will become a further hard edge to Stratford exacerbated by the elevated position of the site and views across from the A422 and the A4300. Although this area will be closer to some facilities than other sites such as those on Loxley Road, they are still a considerable distance from the town centre, schools, railway station, etc. and therefore result again in the increased dependency on the car.
- Sites 8 & 9 - represent a large scale encroachment into the open countryside that would be harmful to the setting of the town. This is further exacerbated by the elevated position of the sites and could result in a negative impact on an important heritage asset of Anne Hathaway's Cottage.

Spitfire Properties LLP

21. I would like to support the proposal for 800 new houses at Shottery provided that the development includes considerable improvements to infrastructure and services in the area.

James Hodgson

22. Site 15 is a suitable location for residential housing and would assist the Council in addressing the shortfall in its five-year land supply. In light of the Council's current strategy of fulfilling needs through a larger number of smaller sites, it is ideally suited for a development of up to 100 houses in accordance with Policy CS16. Factors in favour of this site include:

- proximity to the existing urban area
- neither green belt nor an area of planning constraint.
- much residential development in recent years in Stratford-upon-Avon has taken place in to the north of the river. An allocation south of the river supports the aim of Stratford growing in a more sustainable manner.
- the site is close to existing public transport routes on the A422 Banbury Road which also benefits from cycle lanes, wide pavements and direct access into the town centre. This promotes "green commuting" and more sustainable transport.
- extensive site studies have already been submitted to the Council which show that development would have little or no detrimental impact on the historical, cultural or archaeological character of the area.
- the studies show that there would be no significant loss of natural habitats or natural features (including woodland) by developing the site. Therefore, the impact of development on the biodiversity of the area would be negligible.
- the studies show that there would be no adverse visual impact from developing the site, thereby helping to preserve the aesthetic character of Stratford which is so important and at the same time helping to solve the land supply shortage.

Mixed Farms Ltd

23. Sites 4 & 5 are unsuitable due to: additional housing cannot be accommodated within existing infrastructure; adverse impact of additional traffic in terms of congestion and pollution on the Bishopton Lane area; the sites are an important buffer zone between the urban area and the A46 bypass; the sites encompass a substantial flood plain.

Mr & Mrs David Parfitt

24. Areas 13, 14 and 15 are all very productive Grade 2 agricultural land and as such should be preserved and thus exempt from development.

Alan Percivall

25.

- Area 3 is in the green belt; there must be no development on this side of the A46.
- Areas 6, 7, 8 & 9 will spoil the rural area near Anne Hathaways Cottage. It attracts people from all over the world: why despoil it?
- Areas 12, 13, 14 & 16 similarly spoils a rural area.

Stratford is a rural market town: why ruin it?

H G Ratcliffe

26. Object to the proposal for a new business park on land north of the A46 at the Bishopton Roundabout (Site 3). This is not justifiable and should be removed from the Core Strategy on the following grounds:

- although the establishment of a large business park in the Green Belt may be justifiable on economic grounds it is clearly contrary to the environmental objectives defined in the NPPF.
- contrary to the core planning principles of protecting Green Belts and recognising the intrinsic character and beauty of the countryside.
- it is not appropriate to "redraw" the Green Belt to allow these proposals, as the Green Belt in this area fulfils several of the key purposes of the Green Belt policy.
- is contrary to many parts of proposed Policy CS 1 on sustainable development.
- is contrary to the provisions of Policy CS 10 on landscape
- would be inconsistent with the objective of maintaining the generally open nature of the area.

Stephen Ollerenshaw

27. Parish Plan should be referred to.

Claverdon Parish Council

28. Sites 1, 4 and 5 are suitable for development. None of the others are suitable.

Marson Rathbone Taylor

29. Support Potential Development Location 2. It is in a highly sustainable location given its proximity to the Maybird Retail Park and Stratford Town Centre and the many services and facilities located in these areas. The site also benefits from excellent bus links which run directly along Birmingham Road, including those linking the Stratford Park and Ride scheme to the town centre. The site also has no identifiable constraining factors, is well contained by strong field boundaries and would represent a logical extension to development in this area of Stratford. The site is able to be delivered as a stand alone development of between 80 to 100 dwellings.

William Davis Ltd

30. There is a fully costed plan for some 800 homes west of Stratford-upon-Avon. Should reinstate, confirm, legislate and provide for this to get the project underway.

Michael H Powell

31. Sites 1, 4 and 5 have flood plain implications. These sites also appear to be subject to surface water flooding, this will mean extra development costs if this flooding is to be correctly addressed.

Environment Agency

32. The 500 houses for Stratford should go in areas 12, 13, 14, 15 and 16.

Ron Cockings

33. There are mixed views about the potential development land for a business park west of Birmingham Road/north of A46 with several members of the Neighbourhood Plan Steering Group objecting strongly. It would site business near the A46 reducing HGVs in town. However, there is concern over impact on green belt. A wide range of sites should be explored in order to minimise its impact on the Green Belt.

Stratford-upon-Avon Town Council

34. As part of a more sustainable distribution of growth, with a greater focus on Stratford-upon-Avon, it is necessary for future iterations of the Core Strategy to reaffirm the suitability of land west of Shottery. The allocation of the site in both the 2008 and 2010 versions of the Core Strategy was supported by analysis presented in the 2008 and 2009 versions of the SHLAA which identify it as being suitable and available for development. As demonstrated in the Council's own analysis, land west of Shottery is the most suitable location in which to accommodate strategic development at Stratford-upon-Avon. Accordingly it is an intrinsic part of a strategy which focuses a greater proportion of growth at the settlement than the Third Draft Core Strategy. It should therefore be again identified as a strategic allocation in future versions of the Core Strategy. The conclusions in the Landscape Sensitivity Study regarding this site are overstated and should not form the basis of dismissing the development potential of the west of Shottery proposal.

J S Bloor (Tewkesbury) Ltd and Hallam Land Management Ltd

35. Land off Trinity Way provide a future opportunity to meet the district's future housing needs and is a sustainable location given its proximity to transport infrastructure, community facilities and services. This area of land can also be developed without significantly damaging the character of the location and would be an excellent opportunity to enhance the availability of adjacent areas of public open space for the benefit of the community.

Bruton Knowles

36. Proposed development on land and west of Shottery is objected to for a range of reasons:

1. Lack of compliance with Policy STR.2A of the saved District Local Plan, and proposals considered premature vis a vis the Local Development Framework (in particular Core Strategy and Site Allocations DPD) and Neighbourhood Plan process.
 2. Material changes of circumstances since the last Local Plan Inquiry such that various provisions of the Local Plan are not adequately complied with, eg. no longer any benefits to the Shakespeare Birthplace Trust/Anne Hathaway's Cottage, the "western relief road" in fact provides no relief and Stratford-upon-Avon's congestion is predicted to worsen very considerably from current conditions.
 3. Unacceptable traffic impacts and insufficient benefits.
 4. Unacceptable heritage impact on the setting of Anne Hathaway's Cottage and garden.
 5. Unacceptable landscape impact on landscape sensitivity.
 6. Unsatisfactory pedestrian and cycle crossing points across the proposed link road and measures to ensure accordance with 30mph speed limit.
 7. Unsatisfactory flood risk assessment (including the sequential test vis a vis alternatives) and concerns over flood alleviation.
 8. Unacceptable noise and tranquillity amenity impacts.
 9. Unsatisfactory design quality.
 10. Ecological negative impacts (including lack of ecological invertebrate assessment).
-

11. Adverse impact on tourism.
12. Lack of adequate delivery plan for renewable energy and carbon reduction provision.
13. Impact on air quality given that Stratford-upon-Avon is now designated an Air Quality Management Area.
14. Imprecise nature of application providing insufficient information for adequate amenity impact assessment and lack of PPS4 assessment of impact of local centre.

(NB. These comments relate to the planning application for the proposed development of 800 dwellings)

Residents Against Shottery Expansion

37. Support the identification of potential development areas 4 and 5 which are located at land north of Bishopton Lane. However, this should be considered in the context of allocating the whole 25 ha as a sustainable urban extension in order to meet the town's housing growth:

- site is in a sustainable location, well related to existing services and facilities. The SHLAA identifies the land as one of the areas that is potentially a suitable broad location for development.
- represents a logical extension to Stratford-upon-Avon and will provide a scheme that is well integrated with the adjoining built up area and sympathetic to the character of the landscape.
- not in the Green Belt or Special Landscape Area and a detailed landscape assessment confirms that the development of the site would be appropriate in landscape terms providing that the scheme is planned to ensure that the visual impact would be minimal.
- the land represents the only site around the urban edge of Stratford which is assessed in part in the Landscape Sensitivity Study as having medium/low landscape sensitivity and therefore must be considered to be the most appropriate site for allocation in terms of landscape.
- it should be noted that Plan 1 incorrectly shows a significant proportion of the site as being at risk of flooding, as the modelling of the flood risk agreed with the Environment Agency demonstrates.
- key features of the Masterplan include the provision of circa 575 dwellings, site for a new primary school, canal side parkland, equipped play areas and sports pitches, community allotments.

Miller Strategic Land and Taylor Wimpey

38. Land at Milestone Road (Site 15) is suitable for development. It is accessible, particularly to the main public transport route on Banbury Road, it has a good relationship to the existing built form, and would not have any unacceptable adverse impact on the landscape. It is a site which the Council considered suitable in principle for development in the Draft Core Strategy of 2010 subject to traffic calming on Milestone Road, landscaping being provided to the north east boundary and layout and design of development taking account of adjacent residential properties. These are all aspects that a residential development proposal could easily address.

Persimmon Homes (South Midlands) Ltd

39. The proposal for use of a site to the north of the A46 for commercial development seems completely inappropriate, as does the suggestion for a suitable pedestrian crossing arrangement. Such a site would presumably be located in the green belt and would significantly extend the natural boundaries of the town. Together with traffic implications this would seem to make the site undesirable for the proposed use.

Councillor Peter Moore

Consultation Question: Q156

1. Having moved to Warwickshire it is apparent that there is good delineation of residential areas. Stratford needs to maintain, if not expand its Green Belt provision to prevent "urban sprawl", preserve natural habitats and encourage its residents to be active. This will have the added benefit of keeping Stratford as a desirable tourist destination.

Rita Kubiak

2. The Green Belt boundaries should not be relaxed to allow Stratford to sprawl ugly developments further into the countryside. On the contrary they should be tightened to prohibit any further growth.

Michael Lavender

3. The Green Belt is a restraint on further development of a town that has reached its capacity until the infrastructure is improved.

John Matthams

4. There is no need to amend the Green Belt boundaries to provide scope for further development on the edge of Stratford-upon-Avon until all non-Green Belt sites have first been explored. For example Bishopton Lane provides a suitable location for future development on the edge of the town and is outside of the Green Belt.

Miller Strategic Land and Taylor Wimpey

NB. A large number of responses supporting the extension of the Green Belt around Stratford-upon-Avon have been covered under Policy CS 6 (see section 7.1 Exp)

Plan 1: Stratford-upon-Avon

1. We have noticed that you have not highlighted anywhere within area 2 as a flood risk area. WE have previously notified you of this concern and provided photographic evidence illustrating a lake in the bottom corner of the field which forms after heavy rainfall. The Environment Agency have also confirmed that a quarter of this field is a designated flood risk area. Nearly all of the houses that back on to the south side of area 2 have suffered flood damage at some time and find it very difficult to insure their property against this risk.

Neil & Judie Mudie

2. Plan 1 showing possible development sites should be withdrawn from the Core Strategy as the sites have not been tested and are not required. It is not the purpose of the Core Strategy to allocate specific sites. Indicating possible sites will encourage planning applications and blight communities.

Mark Undery

Stell Golding

Chris Toney

Mrs Sarah Buttrick

Mr Miles Buttrick

Ms Rebecca Sayce

R D & R J Langman

Brian Darnley

Paula Owen

Marcus Weaver

Mrs Caroline Wilks

Jeannie Farr

Dr D Calderon

**Mrs E Kalderon
John Armitage
R.K Fisher
Peter Condron
Mr & Mrs P Hill
Jason Duffy
Miss F Longmore
R Burman
Mr & Mrs Fraser & Linda Edwards
Mr & Mrs D.J Cholerton
Susan Marks
Joan Graham
Gordon Harrington
Bill Tucker
Stephen Parker
Mrs M Childs
B.E.H Whitehouse
Mr B Childs
S.J Wiseman
Mr and Mrs R.E Cain
C.M West
Mrs P West
Mr D.C.M. Young
Patricia Young
Sarah & Peter Greenway
David Edward Martin
Mrs B Wood
P. Wiltsliel
Stefan Law
Mrs M.G Tattersall
Alan Spreadbury
M.B Lewis
Mrs Valerie Lageard
B.W & Y K Bates
Mrs Mary Boddington
Alan Boddington
Mr and Mrs J.S Orchard
James E Philpotts
Nick Poulton
S Watts
Mr Peter Pearce
Monica M Beckett
G.K Allen
Andrew Davies
J Steele Nicholls
Peter Dingley
M.J Bunce
Mrs Helen Petitjean
Andrew Waterhouse
Mrs S.J Sreeves
Julia Shearing
Mr E.R Green
John D Jones**

Peter Taylor
Mrs J Wood
Anna Candy
Mrs D Geldard
John Harris
Bernard R Pumfrey
S Venus
Mrs Diane Rogers
R.J Beresford
Mr and Mrs J. Farrar
Mr Clive Wootton
Jean Powrie
Nicholas Smith
Peter J Hudson
Mrs C C Scott
Mrs S.M Cragoe-Jones
R.D Heppell
Mrs J Calvert
Mrs A Murray Watts
Harry Nicholls
Anna Cooke
S.M & P.V Wall
Mr D & Mrs J.H Smart
John Priest
Mrs Margaret Ann Smith
Mr Richard L Smith
Alastair Child
John Oldfield
Mrs G.M Reid
John Alan Finney
Gordon Harrington
Maureen & John Hill
Mrs C.A Cooper
Mr Derrick Burford
Elizabeth Lang-Sadler
Mrs G Pawley
Miss Mary Finegan
J. Robertson
Paul Kershaw
P.F Wyatt
T.F.R Crossley
Mr B G Harrison
F. Hodgson
Mr & Mrs D.J Hammond
Patricia Jebb
Mr Clifford Rose
Norman and Freda Kitcher
Mrs Vera Hawkins
S.J Warrilow
Mr & Mrs P.F & M.M Williams
A.M. Tudor
Mrs D E Bonham
D. Daniel

Anastasia & Peter Hunter
Mr J.M & Mrs J.A Kent
B. Lomas
Mr & Mrs D.J Chamberlain
B. Stewart
Mr J.M Hind
Mrs Barbara Spencer
Michael Crutchley
A. McIntyre
Mr & Mrs G & W Mazey
Michael Stockhill
James Pullin
Sylvia Leighton
Peter Landsman
David Gooman
Steve Taylor
George W. Sykes
A L S Orr
B. Rossington
Mrs Mary Austin
H Carragher
A Chaplin
A.J Whiting
W.E & B.O Cave
G.I Chamberlain
J.M Stocks
Dai Gistiws
Tony & Sue Holmes
Ann C Curtis
J C Edwards-Broome
Mrs M S Wade
Caroline Stewart
W Macdonal
H R Beach
Mr R Dawney
Malcolm J Wilkes
Dave & Mo Sargent
R Dyer
R D & R J Langman
Mary Monteith
Mrs E J Allard
Brian P Edwards
Don Hanson
Mary Jeffery
Carl Conn
Wyndham Perring
B Littlewood
D E Swinbourne
Mr & Mrs R C & J D Hawkins
W Alan Head
D Pearson
Michael & Sheila Mills
Alan & Sharon Morris

Mary & D A R Morgan
E A Foster
Miss N Whittard
Mrs Elisabeth Brace
Mrs D Levets
Edwina Nicholls
R Green
A L & J K Page
Mr Frank Woodhall
Caroline Abercrombie
Mr C White
Roger and Susan Blackwell
Mr & Mrs D A & R A Atkinson
Mrs E J Hart
P R Gilmore
Mr D J Ockendon
Syvia J Cooper
Ken & Mary Ryman
Pat & Michael Bird
Mrs Joyce Johnson
Pat Johnson
Ms Anne Hicks
Elizabeth Hicks
Miss L Cartwright
Mr D Townsend
Eric Ward
George & Bryony Disher
Penny Gildea
Barbara & Peter Dodd
Kevin Gildea
Terry Brandon
Micheal Whick
Mrs G Woodhall
Fiona Mackie
B.H. Richardson
Mrs C.M. Richardson
E.W. Head
Graeme Ramsay
Mrs E M B Sellar
Deborah Griffiths

3. I am concerned that building speculators (who have already done so much damage to Stratford) will be taking advantage if they have specific sites shown to them in this manner.

Tony Underwood

4. There is no requirement to include Plan 1 (including 16 possible locations for new housing development) in the Core Strategy. To do so will encourage developers to submit spurious planning applications, resulting in appeals that need to be defended using council tax payers' money. Plan 1 should be removed.

Stratford Voice, Peter & M J Donahue

4. I oppose building a business park on green belt land north of the A46 at Bishopton. The A46 should form a barrier to the expansion of the town.

Peter & M J Donahue

Jeannie Farr

Dr D Kalderon

Mrs E Kalderon

John Armitage

R K Fisher

Peter Condron

Mr & Mrs P Hill

Miss F Longmore

R Burman

Mr & Mrs Fraser & Linda Edwards

Mr & Mrs D J Cholerton

Susan Marks

Joan Graham

Gordon Harrington

Bill Tucker

Stephen Parker

Mrs M Childs

B E H Whitehouse

Mr B Childs

S J Wiseman

Mr and Mrs R E Cain

C M West

Mrs P. West

Mr D C M Young

Patricia Young

Sarah & Peter Greenway

David Edward Martin

Mrs B Wood

P Wiltshiel

Stefan Law

Mrs M G Tattersall

Alan Spreadbury

M B Lewis

Mrs Valerie Lageard

B W & Y K Bates

Mrs Mary Boddington

Alan Boddington

Mr and Mrs J S Orchard

James E Philpotts

S Watts

Mr Peter Pearce

Monica M Beckett

G.K. Allen

Andrew Davies

J Steele Nicholls

Peter Dingley

M J Bunce

Mrs Helen Petitjean

Andrew Waterhouse

Mrs S J Sreeves

**Julia Shearing
Mr E R Green
John D Jones
Peter Taylor
Mrs J Wood
Anna Candy
Mrs D Geldard
John Harris
Bernard R Pumfrey
S Venus
Mrs Diane Rogers
R J Beresford
Mr and Mrs J Farrar
Mr Clive Wootton
Jean Powrie
Nicholas Smith
Peter J Hudson
Mrs C C Scott
Mrs S M Cragoe-Jones
R D Heppell
Mrs J Calvert
Mrs A Murray Watts
Harry Nicholls
Anna Cooke
S M & P V Wall
Mr D & Mrs J H Smart
John Priest
Mrs Margaret Ann Smith
Mr Richard L Smith
Alastair Child
John Oldfield
Mrs G M Reid
Maureen & John Hill
Mrs C A Cooper
Mr Derrick Burford
Elizabeth Lang-Sadler
Mrs G Pawley
J Robertson
Paul Kershaw
P F Wyatt
T F R Crossley
Mr B G Harrison
F Hodgson
Mr & Mrs D J Hammond
Mr & Mrs R Stephenson
Patricia Jebb
Mr Clifford Rose
Norman and Freda Kitcher
Mrs Vera Hawkins
S J Warrilow
Mr & Mrs P F & M M Williams
A M Tudor
Mrs D E Bonham**

D Daniel
Anastasia & Peter Hunter
Mr J M and Mrs J A Kent
B. Lomas
Mr & Mrs D J Chamberlain
B. Stewart
Mr J M Hind
Mrs Barbara Spencer
Michael Crutchley
A McIntyre
Mr & Mrs G & W Mazey
Michael Stockhill
B Escott
Joy Watson
James Pullin
Sylvia Leighton
Peter Landsman
David Gooman
Steve Taylor
George W Sykes
A L S Orr
B Rossington
Mrs Mary Austin
H. Carragher
A Chaplin
A J Whiting
W E & B O Cave
G.I. Chamberlain
J M Stocks
Dai Gistiws
Tony & Sue Holmes
Ann C Curtis
J C Edwards-Broome
Mrs M S Wade
Caroline Stewart
W Macdonal
H R Beach
Mr R Dawney
John Miller
Dave & Mo Sargent
R. Dyer
R D & R J Langman
Mary Monteith
Mrs E J Allard
Brian P Edwards
Don Hanson
Mary Jeffery
Carl Conn
Wyndham Perring
B Littlewood
D E Swinbourne
Mr & Mrs R C & J D Hawkins
W Alan Head

D Pearson
Michael & Sheila Mills
Miss N Whittard
Mrs Elisabeth Brace
Mrs D Levets
Edwina Nicholls
R Green
A L & J K Page
Mr Frank Woodhall
Caroline Abercrombie
Mr C White
Roger and Susan Blackwell
Mr & Mrs D A & R A Atkinson
Mrs E J Hart
P R Gilmore
Mr D J Ockendon
Syvia J Cooper
Ken & Mary Ryman
Pat & Michael Bird
Mrs Joyce Johnson
Pat Johnson
Ms Anne Hicks
Elizabeth Hicks
Eric Ward
George & Bryony Disher
Penny Gildea
Kevin Gildea
Mrs G Woodhall
Fiona Mackie
B H Richardson
Mrs C M Richardson
E W Head
Graeme Ramsay
Mrs E M B Sellar

5. Why have 16 locations been identified as possible areas for future development? This seems unnecessary. Development should be more organic and less artificial. Developers will home in on Stratford and undo the planning and good resolutions of the Core Strategy, spoiling the special character of the town.

Mrs Valerie Lageard

6. There is no reason to include in the Core Strategy any possible development sites. Plan 1 should be completely withdrawn as it merely puts a 'black spot' on those sites in the same way that the non-planning term 'strategic reserve' did in the past. The blighting of local areas because of their inclusion and the encouragement that this will give to developers - regardless of the real need - will be in conflict with the Government's localism agenda whereby the bottom up approach engendered from a Neighbourhood Plan, which Stratford is in the process of doing, will identify where the real needs are not necessarily where developers may have a financial interest.

Alan Marks

7. Plan 1 shows a ring of 16 possible development sites which encircle the town. Doubtless when these are exhausted, and the gaps between them in-filled, the expectation is that future plans will identify further rings of sites beyond this and the town will expand outwards ad infinitum. We say this process must be stopped now.

Stratford Voice

8. I agree the A46 should form a barrier, but with Park & Ride and new Parkway Station, some would say Business Park north of A46 would be in right place and easily accessible.

Malcolm J Wilkes

9. I do not understand why the Core Strategy is nominating sites. The inclusion in this document will empower developers and not the local population.

Robin Malloy

10. I object to the identification of areas deemed suitable for further development as this is an open invitation for further unwanted building.

M Lavender

11. I would like to request that you remove Plan 1 from the proposal. These sites have not been tested. They could encourage most of the 560 house target to be concentrated in a small area and this should not be allowed for heritage and infrastructural reasons. The Shottery proposal and a number of smaller ones would ruin our local landscape, could seriously tourism and have a detrimental impact upon our local infrastructure.

Sarah McCormack

Charles P McCormack

12. We understand that Plan 1 and associated possible site allocations has been produced for consultation purposes only and will not be included in the Core Strategy document.

Stratford-upon-Avon Town Council

Draft Core Strategy 2012 - Summary of Representations

10.2 Alcester Area Policy Profile

1. The size and speed of any housing development in Alcester needs to take account of the infrastructure and its ability to cope, eg. drainage/sewage system, new hospital, local schools.

David & Erica Foster

2. The town centre needs inward investment and a plan to sustain and develop retail and business services on the High Street, as this is the heart of the community.

David & Erica Foster

3. Development of the High Street and of local amenities should go hand in hand with housing and business development to ensure that people who live in the town have the opportunity to benefit from its amenities and contribute to its economy.

David & Erica Foster

Topic: 10.2 Alcester Context

1. South Warwickshire Clinical Commissioning Group is fully supportive of the Alcester Primary Care Centre.

NHS Warwickshire - Health Development Manager

2. South Warwickshire Clinical Commissioning Group is fully supportive of the commitment to increase facilities for young people through the creation of a multi use games centre.

NHS Warwickshire - Health Development Manager

3. South Warwickshire Clinical Commissioning Group supports the network of walking and cycling routes within the town and into the countryside.

NHS Warwickshire - Health Development Manager

4. Alcester flooding from surface water and its watercourses are of interest because of the consequences of flooding.

NHS Warwickshire - Health Development Manager

5. Paragraph 10.2.3 refers to Alcester having a 1 in 100 year level of protection. This is correct, however this does not include climate change. The last sentence refers to Alcester being well prepared to meet the challenge of changing weather patterns. Due to the defences only being to a 1 in 100 year standard we recommend the last sentence is removed.

Environment Agency

Topic: 10.2 Alcester Policy Principles

1. Generally support the policy principles identified for Alcester. However, some need to be translated into action as a matter of priority.

A J Mann

2. In principle we are in agreement with the policy principles for Alcester as set out. The stated Policy Principles set out to achieve the improvements to the town that it seeks and places particular emphasis upon the issues that the Society has broadly identified as important to the future prosperity of Alcester and the protection of its historic centre.

Alcester Civic Society

Topic: 10.2 Alcester Environmental Principle

1. Concerned about how the number of suitable and affordable homes in the town and surrounding area will be increased given the former flooding history and accommodating sewerage. Have full investigations been carried out in the new build areas?

Sylvia Eden

2. The River Arrow Nature Reserve only has recreational value at present. The constant presence of dog walkers has meant that many species that used to be present have deserted the reserve. Any educational value that the reserve should have has likewise been affected. Plans to maximise the 'tourist potential' could further cause disturbance. Any plans to further 'enhance' and make accessible the River Arrow along its length should take similar effects into consideration. The idea that conservation and public access are mutually dependant is totally wrong.

Mary Lindsey

3. Paragraph 10.2.19 states that there are no nationally significant ecological features. There are certainly species of county importance in the Alcester area. If every district ignores locally important wildlife, we will have a country full of protected species but very little else.

Mary Lindsey

4. As flood defences in Alcester have been overtopped twice in the last 14 years, steps should be taken to increase the level of flood protection, particularly to the north, to address climate change. No surface water from new developments in the area should discharge into the River Avon or its tributaries within or upstream of Alcester.

Alcester Town Council, A J Mann, Mrs C J Mann

5. Not in favour of pedestrianising the High Street, but traffic management and pedestrian friendly areas should be considered.

A J Mann

6. Support the environmental policy principles including maintenance of flood plains and green infrastructure to aid in flood alleviation. Support the provision of protection for reversing the fragmentation of woodland and encouraging recreational access.

Councillor S A Juned

Topic: 10.2 Alcester Social Principle

1. Absolutely in favour of building a swimming pool.

Sylvia Eden

2. Additional cycle routes are a good idea but would need clear signs warning of cyclists' presence. A new swimming pool is an unnecessary expense. If the junior school pool is still in use, that could be made available and provide some extra funds for the school.

Mary Lindsey

3. Recreational facilities and accessible public open space are very poor, particularly on the west side of town. This should be addressed before any further housing developments are allocated. Extensive areas of POS, together with play areas, allotments and other recreational facilities must be provided within or directly adjacent to new housing developments.

A J Mann, Mrs C J Mann

4. There is strong support for a swimming pool in Alcester. This should be pursued as a priority as residents have to travel several miles in order to swim. A suitable site could be the Greig Centre. The site is central, brownfield, and with the existing Sports Centre on site there is already a suitable management regime in place to run a swimming pool as part of the complex. It should also be possible to retain or create a community hall alongside the pool building.

A J Mann, Mrs C J Mann

5. Public transport to and from other areas is poor. This is evidenced by the fact that car travel is heavily relied on in the Alcester area. The town is generally in need of much reliable and frequent public transport services.

A J Mann

6. There remains a lack of facilities for young people in the town and support is required for a strengthened Greig Centre.

Councillor S A Juned

7. More affordable homes are required for rent and sale and these should be dispersed around the town not concentrated in new estates.

Councillor S A Juned

8. Bullet point one currently states a policy principle to increase the number of suitable and affordable homes and this should be expanded to refer to the future development strategy range of 200-300 dwellings in Alcester or such range as may be revised in the light of comments received.

The Glebe Committee

9. Recreational facilities within the town are already below the necessary space and unable to cope with expansion. A principle calling for recreational facilities to be increased in line with development should be included.

Alcester Town Council

10. Kinwarton needs allotments so that Alcester allotments can be used by Alcester council tax payers.

Lesley Bowen

Topic: 10.2 Alcester Economic Principle

1. Careful thought needs to be given to identifying the land to allocate to allow for an extension of the Arden Forest Industrial Estate.

Sylvia Eden

2. How would you maximise the tourism potential of Coughton Court? It is owned by the National Trust and they do their best already.

Sylvia Eden

3. If bullet point 3 relating to the conversion of farm or other rural buildings to employment-generating activities has to go in the plan, caveat it with being dependent on the nature of the activities involved, the character of the site, etc.

Councillor Justin Kerridge, Mappleborough Green Parish Council

4. Have been concerned about the decline of traditional high streets for some time. As a landlord, unless the area is vibrant the maintenance of property is not done and this just adds to the decline and appearance of the area. Alcester is uniquely situated in that it has always been a centre for commerce but with the added advantage of never having had a main road cutting through it. These have to be its main assets because with that comes civic pride, long traditions and enterprise.

John Bunting

5. Visitors drive through, admire the scenery and go to Broadway, Stratford, etc. where the parking is guaranteed, regulated and periods over 3 hours always charged. Suggest that enforce a 1 hour limit on parking on the High Street with 20 pence tickets and limit town centre car parks to 4 hours controlled by tickets and electronic cameras. Make High, Church and Henley Streets one way and introduce parking both sides of the road where possible.

John Bunting

Topic: 10.2 Alcester Future Development Strategy

1. Alcester needs more housing particularly for young families who will support schools and local shops. High street shops are deteriorating into charity shops and service providers and need to provide more choice for food and drink, clothing and fresh produce.

Lesley Bowen

2. There is serious concern that the constraints set out in previous drafts, relating particularly to [previous] site ALC.3 are no longer mentioned, despite this land being suggested as a Potential Development Option. In view of the need to ensure a five year land supply, this site is unsurprisingly already under serious consideration well before the Core Strategy is adopted. The document, and Council policy generally, should therefore include at least transitional provisions to ensure the work of previous draft consultations and input from local people is not ignored when determining applications prior to adoption.

K J Griffin-Gallagher, Mr M Hipkiss, L H Brice, E Lycett, G F Lycett, R N Butler, Mark Hind & Tonia D'Bras, Roger Pamment, Mrs Lesley Smith, Mr H Green, A J Mann, Julian Davey, Vivienne Smith, Mrs J M Evans

3. New housing developments in Alcester should be no larger than the 2% limit and should be phased, each phase evenly distributed throughout the plan period. It should be stated that the total of 200-300 homes proposed for Alcester is to be regarded as a maximum figure, not a minimum.

K J Griffin-Gallagher, Mr M Hipkiss, L H Brice, E Lycett, G F Lycett, R N Butler, Mark Hind & Tonia D'Bras, Roger Pamment, Mrs Lesley Smith, Mr H Green, A J Mann, Julian Davey

4. Given that 125 dwellings have recently been approved at Kinwarton Farm Road, no further large developments should be allowed until 2016 at the earliest.

A J Mann

5. A reasonable number of windfall sites are likely to come forward in Alcester, and therefore not all of the 200-300 dwellings should be "allocated".

A J Mann

6. It is considered that the scale of residential development (200-200 dwellings 2011-2028) proposed for Alcester is inadequate. This figure should be amended to 500-600 dwellings. This assessment is based on the capacity of a recently approved planning consent in respect of Area 2 on Plan 2 and the capacity of areas 3, 4 and 5 as demonstrated in the Masterplan supporting planning applications north of Allimore Lane.

JS Bloor (Tamworth) Ltd, Gallagher Estates & Pettifer Developments Ltd

7. South Warwickshire Clinical Commissioning Group would like to work with the District Council to ensure that there are enough primary care facilities available to any new local residents moving into newly developed properties.

NHS Warwickshire - Health Development Manager

8. Paragraph 10.2.20 should reinforce that development would be dependent on substantial landscaping and design and materials to shield the effect on surrounding countryside, especially the higher ground west of Coughton towards Alcester Heath, east of Coughton around Windmill Hill and the Arden way national trail, and to the east of the site, in Kinwarton Parish and the Heart of England national trail.

Councillor Justin Kerridge, Mappleborough Green Parish Council

9. All developments need an overall plan with infrastructure agreed. No storm water or sewage to be directed through old town but new pipes to send it all below Oversley Bridge. Large play area needed on west side of town. Land between Stratford Road and Bleachfield Street should be made into a public open space.

John Bunting

10. Alcester, as the largest Main Rural Centre in the District, would be an appropriate location to accommodate some of the additional growth sought, subject to a review of Green Belt boundaries.

Quintessential Inns

11. Overall the Policy Principles set out an ambitious list of opportunities focusing on new social infrastructure for Alcester. It is intended to deliver these by way of contributions from development proposals and other initiatives around the town and with this in mind the more development that takes place the greater the likelihood that money will be delivered through Community Infrastructure Levy that can be spent on providing local infrastructure.

The Glebe Committee

12. Support the principles of the Future Development Strategy for Alcester but object to the scale of housing development within it which is too low given the sustainable nature of the settlement. The level of provision should be increased to reflect the high level of services and facilities available, as well as local demand.

The Glebe Committee

13. There is a need for a Master Plan to be drawn up for Alcester to ensure a cohesive pattern of development.

Alcester Town Council

15. Alcester should not grow into a conurbations which would spoil the atmosphere of the town. Building in future should only be up to the bypass (A435). Building up to the A46 is not suitable.

Kinwarton Parish Council

Consultation Question: Q157

1. I am generally in favour of all the policy principles.

Sylvia Eden, Mrs C J Mann

2. I think the policy principles identified for Alcester seem appropriate. I would like to see firm proposals for 'community woodlands' to address the policy objective of reversing the fragmentation of woodland around Alcester.

Jon Billington

3. Alcester is full of Tudor buildings. A prosperous town will keep them in good repair. Parking and traffic management with an out of centre car park is essential. Construct an out of centre all day car and coach park along Stratford Road. This is within easy walking distance for workers and visitors.

John Bunting

4. There is an overemphasis upon the need for affordable housing in Alcester. The proliferation of large housing estates, including the Conway Estate, created a considerable imbalance in the housing stock of the town which remains to this day. We believe the need for affordable housing is largely met by the existing estates and that serious consideration should be given to the release of land suitable for a few individual houses of substance thereby making a positive contribution to the mix of housing in Alcester and having the potential for bringing wealth into the town.

Alcester Civic Society

5. We generally support the policy principles for Alcester. However, some need to be translated into actions as a matter of priority:

- recreational facilities and availability of suitable and accessible public open space are very poor, particularly on the west side of the town,
- specific proposals are required to address the increased risk of flooding due to climate change,
- the town is generally in need of much more reliable and frequent public transport services.

Eclipse Road Residents Group

6. In general agreement with the General Policy Principles. However, some of the statements are too specific and that under Environmental Principles, bullet point 4 should read "Assess the scope for introducing traffic management measures in the town."

Alcester Town Council

7. Alcester has three senior schools and two junior and infant schools. It is therefore felt there is a necessity to develop a more robust and inclusive educational principle for the town.

Alcester Town Council

8. Recreational facilities within the town are already below the necessary space and unable to cope with expansion. It is therefore felt that a principle calling for recreational facilities to be increased in line with development should be included.

Alcester Town Council

Consultation Question: Q158

1. I am generally in favour of all the policy principles - but the issue of housing scale needs to be taken into account.

Sylvia Eden

2. New housing developments in Alcester should be no larger than the 2% limit and should be phased, each phase evenly distributed throughout the plan period. It should be stated in the Core Strategy that the total of 200-300 homes proposed for Alcester is to be regarded as a maximum figure, not a minimum.

Mr & Mrs Godson, Philip Knowles, Mr J Alderson, Mrs Vivienne Smith, Eclipse Road Residents Group, Nina Knapman, Mrs J M Evans

3. The proposed scale of new housing in Alcester (200-300) seems reasonable provided that it is phased in. This total should include the recent planning permission granted for 125 houses on land east of Kinwarton Farm Road. Furthermore, if the planning applications for land east of the bypass and north of Allimore Lane are allowed, that will overshoot the proposed scale of new housing. In this case, the allocation for Alcester in the Core Strategy should be removed as it would have been significantly exceeded before the Core Strategy is finished.

Jon Billington

4. Object to the scale of proposed housing development and suggest that the figure should be proportionally higher, reflecting the comments we have made in relation to the overall housing requirement and proposed distribution to the MRCs.

Quintessential Inns

5. A recent planning decision has allocated 125 houses to Alcester. This is adequate for the town unless local need is demonstrated by the community and still should be within the maximum of 200 over the lifetime of the plan. Any further expansion of Alcester is not supported.

Councillor S A Juned

6. Given that 125 dwellings have recently been approved at Kinwarton Farm Road, no further large developments should be allowed until 2016 at the latest. A reasonable number of windfall sites are likely to come forward in Alcester, and therefore not all the 200-300 should be "allocated".

Eclipse Road Residents Group

7. The Development Strategy does not adequately address transport issues in Alcester and traffic management around Alcester. These need to be addressed as a matter of urgency as new development will only exacerbate the existing problem.

Alcester Town Council

8. Development should be by balanced phasing, eg. employment facilities should precede major housing developments.

Alcester Town Council

9. The level of housing provision should be increased for Alcester. This increase should come from two sources. Firstly, a redistribution away from the wider dispersal option with a higher proportion of the distribution moving to Main Rural Centres and Stratford upon Avon; and secondly, from an increase in the overall level of housing provision.

The Glebe Committee

Consultation Question: Q159

1. With regard to the draft proposal to build at the top of Captain's Hill (site 7) the following observations are made:

- the land is currently Alcester Academy sports field. As sport is being promoted in schools, the removal of this facility would be detrimental.
- the area serves as a bus drop off point for students attending the Academy. This would have to be relocated, presumably further towards Great Alne.
- the area is on the crest of a hill and the highest point in the surrounding area. Any development would be visually intrusive.
- the current edge of the town forms a natural gateway at the crest of the hill. Any further development would detract from what is currently a beautiful entrance to the town.

David & Erica Foster

2. Of the potential locations for new development in Alcester on plan 2:

- Area 1 seems sensible, there are few other suitable places to build large business units.
- Area 2 has already had planning permission granted for 125 homes.
- Areas 3 and 4 have a current planning application for 350 houses. This is clearly too much to develop at once. However, it is the best site for a phased approach to new housing as it is not in the Green Belt.
- Area 5 is indistinct on the grounds as it is unclear from the map if it is north or south of Allimore Lane. If it is north then the old orchard and eco site must be preserved because it provides a habitat to several rare species.
- Area 6 may be appropriate but would have to be carefully managed with regard to drainage. There is a culvert that takes Spittle Brook under houses on Hadrians Walk and this has flooded in the past, so storm water would have to be stored in some way on the site to reduce the risk of flooding.

Jon Billington

3. Potential locations for new housing in Alcester:

- Areas 3 and 4 should only be considered for development in phases of no more than 2% as 125 dwellings have already been approved at the north-eastern edge of the town. They may be suitable for development but only subject to the constraints set out in previous drafts (see ALC.3). A development brief and masterplan must be adopted for the whole area before any development is considered. Extensive public open space must be provided within these sites as there is a large shortfall in Alcester, particularly in this part of the town.
- it is unclear as to the location of Area 5 as the plan does not show Allimore Lane. The old orchard/eco site must not be affected as it provides a unique habitat to several rare species and development in this area is not appropriate.

Mr J Alderson, Nina Knapman, K J Griffin-Gallagher, Mr M Hipkiss, L H Brice, E Lycett, G F Lycett, R N Butler, Mark Hind & Tonia D'Bras, Roger Pamment, Phillip Knowles, Mr & Mrs Godson, Mr H Green, Mrs Vivienne Smith, Mrs C J Mann, Julian Davey, Mrs J M Evans

4. We would ask the Council to consider land at Captains Hill as a suitable site for housing development.

Quintessential Inns

5. The land between the western bypass is not of low to medium sensitivity for housing development. Housing situated close to the bypass will suffer from unacceptable noise and the site has the potential to impact negatively on the rest of the town. Parts of the site are highly visible. Areas 3, 4 and 5 - development is not supported. If Core Strategy is approved, then development should only be in phases of no more than 2% as 125 dwellings have already been approved at the north-eastern edge of the town. A development brief and masterplan must be adopted for the whole area before any development is considered. Extensive public open space must be provided within these sites as there is a large shortfall in Alcester, particularly in this part of the town. Area 5 and 6 - parts of the area provide unique habitat to several rare species and development in this area is not appropriate.

Councillor S A Juned

6. We disagree that land between the western bypass is of low to medium sensitivity for housing development. The land north of Allimore Lane has some of the highest contours of the town and housing of two storeys or more in this location would be clearly visible from the low-lying open countryside to the west, which would be detrimental to the character of the area. Areas 3 and 4 should only be considered for development in phases of no more than 2% as 125 dwellings have already been approved at the north-eastern edge of the town. If proven suitable for development, it must be subject to the constraints set out in previous drafts of the Core Strategy. A development brief and masterplan must be adopted for the whole area before any development is considered. . Extensive public open space must be provided within these sites as there is a large shortfall in Alcester, particularly in this part of the town. It is unclear as to the location of Area 5 as the plan does not show the line of Allimore Lane. The old orchard/ecosite (57/05) must not be affected as it provides a unique habitat to several rare species and development within or adjacent to this area is not appropriate due to the sensitivity of the wildlife.

Eclipse Road Residents Group, A J Mann

7. Control part of the land identified as Potential Development Option 5 on Plan 2. It amounts to about 3.1 hectares. The identification of this land is fully supported. The land cannot be developed alone because Cold Comfort Lane is not suitable to provide the necessary access. However, once land to the north is developed, further development on this land becomes a sensible way to provide additional housing needed in the town, within the defensible boundaries of the Alcester bypass and Spittle Brook. The land is available for immediate development. There are no land control issues that would be a constraint to development. The site is well related to the existing pattern of development and is close to the centre of the town and to the range of social and community facilities therein. Development in this location offers a sustainable pattern of development leading to a reduced need for car travel within the settlement. There are no statutory designations on or close to the site. It is well screened from the bypass by existing trees and is unlikely to be a haven for wildlife. Overall there are no known physical constraints, making the site entirely suitable and achievable for development.

The Glebe Committee

- 8.
- Area 1 generally appears suitable. However, concern over the size and location which does not relate to already planned access routes.
 - Area 5 is unclear as the plan doesn't show Allimore Lane. This should be reviewed to ensure orchard/ecosite is not affected as development here is not appropriate.
 - Areas 3, 4 & 5 should be subject to phasing. This area may be suitable for development subject to constraints set out in the previous drafts (see ALC.3). A development brief and master plan must be adopted for the whole area before development is considered.
 - Area 6 is thought to be unsuitable because of access problems and the contour of the land. The land near Spittle Brook is subject to flooding.
 - Area 7 needs clarification as to whether future development here relates to expansion of Alcester Academy.

Alcester Town Council

- 9.
- Area 1 for industrial/science park is not intrusive on the community and would hopefully offer job opportunities.
 - Area 7 is in the Green Belt and could not be described as infill or a brownfield site. It is not suitable. Kinwarton has had its fair share of planning permissions up to 2028 and our parishioners do not wish the parish to grow further.
 - There are proposed sites in Alcester parish (areas 3, 4, 5 and 6) which are far more suitable for housing and would be less intrusive.

Kinwarton Parish Council

10. Areas 2 and 7 should not be considered for development.

Sylvia Eden

11. Area 6 and possibly part of 5 are proposed Local Wildlife Sites. They support species of county importance, as well as others under threat. Suitable wildlife organisations should be involved in their future, but not as public amenity, and well buffered from any future development. The whole of this block, areas 3, 4, 5 and 6, is far too big for housing development in a town the size and nature of Alcester. A small part of it, adjacent to present housing, could possibly be used. Area 7 is outside (sic) the present Green Belt and as such not suitable.

Mary Lindsey

12. It is considered that development options 3, 4, 5 and 6 could all come forward without having an adverse effect on the character of the settlement. These areas could come forward in a manner consistent with the Core Strategy Future Development Strategy where they are developed in the context of an agreed Masterplan. It is considered that growth in Alcester could bring about positive economic and social benefits which hitherto have not been provided.

JS Bloor (Tamworth) Ltd, Gallagher Estates and Pettifer Developments

13. Object to site no.7. It makes the town lop-sided and it is too far to walk to shops. Development should be on west side of town.

John Bunting

14. Location 7 should only be considered for the specific purpose of relocating of Alcester High School and that otherwise there should be no expansion into the Green Belt towards Kinwarton.

Alcester Civic Society

Consultation Question: Q160

1. If every few years bits of the Green Belt are clawed back from the countryside, there would soon be no point in having a Green Belt. There are plenty of brownfield sites in the district to use first; some are so big it is a national disgrace that they haven't been used already.

Mary Lindsey

2. The Green belt boundary around Alcester should be retained. To remove the boundary (presumably to accommodate Area 7 on Plan 2) would mean that Alcester would sprawl up the Alne valley, compromise the 'open space' nature of the valley and merge the town with the small hamlet of Kinwarton.

Jon Billington

3. Green Belt should be retained. Allow Arden Forest Industrial Estate to expand towards the river but leave 50 yard wide strip by the river.

John Bunting

4. Land north of Captains Hill should be allocated for residential development. Development of this site would not be contrary to any of the five purposes for including land within the Green Belt identified in paragraph 80 of the NPPF. We would support revisions to the Green Belt boundary to enable this land to be removed from the Green Belt. Subject to there being no requirement to allocate the land for housing to meet the needs of the current plan period, it should be identified as 'safeguarded land'.

Quintessential Inns

The Green Belt should not be changed except to re-incorporate Areas of Restraint for housing.

Councillor S A Juned

Plan 2: Alcester

1. Apart from land north of Captains Hill, there are no other areas of land currently within the Green Belt adjoining the urban area of Alcester that are suitable for housing with a similar or lower landscape sensitivity.

Quintessential Inns

2. We have prepared a draft Masterplan for the development of the site previously identified as ALC.3 (land north of Allimore Lane) and are in discussions with Alcester Town Council regarding incorporating this proposal into a Neighbourhood Plan.

Eclipse Road Residents Group

3. It is understood that the proposed development does not include the field in the western half of the identified site (Area 1). This has archaeological significance and would be used for access only to the eastern half of the site. The site boundary to the north of the development should be planted out with suitable natural screening before any development takes place within the proposed business park area. Measures must be taken to alleviate the risk prior to any development and to ensure that development itself does not have an adverse effect on future flood management. The Parish Council would strongly oppose any proposal that does not comply with the above.

Coughton Parish Council

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10.3 Bidford-on-Avon Area Policy Profile

1. Main concerns are: poor infrastructure; lack of local facilities; uncontrolled increase in dwellings resulting in economic, environmental and social unsustainability; character of village being eroded; and lack of support for local businesses and tourism.

Bidford-on-Avon Parish Council

Topic: 10.3 Bidford-on-Avon Context

1. Omitted from paragraph 10.3.5 is any reference to bus no.166 which provides a Sunday and Bank Holiday service from Worcester to Stratford via Evesham and Bidford.

John Brace

2. Paragraphs 10.3.10 and 10.3.11 expressing concern about the scale of development in the village are fully supported.

David and Judith McCabe

Topic: 10.3 Bidford-on-Avon Policy Principles

No comments received for this section

Topic: 10.3 Bidford-on-Avon Environmental Principle

No comments received for this section

Topic: 10.3 Bidford-on-Avon Social Principle

1. The proposed increase in number of suitable and affordable homes in the village and its surrounding area should be controlled.

David and Judith McCabe

2. The proposals to redevelop Friday Furlong for housing and a new medical centre are fully supported.

David and Judith McCabe

3. Should include the level of housing provision. Bullet point one currently states a policy principle to increase the number of suitable and affordable homes and this should be expanded to refer to the future development strategy range of 140-200 dwellings in Bidford-on-Avon or such range as may be revised in light of comments received.

Taylor Wimpey UK Ltd

Topic: 10.3 Bidford-on-Avon Economic Principle

1. Bidford Parish Council has made great efforts to expand the range of retail facilities in the village but more needs to be done by all the authorities. It is noted that Alcester is being supported for a Portas investment, whereas Bidford would benefit greatly from financial support.

Peter Chadwick

2. Bidford cannot be self sufficient in providing the full range of facilities within its immediate boundary required by Small/Medium Enterprises (SMEs), so close co-operation with nearby locations should be maximised to assist business where cross site facilities, eg. for storage, could be provided in order to keep employment local.

Peter Chadwick

3. Scope should be given for a foodstore of approx. 1,500 sq m gross to be provided outside Bidford village centre.

St Francis Group

Topic: 10.3 Bidford-on-Avon Future Development Strategy

1. The proposal to limit the scale of development in the village is supported.

David and Judith McCabe

2. The issues identified in the Future Development Strategy are generally supported.

David and Judith McCabe

3. There is no evidence that the substantial additional housing proposed in the village can or will be met based on present infrastructural services.

Michael Gerrard

4. No more than 150 new dwellings should be provided in the village and it is essential they are of a type that will encourage local youth to remain and seek work locally.

Bidford-on-Avon Parish Council

5. Council statistics already show the degree of commuting to work and shops, so adding vastly more housing to Bidford will only exacerbate this. It will also place even greater pressure on what services do exist in Bidford.

Peter Chadwick

6. A formal plan should be first established to provide a broader and more substantial set of services and facilities, including their funding, before progressing the construction of additional housing.

Peter Chadwick

7. Object to the scale of housing development which is too low given the sustainable nature of the settlement. The level of provision should be increased to reflect the high level of services and facilities available. An increased level of growth could bring financial benefits through CIL contributions to be spent on improved infrastructure in the settlement along with New Homes Bonus which will bring further money to the Council to maintain services.

Taylor Wimpey UK Ltd

8. Existing medical centre is currently at capacity and in need of replacing. Would be keen to be involved in these key decisions to ensure that there is adequate primary care health provision.

NHS Warwickshire - Health Development Manager

9. Drainage system in Bidford has little spare capacity. Would urge District Council to review the current drainage system to avoid public health consequences.

NHS Warwickshire - Health Development Manager

10. Broadly support growth at Bidford-on-Avon because it is a sustainable settlement capable of accommodating a relatively substantial amount of growth.

Bloor Homes

11. Given the scale of Bidford, its role in serving the rural hinterland and range of services and facilities within the village, it is clearly capable of accommodating more than the suggested 140-200 dwellings.

Miller Strategic Land

12. Given our overall objection to the housing requirement set and belief that Bidford should accommodate additional housing development in order to maintain and improve its role as a sustainable settlement, we do not support the indicated overall level of housing that should be provided during the plan period.

Persimmon Homes (South Midlands) Ltd

Consultation Question: Q161

1. The policy principles are generally supported.

David and Judith McCabe

2. There should be policies in place to ensure that owners of listed buildings do not allow them to fall into disrepair.

Bidford-on-Avon Parish Council

3. If it is intended to deliver the ambitious list of policy principles by way of contributions from development proposals and other initiatives around the town, the more development that takes place the greater the likelihood of delivery to raise money through Community Infrastructure Levy that can be spent on providing local infrastructure.

Taylor Wimpey UK Ltd

4. The identification of 'policy principles' which affect the settlement is comprehensive, but it is largely silent on the strategy or policy approach which will enable these to be addressed. If such a level of detail is appropriate to be included in a Core Strategy (and it is questioned whether it is), then it is considered that a more focussed approach to identifying the policy initiatives which flow from the identification of the reasonable desires and aspirations of the local community would be of assistance.

St Francis Group

Consultation Question: Q162

1. It is not clear how policy is being directed to address or deliver the aspirations for greater local job opportunities and regeneration/redevelopment of sites, nor how the plan has addressed viability issues when there is an evident absence of market demand to deliver such regeneration through Class B employment.

St Francis Group

2. A greater proportion of housing development should be and can appropriately be accommodated in Bidford-on-Avon. Main Rural Centres (MRCs) are required to play a major role in respect of delivering rural housing and mixed used developments within the District. Bidford has the ability to provide the range of development opportunities, including employment, much needed new homes, shopping and other key services.

Miller Strategic Land

3. The level of housing provision should be increased for Bidford. This increase should come from two sources. Firstly, a redistribution away from the wider dispersal option with a higher proportion of the distribution moving to Main Rural Centres and Stratford upon Avon; and secondly, from an increase in the overall level of housing provision.

Taylor Wimpey UK Ltd

Consultation Question: Q163

1. Bidford will be carrying out a Neighbourhood Plan which should help identify the local community's preferred sites as well as size and timing of development. It is hoped that the District Council will fully participate in this to ensure it fulfils the requirements of both the local community and that of the district.

Bidford-on-Avon Parish Council

2. Land to the north of Bramley Way, amounting to about 2 hectares, should be identified for housing development. The site is part owned and part under option to a national housebuilder and is available for immediate development. The site is well-related to the existing pattern of development and is close to the centre of the village, to a range of social and community facilities and to employment opportunities. There are no known constraints to development of the site and no reason why development should not be achieved in the short term.

Taylor Wimpey UK Ltd

3. The vagueness of Plan 3 is such that it is impossible to comment with any clarity on the appropriateness of the 'Development Options'. There is no information within the plan to explain the relative merits of these competing interests, or their potential constraints, or what role the plan envisages they will fulfil. Moreover, the plan does not consider as an option whether a wider regeneration of the existing industrial estates might better meet the needs of Bidford, rather than the release of greenfield development opportunities.

St Francis Group

4. Land west of Waterloo Road, measuring approximately 16 hectares, should be allocated for a mixed community/residential development. The site is located close to the centre of the village, accessible to local services, facilities and a significant employment base, combined with a frequent bus service which makes the site highly sustainable. A development proposal can respond to local infrastructure requirements including public open space, sustainable urban drainage techniques, and other related development needs. Given the recognised secondary school capacity concerns, the site could provide land with the potential for a new secondary school.

Miller Strategic Land

5. Site 2 appears to have a large area subject to surface water flooding. Particular consideration must be given to space for water during the initial design.

Environment Agency

Plan 3: Bidford-on-Avon

1. Site 3 is a greenfield site and is not supported by ourselves, the residents of Bidford and the Parish Council. Site 4 is the existing Marriage Hill Nurseries and is not supported and is strongly opposed by the residents of the village.

David and Judith McCabe

2. Site 4 is regarded as brownfield because of the historical use of part of the site including housing. The concrete foundations of eight houses demolished 45 years ago still remain in the ground. The soil is also of a lower grade than the other eight sites shown on plan 3. A geo-environmental assessment judges the land to be suitable for either employment or residential use. Flooding is an issue in the village but drainage from this site is the only one shown on plan 3 where drainage does not impact on other parts of the village. It is emphasised that there is no history or risk of flooding on this site. It is probable that the two sites at the western edge of the village, which are close to the A46 trunk road, will generate less traffic movements through the village than the other sites. Little employment land has been allocated for Bidford in recent years but many houses have been built. The western part of the site would be suitable for a non-industrial commercial development. Access by road and public transport is good and the site is close to local facilities.

D E Harman

3. Proposed development options 3 and 4 should be deleted from the plan. These areas are outside the environs of the village and are prime agricultural land in open countryside. The other development options should not be considered until issues such as sewer capacity, water supply (pressure) and drainage have been resolved. Bidford has developed far too rapidly, such that the local amenities cannot cope at present with the extra population (ie. medical surgery, primary school). New facilities need to be in place before any further housing in Bidford is even considered. There is not any employment in the immediate area which means Bidford would just be more of a commuter village than at present. Use of derelict sites should be considered, eg. United Carriers.

Mrs J Sawtell

4. Land at the junction of Waterloo Road/Wellington Road which has been vacant for 10 years should be subject to a positive policy framework for a wide range of alternative uses to be considered for the site, including the merits of a small foodstore. This follows specific interest having been identified by an operator who is looking for a presence in Bidford.

St Francis Group

5. Land measuring approximately 16 hectares adjacent to Waterloo Road is suitable for residential development [NB. This is the same site referred to under Q163). The site is available as the landowners are all engaged and committed to the early delivery of the site and no legal ownership issues exist to prevent the site being delivered in the first five years of the plan period. There are no land use policy restrictions which would render the site as being unsuitable. Environmental assessment work demonstrates the lack of physical or environmental conditions, demonstrating its suitability for development. The site does not present any barriers to development as proposed, nor are there any issues expected that will delay the overall implementation of the site.

Miller Strategic Land

6. Site located to the rear of 34 Waterloo Road is a sustainable, well contained areas of land and should be identified as a location for housing development. The site is suitable for a development of approximately 50 dwellings, comprising a former orchard and access track. It is sustainably located in an enclosed location which relates very well to the existing built up area of Bidford. Growth in this location would be well screened and helpfully contribute to the local community by providing affordable housing. There are no overriding infrastructure, environmental or physical constraints and the site is physically and technically suitable for new housing. The site has limited environmental quality.

Persimmon Homes (South Midlands) Ltd

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10.4 Henley-in-Arden Area Policy Profile

No comments received for this section

Topic: 10.4 Henley-in-Arden Context

No comments received for this section

Topic: 10.4 Henley-in-Arden Policy Principles

No comments received for this section

Topic: 10.4 Henley-in-Arden Environmental Principle

1. Network Rail is in discussions with agents in relation to the developer's proposal to develop the derelict former station building into a two storey office building.

Network Rail

2. Support the aim of promoting and encouraging connections between Henley-in-Arden and the Stratford-upon-Avon Canal which would help to further develop the potential of the canal and towpath as a recreational and leisure resource accessible to the wider community.

British Waterways

Topic: 10.4 Henley-in-Arden Social Principle

1. Network Rail is committed to working with station operators, local authorities, Centro and other stakeholders to review and assess opportunities for further increases to car park capacity and other schemes to improve accessibility. Network Rail supports efforts at Henley in Arden station and would welcome the opportunity to review and comment further on detailed proposals.

Network Rail

2. The Parish Council makes the following comments:

- It is vital that cross-District transport links are established between Warwick and Redditch in order to facilitate travel to hospitals.
- Later evening and weekend rail services via Henley in Arden station are needed.
- Redundant building issues at the railway station should be resolved as a matter of urgency.
- Disabled and vehicular access to the west side of the railway station should be created at the earliest opportunity.
- Question the logistical capability of the proposal to create a cycle path to Mays Wood.
- Do not welcome a 'multi-function' enhancement scheme of the area around the Mount as this would damage the aesthetic rural nature of the already widely-used site.
- Do not feel a 'multi-functional' route is required along the River Alne
- The statistics relating to the shortage of play space and park/open space are questioned as they do not include the extensive community recreational facilities provided by the land in trust to the War Memorial Trust. The existing development of the former cattle market on Warwick Road has designated play space and proposed development of the Bear Lane site would presumably also include open space which would go towards addressing a deficit if it has been identified correctly.
- Junior football facilities are available at both the War Memorial fields and Warwickshire College site, both on Stratford Road.

Beaudesert & Henley-in-Arden Joint Parish Council

Topic: 10.4 Henley-in-Arden Economic Principle

No comments received for this section

Topic: 10.4 Henley-in-Arden Future Development Strategy

No comments received for this section

Consultation Question: Q164

1. Lack of suitable car parking remains a major deficit to the town in terms of meeting residents' needs and providing opportunities for maintenance and growth of the local economy, in particular retail and tourism.

Beaudesert & Henley-in-Arden Joint Parish Council

2. Support in principle with the following points:

- Re-introduction of a late night train service to and from Stratford and Birmingham, which would utilise the Shakespeare Line and not the Stratford/Solihull line. Such an introduction would assist both the local night time economy and improve the local transport service as well as reducing the amount of car journeys.
- The main hospitals serving this area of the district are either Redditch or Warwick, accordingly an east/west regular bus service should be delivered between Warwick and Redditch.
- Cannot see the value of a multi-functional use of Beaudesert Mount or a riverside park.

Councillor S Thirlwell

3. We do not see any mention of the severe flooding that can occur through the centre of Henley in the Environmental Principles, or mention of the River Alne and its associated flood plain which is a big issue in this area.

Environment Agency

Consultation Question: Q165

1. Land located at former site of garden centre on Tanworth Lane, whilst not falling directly within the parish of Henley in Arden, should be included as it would provide a potential source of employment for Henley people if it was re-opened or developed. Henley has lost a number of business units in the past. We wish to stress the importance of the inclusion of start-up units in any development proposals on the Mayfield Farm site off Bear Lane and in other future developments.

Beaudesert & Henley-in-Arden Joint Parish Council

Councillor S Thirlwell

Consultation Question: Q166

1. Of the four sites identified on the plan, only sites 1 (Bear Lane) and 2 (adjacent to William James Way) are suitable. The Parish Council seek clarification on the actual location of site 3.

Beaudesert & Henley-in-Arden Joint Parish Council

2. There needs to be far more understanding on where these actual sites are before a full critical response can be made. At the moment I comment as follows:

- Site 1 - needs to be mixed use with start up units and housing, but it should not be used as a reason to further utilise more green belt after any development, ie. the use of Green Belt needs to be well controlled.
- Site 2 - as long as it does not utilise the flood plain.
- Site 3 - there are constraints here if it is referring to the school land off Warwick Road.
- Site 4 - if this is land in front of Hurst House, then I cannot support it as it would detract from the house. It would seem to me that the only land available would be to the back of Hurst House leading up to the railway line, this would need further consideration.

Councillor S Thirlwell

3. Site 1 is land to the west of Bear Lane. In terms of release of this site from the Green Belt, the need to do so is clear. Henley-in-Arden is a historic settlement and therefore significant development opportunities within the settlement to meet existing and future housing needs is severely limited. With regard to other areas of land outside the urban area that might be suitable, they are subject to a number of physical and technical constraints. In order to demonstrate that the site could deliver benefits to justify the release of the site, an indicative masterplan has been prepared which incorporates the following:

- removal of the existing poor quality buildings to the west of the site
- improved access and car parking provision to the railway station
- improved access to the existing allotment gardens
- provision of small employment/starter units to meet the needs of new or existing businesses in the town
- public open space
- a mix of open market and affordable housing
- retention of the existing coal yard

It is concluded in terms of accessibility and sustainability that the allocation of land at Bear Lane for the uses proposed and for up to 75 dwellings would be appropriate and justified.

Oakley Mayfield

Consultation Question: Q167

1. The Parish Council agree in principle but feel that sites 1 and 2 should be designated as exceptional circumstances.

Beaudesert & Henley-in-Arden Joint Parish Council

2. Only if it relates to sites 1 and 2.

Councillor S Thirlwell

Plan 4: Henley-in-Arden

1. In principle Network Rail support the development of this land and the delivery of a new station car park by the developer on the Mayfield Farm site together with the creation of a pedestrian route from the car park to the northbound railway station platform.

Network Rail

2. Site 2 appears to be on the edge of Flood Zone 3. The development area should avoid the flood zones with preferably a buffer of green space.

Environment Agency

Draft Core Strategy 2012 - Summary of Representations

10.5 Kineton Area Policy Profile

1. Increased moving and parked traffic on village roads will cause further parking problems in village centre and surrounding road system. Increase in goods vehicles through Kineton. Changes to roads would lose its historical, quaint layout. Strain to existing sewerage and water pipe network. Pressure on health services in Kineton. Any widening of Lighthorne Road will devalue its countryside nature appeal. Its current beauty and peacefulness will be permanently lost with increased housing in the vicinity. People are drawn to Kineton because of its community spirit and layout. Creating six new housing estates will permanently eradicate the village atmosphere. Development will eradicate established trees, hedgerows, wild shrubs and flowers, loss of insect, bird and animal habitats.

Mr T Brain

2. Building additional houses in Kineton would lead to increased traffic in the village and put extra strain on current village services, such as schools, doctors surgeries. Traffic through the village is already significant and poses dangers in certain parts of the village. Increasing the size of the village will only compound this issue. There is also the loss of open countryside and loss of character to this picturesque village. Adding yet further modern housing estates will only increase the urban sprawl and loss of character.

Mr & Mrs Simon Redmile

3. The strategy mentions a figure of growth of 2% of existing housing stock, but if Kineton has 1,000 houses now, where does the figure of 80-90 come from? Kineton is a go area at certain times of the day, eg. school times and Saturday mornings. There are already more cars and buses, etc. than the streets can cope with, and it is a miracle that no-one has been hurt yet. Any future housing planned must take into account the fact that the main street is too narrow. Parking in the village itself is already horrendous at certain times of the day. As well as having a large Secondary School with all the problems to infrastructure that brings, the village is also a popular cut through to the M40 and this exacerbates an already difficult traffic situation. The sewers here often overflow, particularly at the bottom of Banbury Street, and have not been able to keep up with the increase in population. This will be a major concern in future development. Some new housing is needed, particularly small houses for our young people to be able to buy, but large numbers should not be built at the expense of the rest of this historic village.

Mrs D McGowan

Topic: 10.5 Kineton Context

1. The capacity of the roads in the centre of the village is an issue, particularly at peak school time and at other times, eg. large agricultural vehicles at harvest.

Graham Nabb

2. The Village Plan which was produced in 2003 is currently under review and it is essential that any policy for future development in and around the village pays due regard to the findings of this review when it becomes available.

Brian W Lewis

3. A sustainable community will be one in which local job opportunities reduce the need to travel to work.

Brian W Lewis

4. South Warwickshire Clinical Commissioning Group supports the need for better facilities for children and the retention of village shops and other services through the planning process as a key issue for Kineton.

NHS Warwickshire - Health Development Manager

5. Access and capacity of existing health services from rural Kineton is an issue.

NHS Warwickshire - Health Development Manager

6. Burton Dassett area is ranked within the top 10% most deprived areas nationally for barriers to housing and services. South Warwickshire Clinical Commissioning Group is keen to work in partnership with housing and planning colleagues to work towards breaking down any barriers present.

NHS Warwickshire - Health Development Manager

7. South Warwickshire Clinical Commissioning Group has concerns around the capacity of the transport infrastructure in and around Kineton. Rural isolation exacerbates health problems due to lack of access to services often resulting in mental wellbeing issues.

NHS Warwickshire - Health Development Manager

8. South Warwickshire Clinical Commissioning Group share concerns around the significant risk of flooding in the Dene Valley and would like to be involved in any decisions around a discharge consent that is required to support any proposed growth at Kineton.

NHS Warwickshire - Health Development Manager

Topic: 10.5 Kineton Policy Principles

1. Maintain the village boundaries - mainly the old railway line.

Graham Nabb

Topic: 10.5 Kineton Environmental Principle

1. A significant area of biodiversity in Kineton that is not mentioned is the old railway route around the northern edge of the built up area. This abuts against the primary school field which has around 100 plant species (it is an old ridge and furrow meadow), which in turn is next to the churchyard.

D Napier

2. Whilst to maintain a 'green wedge' along the Dene Valley may be desirable, it will not necessarily be to the total exclusion of any development whatsoever within this area - there may well be individual small sites which can be developed sensitively to the benefit of the area as a whole.

Brian W Lewis

3. Areas of High Landscape Sensitivity may well be identified within the emerging Village Plan.

Brian W Lewis

4. I agree with the principles regarding protecting the areas to the south of the village, ie. the separation of Kineton and Little Kineton, the area along the Dene Valley, and the views and amenity areas south of Banbury Road. However, this should be extended to take in the areas 1, 2, 3 and 4 so retaining the locally understood and preference for the traditional boundary of the village and protection of those areas as important to the village as they are now.

David Preston

5. The need for Severn Trent Water to carry out the necessary works at Kineton Waste Water Treatment Works prior to new housing being implemented is noted. However, this seems to deviate from the text at para. 10.5.10 which references the Combined Sewer Outflow.

West Midlands Metropolitan Authorities Pension Fund

Topic: 10.5 Kineton Social Principle

1. The capacity of the roads in the centre of the village is an issue, particularly at peak school time and at other times, eg. large agricultural vehicles at harvest.

Graham Nabb

2. Kineton High School is in a poor state of repair and will remain a drain on financial resources until it is rebuilt. Therefore, rebuild it (a) on a different position than existing site in order to give access to land for housing development, or (b) rebuild on a different site altogether (Wellesbourne is obvious option).

Peter Cook

3. There is a reference to increasing the number of suitable and affordable homes in the village and surrounding area. This approach would seem to accord with para. 50 of the NPPF. Only concern relates to the definition of suitable and whether this needs to accord with the housing mix identified within Policy CS 20. It is considered that whilst there is a need for affordable homes within Kineton, the Core Strategy should not seek to be overly prescriptive over the mix of new development within Kineton at the risk of creating pockets of identical new build.

West Midlands Metropolitan Authorities Pension Fund

4. Bullet point one currently states a policy principle to increase the number of suitable and affordable homes and this should be expanded to refer to the future development strategy range of 60-90 dwellings or such range as may be revised in the light of comments received.

Mrs G Lines

5. We support bullet points 5 and 6 that promote new play facilities and a circular walk to the north of the settlement. Part of the land to the north of the settlement being promoted for development may be available for play facilities along the former railway corridor which could be opened up to provide part of a walkway along the northern edge of the settlement, both as part of a housing development.

Mrs G Lines

Topic: 10.5 Kineton Economic Principle

No comments received for this section

Topic: 10.5 Kineton Future Development Strategy

1. It is important that the High Landscape Sensitivity of much of the surrounding landscape - particularly to the north of the village - has been recognised. Topography remains of paramount importance in the selection of sites for potential development.

Brian W Lewis

2. It is considered that the scale of residential development (60-90 dwellings) proposed for Kineton is inadequate. The figure should be amended to 150-200 dwellings.

Brian Lewis

3. Acknowledge that the future development strategy broadly captures, albeit at a high level, the key issues affecting Kineton. We would however suggest that the development strategy underplays the provision of shops and services within the settlement. In addition, Kineton has public transport links to Stratford and Leamington Spa.

West Midlands Metropolitan Authorities Pension Fund

4. Concur with the assessment that the landscape around Kineton is sensitive and as such this limits opportunities within the settlement for future development.

West Midlands Metropolitan Authorities Pension Fund

5. Support the general principles of the Future Development Strategy for Kineton but object to the scale of housing development which is too low given the sustainable nature of the settlement. The level of provision should be increased to reflect the good level of services and facilities available.

Mrs G Lines

Consultation Question: Q168

1. The effect of the MOD closing the depot facility has not been built into the plan. This should be considered as the 20 year period could mean any sort of change. The land area should be regarded as best green belt to prevent unwarranted or undesirable development.

Tim Phillips

2. Consideration needs to be given to the biodiversity value of gardens before assuming that 'infill' has no overall impact. Many gardens and brownfield areas are far more biodiverse than the surrounding countryside.

D Napier

3. One of the principles which is key to the whole development of Kineton is the relocation of the High School with a new road into it from Southam Road, possibly running round to Banbury Road. This should now be considered a top priority before any other development proposals can be assessed. Evidence to validate the stated shortfall of recreation space is unclear and questioned if the High School and the sports and social club is taken into account.

Kineton Parish Council

Consultation Question: Q169

1. Broadly the issues identified are appropriate with the caveat that they must be closely linked with all other comments made. For example, opportunities to limit the impact of vehicles in the village will be heavily supported by new access arrangements to the school.

Kineton Parish Council

Consultation Question: Q170

1. Given the relatively small size of the proposed development, I feel there are some far better sites than those proposed. There are a number of derelict/unoccupied commercial or brownfield sites within the village, eg. derelict petrol station/garage on Banbury Road and the empty warehouse premises on corner of Brookhampton Lane. I have concerns about the safety issues concerning access to proposed sites 3, 4 and 5. Both roads providing possible access lead into the village, are narrow, have bends in them, and bridges over the dismantled railway line. Site 4 is presently green fields. The railway line also provides a home to many varied types of wildlife and it would be a shame to destroy this habitat.

David Ferry

2. There is the loss of open countryside and loss of character to the picturesque village. Adding yet further modern housing estates will only increase the urban sprawl and loss of character. In particular many of the areas identified on Plan 5 are deemed as being medium-to-high in terms of landscape sensitivity to housing development. Areas 3 and 4 also have evidence of rare wildlife and development would lead to loss of habitat. Additionally, there would be access concerns off the Lighthorne Road, given that it's a windy fast road as you approach Kineton.

Mr & Mrs Simon Redmile

3. Lighthorne Road area - to build and develop in what has historically been a green belt area would spoil the natural beauty and peace of the area. This area is usually occupied by sheep, etc. It would also stretch the resources, for example, sewage. This, together with the immense development shown on Plan 5, would harm and spoil the village as we know it today. There is no vision for the future in this scheme. The Lighthorne Road is also dangerous enough with the speed and volume of the traffic particularly at peak times.

Richard Cumming

4. Sites outside the settlement boundary should be removed from the plan. The village centre site should be rejected on the basis of it being the last piece of significant open space within the built up area and it could become an amenity. Brownfield sites which have previously been granted planning permission but not been developed due to the moratorium should be included.

Kineton Parish Council

5. As landowner, I can confirm that location 3 is suitable and available for development. The development of the site for housing would be capable of being sustainable and can provide an appropriate mix of housing types and tenures. The site is deliverable within the plan period and development will be designed to conform with all other policy requirements. The development of the site will help to sustain the vitality and viability of the shops, schools, doctors surgery and other community facilities of Kineton. Also, the disused railway line could be used as a cycle way and footpath from site 3 to the main employment at the industrial park. Finally, the Millennium Gardens to the south west of the railway bridge could be extended across the disused railway to give an enhanced green space and park area to the betterment of the community and wildlife.

Robert Brisker

6. We support further development at Kineton and in particular promote location 5 as a suitable site for development. The site is under our control and it is proposed to bring it forward for a mixed use employment and residential development. A draft masterplan demonstrates the way in which a mixed use development could be delivered on this site. The Draft Core Strategy identifies land parcels to the north east of Kineton as having the least sensitivity to residential development, being classified as Medium Landscape Sensitivity. It identifies the need to increase local job opportunities, to sustain existing village services and facilities and the need for better facilities for children. This site can deliver small scale rural employment suitable for this location; can deliver a sufficient quantum of housing to assist in maintaining local services and facilities as well as increasing the supply of affordable housing; and can also provide a play area for use by existing and future residents.

Barwood Developments Ltd

7. The land identified in 1-4 is outside a natural village boundary which should be protected and much of it has poor access. The bottleneck where the Lighthorne Road joins Southam Street is already chaotic at times due to large vehicles and/or volume. There are protected species in area 4. Only 5 and 6 with a road through from Southam Street to Banbury Road represents a sensible and acceptable option.

Graham Nabb

8. Option 4 is back land development of a permanently grazed sheep pasture with a stream running through it. In wetter years, the land floods (also flooding onto my land) as it drains the surrounding slopes. The access onto Lighthorne Road would be very dangerous. Leaving Kineton, there is a narrow old railway bridge (one of the village boundaries) with poor visibility. Driving into Kineton there is a bottleneck on a 90 degree corner and any traffic increase would cause great difficulty. There is only a narrow footpath over the bridge. The sewerage system would need upgrading. At present the small ribbon of houses on Lighthorne Road beyond the bridge require a pumping station. Environmentally this is a very sensitive area, with permanent pasture both sides of the road which is part of a wider open hill and valley landscape. This gives the village a rural boundary rich in wildlife. People walk and cycle on this rural road and it feels open and unspoilt. The bridge and railway line are a visual separation from the village development. Development of the village northwards (options 2, 3 and 4) would completely change the character of the village and there would be no boundary to future development. Economic benefits to the village from previous increased housing seem to have been less than expected. There isn't a lot of employment within the village so new dwellers have to commute. I would have concerns about the services coping - such as primary school, medical facilities, transport. The High School needs upgrading as well. I can see no justification for considering land outside the accepted boundaries of the village. There are other more acceptable sites.

Mrs Rosemary Rivers

9. Farm land should only be used for housing as a last resort. Option 4 should therefore be exempt for this reason alone but also because it supports a great variety of wildlife, including birds, bats, mammals and reptiles. Any development would ruin this environment. Options 5 and 6 should definitely be the preferred sites and if the school were to be removed altogether, site 6 could then provide space for all housing development plus playing fields and recreation area.

Peter Cook

10. I have concerns regarding sites 3 and 4. They are approached down the Lighthorne Road by a hump back bridge and narrow footpath which is inadequate. The approach to both sites via Lighthorne Road is blind because of the bridge, bends in the roads partially responsible for two fatalities and the steep hill which freezes as water runs down. Also, site 4 floods.

Mark Borutan

11. Of the six sites only sites 1, 5 and 6 are moderately suitable for housing development. The key objections to sites 2, 3 and 4 are road safety, access and sewage capabilities.

- Site 6 - has been the subject of extensive previous investigations which has shown it to be eminently feasible. Is it possible to encompass development of site 5 with the existing school and as such would have existing access onto B road and could easily be linked to access via site 6? The need for a new school is of paramount importance to Kineton and the development of this site could enable private finance sources to be encouraged to assist the school development/rebuilding.
- Site 1 - offers good existing access to a B road, a full range of ground services, close to a major watercourse and waste water plant, proximity of employment area.
- Site 2 - accessing this site would be both difficult and expensive. It is low lying and wet, close to and below a disused rail bridge and 10m cutting.
- Sites 3 & 4 - lie either side of the substandard Lighthorne Road, are areas of high/medium landscape sensitivity, in continuous agricultural use, proliferation of bird life, muntjacs and other protected species of particular ecological interest, all foul drainage has to be pumped, wet and difficult to drain, abut the woodland edge of the village and form an integral part of a rich wildlife area, difficult access on to an unclassified road, humpback bridge causes the road to narrow and there are frequent near misses, no pavement on one side of the road, dangerous junction where Lighthorne Road joins Southam Street, in winter Lighthorne Road is frequently impassable.

Mr Robert James Bradbury

12. Areas 3 and 4 would need access from Lighthorne Road and this has many issues
- blind and acute turn off Southam Street
 - potentially make a bottleneck at this junction
 - railway bridge is already difficult to assess when approaching from either direction
 - the path on one side narrows and you cannot see approaching traffic. It would be impossible to safely walk a child or pushchair over this bridge - therefore developments would be cut off to pedestrians
 - increased traffic on this road would seriously affect the households already there
 - the bridge itself is old and there are cracks in the road surface. It is unsuitable for HGVs and more frequent use can only weaken it
 - Lighthorne Road has a history of being hazardous in winter and it can be impassable.
 - Area 4 has an abundance of wildlife and the whole environment would be destroyed by development

Areas 5 and 6 would seem better suited to housing development because:

- Area 6 has a B road that is wide and flat and visibility is clear in both directions
- natural drainage is better at this end of the village
- redevelopment of the High School will require better infrastructure and it would seem prudent that new housing could take advantage of the work to sewerage, utilities, etc.
- both areas are identified as only having medium impact on landscape sensitivity to the village.

M Habberley

13. Fields to the north of the railway line (Areas 1, 2, 3, 4, 5) are significant for the overall biodiversity of the village and so are less appropriate areas for housing than it might appear. The hedgerows along Warwick Road, Lighthorne Road and Southam Street are far more biodiverse than those alongside the arable fields a mile or so further from the village centre. The Lawton Report (2010) highlighted the importance of interlinking habitats - fragmented habitat is not enough to sustain wildlife populations.

D Napier

- 14.
- Areas 5 and 6 are already degraded in character being arable in nature. With the existing ribbon development along Banbury Road, Area 6 would appear to be the most accessible and appropriate for development. The existing Walton Farm development stands somewhat isolated and has a poor boundary relationship with the land to the west which could be improved. The disused railway line to the north of the village provides a 'naturalised' boundary to the existing development and should remain as an important wildlife corridor. The vegetation in the vicinity of area 5 is not as substantial as that found adjacent to areas 3 and 4 and it may well be possible to obtain access to this area without significant visual harm.
 - Areas 3 and 4 - it should be noted that at times of high rainfall the disused railway line acts as a moat or swale, holding substantial amounts of run-off from the fields to the north of the village. Any additional development with substantial drainage should not add additional run-off to this existing 'collecting' feature. Areas 3 and 4 are currently pleasant pastoral landscapes beyond the existing disused railway feature. Within area 4 in particular there is a mosaic of habitats supporting a wide range of reptiles, birds and mammals. Of particular note will be the Great Crested Newt which can be found throughout the area and I would suggest the main breeding ground is within area 4. Grass snakes are also located in the vicinity, as are breeding bird of prey and a number of RSPB 'conservation' listed birds. A number of declining trees are located in the area and provide additional habitat.
 - Areas 1 and 2 - suggest area 2 would be more appropriate for development as this would read as ribbon development along the Warwick Road and relate to the Brookhampton Lane development opposite. To develop beyond Brookhampton Lane, at the base of Pittern Hill, would not appear to relate well to the existing morphology.

Tim Rose

15. The existing traditional boundary of the railway line to the north of the village should be maintained. In particular this would mean that the areas marked 1, 2, 3 and 4 should be protected and not developed. If there is to be any development, land of medium landscape sensitivity would be the more appropriate, so preference should be for areas 6 and 5. Areas 3 and 4 in particular, but also 1 and 2, provide lovely tranquil countryside and views, with wildlife and grazing, and are an amenity for Kineton. Any development here would change the character of the village significantly, to its detriment. Areas 3 and 4 on Lighthorne Road pose particular problems so any development is undesirable. The road is narrow and difficult, especially in winter, with no footpath, and major hazards of the hump back bridge over the old railway, and the turn at the junction with Southam Street. There are problems with the existing sewerage system and the implications of this for any development of more housing.

David Preston

16. Site 5 could have an existing surface water flooding problem. Site 4 is shown to be substantially flooded by run off from adjacent ground. These flooded areas should be identified in a site specific Flood Risk Assessment that considers all forms of flooding.

Environment Agency

17. The Pension Fund own and control the existing Local Plan KIN.C allocation and approximately 4 hectares to the north of Banbury Road. The latter is identified as Site 6 on Plan 5. The site is in arable agricultural use and is identified as Grade 3 in the Agricultural Land Classification. The Landscape Sensitivity Study identifies that Sites 5 and 6 have the least sensitivity to residential development. Site 6 is considered to be broadly free from any constraints:

- it is not considered that the site itself will be of any significant ecological value in terms of habitat and it is not subject to any specific nature conservation designations
- it is not constrained by flood risk
- further work will be needed to explore whether there are any features of cultural heritage or archaeological importance on site
- the site is well positioned to access a range of services, community facilities and jobs either by foot, bicycle or public transport. It is therefore considered to be a highly accessible location for new development.

Site 1 - Brookhampton Lane serves as a clearly defined boundary to the settlement. The site is identified as being High/Medium sensitivity in the Landscape Sensitivity Assessment. For these reasons it is not considered that this site is a viable option.

Sites 2, 3 and 4 - are all located to the north of the abandoned railway line within an area identified as being of High/Medium sensitivity. All three of these sites would also appear to be constrained in some way by the ability to secure access to the highway network.

Site 5 - it is not possible to develop this site without detriment to the settlement form. It may prove difficult to deliver this site without there being an adverse impact upon the setting of the cemetery and play area off Southam Road.

West Midlands Metropolitan Authorities Pension Fund

18. Land identified on Plan 5 as Potential Development Option 2 is supported for housing. The land is in the control of a single owner who is willing to make it available when necessary. The site is well related to the existing pattern of development and is close to the centre of the village, and to a range of social and community facilities. In particular, it is within easy walking distance of the Infant and Junior School, the village centre and employment opportunities on the industrial estate. A satisfactory access can be achieved from Warwick Road via a mini roundabout. There are no statutory designations in respect of archaeology or conservation. The former railway area itself offers the opportunity to enhance biodiversity through management, to bring the area into use for public access and to provide a walkway to the north of the settlement. There are no known constraints to development of the site and there is no reason why development should not be achieved in the short term.

Mrs G Lines

19. It is considered that development option 2 could come forward without having an adverse effect on the character of the settlement. This direction for growth could come forward in a manner consistent with the future development strategy and developed in the context of an agreed Masterplan.

Mr B Lewis

Plan 5: Kineton

1. These six development sites will maximise devaluation of existing properties which will no longer reside on the outer limits of the village. No longer adjacent to, or seeing and hearing wildlife and countryside. Current boundary properties will become part of the inner village whilst new builds become the new village boundaries. The six sites do not take into account existing residents and their reasons for buying/living at the village boundaries. Previous village plans for housing development concentrated in one area of the village causing disruption to one area of the village. Every area is being affected and will cause long term damage to a typical, beautiful English village.

Mr T Brain

2. The identification of 'locations' for possible development indicated on Plan 5 leaves much to be desired. The generalised nature of this approach appears to ignore all of the previous work undertaken at considerable public expense in the Strategic Housing Land Availability Assessment and which was much in evidence in the previous Draft Strategy.

Brian W Lewis

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10.6 Shipston-on-Stour Area Policy Profile

1. Shipston is a rural settlement with a unique visual characteristic. It is very sensitive to developments that might affect that characteristic or do damage to the local economy. It has grown enormously over the past 30 years, largely to the town's benefit. This growth has been contained within the boundaries of the town, delineated by its five entry points, since they were established in the early 1970s. The Town Council want to maintain these boundaries as they form a critical part of the character of the settlement and of the surrounding countryside.

Shipston-on-Stour Town Council

2. The Town Council is in broad agreement with the characterisation of the town and the analysis of its needs. However, there is a requirement for further prioritisation and a more selective and focussed approach to housing development in the town to 2028.

Shipston-on-Stour Town Council

3. It is pleasing to see that the responses to the earlier draft have been taken into consideration and resulted in a revised draft which is pretty near spot on for Shipston. The emphasis on protecting and preserving the vibrant town centre and not allowing any development outside the existing boundaries is exactly what is required. More needs to be done to help create employment opportunities; only allowing the Norgren site to be sold for business/light industrial use would help to achieve this.

Sarah Penrose

Shipston-on-Stour's historic growth and the specific proposals for its future in the Draft Core Strategy are well put to - retain its character. It calls for responsible, clear thinking in its realization of the town's future growth while retaining its unique quality of a lively, economic working centre. So many such towns as Shipston have already been destroyed by insensitive ring growth leaving their once trading centres in decay.

Brian Glover & Jan Fraser Jenkins

Topic: 10.6 Shipston-on-Stour Context

1. I am in favour of the context outlined but have specific areas of concern around the outdated information within 10.6.9. I am keen to understand the Council's stance on a superstore and the comment about promoting stability of the town centre. The comments within the survey [2008 Retail Study] fail to notice that none of the affected areas were included within the poll and it only represented a small snapshot of the entire town and its feelings for these types of developments. Also, the 2008 survey failed to comprehend that many commuting people that travel outside the town to work, will shop while at work or on their commute home.

Andrew Nabbs

2. I ask you to identify the 'household survey' referred to in 10.6.9 for the Retail Study. I am surprised that you continue to base your Draft Core Strategy on information which in the light of present economic circumstances must be out of date.

John P McCarthy

3. In 10.6.12 it says that flood risk is "not considered a significant constraint on future development", whereas in Policy Principles (a) Environmental, it stresses that development proposals and other initiatives and projects will be expected to contribute to the achievement of minimising the risk of flooding. There should be some clarification in the final version of the Strategy as these two paragraphs seem to contradict each other.

Verity Richardson

4. South Warwickshire Clinical Commissioning Group have concerns around the capacity of the transport infrastructure in and around Shipston. Rural isolation exacerbates health problems due to lack of access to services often resulting in mental wellbeing issues.

NHS Warwickshire

5. South Warwickshire Clinical Commissioning Group have concerns around the 2007 flooding in Shipston and are keen to be engaged in discussions around determining the most effective way of reducing the risk of a similar situation occurring.

NHS Warwickshire

6. The high proportion of elderly people suggests Shipston will need to cater for an existing elderly population when considering existing and future care and housing needs, but should also positively plan to encourage more younger families and a working age population to broaden the employment profile of the town. Any ongoing strategy for Shipston should continue to build and broaden its employment profile to ensure those living locally have access to a range of job opportunities and services.

Ainscough Strategic Land

7. Broadly the profile is accurate, although the household survey referred to in 10.6.9 is four years out of date. As such it makes no comment on the development of a large retail supermarket (Waitrose) on Shipston Road in Stratford, easily accessible by car and public transport from Shipston.

Philip J Sykes

Topic: 10.6 Shipston-on-Stour Policy Principles

1. There appear to be a number of initial generalisations in the draft which are subsequently contradicted by specific cases. I refer in particular to the policy principles. The draft acknowledges the historic nature of Shipston and the excessive expansion of the town between 1981 and 2008 and, having set standards for waste management among other matters you seek to encourage further increases in housing whilst there are already serious issues with waste disposal and flooding quite apart from a serious problem with school places.

John P McCarthy

Topic: 10.6 Shipston-on-Stour Environmental Principle

1. I strongly support the principles outlined, particularly further flood prevention measures, a riverside walk, no development to east of river, and provision of accessible woodland.

Peter Russell Wilson

2. Significant investment in the current infrastructure network would be required to cope with any development within the town, particularly the areas 3 and 5. Although not perceived by the Draft Core Strategy to be a constraint the natural heave on the land would cause considerable subsidence to locally adjacent residents.

Andrew Nabbs

3. Opportunities exist for better physical and visual access to the riverside at Shipston and this will form one of the Town Council's priorities.

Shipston-on-Stour Town Council

4. The public footpath referred to starts on the eastern bank of the Stour at its junction with the Brailes Road. For part of its length this footpath provides access to the riverbank. Where it does, the Town Council believes there are opportunities for improved park, picnic and recreational use. There is a lack of parkland in the town and this land in the Area of Restraint may provide the best opportunity for turning current farmland into parkland.

Shipston-on-Stour Town Council

5. A riverside walk would be greatly enhanced if the access to it and other walks on the eastern side of the Stour were made more accessible by a footbridge from Mill Lane car park to the eastern bank. A footbridge would solve the potential accident problem on the bridge and help to promote walks on the eastern banks of the Stour.

Shipston-on-Stour Town Council

6. As a resident for 20 years whose house was flooded in 2007, I hope for strenuous maintenance and regular dredging of the Stour. Perhaps an adjacent field could be engineered as a flood plain.

Kathleen Barrett

7. It is very important that the floodplain on the east side of Shipston is retained and remains a constraint to development.

Councillor R Cheney

Topic: 10.6 Shipston-on-Stour Social Principle

1. Sixth form provision should be provided although in light of the need to maximise local employment there should be equal focus on providing vocational training/apprenticeships also.

Robb Kightley

2. I support the social principles except for the increase in affordable housing. I would need convincing such housing is actually needed and not being provided to be "politically correct".

R Lancaster

3. The principle refers to development of "the riverside area" without making it clear that it must be on the western side of the river. Environmental principle makes it clear that the eastern side of the river is to be protected from development. The social principle should be amended by inserting "on the western side of the Stour" after the words "develop the riverside area."

Mr James Little

4. The local football club requires further investment to purchase land adjacent to the Sports Club on London Road. This is to secure playing facilities for junior teams. With this the Football Club can offer the youth of Shipston adequate playing facilities and also look at providing further investment for out of school activities and training.

Andrew Nabbs

5. The Medical Centre does not need to be replaced, purely modernised to cope with the current influx of patients, This should be considered in conjunction with the Ellen Badger Hospital and offer a wider variety of practitioners to suit the ailments of our ageing population.

Andrew Nabbs

6. The development of a Sixth Form at Shipston will require development on a green field site (notably the football pitches adjacent to the Sports Facility). Although in favour of this, additional sports facilities must be made available either onsite or within the town itself.

Andrew Nabbs

7. In conjunction with the Council and Sport England, a new clubhouse and changing facilities would allow our growing disabled population more access to sports. The local Townsend Hall is in need of restoration and I am in full accordance with any provisions for this.

Andrew Nabbs

8. We are not clear what "suitable" homes means. Does it include for example "extra care housing" identified in para. 9.4.4 but not referred to thereafter? There is an urgent need in Shipston for a choice of housing options for older people, whether this is by adaptations of existing homes, extra care units, through to the refurbishment/replacement of Low Furlong to provide suitable accommodation for the growing number of dementia sufferers.

Shipston SCAN

7. The provision of a new Medical Centre is an ambitious and long-overdue project strongly supported by Scan but we are aware that the project may fail because of competing demands on NHS resources. Should this prove to be the case it is vital that the Council encourages less ambitious alternatives to improve the provision of medical facilities in the town.

Shipston SCAN

8. We hope the emphasis on the need to improve public transport services, including community transport initiatives reflects a determination to address an issue of major concern to older people, the age group most dependent on such services.

Shipston SCAN

9. The need for a roundabout and/or traffic lights at Portobello Crossroads is compelling. We hope that the District Council will press the Highways Authority more strongly to make this happen.

Shipston SCAN

10. For Shipston and the surrounding district the key issues are enhancing education provision in the town, providing a medical and health care service appropriate to the 21st century, improving the transport network, services and infrastructure of the town and increasing recreation and employment opportunities, particularly for the young.

Shipston-on-Stour Town Council

11. The Town Council is working alongside the Medical centre in supporting its ambitions for a new Health and Wellbeing Park in the town. It is equally supportive of the High School and its ambitions for Academy status and the potential addition of a sixth form. However, these developments, if they are to enhance the infrastructure and services of the town, have to be sensitive to local needs.

Shipston-on-Stour Town Council

12. The wide range of sporting and recreational activities in the town would be enhanced by a multi-purpose, all weather, floodlit pitch(es) on which hockey and football could be played. Outline proposals for such a pitch were mooted at the High School but those plans appear to be in abeyance at present.

Shipston-on-Stour Town Council

13. The primary school and secondary school are bursting at the seams - in part victims of their own success. The High School in particular is of an age where replacement rather than refurbishment is required.

Shipston-on-Stour Town Council

14. Strongly agree with proposed increase in the provision of play space for children and young people, with particular emphasis on facilities for adolescents and teenagers meeting places. There is not enough recognition of their social needs - particularly evening and night time events.

Kathleen Barrett

15. It is important that consideration of a sixth form at the High School is considered within the overall capacity of adjacent schools at Chipping Campden and Kineton and not in isolation.

Philip J Sykes

16. The first bullet point needs the addition of words to emphasise the need to restrict the development of housing units in Shipston to the plan limit. Suggest adding the words "...but not exceeding the upper limit proposed in the Plan."

Philip J Sykes

17. Whilst supporting most of the principles in this section I would object to the statement "Increase the number of suitable and affordable homes." Any building of new homes in Shipston and surrounding areas should only be allowed if backed up by the results of a housing needs survey and neighbourhood plan.

Councillor R Cheney

18. Bullet point one should be expanded to refer to the future development strategy range of 140-220 dwellings in Shipston on Stour or such range as may be revised in the light of comments received.

Linfoot Homes Ltd, Banner Homes (Midlands)

19. South Warwickshire Clinical Commissioning Group supports the encouragement of further education; reassurance is sought that appropriate health infrastructure is in place to support such a development.

NHS Warwickshire

Topic: 10.6 Shipston-on-Stour Economic Principle

1. I strongly support the principle of strengthening the town centre through provision of small-scale retail and other business activities, in keeping with the existing character of the town.

Peter Russell Wilson

2. There is a need for a larger supermarket and petrol station in the town. Residents have to travel to other towns to do their weekly shop. The further expansion of housing planned in Shipston will only heighten the problem if a supermarket is not provided.

Mr Robert O'Malley, Matthew Hill, Annemarie Hill, Stephen Caton

3. Object to the removal of the proposed supermarket for Shipston-on-Stour, as previously advocated. This approach does not reflect the final recommendations of the Council's 2008 Retail Study which confirmed the need for between 1,300 sq.m. and 1,800 sq.m. of net convenience floorspace for Shipston under Scenario 1. ASL also requests that the Council review the Retail Impact Study and Household Survey information provided as part of the recently submitted planning application, which reconfirms and validates the Council's 2008 Retail Study findings and the level of convenience goods expenditure and main food shopping trips that are leaking out of the Shipston zone to distant, out-of-

centre supermarkets in Stratford, Banbury and Stow-on-the-Wold. We consider that the previously proposed allocation correlates with all the key tests set out in the NPPF and there is no clear evidence that a supermarket would result in significant adverse impacts on Shipston town centre. Instead, there are a number of clear positive benefits, including the ability to:

- provide for a clearly identified quantitative and qualitative need for a main food supermarket offer in Shipston on Stour;
- provide improved consumer choice and value for existing and new residents within Shipston;
- reduce journey miles undertaken by main food shopping trips;
- claw back lost convenience goods expenditure and custom to Shipston and attract new customers from the surrounding rural catchment area;
- provide access and promotional links between the supermarket and wider development proposal to help create linked trips and enhance the vitality and viability of Shipston town centre; and
- deliver a substantial number of new private sector jobs and economic investment.

Ainscough Strategic Land

4. Whilst attracting industry and manufacturing industries to Shipston might be desirable, a hopeful reliance on this type of employment coming back to the town could be long lived and therefore alternative forms of economic development, as defined in the NPPF, which can offer immediate employment opportunities should be considered favourably, especially when they address an identified demand and need and meet wider sustainability objectives. A 'main food' supermarket would generate a range of jobs and a range of full and part time opportunities.

Ainscough Strategic Land

5. Object to the removal of the option of a larger supermarket in Shipston by recommending a considerably smaller floor space for a town centre food store than in previous versions of the document.

Sharon Begley

Ms Sacha Saunders

Ms Valerie Saunders

Mrs Barbara Baker

Emma Morris

J P Saunders

Jim Campbell

Miss Rebecca E Mann

N R Skakeprank

J Hemming

Patricia Warner

S Bryan

Annabel Hutsby

Neville White

Lauren Gowers

R Jones

Mr J Clarke

M McCrickard

Mr M Nash

Nina Langdon

Ian Pettigrew

Mrs D Terry

C F Nash

William Hands

Dave Cross

A Wyre

**Neil Wilkes
Alice Timims
Christopher Davies
L M Tennant
Mr M Randall
Mrs B Randall
Mr T Stratch
Mr Jacob Harvey
Mr Allan Harvey
Mrs J Holmes
P Holmes
S K Burton
Mrs I Strach
Miss S J King
Ally Franklin
J A Samuels
Elizabeth Warner
Mr David King
J Warner
Mr Graham Akrill
Kerry Sterland
Marie Cameron
A Grosvenor
R Sterland
Mr Benjamin Akrill
Miss Yasmin Akrill
Mrs Dawn Akrill
Russell Critchin
Sarah King
Norman Schulz
Maria Hardwidge
Guy Legge
Ms Vanessa Jones
Mrs Helen Ferris
Mrs Maria Harvey
Holly Ferris
Mr Trevor Baker
Daniel Gibbs
Catherine Bradley
Jackie Averis
Jennifer Hadland
Mrs Joyce Strangwood
Emma Cakebread
Helen Boswell
S Montgomery
Anthony Peter Bryan
Mark Reason
Mrs D Baldwin
Mrs G Owen
Mr & Mrs Bloomfield
G Kiely
Karen James
N Nicklin**

**A Nicklin
Chris Benfield
Gary Wilkes
M Benfield
Sarah Nicklin
Andrew Righton
C Hartwell
Mr S R Murrall
C Caton
Brian Healey
Sue King
Maria Gildea
James Hands
Hayley Begley
Emma Gleed
Debbie Warren
Mr Colin Mumford
Caroline Butler
Mrs D Hawkins
Mrs Danielle Randall
Mrs Ian Unitt
Amy Sleat
Adrian Taylor
Mr & Mrs Shadlow
Graham Shadlow
Mr J King
Mrs King
Mr Alan King
Mrs S M King
Mrs Christine Nash
C & I Diston
Di & Dave Sleat
Steve Jones
Peter Steele
Jack Dunsbee
Ryan Glover
Ian Franklin
J A Laveredge
Mrs Emma Rowlands
Alice Timms
Sharron Randall
R A Wilson**

6. The removal of the larger store in Shipston from the Draft Core Strategy and replacement with a smaller store is very unusual. The people in favour of the supermarket don't feel that the smaller store would add anything to the town. The people who are anti-supermarket only want it because they think it will stop the application for a larger store. I would like to see the larger store re-included in the Draft Core Strategy and allow people a genuine voice on the issue.

Andy West, Connor Ferris, Mark Ford, Clare Dunsbee, Marcus Griffin, Dean Hutt

7. The town of Shipston is no longer able to support without a reasonably sized supermarket and petrol station due to the rapid growth of our town.

Annemarie Hill, Mrs G Hill & Mr D Hill

8. After years of expansion of housing I give overwhelming support to the proposed supermarket and petrol station in Shipston. It's absurd that so many of us have to go to other towns to shop. The supermarket proposal will keep more people in the town to shop and provide much needed local jobs. We also need a petrol station desperately. The lack of competition which exists currently is bad for our residents.

Louise Jones, Sharron Randall

9. There is not a need for a large out-of-town retail development. The Town Council welcomes the down-scaling of retail provision to a store of some 410 sq.m. (net) within the town centre and the principle that developments over 1000 sq.m. are not appropriate for market towns such as Shipston.

Shipston-on-Stour Town Council

10. I especially support the policy of providing 410 sq.m. net of food retail to support the town centre. This is essential to enhance the town centre and is greatly preferable to an out of town supermarket.

Councillor R Cheney

11. Boosting employment in the local economy and the future prosperity of the town centre go hand in hand. New jobs will attract people into the area and a prosperous town centre will help attract new shopping facilities to meet the needs of a growing population.

Shipston-on-Stour Town Council

12. In order to protect the vitality and viability of Shipston town centre, the modest provision of additional food retail floor space is only supported if such development is provided for on centrally-located sites following the sequential approach.

Antony Aspbury Associates Ltd

13. The most direct way to kill off the present small artisan shops in Shipston which are the envy of most other local small towns is to permit an edge of town supermarket.

John P McCarthy

14. The provision of a large supermarket away from the town centre is seen by many of the town's retail businesses as contrary to the Draft Core Strategy principles, and a very great threat to their businesses. The effect on town centres through the opening of supermarkets, with the closure of many businesses, is already a national issue, and one that is contrary to attempts to keep unaffected town centres healthy. A convenience store to cater for housing on the Norgren site and residential areas on the western side of Shipston may satisfy much, if any, demand for an additional food and household goods outlet and would accord with the Draft Core Strategy.

John Morel

15. The Society supports the policy principles for Shipston-on-Stour and particularly the shift away from the strategy based on Scenario 1 of the Retail Study which was based on retaining an unrealistic share of local expenditure in the Main Rural Centres. It supports the aim of improving local shopping facilities in the town centre and considers the proposal for up to 210 sq.m. of additional food retailing to support the town centre as realistic. However, it is concerned that greater clarity is needed with regard to what is meant by supporting the town centre. The town centre is commercially fragile and any inappropriately located retail development could have a severe adverse impact on the centre. The plan needs to be clear that such development is in or on the edge of the centre and the easiest way to achieve this is to define the commercial core on a plan.

Midcounties Co-operative Society Ltd

16. We recognise that there is local support for maintaining a strong retail presence in the town centre but we know that there is likewise considerable support from all age groups for a nearby out-of-town supermarket. We ask that the District Council should not prejudge the issue.

Shipston SCAN

17. Most of those who shop for food out of Shipston do not make special journeys but do so because they find themselves elsewhere for work or other reasons and will continue to do so.

David Gunn

18. We urge the Council to give full and proper consideration to the economic wellbeing and development of the Stour Valley region, specifically by providing support for the business environment, encouraging enterprise and business growth and providing the conditions and support to make this happen. The District Council should be looking to work with organisations such as Stour United Business and the Stour Enterprise Centre, together with their strategic partners, in identifying opportunities and providing support to enable small firms to prosper in the area.

Stour United Business

19. Since 2007, two of the major employers in Shipston have ceased trading (IMI Norgren and Pettifers). This has had a significant impact on the local job market. Stour United Business calls on the District Council to encourage and support the attraction of a major employer to the Stour Valley to fill the void left by those businesses that have closed. This could be through the redeployment of the old Norgren site, which we recommend be retained for employment use. Whereas we subscribe to the consultants reports regarding the over capacity of industrial land within the district, we also recognise that this is not a feature of the local Stour Valley area, and as such call on the Council to seek to retain an element of this land usage within the Stour Valley. We believe that working with Coventry and Warwickshire strategic partners and government departments, it should be feasible to encourage a large employer to set up in the area and utilise such facilities.

Stour United Business

20. We strongly believe that the "town centre" traders provide a critical role in the economic viability of the town and one that should be encouraged and preserved. As with many other high streets and town centres, there is a fragile balance with regard to individual business viability, which can soon escalate into a cumulative effect if it is not nurtured effectively. We have strong concerns about the impact of any "out of town" development on the existing town centre business base and thereby the overall vitality and viability of the market town as a whole, and would strongly recommend to the District Council that such development is resisted.

Stour United Business

21. The town needs to encourage businesses that manufacture and engineer products and provide employment on a full time and regular basis. The Norgren site is in existence for that.

Ms Jacqueline Homer

22. There is very little employment opportunities within Shipston itself and I feel this is an area that needs to be concentrated on, not building more houses.

Mrs Trudy Steele

23. At present there is difficulty parking cars in Shipston town centre.

George Hughton

Topic: 10.6 Shipston-on-Stour Future Development Strategy

1. The medical centre is struggling to keep up with the increase in patient numbers. Infrastructure needs to be put in place before a new influx of people. This includes large schools and general facilities, and keep the library.

Mrs Val Lake

2. Shipston does not have the facilities for more housing. There isn't enough parking, the schools are not large enough and the town is no longer a nice place to live. It is in danger of losing its appeal and charm. Green spaces are slowly being lost and people feel threatened walking around town at night. The situation can only get worse by having more properties built on.

Ms Elaine Pettit

3. Cannot agree with the housing development proposals - 140-220 dwellings would not be in keeping with the uniqueness and character of Shipston. Small scale infill development would be more appropriate.

R Lancaster

4. I would support plans for a petrol filling station and shops so that I don't have to travel to Moreton for fuel.

Julian Burnell

5. Shipston is already overdeveloped. Do not even consider green field development. I would however support Shipston-on-the-Hill at the Old Norgren IMI site, but would be against development adjacent to land options by Ainscough and Cala Homes.

6. Locals would not support development on sites other than the Old Norgren site. Stratford District Council has failed to take account of the fact that Shipston has grown 95% since 2001. The town has already been overdeveloped. Shipston should be left alone to sort its own economic and employment issues before increasing the population.

7. Only develop brownfield sites.

Andrew Nabbs

8. White Consultants' Landscape Sensitivity Study does not support developing greenfield land at Camden Road - application 12/00403/OUT. Development on the ridge line would damage the visual character of Shipston.

9. Large scale development that breaches the rural skyline when viewed from the east would be inappropriate and would damage the character of the settlement and its relationship with the surrounding countryside.

10. White Consultants report into Landscape Sensitivity recognised the character of Shipston and the relationship of the town to the surrounding countryside. In examining the Area Policy Profile the town will draw heavily on the evidence and analysis provided by White consultants' study.

11. STC accepts the towns' remoteness from the motorway network limits Shipston's commercial attractiveness. The Old Norgren site at Tileman's Lane may be too large to attract commercial development, but the reuse of the site needs to be addressed. Rather retain the site for employment than developing for housing. If housing is the only option then this would be better than an abandoned factory.

Shipston-on-Stour Town Council

12. Support the idea that commercial development is more sensitive (landscape) than housing because of its large scale, height and impact on sloping ground.

13. Support paragraph 10.6.19 that land to the west and south west of Shipston have the least sensitivity to residential development and that small parcels of housing development could be accommodated in these areas subject to mitigating measures. Former Norgren factory is in an a medium sensitivity landscape area west of Shipston, the site of a redevelopment proposal by CALA Homes.

14. Correct the last sentence of paragraph 10.6.20 regarding landscaping around the former Norgren site. Replace the words 'views from the east of the town' with the words 'views from the west of the town'.

15. Object to the proposed housing allocation of approximately 140-220 dwellings during the remainder of the Plan period. The basis for this is the 8,000 dwellings for the whole District. This housing figure is wholly unsustainable. At the same time CALA Homes supports the idea that some of the 140-220 homes would be built on infill / redevelopment / change of use sites within the town.

16. The former Norgren site could deliver up to 130 dwellings early in the Plan period to support the Housing Strategy. The site is located in a medium sensitivity landscape area.

CALA Homes (Midlands)

17. Ambitious list of opportunities focusing on new social infrastructure and employment opportunities. If these opportunities are to be paid for through developer contributions then more development would mean more local social infrastructure.

18. Support the principles of the Future Development Strategy for Shipston-on-Stour, but object to the scale of housing development given the nature of the settlement. Increase the level of provision to reflect the high level of services and facilities available, as well as local demand.

Linfoot Homes Ltd & Banner Homes (Midlands)

19. Object to paragraph 10.6.21. The future of the Norgren site may well be decided before this plan is approved. If the current planning application is refused then retain the site for employment. Undertake a housing needs survey before deciding on further development.

20. Support paragraphs 10.6.1 (enhancing the town centre) and 10.6.17 (retain the flood plain to the east as a constraint).

21. Support 1.9 hectares of employment land as a minimum.

Councillor R Cheney

22. Support additional capacity at Itchen Bank Waste Water Treatment works to accommodate large scale development.

NHS Warwickshire

23. Shipston has already taken more than its fair share of development, together with the effect that more development has on the town centre and character of the settlement than other settlements.

24. Retain the Norgren site for future employment and as a site for relocating the Ellen Badger Hospital combined with a relocated medical centre. This in turn will release existing brownfield sites reducing the need to develop greenfield sites on the periphery of the town.

25. Take account the distance of new development from the centre of town and facilities such as schools, medical centre etc.

Mr Peter Britton

26. The Future Development Strategy will preserve and improve a unique small town.

C D Fox

27. Shipston has had a 95% increase in households since 1980. This is not a reason to restrict growth, but the town has lost its major employers. Continued growth will bring new services and employment opportunities to existing residents while meeting local housing needs.

28. Object to limited levels of proposed housing development identified for Shipston.

29. Rather consider a 40% target for main rural centres based on population distribution patterns, ensuring more housing development is focused on key service centres that have more employment and other services. Shipston should then be allocated 625 dwellings not 220 as proposed.

30. Shipston has a need for extra care development. Pre-application discussions have already taken place with County on the delivery of extra care in Shipston on a priority needs basis to help alleviate existing pressure at the Low Furlong Care Home which is ultimately planned for closure.

31. Rapidly ageing population of the District is compounded in Shipston where there is a higher proportion of people age of 65 and over compared to the District, placing extra pressure on existing services - low stock of extra accommodation.

32. To be viable private specialised development needs to be a sufficient scale. 450 hours of care provision per week for a 24/7 care service typically requires over 100 units - inadequate supply across the District and in Shipston.

33. Council needs to plan for the identified needs of Shipston. There is public support for part of a SHIP.1 allocation. There is a demand for a supermarket in Shipston.

34. NPPF requires Local Planning Authorities to allocate suitable sites, apply sequential tests and to set policies to meeting local identified need in accessible locations if needs cannot be met in or on edge of town centres. Council's evidence does not include an assessment of sites for retail development.

35. Object to the Shipston on Stour Area Policy Profile for the following reasons:

- Limited level of housing development
- Removal of a recognised supermarket requirement for Shipston on Stour - provision only being made for 410 sq.m. convenience retail in the town centre.
- Lack of extra care accommodation
- Lack of a hierarchy of preference for development options for Shipston.
- Lack of any reference of local support for a supermarket.

Ainscough Strategic Land

Consultation Question: Q171

1. Need to address the whereabouts of existing town centre car parking.

David Gunn

2. Shipston is unlikely to draw in hordes of tourists, but the market does attract people from walking tours, cricket tours, bowls events and followers of the Cheltenham Festival. Cotswold Way is a few miles from Shipston at Chipping Campden. SDC needs to further explore Shipston as a base for tourists.

Shipston-on-Stour Town Council

3. Support general environmental and social principles, subject to mitigating measures being implemented to overcome impacts on sensitive landscape.

CALA Homes (Midlands)

4. Town Plan identifies the importance of improving sport and recreation facilities, providing a wide range of health benefits.

NHS Warwickshire

5. Strengthen / reinforce the need to avoid flooding in policy CS3.

Environment Agency

6. The number of houses has doubled in Shipston since 1980, more than any other settlement in the District. This growth has seen a surge in traffic, demand for parking in The Square and town centre. Further development will lead to even more traffic and parking issues, increasing the case for out of town shopping and irrevocably changing the character of Shipston.

Mr Peter Britton

7. The principles have been well thought out and show an excellent understanding of what is best for Shipston.

C D Fox

Consultation Question: Q172

1. Not in favour of any future development other than the redevelopment of brownfield sites.

Andrew Nabbs

2. Support the need for more homes provided the identified number is not exceeded. The focus though should instead be on future local employment than more houses. Houses need to follow employment opportunities. Future housing schemes need to be small scale and preferably brownfield / infill.

Steven & Jane-Elizabeth Gee

Consultation Question: Q173

1. Balance future development around the hub of the town to preserve the cohesive settlement. Development to the south has affected this cohesiveness, creating suburbia without many facilities.

Robb Kightley

2. Support redeveloping the former Norgren site before any other development. Brownfield land should always be preferred instead of the destruction of greenfield sites. It will then be logical to extend the development of land adjacent to the triangle formed by Camden Road, The Fosseyway and Darlingscote Road.

Julian Burnell

3. Support the redevelopment of the former Norgren site on Camden Road. This would be consistent with the principle of developing brownfield sites before new greenfield sites. This is also consistent with Policy CS 16 'Spatial Distribution of Development', confirming a commitment to redeveloping / reusing land and premises and pursuing regeneration opportunities.

CALA Homes (Midlands)

4. All potential sites are located outside the built up boundary on greenfield land. This will destroy the towns setting. Redevelop the former Norgren site for employment only. Some industrial units could be moved from Shipston (Lower Tilemans Lane) and Tilemans Lane used for housing and community uses.

Paul Richardson

5. Parish Plans should be the key principle in assessing development proposals for the countryside.

Claverdon Parish Council

Plan 6: Shipston-on-Stour

1. Object to more housing, especially south of the town. Avoid locations 6 and 7. Shipston is increasing becoming a dormitory town. It no longer feels like a gateway to an area of outstanding natural beauty. Rather focus development on locations 8, 1, 2, 3 and 4, small characterful solutions to gradients etc. Need to reinforce the uniqueness of the town and place development so people may walk to town.

Robb Kightley

2. Arbitrary allocation of the restricted area extending either side of the flood risk area. The eastern side of town is more appropriate for development. The triangle of land bordered by Banbury Road, Fell Mill Lane and the Barcheston - Honington road is close to town, level and ideal for a health centre and extra housing.

Mr Jem Raison

3. A top priority should be redeveloping the former Norgren site for industry or start up business applications.

Roger Berry

4. All sites other than number 4 on Plan 6 are unsuitable, encroaching into the rural environment & undermining the uniqueness and character of Shipston.

R Lancaster

5. Areas 1, 2, 3 and 4 offer the greatest development potential as this is the towns' second centre containing a secondary school, swimming pool and the Sheldon Bosley hub, an important social centre. Support the redevelopment of the former Norgren site and brownfield and then developing greenfield sites.

6. Developing in areas 5, 6 and 7 is not desirable as this would have the greatest visual impact on the town. The land is further away from schools, further away from both the rugby club and medical centre, encouraging fewer people to walk to town. Developing area 8 would have a disproportionate effect on the overall character of the Stour Valley and should be avoided.

Julian Burnell

7. Redevelop the Norgren site solely as residential with the land between it and Shipston being used as park land / recreation. To compensate loosing the employment land developers should pay a contribution to developing Shipston's industrial land to the north from the top of Tilemans Lane around the rugby club with a new road from the A3400 to Tilemans Lane, together with highway improvements at Darlingscote Road (Fosseway) junction.

Mark Wildish

8. Areas 1 & 2 pose the least resistance as they are natural extensions to the Tilemans Lane area and the local school.

Andrew Nabbs

9. Welcome the area of restraint on the eastern bank of the Stour behind Stratford Road and on the eastern and western banks of the river behind the London Road.

10. Sites 1 & 2 - classified in the Landscape Sensitivity Study (LSS) as highly sensitive - inappropriate to develop. Shipston Town Council concurs.

11. Site 3 has been earmarked for a supermarket, petrol station, housing and extra care accommodation. The LSS classified this area as medium sensitivity. STC concurs. Housing or commercial development would not be appropriate.

12. Site 4 - the former Norgren site north of Camden Road. Identified in the LSS as having medium landscape sensitivity. This site is best used for employment. STC recognises that there should be some form of development on this site.

13. Site 5 - The LSS classifies this area as having medium sensitivity. STC would concur. Inappropriate for housing.

14. Site 6 - The LSS classifies the site as having medium sensitivity. Any development on this site should be subject to a landscape and visual impact assessment. It may prove that developing the lower fields would be appropriate.

15. Site 7 - The LSS classifies the area as medium sensitivity although it borders the cemetery and allotments to the south that is highly sensitive. Any development should again be subject to a landscape and visual impact assessment.

16. Site 8 - The LSS classified this area as being highly / medium sensitive. With caveats, location and height restrictions as detailed in the LSS, housing on this sites may be appropriate.

Shipston-on-Stour Town Council

17. Location 4, the vacant Norgren factory site is the only brownfield site of the 8 locations that has potential. A detailed masterplan for a mixed use scheme has been prepared. The site has existing infrastructure and can accommodate up to 130 dwellings.

18. The SHLAA states that the former Norgren site should come forward as a broad location as it is considered a sustainable mixed use redevelopment opportunity.

CALA Homes (Midlands)

19. Area SH09 in the White Environmental Report is too generalised, whilst the former Norgren site, a brownfield site, is included as part of Hanson Hill. The area north of the B4035 has a medium sensitivity. The area south of Hanson Hill should have its previous status of high sensitivity restored.

20. For reasons mentioned above, the designations shown on Plan 6 are inexcusable and irresponsible. Areas 4 & 3 align with SHIP.1 of the previous (2010) Plan and may be acceptable. These align to the CALA Homes (4) and Ainscough (3) applications. Together these applications in total comprise 314 units against the Plan's upper limit of 220 homes. Areas 1, 2 and 8 should therefore be removed from the Plan. In addition areas 5, 6 and 7 should also be removed based on observations contained in the White Report about the scenic nature of the 'gem' of Hanson Hill.

Philip J Sykes

21. Except site 4, all other sites are on land being used for agriculture and should not be developed. The Draft Core Strategy identifies the need in Shipston for more green space, so perhaps these areas should be public parks or woodland. Develop the former Norgren site for employment and not housing.

Steven & Jane-Elizabeth Gee

22. Applications 12/00403/ OUT - we have sufficient shops in Shipston. If a supermarket is built then the lovely market town will become a ghost town.

Mr & Mrs V Cull

23. Area 8 is controlled by Linfoot Homes. The 1.15 hectare sites is suitable for housing because it is available (immediately available for development), suitable (excellent location, well related to existing facilities and good access) and the land has no known constraints.

Linfoot Homes Ltd

24. None of these sites are suitable for large scale development. Retain site 4 for industrial use and retain the area of restraint as outlined on the plan.

Councillor R Cheney

25. Not a great idea to put housing on hill tops from a visual perspective.

26. The most suitable area for housing has not been identified by the SHLAA, an extension on the former Pettifer head quarters site north east of the A3400, abutting site 8. The dwelling is known as Springfield. The 5 - 6 acres of land could be an attractive development option. The site is not affected by floodplain of the Stour and views towards town could be mitigated.

Set Design

27. Support the area of restraint east and south of Shipston. Conserve the rural setting of Shipston and the adjacent settlement of Barcheston to the east to keep the approaches to Shipston east of London Road and the open valley of Stour free of development.

28. Option 7 is too far away from the town centre.

Mr Peter Britton

29. Site 3 would be suitable for a small housing development, not the scale proposed in application 12/00403/OUT.

C D Fox

30. Propose a site east of London Road for approximately 80 dwellings, currently shown as an area of restraint on Plan 6. Could be developed without causing harm. Well located site that could include affordable and market housing. Orbit have an option on the site. Would like the site promoted through the Draft Core Strategy.

Orbit Homes

31. Option 3 is the most appropriate and sustainable site to meet Shipston's needs, both market and affordable housing. The site is within walking distance of facilities and services, will have the least visual impact on the landscape and creates a form of infill development with links to the secondary school and park land. The site was previously part of Policy SHIP.1 in 2008 and 2010. Policy SHIP.1 previously allocated the land for about 250 dwellings, specialist accommodation for the elderly, businesses, a 2,500 metre square food store, a medical centre and community facilities.

Ainscough Strategic Land

32. Area 2 is controlled by Banner Homes. The 2.5 hectare site forms part of the area identified as SHIP.1 in the Draft Core Strategy (February 2010). The site is suitable for both housing and employment development. The site is available (immediately available for development), suitable (excellent location, well related to existing facilities and good access) and the land is well related to the existing pattern of development.

Banner Homes (Midlands)

Draft Core Strategy 2012 - Summary of Representations

10.7 Southam Area Policy Profile

No comments received for this section

Topic: 10.7 Southam Context

1. Paragraph 10.7.5 uses information which is now eleven years old and currently information available from various public sources shows that commuting to Banbury, Rugby, Coventry, Birmingham and employment areas as far away as Oxford has increased.

Southam Town Council

2. Para 10.7.2 - query population number of 6,500 which does not appear to have increased since 2001 despite 'significant development in recent years.'

Councillor S H Jackson

3. South Warwickshire Clinical Commissioning Group raises the issue of the capacity of various services to continue to deliver to the local population following the planned residential developments.

NHS Warwickshire

4. South Warwickshire Clinical Commissioning Group has significant concerns about the government's proposals around High Speed rail and the impact it will have on noise, air quality and local green infrastructure.

NHS Warwickshire

Topic: 10.7 Southam Policy Principles

1. Support, in general, the policy principles identified in relation to Southam.

William Pease

Topic: 10.7 Southam Environmental Principle

1. The Council can see no reason to delete any of the Environmental Policy Principles as they are all relevant and the future of the town for residents and visitors alike is dependent on making it a pleasant place to stay. Maintaining and enhancing Southam as a market town and protecting the environment is essential if it is to move forward.

Southam Town Council

2. The environmental policy should include the River Itchen upstream from Bishop's Itchington where the water is known to be very clean. It should also encompass Bishop's Bowl Lakes. This would enhance linkages between environmentally important sites and support biodiversity. The area around the former quarries is also of great significance for insects and is under consideration by Natural England for designation as a SSSI.

Bishops Itchington Parish Council

3. It is essential that the green space in the centre of the town is preserved and enhanced.

William Pease

4. I am pleased that it is proposed that pedestrianisation is investigated. If the section of Wood Street from the High Street to the car park entrance were pedestrianised it would have huge road safety and environmental advantages.

William Pease

5. Bullet point 5 seeks to protect areas of High Landscape Sensitivity and also refers to areas of Medium Landscape Sensitivity. These concepts are not defined anywhere in the document, nor actually identified on a Plan. This needs to be done.

**South East Southam Land Owners Consortium
Midland Commercial Properties**

Topic: 10.7 Southam Social Principle

1. There is certainly a lack of affordable housing throughout the District. Affordable homes should be on small scale estates, eg. Church View.

Southam Town Council

Money needs to be found to provide the recommendations listed, particularly with regard to the shortfall in green space and play space, and a new library is definitely needed. Increasing green space, cycle routes, footpaths, play areas and youth facilities are essential to everybody's wellbeing.

Southam Town Council

2. Is the reference to "affordable housing" in the 1st and 9th bullet point the same thing?

Councillor S H Jackson

3. Support the aim of developing traffic free links to the Grand Union Canal, which would help to further develop the potential of the canal and towpath as a recreational and leisure resource accessible by the wider community.

British Waterways

4. Should include the level of housing provision. Bullet point 1 currently states a policy principle to increase the number of suitable and affordable homes and this should be expanded to refer to the future development strategy range of 170-260 dwellings in Southam or such range as may be revised in the light of comments received.

South East Southam Land Owners Consortium

Topic: 10.7 Southam Economic Principle

1. We support a number of the bullet points in the Economic Policy Principles section. In particular support is given to:

- promote the local economy and support the provision of more local job opportunities
- assess the need to identify additional land for employment development
- consider favourably the conversion of farm and other buildings in the surrounding areas for employment generating activities
- support the continuing employment use of successful local employment sites in the surrounding rural areas.

Codemasters Software Co Ltd

2. The Town Council can see nothing that needs deleting, but perhaps businesses throughout the town and on the industrial estate could be encouraged to make a more determined effort to recruit locally. There is a need to promote local jobs in Southam. The museum (Cardall Collection) should be supported and tourism in the town may increase if the environment is enhanced.

Southam Town Council

3. Object to the policy principles identified. In particular, the principles include an obligation to retain the remainder of Holywell Business Park for employment use. The site has been marketed for a long period of time and limited demand for additional B1, B2 and B8 floorspace exists. Rather than retain the remainder of the Business Park for employment use the policy principle should be amended to reflect a presumption in favour of sustainable development and, in particular, to allow for flexibility so that the needs of the residential and business communities can be met. It is a brownfield site within the urban area that could be used to meet one of a number of clear needs within the district including housing and retail development. Those needs have not been fully met in the preparation of the Core Strategy, which is in direct conflict with the NPPF.

Rego Southam Ltd

4. Support the aim of supporting opportunities for heritage and tourism attractions such as the canal corridor. Inland waterways are a significant part of the cultural heritage of the area and can form an important visitor attraction in their own right, opening up access to the wider countryside. Sympathetic waterway-associated development can therefore significantly enhance the character, attractiveness and distinctiveness of the District.

British Waterways

Topic: 10.7 Southam Future Development Strategy

1. Paras. 10.7.12 - 10.7.14 deal with possible future development and the constraints thereon. However, 10.7.17 then talks about large scale development which is contradictory.

Southam Town Council

2. Para. 10.7.20 - there is currently sufficient land allocated for employment purposes and the present sites have provision for small scale enlargement if justified.

Southam Town Council

3. Para. 10.7.22 - indicates housing for Southam of 170-260 dwellings which is already more than provided for at Sites 1 and 8 and which are on the present District Plan and could well come forward in the short term. [NB. This comment refers to Proposed Development Sites identified in Consultation Core Strategy 2010]

Southam Town Council

4. Para. 10.7.23 - identifies future additional sites, all of which have severe constraints such as flooding, removal of green space and isolation from the main town hub, shopping, schools, etc.

Southam Town Council

5. Southam needs to develop more of a community feel. Many of the people living here work elsewhere, giving it the feel of a commuter town. A lot of work needs to be done to persuade those people that they should become more involved in the town. A more vibrant town centre where there is always something to do would go a long way towards addressing the problem.

Southam Town Council

6. The 2012 Core Strategy suggests a lower level of residential growth than the 2010 version, which proposed around 300 dwellings on two sites. The 2010 Core Strategy did not attract objections seeking to reduce the amount of growth proposed in Southam, and it would therefore appear to be unnecessary to reduce the amount of growth proposed.

Southam United Football Club

7. South Warwickshire Clinical Commissioning Group supports the proposed additional capacity at the Itchen Bank Waste Water Treatment Works to accommodate any large scale developments.

NHS Warwickshire

8. South Warwickshire Clinical Commissioning Group have concerns around any proposed development to the east of the bypass which would potentially exacerbate existing severance issues. It supports the intentions of integrating high quality crossings of the bypass for pedestrians and cyclists which will be essential in order to provide attractive links to the town centre, schools and other facilities.

NHS Warwickshire

9. South Warwickshire Clinical Commissioning Group have concerns around the impact further development may have on the flooding of the River Stowe. It would urge the consideration of alternative sites for development which would reduce further flooding risks.

NHS Warwickshire

10. South Warwickshire Clinical Commissioning Group urge the consideration of appropriate transport, health, etc. links if locations for further development were identified for the edge of the town.

NHS Warwickshire

11. Southam can accommodate more than one site due to the services available within the town. If the Council maintains their requirement for 170-260 dwellings for Southam between 2011 and 2028, based on 56 dwellings per estate, at least three sites will be required in Southam during this period.

Fisher German LLP

12. The Draft Core Strategy looks to enhance the green infrastructure to support the function and use of the River Stow. It also looks to improve access to countryside walks along the River Stowe. Both of these requirements could be partially met through land or access being made available by the landowners as an offset for development as part of the land at Wincotts. (ie. site 5 on Plan 7)

Fisher German LLP

13. Overall the Policy Principles set out an ambitious list of opportunities focusing on new social infrastructure for the town. It is intended to deliver these by way of contributions from development proposals and other initiatives around the town and with these in mind the more development that takes place the greater the likelihood that money will be delivered through Community Infrastructure Levy that can be spent on providing local infrastructure.

South East Southam Land Owners Consortium

Consultation Question: Q174

1. All the three areas of Policy Principles are valid. If any sites are identified for development, the Policy Principles outline should all be taken into consideration, such that they all come to fruition at the time of completion of any new housing in the town.

Southam Town Council

2. Provision should be included for a Skate Park and the Tollgate Road play area should remain open, ie. unfenced.

Southam Town Council

3. The proposed Policy Principles are generally appropriate although given the support for the proposed Southam United Sports and Community hub development it would seem appropriate to add a specific policy principle, for example: Identify opportunities and support proposals to enhance existing community and sports facilities.

Southam United Football Club

4. The majority of the Southam Policy Principles are considered appropriate. It is proposed that the second sentence of bullet point 5 of (a) Environmental is amended to include High/Medium Landscape sensitivity: "Where sites of High/Medium Landscape Sensitivity and Medium Landscape Sensitivity are affected by future development, ensure appropriate mitigation measures and enhancement opportunities are taken wherever possible."

Stoneythorpe Hall (Jersey) Ltd

5 One environmental principle I would add is the provision of a riverside path alongside the River Stowe to link Welsh Road East and Stowe Drive. This would provide an additional pleasant link from houses on the far side of the by-pass and the town itself. If land by the river off Welsh Road East could be brought into public ownership at the same time, it would go a little way towards reducing the current deficit in greenspace.

William Pease

6. Policy Principles Part (a) Environmental contain no mention of the protection of Areas of Restraint, not withstanding that elsewhere the Core Strategy puts forward a policy (CS 7) designed to protect such areas.

South East Southam Land Owners Consortium

Consultation Question: Q175

1. It is considered that the sports facilities [on Banbury Road] are appropriately located as they are accessible by sustainable methods of transport. The existing location near to the employment area ensures that there is no conflict in adjoining land uses. We agree that development to the east of the bypass would also result in greater segregation of the rural centre.

Stoneythorpe Hall (Jersey) Ltd

2. The level of housing provision should be increased for Southam. This increase should come from two sources. Firstly, a redistribution away from the wider dispersal option with a higher proportion of the distribution moving to Main Rural Centres and Stratford upon Avon; and secondly, from an increase in the overall level of housing provision.

South East Southam Land Owners Consortium

Consultation Question: Q176

1. Site 1 - the extent of this area, having provided necessary infrastructure and access, has the potential to provide 125 dwellings. The site lies within two ownerships and the title boundaries extend to the highway road frontages which will allow for suitable access arrangements. The site falls outside an area of flood risk. Southam is a sustainable rural location and boasts excellent amenities, facilities and transport connections. The site has good road frontage which affords good visibility splays and will enable good access to the site. There is already existing development opposite the proposed frontage. The site is no more prominent than the other areas identified as possible locations to bring forward for development. The site is developable and deliverable in terms of its topography, size, location and

availability. The site would appear more compact and integrated with the existing envelope than some of the other potential development options.

Stoneythorpe Hall (Jersey) Ltd

2. Site 3 - lies within one ownership and the title boundaries extend to the highway frontage which will allow for suitable access arrangements. The site falls outside the area of flood risk. Southam is a sustainable rural location and boasts excellent amenities, facilities and transport connections. The site has good road frontage which affords good visibility splays and will enable good access to the site. There are no highway or infrastructure restrictions which would hinder or fetter development on this site. The site adjoins the main rural area which is considered a sustainable rural location. The existing hedgerows to the west and north of the site provide a firm defensible boundary. The site is no more prominent than the other areas identified as possible locations to bring forward for development. The site is developable and deliverable in terms of its topography, size, location and availability. The site would appear more compact and integrated with the existing envelope than some of the other potential development options.

Stoneythorpe Hall (Jersey) Ltd

3. Site 4 - lies within one ownership and the title boundaries extend to the highway frontage which will allow for suitable access arrangements. The site falls outside the area of flood risk. Southam is a sustainable rural location and boasts excellent amenities, facilities and transport connections. The site has good road frontage which affords good visibility splays and will enable good access to the site. There are no highway or infrastructure restrictions which would hinder or fetter development on this site. The existing boundary planting provides defensible boundaries. The site is no more prominent than the other areas identified as possible locations to bring forward for development. The site would appear more compact and integrated with the existing envelope than some of the other potential development options.

Stoneythorpe Hall (Jersey) Ltd

4. Site 8 is susceptible to surface water flooding, however this will be dealt with at the application stage as it is not particularly concentrated.

Environment Agency

5. High Landscape Sensitivity rules out future housing development on Potential Development Options 1, 2, 3, 5 and 6. Area 4 is part of an Area of Restraint and is ruled out. There are serious question marks over the development, at least for housing purposes, of Options 7 and 8 since it contains existing sport and recreation facilities which are vital to the town, is close to the main industrial area with the likelihood of environmental conflict, is close to the line of the High Speed 2 route with the likelihood of noise and blight affecting residential development, includes land at the junction of the A423 and A425 whose open nature is important to the character of the town. Option 7 (and possibly 8) could however encompass additional employment development if appropriate.

South East Southam Land Owners Consortium

6. The only suitable land for further housing development in the town is land to the east of the A423 Banbury Road. This embraces Potential Development Options 9, 10 and 11. Of these, Option 9 is to be preferred as it is closer to the town and to the existing industrial estates, as well as offering better opportunities to integrate with existing surrounding development and to improve linkages between areas on the south-east side of the by-pass and the main part of the town. The land concerned is capable of accommodating up to 250-300 dwellings, together with a care village and B1/hotel development. Only part of it could be allocated for this plan period and the balance developed in a later plan period. to respond to future needs for additional housing development. A Masterplan showing how this site could be developed was submitted for consideration in November 2011. There is no specific evidence to support the assertion that the bypass is a 'significant' constraint to integrating communities to the east of the bypass with the rest of the town. The existing areas to the east of the

bypass are well-connected to the centre of the town by pedestrian and cycle links and are closer to the town centre and other facilities than many other areas to the north, west and south-west of the town. The development proposals submitted illustrate how high quality crossings of the bypass for pedestrians and cyclists can be achieved. The site is well-related to the existing pattern of development and is close to the town centre and to a range of social and community facilities. The site is also within walking distance of employment opportunities. satisfactory vehicular access can be provided from the existing junction with the A423. There are no statutory designations in respect of archaeology or conservation. The Landscape Sensitivity Assessment concluded that the landscape to the south of Southam is of medium sensitivity to housing development. There are no known constraints to development of the site and there is no reason why development should not be achieved in the short term. There is interest from at least one national housebuilder in delivering residential development on the site.

South East Southam Land Owners Consortium

7. Permitting a major development some years ago to the east of Southam outside the bypass was a significant planning mistake. This should not be perpetuated and exacerbated by expansion to the east. The bypass created a physical and psychological barrier to integration with the rest of the Southam community. Its location promotes the use of cars, with the consequential effect that residents then drive further afield rather than use local shops.

Nigel Rock

8. Development Option 1 - acceptable for development. This would adjoin existing established developments with no apparent access route difficulties. The Council considers that this is the only realistic option for more housing. It is within walking distance of schools, leisure centre and shops. Could be extended to avoid further building in other areas of the town.

Development Option 2 - not acceptable for development and should be deleted.

Development Option 3 - not acceptable for development and should be deleted.

Development Option 4 - not acceptable for development and should be deleted.

Development Option 5 - not acceptable for development and should be deleted.

Development Option 6 - acceptable for industrial development only, not housing. Too remote from the town centre and schools and can only be accessed by crossing A425.

Development Option 7 - acceptable for industrial development only, not housing. The town, schools, etc. can only be accessed by crossing A425 which is effectively part of the bypass. Likely therefore to suffer from isolation. It is also too close to the proposed HS2 route, with associated noise, let alone any disturbance due to rail construction. Could be suitable for sports pitches, clubhouses, etc.

Development Option 8 - acceptable for development. A425 provided a southern boundary to the town. The HS2 route effectively provides a new southern boundary. The Council therefore has no objections but care will have to be taken to ensure safe pedestrian routes into Southam for schools, etc.

Development Options 9, 10 and 11 - not acceptable for development and should be deleted. A423 bypass provides a natural eastern boundary for Southam. There has been some concern about the extent to which existing developments outside this boundary have been integrated into the town.

Further development to the east of the bypass is bound to create the impression that a second Southam is being built outside of the bypass. This would adversely affect the character of the town and is therefore undesirable.

Southam Town Council

9. Object on the strongest possible terms due to exclusion of 2.4 hectare site at the Holywell Business Park from the defined built-up area. It should be identified as a Potential Development Option given it remains undeveloped, notwithstanding it has planning permission for employment uses. This market signal that the floorspace is not required should be taken into consideration and the site could meet other clearly identified needs of the residential and business communities.

Rego Southam Limited

10. Locations 7 and 8 would appear to be consistent with the land proposed by the clubs for the Southam United Sports and Community Hub. The Council's 2009 SHLAA identified this land as being suitable, available and achievable for development and the results of the technical work carried out so far on behalf of the Clubs supports this conclusion.

Southam United Football Club

11. Although the map is not very specific about locations I have reservations about all of the potential development options with the exception of those already in the local plan.

William Pease

12. Potential Development Options 5 & 6 - my client's land is deliverable without being as high an impact as the Landscape Sensitivity Study suggests. Services are available close to the sites, eg. bus stop, business park, foodstore. A new footpath could provide a link to the town centre. The impact of development is no greater than other proposed sites on the edge of Southam. The proposed areas are relatively flat and located before the land starts sloping steeply towards the west. They are above the flood plain.

Fisher German LLP

13. Other sites assessed in the SHLAA and identified as potential development sites on Plan 7 are less suitable for development than our client's sites for the following reasons:

Site 9, 10 and 11 - are to the east of the bypass. The Draft Core Strategy states that development to the east would exacerbate issues of severance and integration.

Site 4 - is identified as an area of restraint, as partially within public open space and is within the floodplain according to the SHLAA.

Site 1 - is located north of the town and extends the boundary of Southam past the obvious natural boundary of the northern bypass roundabout.

Site 8 - partially occupied by the town's football and bowls clubs at a time when amenity greenspace and an increased provision for mini football and rugby pitches are required. To develop the site must be considered short-sighted. The planned route of HS2 passes immediately adjacent to the boundary. Construction of the railway will cause disruption to the site, whilst there may well be constraints on planning once the route is safeguarded in 2014. This affects the deliverability of the site.

Sites 2 & 3 - located on sloping ground to the west of the town and would be highly visible from the surrounding landscape. Such reason has been given in the Landscape Sensitivity Study as a key argument against development of the western edges of my client's land.

Site 7 - is an unnatural extension of the boundary of the town to the south and is impinged upon by the proposed route of HS2 which will affect deliverability of the site.

Fisher German LLP

14. We support further development at Southam, in particular Location 1 (land west of Coventry Road). This site was identified as a draft allocation in the 2010 Draft Core Strategy, delivering approximately 100 dwellings served by a vehicular access from Coventry Road. Land to the north of Southam continues to represent the most suitable and logical area for development.

Taylor Wimpey UK Ltd

Plan 7: Southam

No comments received for this plan

Draft Core Strategy 2012 - Summary of Representations

10.8 Studley Area Policy Profile

1. No mention is made for dealing with extra resources for the new developments regarding traffic, parking, education. Assuming the present repairs prevent heavy rainfall perpetually flooding the sewer at the Barley Mow roundabout, would the system cope with more households? Stretching of the present facilities begs the question how much bigger Studley can become before there will not be a community any longer.

Liz & Peter Freeman, Mark & Mandy Worrall

2. The value of a village atmosphere remains at the heart of the community. In order to maintain this atmosphere there has to be a balance between environmental, social and economic principles. However, this does not suggest an equal balance of principles, but one that is based on need.

Councillor Hazel Wright

3. I note that a vision statement has not been included or a request for one in the Parish profile, therefore a prescriptive approach has been taken.

Councillor Hazel Wright

4. There are references to the cross boundary relationship with Redditch but little emphasis on the relationship with Mappleborough Green and Sambourne with whom we share some common problems, traffic being one.

Councillor Hazel Wright

5. Existing infrastructure in Studley will not support any extra development. The A435 is already at capacity and is also subject to Air Quality Management. These would pose major constraints on any development in Studley as well as spaces for children in local schools which are full and in many cases there is no scope for any extra spaces to become available.

Studley Parish Council

6. Given the size and range of facilities in Studley, BDW agrees that it represents a sustainable location for growth during the plan period. It is well linked to a range of employment opportunities and offers comparison and convenience shopping that would not be out of place in many small towns.

Barratt David Wilson Ltd.

Topic: 10.8 Studley Context

1. The A435 issues have been fully aired and surely do not need revisiting again. The main problems with traffic flow is around peak hours and when there are weeks of road repairs, etc. Excluding these times/issues there are no real problems. If however any expansion is considered this would surely not be the case.

David Burchell

2. 'A reasonable level of support for the provision of housing for young people, sheltered housing and small family homes' in reality means low.

David Burchell

3. What is not made clear in the document is that it does not just refer to Studley but covers the County Ward of Studley that includes Sambourne, Mappleborough Green and Coughton. Without this being made clear a lot of the references are at best misleading and at worst incorrect.

Councillor Paul Beaman

4. Paragraph 10.8.10 - do not address the "gap" with special types of housing.

CPRE Redditch Group

5. South Warwickshire Clinical Commissioning Group would have serious concerns around further development of the A435 in Studley. The main road already has a volume of 20,000 vehicles passing through on a daily basis and any additional development near by would exacerbate any air quality management, noise and road safety issues.

NHS Warwickshire

6. South Warwickshire Clinical Commissioning Group has concerns around the retail space in Studley and the current trend towards cafes and takeaways opening up. Its view is that there should be more healthy food options available.

NHS Warwickshire

7. South Warwickshire Clinical Commissioning Group has concerns around the lack of larger affordable homes in the village and would encourage Stratford District Council to look into this issue.

NHS Warwickshire

8. It must be noted that any development of areas within Sambourne Parish should be under the control of the Parish Council and not Studley and must fall in line with the Sambourne Parish Plan recommendations.

Lynn Evans

9. The Parish Council are disappointed that demographic factors have not been taken into consideration. A housing needs survey was undertaken by the Parish Council in 2011, the results of which were that there is a shortage of three bedroom family homes. Many families are trapped in two bedroom properties not able to move to larger homes and properties are then not available for people wanting smaller ones. In many cases families have to move away from the village if they require larger properties.

Studley Parish Council

10. The statement in para. 10.8.10 is misleading and should be used in context with the later Studley housing needs survey of 2011. The 2006 survey may have indicated a reasonable level of support for the provision of certain types of housing but it does not mean that between 160 and 240 dwellings were being sought. This is borne out in the 2011 housing needs survey where only 29 alternative homes were sought. The 2011 survey gives no indication of a demand by the local community for additional housing in Studley. For that matter nor does Sambourne or Middletown.

Ken Miller

Topic: 10.8 Studley Policy Principles

No comments received for this section

Topic: 10.8 Studley Environmental Principle

1. In addition to retaining the separation gap between Studley and Redditch the policy should retain the gap between Studley and the villages in the adjoining Green Belt to ensure development does not encroach and undermine the character of the area and ensure that the separate identity of the villages is retained.

Brian Summers

2. Studley must maintain a clear green belt around its borders and to prevent the spread of Redditch from enveloping the village. This particularly applies to area north west of the village from St. Judes Avenue to Green Land and the adjacent areas.

R H Jarman

3. I cannot find any mention of the open space now known as Studley Common Nature Reserve and I feel that this must be preserved against any development as it provides a necessary refuge for wildlife and people alike.

R H Jarman

4. Correct the name of Rough Hill Wood in point 10.

CPRE Redditch Group, Mappleborough Green Parish Council, Councillor Justin Kerridge

5. Can assist in achieving bullet points 1, 4, 10, 12 and 13 through Redditch's development proposals.

Redditch Borough Council

6. Insufficient emphasis has been placed on the need to maintain an intact Green Belt with no encroachment. Elsewhere in the document there is a suggestion that a joint approach should be adopted to cross boundary issues. The two settlements have totally different characteristics. The principle may be good, but can disadvantage Studley. The balance has to be in Studley's favour, therefore adjusting the Green Belt boundary to accommodate the needs of Redditch should be resisted.

Councillor Hazel Wright

7. A greater emphasis should be placed on tree planting, making it a condition of every planning application especially on the main corridors in Studley.

Councillor Hazel Wright

8. The environmental regeneration of the village should not just receive support but a feasibility study carried out in conjunction with the community.

Councillor Hazel Wright

9. Any development proposal should not impinge on the high quality landscape. The village is highly dependent on landscape for its identity.

Councillor Hazel Wright

10. To the best of my knowledge there have been no actions applied as suggested in the Air Quality Management Area Action Plan. A strong policy should be indicated in the Core Strategy to ensure mitigation of some of the problems.

Councillor Hazel Wright

11. There is no reference to developing GI networks between Studley and Redditch Borough, between existing settlements or between the new development proposed either within the Core Strategy or the potential development which Redditch Borough may propose outside of their area. This could usefully strengthen networks and enhance the quality of any development.

Worcestershire County Council

12. I believe that it is appropriate to protect not only those areas of high landscape sensitivity but also those of medium landscape sensitivity.

Andy Giblin

13. I can't see there is a problem with the amount of Natural Accessible Greenspace available. In the south of the village the countryside is easily accessible. This accessibility would be reduced if there was development on the Green Belt surrounding the village.

Richard Horton

Topic: 10.8 Studley Social Principle

1. There is a proposal to improve public rights of way links from within Studley to the west of the A435 and south of the A448. Much of this land is grazed by sheep and cattle. There have already been several cases of sheep worrying by dogs and increasing access is likely to exacerbate this problem unless an effective means can be found to ensure that dogs are kept on leads at all times on these rights of way.

Philip Jones

2. The existing public rights of way links are more than adequate and this does not need to be considered any further.

David Burchell

3. With the limited space available within the built up environment of the village, opportunities for expanding the green space are limited. Therefore the only option available is to ensure the retention of the green belt around the village that provides welcome green space for all to enjoy.

Councillor Paul Beaman

4. In bullet point 1, add "in co-operation with the local community"

Mappleborough Green Parish Council, Councillor Justin Kerridge

5. Bullet point 6 - should this be east of A435 not west of A435? As it stands it describes the area south of A448 more definitively but ignores the land to east of A435.

Mappleborough Green Parish Council, Councillor Justin Kerridge

6. The Library is now closed and up for sale. This space should be protected for community purposes and to contribute to the environmental regeneration of the village centre. Any attempt to develop it for housing should be resisted.

Councillor Hazel Wright

7. Many families in Studley are trapped in two bedroom properties making them not available for people who want to move to smaller accommodation or in the case of people who want one bedroom accommodation wanting to move to a large property. It would seem that affordable suitable family housing is required to release these smaller properties that are within the built up environment of the village.

Councillor Hazel Wright

8. Home Choice Plus cannot be considered a suitable measure for assessing actual need. For instance affordable housing has to cover the whole spectrum of need; an example of this is that there are not many four bedroom houses available. This would not be reflected in Home Choice. People move out of the village to achieve more bedrooms. Estate agent signs suggest that one and two bedroom properties have a constant turn over. A balanced community needs a variety of housing not necessarily the cheapest smallest properties offering little amenity value.

Councillor Hazel Wright

9. Ground for a children's play area south of the Alcester Road should be identified.

Councillor Hazel Wright

10. Most of those seeking different accommodation were from rented housing. Six were after larger rented homes and six or seven wanted smaller. It is possible that these homes could be swapped thereby resolving the problem. It is likely only 10 to 20 new and different homes are needed to satisfy local demand leaving the 10 to 20 vacant houses available to newcomers.

Ken Miller

Topic: 10.8 Studley Economic Principle

1. Conversion of farm and other buildings in the surrounding rural areas should be deleted as this will compromise the rural aspects of the villages and the local road infrastructure is inadequate to support any such development.

Brian Summers

2. Sambourne Parish already has the extensive Allely's site, the new development at Chestnut Court and Troy Industrial Estate, all of which contribute to noise and light pollution. There is also considerable farming activity, which is to be expected in a rural environment. Any further employment-generating activity would not be welcome.

Philip Jones

3. Employment sites in the village should be retained especially the site on Birmingham Road. Businesses boost the economy of the village through use of the shops and other local businesses which is essential to the vibrancy of Studley.

Studley Parish Council

4. I believe that there is a high need for small business starter units within the Studley village area. Over the years many of these small units have been taken down to make way for housing and the building of supermarkets. Without small units within the village or outskirts of the village business men are forced to go to Redditch or Alcester, taking job opportunities away from the village people.

David Bush

5. The reference to three employment sites is factually incorrect. There is no employment site on Bromsgrove Road other than a Builders Merchant and a garden equipment shop. There is no reference to the sites off The Slough which are major employment areas. None of the employment sites in Sambourne or Mappleborough Green are mentioned.

Councillor Paul Beaman

6. There is little reference to agriculture which forms a large part of the vitality of Studley and the surrounding villages. Any attempt to build on, in or near to the fields that surround the village will affect the viability of the farms and introduce unacceptable harm to the area.

Councillor Paul Beaman

7. References to the centre of the village should reinforce the desire to restrict the proliferation of charity shops and takeaway food outlets that change the viability of the village from a day to a night time economy. This shift from normal daytime trading to one where more businesses are open in the evening has a serious impact on the ability of the remaining shops to attract customers. No new food outlets should be permitted unless there are very special circumstances for permitting them, such as bringing redundant buildings back into use or providing employment to village residents. They should not be in competition with established traders.

Councillor Paul Beaman

8. I do not believe that it is essential to keep the employment sites of Brickyard Lane and Bromsgrove Road/Green Lane in business use. I do not believe that there is a requirement to assess additional employment land. Nearby Redditch already provides significant employment opportunities for the residents of Studley.

Andy Giblin

9. Bullet point 4 'consider favourably' - if this must go in then caveat it with "...dependent on the nature of the activities involved, the character of the site..." etc.

Mappleborough Green Parish Council, Councillor Justin Kerridge

10. Wish it to be strongly recognized that a major factor is the management of traffic flowing through Studley. It has a major impact on the village constraining for instance the use of retail outlets. This restriction on the development of business contributes to a failing business environment and should be officially drawn to the attention of the Local Enterprise Partnerships who will have a key role in dealing with proposed future arrangements.

Councillor Hazel Wright

11. The employment site of Birmingham Road should be dedicated to employment and employment opportunities intensified. Any attempt to put housing there should be resisted as recommended on two occasions by Planning Inspectors. Plans produced by the local community acknowledge the need to maintain the site for employment.

Councillor Hazel Wright

12. The role of the village centre should be bolstered by the adoption of the recommendations in the Portas Review December 2011. This approach acknowledges the change in shopping habits and recognises that high street shops alone cannot achieve regeneration of the village centre. It does need a "Studley Village Centre" approach. This should be part of a feasibility study which should encompass both the private and public sector. This action should be embedded into the Core Strategy. The need to enhance the image of the centre of Studley is probably the key challenge.

Councillor Hazel Wright

Topic: 10.8 Studley Future Development Strategy

1. Whilst I appreciate that there is a need for suitable housing for the young and less able people, this should be achieved by using brownfield and other derelict sites. The village does not need and could not cope with the vast number quoted. The roads are already at capacity, we shall soon have no fire station, the library is being downgraded, we have few shops and poor transport links, so more houses will only mean more cars.

R H Jarman

2. I am deeply concerned, even mystified as to why the District Council should consider potential development options in the Green Belt adjoining Studley in order to satisfy the shortfall of sites within the built up area needed to achieve the allocated number of new dwellings demanded of Studley. As I understand it, the number of dwellings is based on its existing size and classification as a Main Rural Centre but takes no account of any restraints that may affect its ability to achieve these numbers. The number of dwellings for Studley should be adjusted downwards to a level it can sustain. Under the Localism Bill it is intended that instead of local people being told what to do, local communities have genuine opportunities to influence the future of the places where they live. This strategy is being thrust down from the top contrary to the principles on which the bill is based.

Ken Miller

3. Rather than exploring ways of inducing developers to use brownfield sites or looking beyond the Green Belt to meet the set housing allocation, the District Council is treating the situation as a special circumstance and exploring the possibility of reducing the Green Belt in the area. How can this situation be classified in anyone's language as a special circumstance.

Ken Miller

4. Studley is closely tied into Redditch, from which it wishes to maintain its own identity. However, the roads between the two communities are already very busy and the situation would worsen with increased housing development in Studley, as the Core Strategy recognises. There already exists an air pollution problem in the centre of Studley on the routes between Studley and Redditch. Both of these problems can only be partially resolved by constructing additional routes between Studley and Redditch and are, therefore, almost insurmountable. There is spare capacity on most of the routes in Redditch which lends itself to further development, but that doesn't help Stratford District Council achieve its housing target.

Ken Miller

5. Apart from areas to the north of Studley, potential development options 1, 2 and 3, the remaining land surrounding the built up area is in the Green Belt and categorised as High to High/Medium Sensitivity to Housing Development. Apart from Henley, all the other main rural centres are bounded by significant areas of land only categorised as Medium Sensitivity to Housing Development and do not have the added infrastructure problems of Studley due to its proximity to Redditch and desire to retain its own identity. See Fig 1. Summary of Landscape Sensitivity to Housing Development.

Ken Miller

6. Cabinet has taken the decision to depart from the GL Hearn recommendations of 11,000 - 12,000 dwellings on the rationale of a 'duty to protect our countryside for future generations'. This duty to protect our countryside must extend to Green Belt Land classified as High and High/Medium Sensitivity to Housing Development around Studley with its almost insurmountable infrastructure problems.

Ken Miller

7. As a small house owner I do not agree with any more housing / social housing / industrial building in the Studley area. Social housing whenever it becomes vacant should be reserved for Studley residents only. Huge juggernauts should be banned from using the small roads and streets within the village.

J L Sexon

8. The village atmosphere should be preserved. This whole strategy is in real danger of ruining that. Studley is already 'the largest village in Warwickshire' with considerable expansion having taken place. Enhance the existing certainly but no expansion.

David Burchall

9. Preserve the Green Belt at all costs. There is no way that this should or needs to be violated. Mention is made of a critical feature of preserving the gap between Studley and Redditch. This must surely also apply to all boundaries and such potential merging. Housing expansion should surely not be considered outside of the present Studley Parish boundary.

David Burchell

10. The strategy highlights areas for continued employment sites without needing to give undue consideration to developments within our existing countryside which again should be resisted.

David Burchell

11. Although possibly more expensive to develop than green land, "brown land " should be reused first. Having disused buildings scattered around detracts from an otherwise pretty village. We should want to encourage trade and a flourishing community and not be let down by disused / derelict buildings.

Mr Page

12. The road network struggles to cope with present demand especially during rush hour. An additional 160-240 houses seems too much, especially with the likely increase in housing stock in nearby Redditch over the same period adding to the problem. How can Stratford District Council address the challenge to enhance the image of the village by building more houses? I think the traffic situation needs to be resolved before any new houses can even be contemplated in this plan.

Michael Clapham

13. This is green belt land; there must be brown land available. All thee houses would take away the character of the village. Extra houses would cause more problems on the roads as we already have problems with the bypass being cancelled, causing pollution, accidents, etc. This will take over the overspill of Redditch and who is going to buy these houses with unemployment in the area really bad? Studley is a small village and I would like it to stay one.

Denise Clarke

14. I do not agree that there is a requirement to increase housing stock in Studley. Studley is the largest village in Warwickshire. Why does it have to become even bigger? Build elsewhere - on brownfield sites and away from the Green Belt.

Kevin Ross

15. I feel that any new development should consider that the centre of the village is located around the Pool Medical Centre. All low cost development should be as physically close as possible to this to reduce traffic movement for taking children to school, for walking access to the shops and pubs.

Alan Elsworth

16. Lack of green areas within the village would surely suggest a greater need for maintenance of the surrounding green belt. No mention is made of infill around the village in the Strategy, not even a proposal to use available land first.

Mark & Mandy Worrall

17. Studley has not had a police station and has recently lost its fire station, never mind the inadequacy of the road network or available jobs in the area - a trip round the Redditch industrial estates demonstrates this. If these new dwellings are to be occupied by Birmingham commuters, if they don't go by road the train service is already swamped.

Charles Farran

18. South Warwickshire Clinical Commissioning Group has concerns around localised areas affected by flood risk to the east of Birmingham Road and Castle Road. It would urge Stratford District Council to ensure that any residential developments do not exacerbate the existing flood risk and that appropriate steps are taken to mitigate it.

NHS Warwickshire

19. South Warwickshire Clinical Commissioning Group would urge Stratford District Council to consult with both itself and NHS Worcestershire regarding the impact of any developments on the edge of Redditch on access to primary and secondary health care, in particular issues around discharge of patients over the Warwickshire/Worcestershire border.

NHS Warwickshire

20. Caution should be taken when planning additional residential sites on the edge of the town to ensure appropriate links are made to accommodate residents' access to health care, transport, etc.

NHS Warwickshire

21. Strongly support the reference made to the potential need to accommodate Redditch related growth. The Borough Council is in a position to work closely with Stratford District Council on the progression of this aspect of the plan and can provide detailed information on the exceptional circumstances which demonstrate that cross-boundary growth is essential, particularly with regard to employment allocations at Gorcott Hill.

Redditch Borough Council

22. We note that the population of Studley has not significantly increased, if at all, over the period since 1981. We therefore believe that Studley should be a focus for new housing development, and that given the importance attached to regenerate the centre of the village and the services it provides, an increase in population is a key priority for the sustainable development of the village. We do not support the indication given in paragraph 10.8.24 of the overall level of housing that should be provided during the plan period.

Bloor Homes

23. Your proposals lack common sense in that you have made a cloistered proposal without first exploring the real issues or discovering local views. You ignore the Studley Parish Council Housing Survey of 2011 which identified several brownfield sites, none of which features in your proposals. Your policy is in direct opposition to the recent Government strategy which emphasises that brownfield sites should be used first and that the green belt policy should be sustained. The government also refers to sustainability of new housing development, so you will need to make sure that your future proposals take account of Studley's infrastructure, including the pressure on schools filled to capacity and an A435 road which causes pollution and congestion.

Dr Barrie Wade and Mrs Ann Wade

24. The Parish Council wish to object to the proposals for Studley with an option for an additional 160-240 dwellings to be provided in the period 2011-2028.

Studley Parish Council

25. The Parish Council is very disappointed that following a number of previous Core Strategy meetings and workshops proposed sites suggested have been totally ignored especially as these were brownfield sites within the confines of the village. Nearly all of the suggested sites are in the green belt which is totally unacceptable. To extend Studley any further would destroy the green belt surrounding the village. The Council feel the strategy is trying to squeeze too much development into a relatively small area. We are aware that development has to go somewhere but until sites within the village are utilised the green belt areas should be protected.

Studley Parish Council

26. Existing infrastructure in Studley will not support any extra development. The A435 is already at capacity and is also subject to Air Quality Management. These would pose major constraints on any development in Studley as well as spaces for children in local school which are full and in many cases there is no scope for any extra spaces to become available.

Studley Parish Council

27. Employment sites in the village should be retained especially the site on Birmingham Road. Businesses help boost the economy of the village through use of the shops and other local businesses which is essential to the vibrancy of Studley.

Studley Parish Council

28. Sites are available within Studley on previously developed land which should be assessed before considering Green belt options on the edge of the village. Paragraph 80 of the NPPF identifies the five purposes of green belt designation. The potential locations which have been identified on Plan 8 are sites within the Green Belt which serve these five functions. There are brownfield options within the village which should be considered before developing Green Belt sites.

Harris Lamb

29. Studley is a village, a status most if not all residents would wish it to remain so. It does not need housing developments; it needs to develop and work on its community. What also must be considered is the effect on the local school system.

Louise Ritchie

30. The match between the number of houses proposed by the mathematical model of houses needed and the infrastructure is not identified.

Councillor Hazel Wright

31. The high volume of traffic on the A435 through Studley has a major impact on the local environment. This must act as a significant restraint on development on the edge of the village. If not, it can only make the situation worse. Since the road has been detrunked and at present there appear to be no plans to revise the way the road is used, despite that it has been agreed that the existing single carriageway is poorly aligned with severe safety and environmental problems.

Councillor Hazel Wright

32. Paragraphs 10.8.21 and 10.8.22 identify the areas known as Winyates Green Triangle and Gorcott Hill as needing to be considered for potential development. As owners of the Gorcott Hill site, we support this statement and maintain the view that its development, in conjunction with the land being identified for development within Bromsgrove District remains the most sensible option as it will provide a strategic employment area.

Owners of land at Ravensbank Drive/Gorcott

33. No mention is made of infill around the village in the Strategy, not even a proposal to use available land first.

Liz & Peter Freeman

Consultation Question: Q177

1. The Police and NHS are concerned about the growth in the number of takeaways in Studley.

Stratford Local Strategic Partnership

2. I would like to see an 'Environmental' principle added that recognises that the Green Belt is essential all round Studley, not just between Redditch and Studley, as close proximity to the countryside gives Studley a sense of place as a Warwickshire village. The visibility of, and easy access to, the surrounding countryside should not be adversely affected for current Studley residents by future development.

Richard Horton

3. I do not consider that it is appropriate to solely consider keeping the identity of Studley without applying similar principles to neighbouring villages.

Andy Giblin

4. The Parish Council feels that the policy principles identified are broadly appropriate, however we would defer to our neighbours in Studley given the size of their settlement both physical and organic and we would likely support any comments made by Studley.

Mappleborough Green Parish Council

Consultation Question: Q178

1. The number of houses being proposed seem reasonable if sites can be found for them that do not lead to significant development on Green Belt land outside the existing boundaries of Studley. Studley had already seen a significant increase in size in the last 27 years so does not need to increase significantly in size. Any development on Green belt land should be small scale and environmentally friendly. The village's significant traffic problems must be considered when assessing how many houses should be built. This is an issue on any site in the village, not just along the Alcester Road.

Richard Horton

2. The number of homes proposed within Studley cannot be accommodated without constructing a bypass. That is the only way that traffic flows can be reduced enough to consider any development along the numbers being proposed. The use of employment sites within the triangle of the village for housing would be acceptable as long as the jobs relocate to other sites on the edge of the village. The redevelopment of existing employment sites outside the triangle is not acceptable under any strategy.

Councillor Paul Beaman

3. Studley already has problem with amount of traffic. If more housing is to be introduced this would increase traffic even more.

Andrew Clarke

4. We would defer to Studley on this matter.

Mappleborough Green Parish Council

5. Greater emphasis should be placed on small scale housing development, encouraging individual developments thereby achieving a greater variety of housing types, styles and levels of innovation.
Stephen Marchant, R J Smith

Consultation Question: Q179

1. There are a number of issues that would make Site 8 a poor option:

- infrastructure on Manor Road and Castle Road is already very tight in serving Gunners Lane, eg. roads.
- tight access between A435 and Manor Road is restrictive for visibility and more traffic would increase risk of accidents.
- views to The Manor and Catholic Church from footpaths across The Park would be affected.
- many children use culs de sac at end of Gunners Lane to play and extra traffic would compromise their safety.
- the land is interesting with its mix of trees, fauna and undulations with its use as a ménage

Sarah Bratton

2. Infill at sites 1 and 3 look like good ideas as less impact on the Green Belt which we need to preserve.

Sarah Bratton

3. I oppose any development of the area known as Winyates Green Triangle. (Site 9)

Sharon Summers

4.

- Locations 1 and 2 - desperately need redevelopment as they are a complete eyesore.
- Location 3 - development possible subject to strict conditions particularly in terms of noise generation.
- Locations 4, 5, 6, and 7 - inappropriate for development as outside physical and identified constraints of the village and within the Green Belt.
- Location 8 - no detail is provided in terms of access/ traffic generation, etc and cannot be assessed. Therefore the presumption must be in favour of no development.

Steve Jones

5. Potential Development Option 8 is unsuitable for development. The area at the end of Gunners Lane and east of A435 is particularly beautiful and should be maintained. It is well used by locals and any development in this area would have a major impact. When entering the village from the south the views across the countryside down to the River Arrow are spectacular and must be retained.

Liz Davies

6. Areas 4, 5, 6 and 7 highlighted for development are not sensible options for housing. They will impinge on views from Middletown and the countryside area that Sambourne is located in, while increasing traffic through what is already a dangerous area.

Lorna Bullett

7. The large expanse of land between Studley and Redditch would be better utilised for housing while not disturbing the surrounding villages. The argument not to join them up is silly as they already do join from the area at the bottom of the high street.

Lorna Bullett

8. Some of the sites identified would clearly conflict with the policy in section 7 to protect the Green Belt area. Sites 4, 5, 6 and 7 are in Sambourne Parish area of Green Belt. In particular sites 4, 5 and 7 would have severe impact on the openness and character of the area and should be deleted as unsuitable for development. Site 6 would have less impact with suitable road infrastructure. However any development allowed within Sambourne parish to support Studley should be limited to the 2% limit for individual settlements as set out in Section 9.

Brian Summers

9. Green Belt options 4, 5, 6 and 7 are within Sambourne Parish, yet this is not mentioned in the document. Options 5 and 6 in particular would encroach into the countryside and close the gap between Middletown and Studley. Yet great pains have been taken in similar circumstances to retain the separate and distinct identity of Studley and maintain a gap with Redditch. Middletown is a country hamlet much different from Studley and wishes to maintain its separate identity. One of the purposes the Green Belt serves is to check the unrestricted sprawl of large built-up areas and another is to prevent neighbouring towns merging into one another. I do not consider that justification exists for housing development in the Green Belt as other locations can be found beyond the Green Belt. This is not a special circumstance issue and would set a dangerous precedent. Junction of Middletown Lane and A448 has had many accidents. Middletown Lane is a rat run with 250 vehicles per hour queuing to negotiate the junction.

Ken Miller

10. Lack of green areas within the village would suggest a greater need for maintenance of the surrounding green belt. The area east of the A435 towards the church is particularly valued and used frequently by residents. There would be little room for building on area 8 without restricting this present enjoyment.

Presumably developing areas 9 and 10 would cause the least green belt disruption.

Liz & Peter Freeman, Mark & Mandy Worrall

11. All of the areas that border Studley are visually attractive and the green belt status serves the purpose of limiting development to ensure a sensibly laid out village shape/size. Once the Green Belt is built on, the precedence would be set to continue building on field after field over the years. Regarding area 7, a mass of new houses on the southern edge of the village would do nothing to increase the feeling of community or help the village economy as people would use their cars to drive out of the village for their requirements.

Craig Hunt

12. Half of the potential development sites in Studley village (4,5,6,7) are situated on the Bromsgrove Road on green belt land. If all these sites were to be developed this would lead to a significant population increase with resulting traffic problems, in particular site 7 at the junction of Bromsgrove and Alcester roads. Significant development along Bromsgrove Road would start to separate existing houses from the countryside. Any development should only be small in scale and environmentally friendly and should not result in the entire western side of Bromsgrove Road being developed.

Richard Horton

13. Placing housing developments in Green Belt land is not justifiable when other locations outside Green Belt are available. Options 5 & 6 in particular would encroach on the countryside giving precedent to claim other Green Belt land and expand housing further into the countryside. The gap between Middletown and Studley would close and country living would be gone forever. The occurrence of flooding on Middletown Lane is frequent. The drainage system on the land is poor and to have an access road at that point would add to the problems. There is a high frequency of accidents at the crossroads and to add further access at that position would be dangerous.

Patricia Tarantino

14. Sites identified for development:

- Sites 1 & 2 - suitable.
- Site 3 - unsuitable if former railway line is obstructed, planning guidance stipulates these should be kept free for potential future use.
- Sites 4, 5 & 7 - appear to be on farming land.
- Site 8 - highly unsustainable, leave The Park alone, widely used as recreation open space as well as grazing.
- Sites 9 & 10 - possibly suitable.

Michael Bond

15. I do not support any form of development on Site 8. This land is within the Green Belt, the boundary of which should be retained intact on the east of the village. This area has an open fee, any development will have an adverse impact upon the setting of listed buildings, ie. the Catholic Church and Manor House, which have a historic and unique relationship across the open "park" to the listed parish church over the river. The views across the valley towards and between the buildings give Studley its only intact historical reference to being a village. The Landscape Study identifies the site as having "high" landscape sensitivity. Development would require access from the already congested and narrow Manor Road and Castle Road. Land is also an area of flood risk potential. The Park is used for informal recreation by many people. To swallow it up with development would deny people much-needed recreation space. Studley should remain a village and development should be limited to small-scale sites on brownfield land only.

Gary Woodward

16. Object to proposals for development in the green belt area along the A448 Bromsgrove Road. Middletown is a small hamlet situated in Sambourne Parish and is distinct from Studley. It is essential that green belt is maintained otherwise large conurbations will just continue to spread. Local schools are already over subscribed. There is sufficient land available within the existing boundary of Studley. The area within the Green Lane triangle (Area 2) provides adequate space for the stated needs.

Robert Mansell

17. Object to the green belt being built on when other land within Studley is more appropriate for development, ie. area around and between Green Lane and Station Road. Fringes and general surroundings of Studley are of equal importance as village centre in order to attract businesses and visitors to the area. Middletown is a small and historic hamlet and will be absorbed into Studley if this building is approved. It is as important for Middletown and Sambourne to be distinct and separate from Studley as it is for Studley to be separated from Redditch. It will be detrimental to the wildlife and rural area. Landscape Sensitivity Study clearly states that the impact of development would be highly detrimental to Studley, exactly the same applies to Middletown.

Joan Mansell

18. Site 4, 5, 6 and 7o adjacent to A448 are inappropriate and should be removed from the plan. These sites lie within the Green Belt and would be an unwelcome step towards the coalescence of Studley and Middletown. They would cause more traffic to be joining the A448 which is already considered to be a dangerous road with a significant accident history. They would probably introduce more traffic "rat running" through Sambourne which is already plagued by traffic.

Philip Jones

19. Do not consider that justification exists for housing development in the Green Belt as other locations can be found beyond the Green Belt. This is not an exceptional circumstance and would set a dangerous precedent. Options 5 and 6 in particular would encroach into the countryside and close the gap between Middletown and Studley. One of the purposes the Green Belt serves is to check the unrestricted sprawl of large built-up areas and another is to prevent neighbouring communities merging into one another.

Paul Smith, B S Sewell, Mr & Mrs M Russell, H Barlow

20. In essence all should be resisted. However, trying to objective:

- Options 1, 2 and 3 if contained are possibilities although they may impinge into Green Belt.
- Option 8 would represent an unwarranted expansion of the existing boundary into Green Belt.
- Options 4, 5, 6 and 7 are totally unacceptable. They are all outside Studley Parish boundary and represent unacceptable expansion over the A448 into Green Belt. Development would represent undue and unnecessary expansion of Studley and unwanted encroachment with Middletown and Sambourne. Once started it would be added to over the years bit by bit.

David Burchall

21.

- Site 1 - would lead to an expansion of the A435 industrial area which is primarily larger industrial and office units. As the economic need is for smaller units, the development of this site would not be in keeping with the existing area and is not suitable for economic development.
- Sites 1 & 2 - development, particularly industrial, should be discouraged as it would eat into the Green Belt potentially causing the industrial areas of Redditch and Studley to merge. Are unsuitable for economic development because there is a recognised issue with the volume of traffic using the A435. Any development within this area would increase the volume of traffic to the roundabout, causing potential increases in air quality issues.
- Site 3 - business use area has a large number of small enterprises. Further development in this area should encourage smaller units targeted at start up and small business enterprises. Development will combine to form one economic development zone. Will have the desired effect to draw more traffic away from the A435 route. There is the potential to redirect industrial traffic into Green Lane away from the residential estate. Historically used as sidings, storage and loading depot and partial or complete redevelopment of previously developed land is supported by paragraph 89 in NPPF.

David Bush

22. None of the sites put forward are acceptable other than Winyates Green Triangle (Site 9). This could be an acceptable location for development due to its proximity to the local services within Redditch.

- Site 1 - should be retained for employment and any expansion of this area for housing will erode the separation between Studley and Redditch. It would have a dramatic impact on the viability of the retail outlets and service companies as the employees of the various companies use the local shops and businesses for their needs.
- Site 2 - would introduce unacceptable extra traffic onto the Redditch Road which has been identified to be at capacity. It would also reduce the separation from Redditch and have a dramatic effect on the open views from the west of the village.
- Sites 3, 4, 5, 6, 7 - are on the wrong side of one of the most dangerous roads in the district. Any development on the south side of the A448 would be most strongly resisted by residents. As well as traffic issues it would also spoil the open countryside which gives Studley and Sambourne their strong individual identities.
- Site 8 - is a complete non-starter as access has to be on to the A435 which would increase the air pollution and traffic volumes. It would also affect the open views of the countryside from the two parish churches and the nearby Studley Castle.

Unless action can be taken to address the problem of air quality within the village, and means of considerably reducing the traffic through the village can be achieved, no additional development can be considered in or around Studley.

Sites within the village should be looked at seriously before any development can be considered within the green belt. There are several underused industrial and commercial sites that, taken together, could provide enough homes to meet Studley's allocation. These should form the core of any plan before looking to extend the village envelope.

Any small site put forward within the green belt that related closely with the existing form of the village and was of an outstanding design or offered substantial benefits to the village might be considered.

Councillor Paul Beaman

23. Sites 1, 6 and 8 are suitable because they are adjacent to existing developments. Sites 3 and 5 at a push but the remaining sites are completely undeveloped and should remain so to meet the environmental principle that "seeks to protect those areas of High Landscape Sensitivity surrounding Studley from development."

Donald Cooper

24.

- Areas 1 & 2 - are the most obvious places as there are disused houses there already.
- Area 3 - should be OK.
- Area 4 - is right opposite a busy junction and any more traffic would probably need an island at the top of Station Road. Traffic comes up The Slough too fast as it is when trying to turn right at the top of Station Road.
- Areas 5 & 6 - are OK.
- Area 7 - is again moving close to a fast junction. An island where The Slough joins the A435 would make life easier for traffic trying to turn tight onto the A435 and would encourage use of The Slough more for traffic coming south from Redditch.
- Area 8 - would only increase traffic which is already ridiculously high on the A435.

Mr Page

25. The areas marked for potential development give no indication as to the size and type of development that could be built. This makes the question almost impossible to answer.

Sites 1, 2 and 3 - ruled out by the stated principle in paragraph 10.8.14 of preserving Studley's separate identity from Redditch. All of them would contribute to the narrowing of the gap.

Brownfield/redevelopment sites should have been included on the plan with an estimate of the numbers of houses these sites could take factored in when looking at the proposed greenfield sites.

Michael Clapham

26. Strongly disagree with the potential development areas 4, 5, 6 and 7.

Areas 1, 2, 3 and 8 are suitable.

Andrew Clarke

27. Do not consider it is appropriate to solely consider keeping the separate identity of Studley without applying similar principles to neighbouring villages. Whilst favour not expanding the boundaries of Studley, if green belt land is to be built on, it would be better to build between Redditch and Studley where the boundary is already very blurred and where any visual impact would be minimised. If the maintenance of individual urban areas is considered important, then the development of green belt to the south of Studley would be a far greater risk to the identities of the small villages of Sambourne and Middletown.

Andy Giblin

28. Site 4 - is designated green belt land and should be kept that way. It is an area of natural beauty. Any development would have a significant adverse visual impact on the area in general. A new housing development in this area would give rise to additional traffic that would adversely affect highway safety. Entrances to any such development are likely to have a significant impact on the A448 in the immediate vicinity of other major junctions, ie. Station Road. With an inadequate road infrastructure, the additional traffic is also likely to have a significant adverse environmental impact with additional pollution and CO2 emissions, along with additional noise from increased traffic flows. Additional surface run off is likely to result in additional problems downstream as additional volumes of water are channelled there. Any inability to disperse this additional water is likely to result in the potential for a back up of water in the system increasing flood risks upstream during high levels of precipitation.

Andy Giblin

29. Object to Area 4 in particular. Also do not like the proposal to build on green belt land, in particular areas 5, 6, 7 and 8.

Area 3 - does offer some possibilities for building use as it is largely scrub land currently.

Philip Crook

30. Option 4 - do not want to lose the lovely countryside opposite my house and believe it is unsuitable for housing because:

- residents of Studley will lose one of the nicest views from our village
- green belt land should only be built on in exceptional circumstances. Nothing in the consultation highlights an exceptional circumstance.
- there are plenty of places outside of Studley more suitable for housing, eg. areas not in the green belt, and/or brownfield sites, Redditch.
- there is a public footpath in this field that is used by many residents
- there are already traffic issues at both ends of The Slough. These will become much worse if there are houses built.
- these houses would be on the wrong side of the A448 for getting to local amenities, including schools and shops. This could be very dangerous.

Kevin Ross

31. Any development should be at area 8 rather than areas 4 or 7 which are too far from schools and shops.

Alan Elsworth

32. We were somewhat disturbed to see that the Studley plan suggested the possibility of limited development between Sambourne and Studley, some of which was to be in Sambourne rather than Studley. We are very much against this proposal and feel that the areas of green belt between Sambourne and Studley and between Sambourne and Redditch/Astwood Bank need to be retained.

Sambourne Parish Plan Steering Committee

33. It is considered that Options 1 and 2 are likely to be unsuitable locations for development as they would reduce the gap between Studley and Redditch where this land serves an important Green Belt purpose. Development at these locations would contradict environmental principles 1 and 12 contained in the Draft Plan which apply to Studley.

Redditch Borough Council

34. Would support the allocation of housing and some employment along the A435 corridor. Due to the significant amount of job opportunities available to Stratford residents within Redditch, this may be an appropriate rationale for allocating some suitable Redditch employment land in Stratford in particular the release of Gorcott Hill. (Site 10)

Redditch Borough Council

35. Other than instances where publicly owned land is identified, we feel that it is surely the responsibility of local private landowners to determine for themselves whether land is suitable and available.

Mappleborough Green Parish Council

36. Sites 5 and 6 are unsuitable on four counts:

- they encroach towards Middletown. A specific aim of green belt is to stop the merging of distinct communities. Siting housing here would lead a long way down the track towards a merged Sambourne/Middletown/Studley.
- the new houses would be on the other side of the busy main road from the main village. This is unpleasant for the residents, dangerous and works against a feeling of inclusion and community.
- it would most definitely increase the traffic flow through Sambourne which is already fighting to reduce this.
- it is a long way from the centre of Studley which would again increase a sense of isolation/ non community.

Site 4 is not as bad as 5 and 6 but still the wrong side of the main road, likely to encourage more encroachment along Jill Lane and very likely to increase traffic through Sambourne.

Site 7 is not as bad as 5 and 6 but still the wrong side of the main road and a distance from village centre

Site 3 - the top end of Green Lane up to the A448 has been made unsightly by recent actions of industrial and private land owners. It may benefit from some development which involved a considerable amount of landscaping to improve the visual amenity of this once beautiful corner of the area. It may be a suitable location once all suitable more central locations have been developed.

Other sites:

- perhaps the farm buildings to the east of A435 near Spenal, although wrong side of a main road and quite distant from centre.
- perhaps the Spenal Corner "commercial centre". Again, even further from centre and wrong side of road.
- perhaps the farm next to Washford Mill and the Washford Mill out-buildings, although next to river, isolated and wrong side of main road. This is a very tatty area at present and might benefit from well designed and landscaped development.

Mappleborough Green Parish Council, Councillor Justin Kerridge

37. Confirm that supportive of the allocation of potential mixed residential development at land along Alcester Road, Studley, indicated as Potential Development Option 8. BDW would like their proposals to form 'part of the solution' to the existing and ongoing pressure on traffic and infrastructure. Given the extent of the site frontage, can offer additional capacity and potential highway improvements to mitigate the impact of the development proposed. Accept that development proposals will need to make appropriate contributions towards more strategic highway improvements as well as education and other Section 106 (or CIL) requirements. Will also investigate the opportunity to reinforce the edge of the built form of Studley with a large area of public open space to the west, which is already bisected by numerous public rights of way. BDW are keen to integrate housing for older people and are considering a care home, possibly accompanied by a range of sheltered housing and private bungalows in order to meet the changing needs of an ageing population. Further consideration of potential incubator spaces/flexible small business units will also form part of future work on this site.

Barratt David Wilson Ltd.

38. Site off Brickyard Lane (Site 3) is a sustainably located and well contained proposal.

Bloor Homes

39. Areas 3, 4, 5, 6 & 7 do not fall within Studley Parish and are in the Parish of Sambourne to which there is no reference. Any development of this land should be under the control of Sambourne Parish Council and must fall in-line with the recommendations of the Sambourne Parish Plan, which may dictate that development of this land is not appropriate.

Mr Laurence Evans

40. Sites 1, 2, 5, 6 are indicated as having areas subject to surface water flooding. Site numbers 9 and 10 may be completely in Flood Zones 3a/3b. Areas of land that lie in Flood Zone 3 will not be suitable for development.

Environment Agency

41. Proposed potential development sites (nos. 3, 4, 5, 6 & 7) lie within the parish of Sambourne and in green belt land. It is apparent that consideration of sites for development focussed only on the south-western boundaries of Studley. Other adjoining parishes, eg. Mappleborough Green, can offer sites which would not necessarily have to be accessed from the A435 or A448. Public transport in this area could be provided by extending services in adjacent areas, eg. Redditch. The majority of residents value the rural character of Sambourne. The feature which forms this character and separates Sambourne from the more urbanised neighbours - namely the Green Belt - must be maintained at all costs. Sambourne seeks to preserve this separate identity. Urban sprawl must be prevented. There is no identified need for further housing in Sambourne. The draft document makes no reference to brownfield development. The NPPF imposes the requirement that building should go ahead on brownfield land ahead of greenfield. The District Council should catalogue these sites so that they can be used preferentially as required. Residents value highly direct access to or views of the countryside. Sambourne is served by 'C' and 'D' class lanes. The volumes and means speeds of vehicles using these roads already represent a considerable danger to users other than vehicles. As there are no bus services in Sambourne, than any extra development would of necessity exacerbate this problem.

Sambourne Parish Council

42. The land adjacent 44b Birmingham Road should be identified as a suitable site for small scale residential. The site has already been surveyed and found to have low ecological value, does not include any flood zone. The site also offers the only 'gateway' development opportunity along the A435 as well as the opportunity of encouraging tree planting along the A435, all policies within the draft document.

Stephen Marchant, Christine Marchant, R J Smith

43. Full consideration should be given to the redevelopment of the Arrow Works site to the north of the village. It was, along with adjoining land, previously identified as a site for redevelopment under proposal STUD.1 of the Consultation Core Strategy (February 2010). The site is presently occupied by Ricor and operates heavy engineering for the automotive industry. The business operation has caused issues with neighbouring residential properties in terms of noise emission and the landowner will consider options for relocation to Studley / Redditch. This presents the Council with an opportunity to redevelop the existing brownfield site. The landowner has commissioned technical work which demonstrates that the site is capable of redevelopment. There may be potential for providing a link road between Birmingham Road and Redditch Road which would deflect traffic from the centre of Studley. An appropriate scale of development across the entire site would be needed to fund infrastructure improvements of this type. The Council's Employment Land Study identifies a surplus of industrial and warehouse floorspace. It also acknowledges that vacancy rates within the Birmingham Road site are high and that the selective release of employment sites in Studley may be reasonable. There is therefore no qualitative or quantitative reason to protect the Arrow Works site for industrial and warehouse floorspace. The allocation of this site could potentially 'counter' the need to release Green Belt sites on the edge of the village.

Harris Lamb

44. Any proposal to build along the A448, which is the eighth most dangerous road in the country, is irresponsible. The increased traffic on an already extremely busy road will cause even more congestion, not to mention the chaos and disruption caused whilst building takes place.

Louise Ritchie

45. Most of the sites shown are not suitable for development, only those within the village envelope of Studley village boundary are admissible. This rules out those west of the A448 which are in Sambourne parish and also within the Green Belt which surrounds the village. To build on Redditch Road (sites 1 and 2) will increase traffic along the A435 which at the island is at capacity, and increase the waiting of traffic at the island which will increase the air pollution which is already above government limits. To build on the Redditch Road will go against the Council's previous designation of the site as restricted for industrial/employment use. It will decrease the space between Studley and Redditch which planning inspectors have said should be maintained. Any social housing should be restricted for those having a strong connection with the village.

Helen & Bill McCarthy

46. The potential locations should be deleted as they lay on the outskirts of the village which means intrusion into the Green Belt. There are no justifiable or exceptional circumstances to justify removing land from the Green Belt when the Parish Council has identified potential development sites that are in the present built up area and the envelope of the village.

Councillor Hazel Wright

47. Land to the south of the Blacksoils Brook and to the north of the A4023 Coventry Highway (Site 10) is an ideal opportunity for the development of the eastern side of Redditch, to the west of the A435, to be comprehensively planned.

Owners of land at Ravensbank Drive/Gorcott

Consultation Question: Q180

1. No amendments to the Green Belt boundaries should be considered in order to retain the openness and character of the area.

Brian Summers

2. Studley does not have sufficient facilities for its existing housing stock and this situation is unlikely to change.

Ken Miller

3. Studley has clearly defined boundaries. There is currently good access to the surrounding countryside and Studley feels part of the Warwickshire landscape. The green belt has preserved this by preventing Studley growing beyond its current boundaries.

Richard Horton

4. Do not support any suggestion that there could be any form of intrusion of development into the Green Belt around Studley, but in particular on the vague "site" identified as number 8.

Gary Woodward

5. Consideration should be given to amend the Green Belt boundaries. Currently there is a sprawling nature of developments along the A448 which gives the effect of the industrial estate The Slough / Green Lane being in the Green Belt area. This does not clearly emphasise the Green Belt which separates Studley and Redditch. This will then clearly define the Rough Hill Woods as the Green Belt boundary to the west of Green Lane/The Slough site.

David Bush

6. Attention needs to be given for more Green Belt to be added, for instance Winyates Green Triangle. The high quality level farmland at Ravensbank and the four meadows Nature Reserve at Far Moor Lane would best be put in the Green Belt to cement the gap between Bromsgrove and Redditch with Birmingham.

CPRE Redditch Group

7. The built up area boundary line for Studley should be extended to include the garden of 105 Redditch Road. The boundary line currently finishes just before his house and therefore his garden is excluded from any possible development. My father merely wants to build a modest, comfortable bungalow for him to live in for as long as he is able to without having to go into a care home.

Sarah Pittaway

8. The area between Studley and Redditch should be protected. It is important that the buffer zone remains in place and there is no adjustment to green belt boundaries.

Studley Parish Council

9. Amending the Green Belt should not be considered for the following reasons:

- the village lies completely in the Green Belt.
- there are no exceptional circumstances to justify removing land from the Green Belt.
- Studley's eastern and western edges are very strongly defined.
- the landscape around Studley is very attractive and of high quality.
- the document acknowledges that it is the character and quality of this landscape that identifies Studley.
- the flood risk to the east of Birmingham Road and Castle Road.
- the need to maintain the gap between Redditch and Studley.

Councillor Hazel Wright

Plan 8: Studley and Mappleborough Green

1. The strong consensus in the 2010 Parish Plan for Studley was that there was support for housing development of existing empty shops and sites within the village, particularly the old Co-op site, but no support for development of the Green Belt land surrounding. The Potential Development Options are all on Green Belt land and would all be detrimental to the village, its amenities and character.

Bill Acres

2. I am opposed to the District Council considering potential development options in the Green Belt adjoining Studley in order to satisfy the shortfall of available sites within the Built-Up Area and achieve the allocated number of new dwellings demanded of Studley.

Paul Smith, B Sewell, Mr & Mrs M Russell, H Barlow

3. The map identifies two sites '1' and '2' to the north of Studley as potential development options. It is assumed that such sites are identified for potential development needs of Redditch.

Bromsgrove District Council

4. At least five of the areas marked are actually in the Parish of Sambourne. Apart from one small reference to Sambourne there is no mention of any consultation or consideration regarding the impact of these areas with neighbouring villages such as Sambourne, Middletown and Mappleborough Green.

Lynn Evans

5. Potential Development Options 4, 5, 6, 7, and 8 should not even be shown on the map let alone be considered in passing.

Ken Miller

Draft Core Strategy 2012 - Summary of Representations

10.9 Wellesbourne Area Policy Profile

No comments received for this section

Topic: 10.9 Wellesbourne Context

1. I find it very difficult to identify the two priority habitats mentioned in paragraph 10.9.11. I certainly have no knowledge of a 'Wet Woodland' within Wellesbourne Wood.

John Brace

2. Support the further opportunities for augmenting the existing Warwick-Wellesbourne-Stratford cycle route which passes through the village, as this supports our physical activity agenda along with mental health and wellbeing.

NHS Warwickshire

3. Share the concern District Council has for the capacity constraints of the current transport infrastructure in and around the village. Lack of access to transport contributes to isolation and the ability to access basic services such as GP surgeries and local shops.

NHS Warwickshire

4. Other concerns in this area include the immediate capacity constraints of the Waste Water Treatment Works. Any development considered would have to include a programme to address these capacity issues.

NHS Warwickshire

5. Have concerns around the flooding Wellesbourne suffered in 2007 and welcomes the Flood Alleviation Scheme supported by the Environment Agency.

NHS Warwickshire

6. Would like to highlight the importance of parks, gardens and green spaces in relation to mental health and wellbeing and as a consequence have concerns about the under provision of these facilities in the village.

NHS Warwickshire

Topic: 10.9 Wellesbourne Policy Principles

1. Overall the Policy Principles set out an ambitious list of opportunities focusing on new social infrastructure for the village. It is intended to deliver these by way of contributions from development proposals and other initiatives around the village and with this in mind the more development that takes place the greater the likelihood that money will be delivered through Community Infrastructure Levy that can be spent on providing local infrastructure.

Walton Estates

Topic: 10.9 Wellesbourne Environmental Principle

1. Are you restricting the policy to "maintain the openness of the River Dene valley and create greater public access to it" to the environmentally poor west side of the village or including the more environmentally rich east side of the village?

Protect Wellesbourne Group

2. Bullet point 9 seeks to protect areas of High Landscape Sensitivity and also refers to areas of Medium Landscape Sensitivity. These concepts are not defined anywhere in the document nor actually identified on a Plan. This needs to be done. Moreover, if the concepts are to be derived from the Landscape Sensitivity Assessment, then it is difficult to see how they will be defined since these concepts relate to the type of new development being considered (residential or commercial).

Walton Estates

3. Bullet point 9 should also be reworded to delete the words 'very special circumstances' as this wording relates to the test required to assess development in the Green Belt. More suitable wording might state 'unless there are specific circumstances which outweigh the landscape sensitivity'.

Walton Estates

Topic: 10.9 Wellesbourne Social Principle

1. The impact of heavy goods vehicles should be considered beyond the village, particularly on the A429 between Wellesbourne and the M40 at Longbridge.

Charlecote Parish Meeting

2. Should include the level of housing provision. Bullet point 1 currently states a policy principle to increase the number of suitable and affordable homes and this should be expanded to refer to the future development strategy range of 160-240 dwellings in Wellesbourne or such range as may be revised in the light of comments received.

Walton Estates

Topic: 10.9 Wellesbourne Economic Principle

No comments received for this section

Topic: 10.9 Wellesbourne Future Development Strategy

1. There is already a planning application for the Redhill site for up to 175 dwellings - this should be acknowledged in the Draft Core Strategy. Similarly a number of 'sheltered accommodation' properties are being developed on the site of the old garage in Stratford Road. Taking these developments into account only around 40 houses remain to be developed to meet the strategy objectives. This can be accommodated by minor development and infill, without major new developments. There is no need to sanction any development that impacts even on medium landscape sensitivity.

John Haywood

2. Would you qualify the statements made within the Draft Spatial Strategy document with reference to the actual true number of new homes that you expect Wellesbourne to absorb during the plan period?

Protect Wellesbourne Group

3. We are concerned about the description of the area to the west and north of the M40 Distribution Park as of Medium Sensitivity, particularly as those areas are not specifically defined or limited.

Charlecote Parish Meeting

4. Paragraph 10.9.15 refers to the undesirability of further development close to the River Dene, even outside the floodplain, as this would lead to the loss of important open spaces. This presumably refers to the area identified as an Area of Restraint to the north-west side of Bridge Street, as this is the only area that could be regarded as an important open space, and not to the whole length of the river. This should be made clear in the document.

Walton Estates

5. Paragraph 10.9.18 refers to the areas of Medium Sensitivity to residential development to the south and east of the village, as set out in the Landscape Sensitivity Report. It is far from clear that this is the correct conclusion in respect of land to the east given that the report says that "the openness and lack of field boundaries would make any potential housing development very visible. Added to this, the conclusion of the landscape study in the February 2008 SHLAA was that "the area is not considered suitable for development."

Walton Estates

6. The sustainable and accessible nature of Wellesbourne is recognised by its identification as a Main Rural Centre in the hierarchy of settlements. It is the joint third largest settlement in the District (outside Stratford). It supports a range of shops and facilities for the local area, and has good public transport connections to higher tier settlements. As a result Wellesbourne offers a good service base to support its population which reduces the need to travel elsewhere (particularly by private vehicle). Development in the settlement would help promote a sustainable pattern of development. It is capable of accommodating additional housing and employment development which will help support services and social and community facilities. Consequently, the scale of housing in paragraph 10.9.22 is too low given the sustainable nature of the settlement. The level of provision should be increased to reflect the high level of services and facilities available. An increased level of growth could bring benefits through CIL contributions to be spent on improved infrastructure in the settlement.

Walton Estates

7. Fully support a more flexible approach to Wellesbourne Airfield as set out in (see paragraph 10.9.22). Given that several parcels of land at Wellesbourne Airfield have not been delivered for Class B employment use to date, it is appropriate to allow other economic development (as defined in Core Strategy paragraph 9.7.3). This could include retail use (subject to compliance with other Core Strategy policies). Paragraph 10.9.22 and the Policy Principles for Wellesbourne should therefore distinguish between the following:

- Existing employment sites in active B1-B8 use. These should be protected in accordance with Policy CS 22; and
- Sites with unimplemented or partly implemented planning permissions, for which other economic development (ie. non Class B1-B8 use) may be appropriate. A more flexible approach as referred to in Policy CS 22 should be adopted for such sites. This applies to land at Wellesbourne Airfield.

Wellesbourne Airfield

8. Wellesbourne is clearly a suitable location to accommodate further housing and employment development. We support the principle of seeking to adopt a more flexible approach to the use of the 'saved' Local Plan employment allocations at Loxley Road. Consideration should be given to a range of economic development, including food retailing and potentially residential development subject to satisfactory environmental conditions. It is considered that these new development options could come forward as they are within the built-up area without having an adverse effect on the character of the settlement. These areas could be developed in a manner consistent with the Core Strategy's Future

Development Strategy where they are developed in the context of an agreed Masterplan. Indeed, it is considered that growth in Wellesbourne could bring positive economic and social benefits which hitherto have not been provided.

Barwood Developments Ltd

9. It is considered that the scale of residential development (160-240 dwellings) proposed for Wellesbourne in paragraph 10.9.22 is inadequate. It is considered that the figure should be amended to 300-400 dwellings. This assessment is based on the capacity of the recently approved planning consent in respect of Area 7 and the capacity of land south of the airfield within the built-up area boundary.

Barwood Developments Ltd

10. Whilst it is recognised that other sites had been outlined to take potential development, it should be noted that Wellesbourne does not have the infrastructure to support such development. The proposed development on areas 5 & 6 (Redhill Site) comprises 175 houses and 50 extra care homes. Therefore the numbers referred to should reflect this and be reduced to around 15 dwellings.

Wellesbourne Parish Council

Consultation Question: Q181

1. Would urge the District Council to look into the lack of a community leisure facility as currently local residents have to travel to access such a service. Would also welcome a review of resident's access to other local amenities such as shops that sell healthy food options, community pharmacists and local GP services.

NHS Warwickshire - Health Development Manager

2. Paragraph 10.9.7 acknowledges that just 8% of main food expenditure in the Wellesbourne and Kineton area is spent in Wellesbourne. There is a significant outflow of expenditure to Stratford-upon-Avon and Warwick/Leamington. The paragraph then concludes that there is no need for additional retail floorspace in Wellesbourne. We disagree with this statement. The Retail Study did not assess the future convenience goods need for Wellesbourne. The suggested lack of need in Wellesbourne is not justified against the evidence base. The low level of convenience goods retention indicates both a quantitative and qualitative need for additional food store provision in Wellesbourne. An increase in the retention of locally generated convenience goods expenditure should be a priority for the Council. The provision of a new foodstore in Wellesbourne would assist in achieving the sustainability objectives set out in Policy CS 1, namely reducing the need to travel and ensuring access to a range of services and facilities.

Wellesbourne Airfield

3. We would venture to suggest that due to the unique character of Wellesbourne protection should be given to areas of Medium Landscape Sensitivity as well as areas of High Landscape Sensitivity.

David & Susan Close

4. With regard to Policy Principles (b) Social, there is a need to secure developer contributions to fund a new police office/post following the recent closure of the police station. The Wellesbourne Neighbourhood Policing Unit already covers an unrealistically large geographical area. The existing 3 officers need to be based within Wellesbourne and not at Stratford, where they have become even more remote.

Mr J Morgan

5. Environmental - reduce traffic, especially heavy goods vehicles on the B4089 directing HGVs to use the A429 using a traffic management plan with appropriate enforcement measures.

Environment - should also refer to protection of medium sensitivity landscape as well (Government planning document states that should consider ordinary landscape areas).

Social - there is no recognition of the Housing Needs Survey for Wellesbourne. The word "and" needs to be deleted between suitable and affordable to read "suitable affordable homes".

Social - create additional car parking in Wellesbourne village centre. Obvious place to state is adjacent to the Village Hall/Youth Club/Precinct area.

Social - provide a multi-purpose community leisure centre; need to raise awareness of the existing local amenities that the Parish Council are trying to salvage, Wellesbourne Sports & Community Centre and the Village Hall.

Wellesbourne Parish Council

Consultation Question: Q182

1. Paragraph 10.9.21 - all developments should be reduced and a flexible approach to use the land considered.

Wellesbourne Parish Council

2. Now that it has been publicly stated that the 225 houses for the Redhill site is part of Wellesbourne's allocation of a maximum of 240 houses then should the Draft Strategy mention this? Thus saying only 15 houses are still required to complete Wellesbourne's proposed allocation. For this small amount it is reasonable to suggest they are built on brownfield land or infill.

David & Susan Close

Consultation Question: Q183

1. Site 9 - majority of site is located on a floodplain, with many properties flooded during the last two flood episodes, despite remodelling of the watercourse after the 1998 Easter floods and the replacement of the culvert on Newbold Road. It is at present semi-improved grassland, just prior to the initial Core Strategy it was agricultural land. The land sits outside the boundary of the village and is deemed of high/medium sensitivity to development and is recommended to be kept as a valuable wildlife buffer in the evidence database. Just prior to the first Strategic Land Assessment the field was planted to meadow, this has encouraged recreational use and the possibility of linking existing footpaths into the national public footpath network. I note this land has been previously linked with other developments in the village as a potential inducement for approval of planning on other sites.

D Troth

2. The 2012 Draft Core Strategy for Wellesbourne is inconsistent and contradictory in several areas. The Environmental Policy Principle states "Maintain the openness of the River Dene Valley and create greater public access to it" and "Reduce the risk of flooding in the village". However there are a number of sites identified which run counter to this principle - in particular sites 1, 2, 7, 8 and 12. Paragraph 10.9.10 states "In terms of sensitivity to residential development, the river valley is classified as an area of High Landscape Sensitivity. Areas to the north, north east, west and south west of the existing settlement boundary are recorded as High/Medium landscape sensitivity. Land parcels to the south and east of the village have the least sensitivity to residential development and are classified as Medium.

John Haywood

3. Potential Development Option Site 13 (HRI) - it should be noted that this is a site of high sensitivity given its proximity to the Conservation Area and heritage location of Charlecote and Charlecote Park.

Charlecote Parish Meeting

4. Control the land identified as Potential Development Option 8. The land concerned amounts to 5.6 hectares. It is capable of accommodating up to 145 dwellings, although this figure could be reduced having regard to the need to accommodate open space and a suitable buffer to the River Dene. The Landscape Study which formed part of the February 2008 SHLAA commented that this site would be suitable for development; it identified it as one of the broad locations for growth in the settlement. The July 2009 SHLAA further identified this site as suitable for a mix of dwellings of about 145 units. Given the recent commitment to a site at Ettington Road, if this site is deemed to be appropriate for development, then only a part of it could be allocated for this plan period and the balance developed in a later plan period to respond to future needs for additional housing development. In any case, the numbers of houses to be built in Wellesbourne could well be increased as a result of other objections, including those to the overall level of development and the distribution of development:

- All of the owners of the land confirm that it is available for immediate development. There are no land control issues that would be a constraint to development.
- The site is well related to the existing pattern of development and to a range of social and community facilities. The site is also close to employment opportunities on the M40 Distribution Park.
- Satisfactory vehicular access can be provided from Brookside Avenue and Kineton Road.
- There are no statutory designations in respect of archaeology or conservation area, listed building or historic parkland on or close to the site.
- The Landscape assessment carried out on behalf of the District Council concluded that the landscape to the south of Wellesbourne that includes this site is of high/medium sensitivity to housing development. Much of the land around Wellesbourne falls within this category, so landscape considerations are only one of the factors that need to be taken into account. The Landscape Study carried out as part of the 2008 SHLAA identified no impediment to development and indeed identified the site as suitable for housing development.
- An Extended Phase 1 Habitat Survey has been undertaken and demonstrates that development can take place without harm to the environment. No protected species or flora and fauna were identified that would be harmed by development of the site.
- A detailed Flood Risk Assessment concludes that a small part of the site alongside the riverside falls within a flood risk area but the majority of the site is flood zone 1 and therefore suitable for development. It would be appropriate for the area liable to flooding to be made available for public access, thereby providing not only a public open space but also a wildlife corridor.
- A public footpath along the river would then improve local facilities and link with the existing footpath system just beyond the site.
- The agricultural land quality of the site poses no particular constraint to development.

Walton Estates

5. We consider that the Future Development Strategy for Wellesbourne has failed to acknowledge the potential offered by the Wellesbourne Airfield site which is included within the built-up area boundary of the settlement as defined in the current adopted Local Plan. There is land to the south of the M40 Business Park that is suitable for residential development within the built-up area boundary that could be developed without the loss of important open spaces elsewhere on the periphery of Wellesbourne.

Barwood Developments Ltd

6. No further locations should be identified apart from 5 and 6 which are already earmarked for the 225 houses recently given outline planning permission.

David & Susan Close

7. I object to consideration of Site 3, open land to the rear of existing residential properties in Dovehouse Drive as a potential future residential site. Following the recent grant of planning permission at the Ettington Road site, it is considered that the remaining residue of 15 units for Wellesbourne over the plan period should be delivered through infill and small scale development rather than any further major residential site allocations. This recent consent has consumed if not exceeded the remaining capacity of 120 dwellings of the Wellesbourne Waste Water Treatment Works until such time as it is upgraded. The site has been the subject of outline planning proposals for residential development on three previous occasions in 1984, 1985 and 1997. In all three cases permission was refused on appeal, essentially on the basis that the development would intrude into open countryside and that there was no pressing shortage in the supply of new housing land. The Inspectors decision letter also refers to a restrictive covenant around Chadley House that would prevent residential development within 100 yards of the site. There has not been the development of necessary infrastructure to go with the size of the village, in particular overstretched health facilities, lack of public transport, uncertain future of long term employment at the HRI site, lack of a leisure centre and modern community centre and the recent closure of the police station. The existing Dovehouse Drive development involves a 3.5 mile drive to the village centre and the provision of additional development further away from the village would not be considered sustainable in terms of promoting additional walking and cycling.

Mr J R Morgan

8. Sites 1, 2, 8, 9, 12 and 13 appear to be affected by flood zones. Areas of land that lie in Flood Zone 3 will not be suitable for development. Site numbers 9 and 10 may be completely in Flood Zones 3a/3b.

Environment Agency

9. We feel very strongly that Site 3 should be deleted as it is totally unsuitable for development. Outline planning permission has been sought on three previous occasions and each time been refused as any development would be a gross intrusion into open countryside and spoil the edge of the village. The site fronts Wellesbourne Wood which is a nature conservation site and acts as a buffer between the wood and the village. Chadley House adjoins the site and a restrictive covenant exists where no new building can take place within 100 yards of the house. This represents almost a quarter of the site, imposing constraints on design and site layout. Vehicular access to the site would present problems. Dovehouse Drive has already exceeded its capacity, carriageway widening would be required if access was from Oxford Way and access to Loxley Road would create problems of forward visibility, not to mention a huge impact on existing trees and hedgerows. One of the policy principles is to increase the provision of greenspace in Wellesbourne so why destroy what is a much appreciated greenspace? We believe the granting of permission for development of the Redhill Nurseries site virtually fulfils Wellesbourne's allocation.

R & M Wilkins

10. We reaffirm that land off Ettington Road for which the District Council resolved to grant planning permission on 22 February is the most suitable and sustainable location for residential development in Wellesbourne. The next round of the Core Strategy should define the site as suitable for 175 dwellings, reflecting the recent decision and evidence base which supports the site for housing.

Broadway Malyan

11.

- None of the locations should be considered other than 5 & 6 (Redhill site) which has already been identified and has outline planning permission. Wellesbourne has the allocation of what was agreed and there should be no further imposition as none of the sites are appropriate.
- Site numbers 2, 7, 8 & 12 were all rejected by the District Council and Parish Council as areas of restraint around the River Dene with impact on the river corridor which exacerbates flood risk between sites 7 & 8.

- Sites 3, 4, 7, 8, 9, 10 & 11 are all outside the built up boundary of Wellesbourne, the only exception to this being site number 1.
- Site 13 should be for established use only (eg. Science Park) and have no residential accommodation.

Wellesbourne Parish Council

12. Control the land identified as Potential Development Options 3 and 4. The land concerned amounts to some 20 hectares. It is capable of accommodating up to 500 dwellings, but realistically this figure is likely to be lower so that other associated development can be accommodated, such as community facilities and open space, and so that a suitable buffer zone is provided to the edges of the site, particularly Wellesbourne Wood to the south. The Landscape Study which formed part of the February 2008 SHLAA commented that part of this site would be suitable for development immediately to the west of the built-up area, although the extent of this may be limited by the setting of Chadley House. The February 2008 SHLAA identified this part of the site as one of the broad locations for growth in the settlement. In the July 2009 SHLAA, however, this site was not assessed, although the eastern part of the land was assessed when it was commented that "It could be considered suitable for housing. The site has good access and is adjacent the development boundary and existing residential properties." The wider site encompassing both of these areas offers the opportunity for a more comprehensive approach, given that the site has a natural boundary to the south formed by Wellesbourne Wood. The number of dwellings that could be accommodated on this site is greater than the range of 160-240 dwellings set out in paragraph 10.9.22. However, if the site is deemed to be appropriate for development, then only a part of it could be allocated for this plan period and the balance developed in a later plan period to respond to future needs for additional housing development. In any case, the numbers of houses to be built in Wellesbourne could well be increased as a result of other objections, including those to the overall level of development and the distribution of development. Policy CS16 makes an explicit exception to the minimum estate size for larger schemes accompanied by a detailed Masterplan. This can be prepared to show how this site could be developed:

- All the owners of the land identified confirm that their land is available for immediate development. There are no land control issues that would be a constraint to development.
- The site is well related to the existing pattern of development and to a range of social and community facilities. The site is also within walking distance of employment opportunities on the M40 Distribution Park. The main supermarket in the settlement together with employment facilities are within 0.8km distance that national guidance advises that people are prepared to walk to access facilities.
- Satisfactory vehicular access can be provided. It is envisaged that the main vehicular access to the site would be taken from Loxley Road. Work undertaken in respect of a previous planning application for part of the site confirmed that sufficient space existed and that visibility at the junction was satisfactory. Alternative access points include onto Ettington Road or through the Dovehouse estate. In any case a pedestrian and cycle connection at this point is envisaged to provide good links to the existing settlement.
- There are no statutory designations in respect of archaeology or conservation area, listed building or historic parkland on or close to the site.
- The Landscape assessment carried out on behalf of the District Council concluded that the landscape to the south of Wellesbourne that includes this site is of high/medium sensitivity to housing development. Much of the land around Wellesbourne falls within this category, so landscape considerations are only one of the factors that need to be taken into account.
- There is no evidence of any protected species or flora and fauna that would be harmed by development of the site,
- The Agricultural Land Quality of the site is Grade 3 and poses no particular constraint on development, unlike other sites around Wellesbourne.

Walton Estates

Plan 9: Wellesbourne

1. Plan 9 excludes some previously developed land at Wellesbourne Airfield from the Built-Up Area Boundary. This is identified within the Built-Up Area on the adopted Local Plan Proposals Map (Inset Map 2.8) and Map 2 of the Core Strategy. Plan 9 would therefore appear to be in error and requires correction.

Wellesbourne Airfield

Draft Core Strategy 2012 - Summary of Representations

10.10 Countryside and Villages

1. Agree with the policy. Villages are dying due to a lack of affordable housing for young people. As a result Parish and Church Councils are finding it difficult to find young people to take over from roles vacated by the elderly.

T P Hitchman

2. Support the reuse of brownfield land and existing buildings. These principles should also apply to policies in the area profiles.

English Heritage

3. Concern about the scale/number of homes being proposed in the village of Brailes. The Area of Outstanding Natural Beauty (AONB) would be ruined by large estates. Brailes is a village, not a town, with a unique character and architecture, without the infrastructure needed to support a surge in population. Development of this scale would overwhelm the transport, schooling and other amenities in the village.

Joel Young

4. Houses should be built in towns where people live and work, not in villages. There is no need for houses in villages where the cost of living is higher - transport and energy. Rather look at who needs housing and where they would like to live. Spread the houses out in Brailes instead of placing them all in one location such as recent developments

Ian Lane

5. The policy should embrace the spirit of the Localism Act and recognise that Tanworth parish is unique in Stratford District, both in terms of the role of the Green Belt in local life and outside pressures.

Tanworth-in-Arden Parish Council

6. Napton Road development site being proposed for housing in the Stockton Local Service Village (LSV). The proponent says the site is a logical extension of the existing village/built form. A scheme would be well integrated with the adjoining village centre, sympathetic with its character and landscape. A low density scheme would deliver about 60 homes.

Trustees of W A Weaver

Topic: 10.10 Strategic Objective

No comments received for this section

Policy CS.25 Countryside and Villages

1. Concerned that the term 'small scale' is not defined. Rather use the words 'appropriate scale'.

Cotswolds Conservation Board

2. The policy recognises the need for a strong rural economy, identifying developments that would be appropriate in the countryside. However, the policy does not recognise the role of retail such as garden centres and nurseries.

3. There either needs to be a separate policy on garden centres or nurseries, or the policy needs to recognise the economic benefits of these businesses to the rural economy.

4. Could include an additional category of development that would be appropriate in the countryside subject to principles (i) to (v) of the policy.

5. Suggest the following wording: 'New and extended garden centres and nurseries where it can be demonstrated that the development would not have any undue impact upon the rural character of the area.'

6. The policy should support the creation of specialist retail businesses that can support employment and the local rural economy, without affecting the viability of town centres. The policy as worded is not consistent with paragraph 81 of the NPPF ... policies that support sustainable economic growth.

Garden Centre Group

7. Amend CS 25 to include high technology businesses to ensure compliance with other parts of the plan.

Codemasters Software Co. Ltd

8. Conversion of holiday lets to open market dwellings is not supported by the document and needs clarification.

Paul Harvey

9. Need to include some limited development in the countryside otherwise life will be unsustainable. Cost of services per head of population are rising and changing demographics will mean the need to travel further (especially the elderly) for medical services.

Will Hanrahan

10. Need to define what is small scale. Development needs to rather fit in with the character of a settlement and the landscape. Support emphasising residential, business and tourism and leisure development in rural areas.

Country Land and Business Association

11. Support new rules for barn conversion.

12. The policy needs to do everything to maintain the viability of pubs. Support Brookhouse Engineering, a major source of employment in the Wixford Parish.

13. Take account of the Wixford Parish Plan when considering future planning applications. Wixford Parish Council has put together a local plan for Wixford that gives strategic direction for development in the village over the next 10 years.

Wixford Parish Council

14. Assumed that the policy can be applied to the AONB.

Long Compton Parish Council

15. Need controls over the type of holiday accommodation in rural areas as many brick barns in Warwickshire are being lost to this type of conversion. A 10 year time period could be applied as part of the conditions of grant for a conversion.

Snitterfield Parish Council

16. The policy needs to be more flexible to take account of businesses that can't be converted back to residential. In Earlswood a business property hasn't succeeded, but the owner still can't convert the building back to a dwelling.

Jeff Perks

17. Apply the following principles in the assessment of proposals.

- Avoid high quality agricultural land
- Re-use brownfield land and prioritise using existing buildings
- Don't cause undue harm to existing uses and occupants of properties in the vicinity
- Don't cause undue harm to the character of the local landscape and communities and important environmental assets.
- Do not create a significant increase in traffic on rural roads

The Stratford and Warwick Waterway Trust Ltd, Earlswood & Forshaw Heath Residents' Association

18. Parts (b), (c) & (d) of CS 6 (Green Belt) need to be read in conjunction with CS 25, subject to minimal impact on the openness and character of the area. The overall form of development needs to be consistent with the strategy for the District.

19. Policy CS 25 is complex and the implications are difficult to assess. It appears that it will now be easier to develop outside villages or within open space land inside villages than under the 2006 local Plan. The policy should be revised so that it does not allow development that would undermine the District's villages or their rural setting.

CPRE Warwickshire Branch

20. Encourage small scale employment schemes within LSVs that offer sustainable local employment for existing residents thereby reducing the need to travel. In LSVs encourage small scale neighbourhood B1 employment schemes offering facilities as set out paragraphs 25 and 28 of the NPPF. Address the above by adding a paragraph that refers to the NPPF, Site Allocations DPD considerations and the need for Local Service Villages to have small scale local employment development. Don't alter existing boundaries of LSVs to accommodate economic growth, but where there is evidence for an allocation of mixed use development that includes employment land, then identify in a Site Allocations DPD.

David & Angela Tucker

21. Parts (a) and (b) of CS 25 refer to small scale schemes. There needs to be a definition of what actually is small scale. Each settlement or scheme needs to be considered on its merits. Remove the words 'small scale'.

The Glebe Committee

22. Disagree with the idea that strong rural communities/economies mean a wide range of residential, business, tourism and leisure development. Add the words 'with meaningful consultations with the community'

23 Disagree with part (e). Sounds like a rogue's charter. A business could be allowed to be established without community support. In some cases a business may be a ruse to get a house. Rather deal with it case by case.

Mappleborough Green Parish Council

24. Concern about 8 affordable houses being built in Sutton Lane Brailes. This is attractive countryside and part is an AONB. Small scale schemes of 8/9 houses at a time will result in large estates. New development rather needs to be within villages (infill) to get a mix of all types of properties.

Denise Montgomery

25. Broadly support CS 25 part (b) - small scale housing schemes within or adjacent Local Service Villages in accordance with Policy CS 16. Rather than 'small scale' refer to development of an 'appropriate scale'. What is small scale? As worded a comprehensive development on a suitable site with community benefits and affordable housing may not be appropriate.

26. Support development at Salford Priors as it would complement development at Bidford-on-Avon.

Bloor Homes

27. The policy needs to be updated to reflect the approach to rural growth in chapters 3 and 6 of the NPPF. For example list special circumstances that will allow isolated buildings in the countryside. Include the potential for some market housing to facilitate the provision of additional affordable housing.

Gregory Gray Associates

28. Permit barn conversions where they are stand alone structures and not attempts to sub divide existing holdings.

Tanworth-in-Arden Parish Council

29. Agree that villages become places for people to live, work and play, but the policies should have regard to the potential damage that incremental development can bring. Need the equivalent of a rural business class that re-examines the impact on the community when firms seek to expand.

Harbury Society

30. Recognise the importance to restrict inappropriate development in the countryside, but the policy needs to be flexible enough to allow types of development and uses that are dependent on the location of the waterway infrastructure. The policy needs to be more explicit in allowing waterway-related and waterway dependent development in rural locations.

British Waterways (East and West Midlands)

31. Support CS 25 that allows certain types of development in the countryside. Part (b) of the policy should rather be phrased as 'relate well to Local Service Villages' instead of 'within or adjacent to 'Local Service Villages'. It will also be useful to define small scale in criterion (b). The 2% growth figure proposed in CS 16 is arbitrary and is not supported.

Gloucester Diocesan Board of Finance

32. Don't agree with part (m) of the Policy. The extension is not quantified and unreasonable is not defined. What are the criteria. If a proposal to expand would result in an expectation to having to relocate then there must be some policy or rule of restraint that would prevent expansion, such as the Green Belt policy. CS 25 could be in direct conflict with CS 6. Therefore need to re-write part (m) to support businesses, exclude ... 'if it would be unreasonable to expect business to relocate'.

Cathy Kimberley

33. First paragraph of Policy CS 25 is subjective and the policies vague.

Mrs J and Mr M Buckley

34. CS 25 (ii) change 'should' to 'must'.

35. CS 25 (iii) define 'undue harm'.

36. CS 25 (iv) define or remove the words 'significant increase'

37. CS 25 detail what is meant by 'acceptable principle'.

38. CS 25 (h) define 'where this would secure benefits to its function and appearance'

39. CS 25 (i) define 'subject to its location and character'

40. CS 25 (k) define 'similar scale'

41. CS 25 (l) clarify what is meant by 'readily accessible by means of transport other than the private car'. What sort of transport will be used?

42. CS 25 (m) re-write 'if it would be unreasonable to expect'.

43. CS 25 (n) define or remove the word 'genuinely'

44. CS 25 (r) quantify 'relate to the scale and nature of an existing use'.

45. CS 25 (s) define 'where this would secure benefits to its function and appearance'

46. CS 25 penultimate paragraph ...'all other types of development or activity in the countryside, will need to be fully justified' is non specific and the statement needs to be defined.

47. CS25 ultimate paragraph 'will' is subjective and needs to be replaced, for example 'must'.

Earlswood & Forshaw Heath Residents' Association

48. Disagree with the idea that strong rural communities/economies mean a wide range of residential, business, tourism and leisure development. Remove. The policy needs to refer to having meaningful community consultation.

49. Residential - Part (e). Sounds like a rogue's charter. A business could be allowed to be established without community support. In some cases a business may be a ruse to get a house. Rather leave it out and deal with it case by case.

50. Residential - Part (f). Seems to encourage bad neighbour behaviour. Leave it out and rather deal with it on a case by case basis.

51. Residential - Parts (h) & (i). Too specific - rather leave it out.

52. Business - Parts (j) - (p). Needs meaningful community/Parish Council consultation. Add the following caveat 'dependent on the nature of the activities involved, the character of the site'.

53. Tourism and Leisure - Part (s). Again, too specific.

54. The policy needs to be reworded to allow development that is not harmful to the countryside. Need to allow acceptable development. Many of the points seem to be too specific (golf clubs, caravan parks etc). We cannot know what types of development we haven't thought of that may be desirable.

Justin Kerridge

55. Parts (a) and (b). Need a definition of what is meant by small scale. Remove the words small scale.

Walton Estates

56. Part (a) under community refers to housing and employment. Degree of repetition. Part (a) only needs to refer to community.

57. Part (b) under the sub heading residential could lead to some confusion. The policy cross references with Policy CS 16 that articulates the spatial housing distribution and significant development being directed to Local Services Villages through Site Allocations or Neighbourhood Plans. Policy CS16 does not use the words 'small scale housing schemes'. Allowing growth of 2% of existing housing stock is unlikely to be how people perceive small scale.

Persimmon Homes (South Midlands) Ltd

Policy CS.25A Community

1. Object. No infrastructure to service an increase in population. We have a small shop, poor public transport and narrow overcrowded lanes which will only get worse.

Jeanne Lowe

2. Support. Encourage limited housing in the countryside to prevent it from becoming a residential home for the wealthy and elderly.

Will Hanrahan

3. Support small scale housing, employment and community facilities to meet local need proven by a Parish, Community or Neighbourhood Plan.

Need to mention Parish Plans or Village Design Statements or Housing Need Surveys.

Harbury Society

4. Degree of repetition and part (a) only needs to refer to community.

CALA Homes (Midlands)

Policy CS.25B Residential

1. To permit the re-development of bad neighbour sites is dangerous because it encourages developers to become bad neighbours. Rather deal on a site by site basis and not enshrine in the Core Strategy.

Harbury Society

2. (d) conflicts with paragraph 55 of the NPPF that allows development in the countryside where development would re-use redundant or disused buildings and enhance the immediate setting. Redundancy / disuse and enhancement of the setting are key criteria as opposed to whether the building is listed or local historic or architectural merit.

Howkins & Harrison

3. Part (b) under the sub heading residential would lead to confusion. The policy cross references with CS16 that articulates the spatial strategy of housing distribution and envisages a significant amount of development in the Local Service Villages through Site Allocations or Neighbourhood Plans. Policy CS16 does not use the term 'small scale housing schemes' to describe the allocations in LSVs. Policy CS16 refers to estate sizes being no more than 2% of existing housing stock. Most people would not perceive this as small scale.

4. Interpretation of small scale in Policy CS16 actually applies to local choice schemes identified by the community, in addition to allocated development sites. Reword sub section (b) to avoid confusion.

CALA Homes (Midlands)

Policy CS.25C Business

1. Support part (m) of the policy as it would be unreasonable to expect a business to relocate in order to expand.

Codemasters Software Co. Ltd

2. The policy of conversion of buildings does not accord with the NPPF. Conversion to residential is now acceptable.

Reuben Bellamy

3. Do not support part (m). Quantify the extension as in the case of listed buildings which refers to (k) redevelopment at a similar scale, or (l) small scale expansion. Need to define what is unreasonable. If a proposal to expand would result in an expectation to relocate, then there must be some policy or rule that prevents expansion such as the Green Belt. This policy statement could be in conflict with another which would be inappropriate.

4. Re-write part (m) to support businesses, but exclude if it would be unreasonable to expect a business to relocate.

Cathy Kimberley

5. Object to a building needing to have been existence for at least 10 years - part (j). The 10 year figure has not been justified and would preclude the conversion of modern redundant buildings that could benefit the rural economy.

Howkins & Harrison

6. Part (k) precludes the potential to redevelop existing buildings for holiday accommodation where it could lead to a visual enhancement of a site/area. Refer to a recent appeal decision at The Cottage, Binton CV37 9TE (APP/J3720/A/11/2161301;11/00929/FUL).

Howkins & Harrison

Policy CS.25D Tourism and Leisure

1. Sport plays a vital role in the economy of the West Midlands. Not all sports are played in an urban environment. Add a more general sport clause instead of only referring to equine and golf.

Sport England

2. Part (q) - tourism and leisure schemes will also be assessed against Policy CS 24. Restoration of the River Avon to navigation from Stratford to Warwick and to join with the Grand Union Canal at Warwick accords with the provisions contained in the Stratford-on-Avon District LDF and Draft Core Strategy.

The Stratford and Warwick Waterway Trust Ltd

3. Do not support the emphasis on tourism and especially golf courses and driving ranges. These facilities impact adversely on the landscape and habitats and create more road journeys.

4. Golf courses, driving ranges and ancillary facilities degrade the environment.

Harbury Society

Topic: 10.10 Sustainability Appraisal Implications

1. A sustainability assessment of Noralle's proposal for sites on Napton-on-the Hill highlights some advantages of locating modest levels of new housing in rural villages.

Noralle Traditional County Homes

2. Increased development in the countryside could lead to increased car usage leading to increased carbon, NO₂ and CO₂ emissions contributing to pollution.

NHS Warwickshire

3. The sustainability appraisal highlights potential negative impacts on transport networks as a result of increased car dependency. This is contrary to the NPPF and Core Strategy's aim for sustainable development.

Miller Strategic Land and Taylor Wimpey

Topic: 10.10 Explanation

1. Concern that some of SDC's parishes have some of the lowest proportion of services, such as shops, post offices, GP surgeries and public transport. Public health are keen to promote and support access to key services as this reduces rural isolation and impact on individuals mental wellbeing.

NHS Warwickshire

Topic: 10.10 Development Management Considerations

1. Support the general principles. Policy 'c' should be Policy 'd' as this refers to historic buildings. Policy d needs clarification as this is critical for my Parish.

Morton Bagot, Oldberrow & Sperrall Parish Council

2. Development Management Considerations are not stated for 'c' - the comments listed are actually for 'd' Criteria for development of existing rural buildings. Would welcome clarification on this subject as we need to understand what development pressure we are under.

Paul Harvey

3. Paragraph (7) on page 189 - is such a condition about farm shops enforceable and is it reasonable.
Councillor S H Jackson

Topic: 10.10 Delivery and Monitoring

No comments received for this section

Consultation Question: Q184

1. Parish Plans should be a key principle in assessing development proposals for the countryside.
Bearley Parish Council

2. Agree with the principles.
Wootton Wawen Parish Council

3. Need flexible policies for change of use of rural buildings to holiday accommodation to permanent dwellings. Take the economic tourism realities of particular areas into consideration when reaching agreement rather than having a policy prohibiting a particular change of use.
Country Land and Business Association

4. Provision of rural jobs and its impact on the locality. For expansion - assess cumulative impacts.
Harbury Society

Consultation Question: Q185

1. Welcome points (a) small scale schemes for housing, employment or community facilities ... edge of villages and (b) small scale housing schemes, including the redevelopment and conversion of land and buildings ... adjacent to Local Service Villages in accordance with Policy CS 16.

2. Agree with the significant need for affordable housing. This has been confirmed by various Housing Needs Surveys commissioned by the District Council and more detailed assessments by individual communities.
Warwickshire Rural Community Council

3. Amend CS 25. Rework (i) to state 'agricultural land which is not categorised as best and most versatile should be preferred over the MMV land' under (iii) harm to existing uses and occupants of properties in vicinity of the site should not be overriding factors in determining consents. If not then this will become a Nimby charter.
Noralle Traditional County Homes

4. Covers everything apart from military use.
Earlwood & Forshaw Heath Residents' Association

5. In general agreement with the forms of development and uses being proposed in the countryside and villages, especially small scale housing and employment schemes within or on the edge of a village. Infill plots in LSVs and smaller rural settlements together with opportunities for conversion or refurbishment of buildings and the development of land adjacent to existing settlements would be acceptable.

6. Read CS 25 together with Parish or Neighbourhood Plans for LSVs or smaller settlements. The policy should reference development proposed as part of a Parish or Neighbourhood Plan.

Alscot Estate

Consultation Question: Q186

1. No need for further controls restricting the change of use from existing rural buildings. The policy needs to be flexible enough to reflect the location and economic realities at that time. Employment provision will only occur where there is sufficient demand and conversion is economically worth undertaking.

Country Land and Business Association

2. Less control is preferable.

Napton-on-the-Hill Parish Council

3. Yes, this is proving to be an easy option for some.

Mrs J and Mr M Buckley & Earlswood & Forshaw Heath Residents' Association

Consultation Question: Q187

1. Don't support including lists of development to be included in the policy. Invariably this means that anything not on the list will therefore unlikely be approved.

Country Land and Business Association

2. Need further clarification regarding individual houses on agricultural land and whether these are prevented by CS25.

Napton-on-the-Hill Parish Council

3. No. Consider all reasonable proposals. New technologies will create new and unforeseen opportunities.

Earlswood & Forshaw Heath Residents' Association

Consultation Question: Q188

1. The policy should refer to local choice schemes meeting housing needs identified by the local community.

Warwickshire Rural Community Council

2. Improve the justification and business case for conversions to holiday lets.

Councillor S H Jackson

3. In Earlswood where businesses have not succeeded and the owner or community would like to change the use back to residential, this currently cannot be done. The policy therefore needs greater flexibility.

Ewen Cunningham, Mrs J and Mr M Buckley

4. Would permit the expansion of businesses, but this won't address incremental increases in noise, pollution, congestion and travelling.

Harbury Society

5. The policy should encourage cyber infrastructure to allow working from home and a reduction in of strain on the transport network.

6. The policy needs to have a greater degree of flexibility- change of business use to residential use.

Earlswood & Forshaw Heath Residents' Association

7. Enhance cross referencing between CS 25 & CS 24.

Natural England

Consultation Question: Q189

1. Support the policy. The benefits of sport include economic and employment.

Sport England

2. Brasenose College owns land on the edge of Shotteswell. This land could be used as a children's play area, a sports field and space for a new village hall or pavilion with a small number of houses to meet local needs. Given Council's revised policy, the development potential of this land needs to be considered by Council.

Brasenose College

Consultation Question: Q190

No comments received for this section

Sites submitted in this section as part of the Draft Core strategy 2012 consultation

1. Act on behalf of Mr John Bradley who owns 2 land parcels on the edge of Newbold-on-Stour. Both sites are available for housing development together with community space. The first land parcel is 2.19 hectares and is located next to Church Farm to the south east of Newbold. The land is flat and somewhat overgrown. Site access can be achieved off Mill Lane or from the Burrows. The second site is 2.5 hectares and is located north east of the Beazer development. The site has access to a nearby river.

Arrow Developments

2. Act on behalf of Mr T J Warhust who owns land at Green Farm on the edge of Sutton under Brailes, a small settlement 3.5 miles south east of Shipston-on-Stour. Services are available in nearby villages of Cherrington and Stourton. Sutton under Brailes has a bus service and the town is suitable for local choice and affordable / social housing. The first site is within a conservation area and the second has road frontage.

3. Act on behalf of Mrs Julie Kirkham who owns land on the edge of Whatcote, a small settlement 4 miles north east of Shipston on Stour which has an attractive pub and church. The land measures 0.62 hectares in extent, is flat and is currently being used as a paddock. The site is suitable for local choice and affordable housing. Access can be taken off a road adjacent to the Rowlands Way development.

4. Act on behalf of Mr and Mrs Dimarco who own land in Welford-on-Avon. The land is suitable for open market housing with a proportion as affordable housing. The 0.95 hectare site is currently being used as a horticultural business and is almost entirely covered by glasshouses. The site has no trees

and is located beyond the Conservation Area but is still close to services and facilities offered by the village. Site access is achievable off Millers close.

5. Act on behalf of H G Hodges and Sons Ltd who own land towards the northern end of Long Marston. The site is available for open market housing with a proportion suitable for affordable housing, with public open space. The front parcel measures 1.22 hectares and is located within the built up area of the settlement. The site is generally flat and contains a few trees. The second site lies to the east of the first, measuring 1.6 hectare and forms part of a larger agricultural field with access adjoining Rumer Close. This land is suitable as amenity space or playing fields.

6. Act on behalf of Mr R Chabra who owns land at the Lodge, Lower Quinton, which is located adjacent to the Quinton House Nursing Home. A small scale scheme of about 4 dwellings could be built on site. A range of facilities and services are located close to the area. The site is heavily treed and is subject to a TPO. Previous planning history includes an appeal in 2002 (ref APP/J3720/A/02/1083176).

Stansgate Planning

7. On the assumption that there will be a site Allocations DPD, the following two sites are submitted:

- Site at Leamington Road, Long Itchington. The level site is located to the north of the village and is not in a flood plain. The site is approximately 0.63 hectare in extent, relates well to previous development and is easily accessible.
- A site fronting the B4100, Gaydon, behind the Gaydon Inn. The site is level and well contained within the village envelope. The site is approximately 0.49 hectares in extent, has direct access to the B4100 and would be suitable for a range of housing. It is well related to local amenities and nearby employment at JLR.

Bluemark Projects Limited

8. RPS supports the consideration of land north of Mill Street, Harbury, for housing. The site is located beyond the Conservation Area and represents a development opportunity for a large number of dwellings in Harbury. The site is within the built form of Harbury, well integrated with the village centre, sympathetic to its historic character and surrounding landscape.

Heart of England Cooperative Society Ltd

9. A 23 hectare area on the western edge of Lighthorne Heath has potential for up to 500 dwellings. There are no known physical constraints. The site has excellent access, there are no known infrastructure difficulties, ground conditions are good, and the site is not within the Green Belt, AONB or SLA. The site is deliverable and developable, and close to the Gaydon site, a major employer.

Broadway Malyan

10. RPS supports the consideration of land south of Napton Road, Stockton, but within the village. A masterplan led development could contribute towards meeting the housing needs of Stockton. A well integrated scheme reflecting the character of the settlement could deliver around 60 dwellings.

Trustees of W A Weaver

11. Potential site off Plough Lane, Gaydon Road, Bishops Itchington is suitable for housing.

12. Potential site north of Breach Lane, Claverdon is suitable for a housing allocation.

Persimmon Homes (South Midlands) Ltd

Draft Core Strategy 2012 - Summary of Representations

10.11 Large Rural Brownfield Sites

1. Concerned that further development at the Gaydon site would increase traffic problems. The B4451 in the village is already extremely busy with vehicles speeding in excess of the 30mph speed limit. Recently there have been traffic tail backs at J12 of the M40 during peak hours. Appropriate mitigating measures therefore need to be put in place.

2. Former Harbury Cement Works already has a masterplan in place. Development needs to be in accordance with the masterplan or justification given as to why there would be any departure. Pleased to see that the masterplan is being carried forward. Employment and or residential development should only take place where it meets local need.

Bishops Itchington Parish Council

3. Additional units should be allocated for development on rural Brownfield sites as these have the least environmental or amenity value. Support development of sites that do not have adverse impact on the local and natural environment given the site is in a sustainable location.

4. The proposed development of up to 300 residential units and 2 hectares of employment land would be a logical extension to the proposed redevelopment of the Storage depot. The site is not constrained and represents a logical development opportunity consistent with other Core Strategy policies and the adopted provisions of the NPPF.

5. The Draft Core Strategy should refer to 'Land adjacent to Long Marston Storage Depot' as the site would provide significant support to the proposed policy stance and the wider vision for the Stratford-on-Avon District.

Codex Land

6. Suggest including the Napton Brickworks sites on the plan, but under the Rural Brownfield sites category. Most of the dwellings will in any event be live/work units.

Noralle Traditional County Homes

Topic: 10.11 Strategic Objective

1. Reference should also be made to the additional Strategic Objective 9 we have suggested, relating to Large Rural Brownfield Sites.

Follett Property holdings Ltd

Policy CS.26 Large Rural Brownfield Sites

1. Support this policy but would like to see reference to the need for adequate sporting infrastructure.

Sport England

2. Include the Codemaster campus site at Lower Farm, Stoneythorpe, Southam as a large rural brownfield site. In line with the other sites, suggest the following uses:

- High-technology uses
- Research and design of computer software
- Additional office accommodation
- Ancillary staff accommodation
- Ancillary leisure accommodation

Other uses may be acceptable if they satisfy the following provisions:

- Prepare a masterplan for the site
- Provide a new junction to the A425, internal roads and car parking
- Provide improved landscaping
- Consider the impact of development on any ecological and archaeological features of the site
- Build on existing good practice with regard to green travel modes for staff.

Codemasters Software Co Ltd

3. Have a limit on production - increases would further increase traffic levels in and out of the area. Large numbers of employees already use the motorway causing tail backs to the turn off. Explore the use of the MOD extension to the railway to see if there could be some joint use. This could cut down on heavy transport movement.

Tim Phillips

4. Whilst not on the same scale as the four proposed brownfield sites, consider a 7 acre brownfield site at Salford Road, Bidford on Avon. The site is shown on Plan 3 as area 4. Some of the land contained 8 terrace houses that were demolished 45 years ago. A relatively small area has been quarried, and used as a tip by the former Alcester Rural District Council. The larger part of the site contains glasshouses built 30 years ago that are now uneconomical and should be demolished.

D E Harman

5. Proposed rural brownfield sites provide excellent opportunities to deliver housing next to existing villages to meet the housing needs of these rural communities.

CEMEX

6. In the February 2010 Draft Core Strategy the criteria for large previously developed sites referred to the need for designs to minimise the need to travel and promotes the use of transport other than the private car. The criteria in the current draft Core Strategy has now been replaced by '(f) modes of transport other than the private car are provided in an effective manner.'

7. Aston Martin Lagonda (AML) recognises the need to encourage modes of transport other than the private car and we will continue to implement a Green Travel Plan. This will be extended to future developments in the Gaydon site. AML are concerned about the requirement to 'provide alternative modes of transport'. This requirement is potentially onerous and could jeopardise investment and development of the site.

Aston Martin Lagonda Ltd

8. The Core Strategy does not give any guidance as to the scale of developments to which the policy criterion apply. The proposed wording creates uncertainty and it is not clear what provisions are capable of being delivered. Rather use the wording in Policy CS.2H(v) of the 2010 Consultation Draft Core Strategy.

Jaguar Land Rover Ltd

9. What we really need are small scale employment sites immediately adjacent to villages, not huge sites that would need workers from outside the area to travel to the area and for goods to be freighted by road.

Harbury Society

10. The Former Southam Cement works at Long Itchington is located adjacent to the Grand Union Canal (Kaye's Arm) and Stockton Reservoir. A masterplan for this area is welcomed by British Waterways. We would welcome discussions regarding this allocation and associated requirements. Development must not affect the integrity of the waterway structure and water quality as a result of unauthorised discharges and run off or encroachment that would prevent the waterways from being unlocked.

British Waterways (East and West Midlands)

11. Maudslay Park in Great Alne is a large brownfield sites in the Green Belt that has formally been used for B2 industrial opportunities. The regeneration of this site presents a significant regeneration opportunity.

Urban Renaissance Villages (URV) and Helical Bar

12. Policy CS 26 - 'will' is subjective and needs to be replaced with, for example 'must'.

13. Policy CS 26(b) - 'could reasonably be provided elsewhere' requires to have a full definition of 'could reasonably' as it is a subjective statement.

14. Policy CS 26(f) - does not make sense. Reword as follows: 'The modes of transport other than the private car that are provided in an effective manner'. What sort of transport? Do not believe what is meant here?

Earlswood & Forshaw Heath Residents' Association

Policy CS.26.1 Gaydon Site

1. Object to the requirement that all on site development proposals should take into account the need to prepare a comprehensive Masterplan.

2. Question the District Council's intention to define the extent of the Gaydon site in line with the inset map on the consultation Core Strategy. The final sentence on page 191 of policy CS 26 should be reworded as follows: 'Other uses will be acceptable if they are compatible and satisfy the provision of the policy'.

Aston Martin Lagonda Ltd, Jaguar Land Rover Ltd

3. Policy CS 26 1. - change the word 'should' (subjective) to 'must'

4. Policy CS 26 1.(d) - the word 'consider' is subjective. Amend to produce a specific policy.

5. Policy CS 26 1.(f) - 'have regard' is meaningless and subjective and needs to be amended to produce a specific policy.

6. Policy CS 26 1.(q) - the word 'assess' is meaningless without there being a specific scale to set the assessment against. Delete or re-write (q).

Earlswood & Forshaw Heath Residents' Association

7. Given the proximity of Gaydon to Banbury, further discussion needs to take place between the two District Councils.

Cherwell District Council

8. The Gaydon site is of strategic importance to the sub region in the provision of jobs and its interface with other industries and suppliers. The policy needs to be pro-active enough for future investment at Gaydon.

Coventry & Warwickshire Local Enterprise Partnership

Policy CS.26.2 Former Engineer Resources Depot, Long Marston

1. Support this policy.

Cotswolds Conservation Board

2. Former Engineer Resources Depot, Long Marston - The policy should make clear that the redevelopment of the site is meant to be 'leisure' led, in accordance with the masterplan and planning permissions (ref.09/00835/FUL) (11/0784/VARY). Therefore the policy should read as follows:

'The redevelopment of the former Engineer Resources Depot at Long Marston is appropriate as a major leisure village. In addition to and sharing the same site as major leisure village, other specific forms of development may be considered appropriate, for example:

- Storage and distribution (Class B8), subject to acceptable traffic impact
- Other forms of employment that make use of the rail connection of the site
- Residential development of a form and scale that meets local needs or is justified in relation to other uses on the site.

Leave the remainder of the policy as proposed.

3. Object to the policy requiring public transport links to Stratford along the old railway line, known as the Greenway. This is in conflict with the strategy and vision of the Core Strategy to promote health and well being of residents. This also is in conflict with the NPPF.

Reuben Bellamy

4. Note the area proposed in Long Marston. Notwithstanding the planning permission, development should be phased to the later plan period to allow for infrastructure provision. At present the area does not have access to a full range of services.

Wychavon District Council

5. A bus route would better serve any housing development planned for Long Marston. A bus route should be more economically viable. How many people would realistically use a train to come in to Stratford from there? The elderly and infirm would be better served by a bus service.

Mrs L Martin

6. Policy CS 26 2. - 'acceptable in principle' requires the principle to be detailed as it is non-specific. 'May be acceptable if they satisfy the provision of this policy' is meaningless and needs clarification. There are no defining criteria.

7. The word 'should' is subjective and needs to be changed to, for example, 'must'.

8. Policy CS 26 2.(a) - 'take into account' is subjective, replace with something more objective, such as 'must adhere to'. Rewrite the sentence starting with 'All development proposals on the site should take into account the ...'

9. Policy CS26 2.(h) - 'have regard' is meaningless and subjective. Delete or amend CS 26 2.(h) to be more objective.

Earlswood & Forshaw Heath Residents' Association

10. Land adjacent to the Long Marston Storage Depot, Pebworth Parish, Wychavon. Given that the site is on the border with Stratford-on-Avon District there are clear synergies and linkages between the proposed site and the Draft Core Strategy.

11. The 18.766 hectare site located on former MOD land is justifiable and a sustainable development option. The NPPF refers to Local Planning Authorities having a duty to co-operate with neighbouring authorities on strategic developments. LPAs need to demonstrate that they have considered cross-boundary issues, linkages and development requirements with adjacent authorities.

12. SDC need to consider the site within the local context and development of masterplan concepts.

13. Both Authorities need to be aware of the proposed development scheme.

14. Need to demonstrate that the scheme is in accordance with policies in the Draft Core Strategy.

15. Consider the scheme and draft Core Strategy in respect of the NPPF.

16. Consider the benefits of the proposal for the Stratford-on-Avon District.

17. The redevelopment of the Long Marston Storage Depot together with this site would complete the regeneration of the area, providing significant visual and environmental improvements, and enhanced local biodiversity.

18. The development of this site would be consistent with parts (a) - (f) of proposed Policy CS 26.

- Redevelopment would be in the local interest
- The site is ideal for development
- Development would enhance the site and provide new habitats
- The local school in Lower Quinton would benefit as children fill empty places
- The scheme will have little or no impact on the AONB
- The scheme would enhance local bus services and provide additional support for the Greenway, a popular cycle route to Stratford-upon-Avon.

Codex Land

19. Proposals submitted on land adjacent to the Long Marston Storage Depot, controlled by The Bird Group, and submitted to the Wychavon District Council for a mixed use development.

20. Vision - to create a sustainable extension to the St Modwen proposal on the previous Royal Engineers Central Depot. The mixed use proposal will regenerate the area, integrating the site into the wider landscape and providing connectivity to Stratford-upon-Avon via walking and cycling along the Greenway.

21. Around 500 homes being proposed, up to 150 self catering holiday cottages, an outdoor activity centre, a touring caravan site, a museum and passenger train service and retail and commercial uses and sports pitches.

22. Surrounding land contains a variety of employment uses, employing around 500 people (mostly local). Health facilities are located approximately 2km away in Lower Quinton, with dentists and a hospital in Stratford-upon-Avon. Local shops can be found in surrounding villages, while a bus service runs along Camden Road adjacent to the site. Early years education can be found in Pebworth and Lower Quinton (playgroup) and Pebworth First School and Quinton Primary School. The nearest secondary schools are located in Stratford-upon-Avon and Chipping Camden.

23. It is recognised that the site has potential ecological and archaeological issues.

24. The site and its surrounds lie within the Severn and Avon Vales Character Area No. 106. Character Area No. 107 lies to the south of the site. The area around the site has a general rural character, with the countryside comprising of grasslands and arable fields. Trees are located on and around the site. The site contributes in a limited way to the character and visual appearance of the local and wider landscape and setting of the Cotswold AONB to the south east. Quinton Brook and Gran Brook cross the site.

25. Remediation of contaminated land took place in 2001.

26. Development Principles:

- Environmental sustainability - sensitive design
- Inclusive community - delivering a mixed use sustainable extension
- Local economy - development will promote local employment
- A place for families - development proposals to be formed around a strong landscape framework

27. Movement strategy - new roundabout on Campden Road, shared space streets. The primary access road will have traffic calming measures and secondary streets will be designed to contribute to overall pedestrian and cycle network across the site.

28. Key elements of masterplan:

- Access - new roundabout onto Camden Road
- Linkage to adjacent open space and development
- Entrance/key space
- Reinforce existing landscape
- New landscape planting
- Secondary highway network
- New development to have gardens backing onto the boundary
- Potential cycle/pedestrian links
- Reinforce existing landscape buffer
- New linear park along southern boundary, protecting the brook & with play opportunities
- Potential employment and local facilities
- New formal sports provision
- New open space
- Potential access/link
- Existing bund and landscape buffer

Benefits:

- High quality mixed use residential environment
- New affordable homes in Wychavon District
- New community facilities
- Contributes towards meeting the housing needs of Wychavon District
- Enhance the sustainability credentials of the area - cycling and walking
- Integrate the site with the surrounds

Pad Design Ltd

29. There needs to be consistency between the planning permission (500 dwellings, 35% affordable, 10% market and 150 self catering lodges) for the Long Marston (09/00835/FUL) and the emerging policy. Local Plan Policy CTY.18 does not define need and should not be interpreted in the same way as COM.1 or CTY.5. The scale of the proposed residential development is consistent with the needs of the local population or is related to the form of any development and use of the site.

Follett Property Holdings Ltd

Policy CS.26.3 Former Southam Cement Works, Long Itchington

1. Stockton and Long Itchington sites provide excellent opportunities to deliver housing adjacent to existing villages. Both Stockton and Long Itchington are Local Service Villages (LSVs) that provide a range of services and facilities for residents, including shops, primary schools and community centres. These villages are only 2 miles from Southam where there are more services and facilities and employment opportunities.

CEMEX

2. Policy CS 26 3. 'should' is subjective and needs to be changed to, for example, 'must'.

Earlswood & Forshaw Heath Residents' Association

3. Former Cement works, Long Itchington - quarrying is anticipated to take place until 2020, so redevelopment of the site won't be possible until the final phase of the Plan. This needs to be made clear in the policy.

Follett Property Holdings Ltd

Policy CS.26.4 Former Harbury Cement Works, Bishops Itchington

1. Harbury cement works - support the masterplan being part of the consideration of development of the site, but the Core Strategy Policies are too vague. Right to insist that there is a rail connection to the site to reduce lorry movements. Need more controls to prevent congestion and environmental damage.

2. Need stronger policies to protect the rich ecology of the site that has already been compromised by the previous owner. The 'comprehensive, structural landscaping' demanded has potential to further damage wildlife.

3. Rail connection won't solve traffic/congestion problems

4. Leisure, tourism and recreation - this is too vague. Need restrictions on noise, congestion and tighter policies on habitat protection

5. Employment and residential development of a scale to meet local needs - This is too vague. Developers need to comply with a masterplan that restricts new buildings on previously developed parts of the site, provides public transport and various environmental restrictions.

6. The Sustainability Appraisal raises concerns about potential impacts being difficult to quantify and the policy needs strengthening to minimise adverse impacts.

Harbury Society

7. Policy CS 26 4. - 'appropriate in principle' requires the principle to be detailed as it is non-specific. 'should' is subjective and needs to be changed to, for example 'must'.

Earlswood & Forshaw Heath Residents' Association

8. The Harbury Estate is a proposed strategic mixed development, providing market and affordable housing and employment opportunities. The land in question includes the former cement works and adjoining land that is allocated for development in Policy CTY.20 of the Stratford District Council Local Plan Review 1996-2011. The land designated by Policy CTY.20 of the Local Plan is also subject to an adopted Masterplan. Agricultural land at Deppers Bridge to the north east and beyond the London to Birmingham railway line should be included in the policy.

9. Ecological surveys indicate that with management, development should not have any unacceptable impacts on biodiversity interests.

10. Although the adopted Local Plan (Policy CTY.20) and subsequent Masterplan covers part of Harbury Estate, the Council needs to consider more comprehensive options for the land.

11. Harbury Estate consists of 143 hectares of land adjoining and to the west of the Banbury to Birmingham railway line. About 100 hectares is contained in the CTY.20 Masterplan area, just to the north of the Bishop's Itchington village. The village of Harbury lies about 2km to the west and the town of Southam about 4km to the north east. The Gaydon motor production site is about 5km to the west and the extensive employment area on the southern boundary of Southam is only 2km away.

12. The following uses are appropriate in principle:

- Leisure, tourism and recreation
- Classes B1, B2 and storage and Class B8, subject to acceptable traffic impact
- Other forms of employment that make use of the rail connection to the site.

13. A mixed use development of the site has the potential to make a significant contribution to the District housing targets. Harbury Estate has potential for about 500 houses.

14. The development would provide for improvements to local public transport and provide access to community, green, open amenity and recreation space. Development would complement the surrounding area in terms of design, materials, layout, scale and density. Development of the land would enhance biodiversity within the development and the Harbury Estate.

15. The Harbury Estate has a history of employment use and rail links. The site offers opportunities for Class B1, B2 and B8 uses. Support is provided for in PPS4 that suggests that economic development in rural areas should be located where employment, housing schemes and other facilities can be provided close together.

16. Stratford District Council's relatively recent approval of development at Middle Quinton on a large rural previously developed site provides a pointer to the sustainable development of large rural brownfield sites in the District.

Follett Property holdings Ltd

Topic: 10.11 Sustainability Appraisal Implications

1. The justification for using this site is that it is previously developed. The Sustainability Appraisal worries about potential impacts being difficult to quantify and the need for the policy to be strengthened to minimise adverse impacts.

Harbury Society

Topic: 10.11 Explanation

No comments received for this section

Topic: 10.11 Development Management Considerations

No comments received for this section

Topic: 10.11 Delivery and Monitoring

No comments received for this section

Consultation Question: Q191

1. No. The provisions for Long Marston Depot are not appropriate. The Greenway is important for the health and well being of residents of Stratford and surrounding villages, as well as tourists. The provision regarding public transport links from the site to Stratford and Green Infrastructure are inappropriate and in conflict with the NPPF and the vision of the Core Strategy. Any public transport links should rather be along Mickleton Road, so that it may take in Quinton and Clifford Chambers. The number of proposed dwellings would not support a new public transport route.

Reuben Bellamy

2. Support the uses identified for the Gaydon site. Object to the requirement that 'All development proposals on the site should take into account the need to (a) prepare a masterplan in conjunction with the owners of the site, local communities and other interested parties'. A masterplan is unnecessary and unduly onerous. The need to prepare a masterplan removes the flexibility supportive approach in Policy CS 22.

3. In the February 2010 Draft Core Strategy the criteria for large previously developed sites referred to the need for designs to minimise the need to travel and promotes the use of transport other than the private car. The criteria in the current Draft Core Strategy has now been replaced by '(f) modes of transport other than the private car are provided in an effective manner.'

4. AML recognises the need to encourage modes of transport other than the private car and we will continue to implement a Green Travel Plan. This will be extended to future developments in the Gaydon site. AML are concerned about the requirement to 'provide alternative modes of transport'. This requirement is potentially onerous and could jeopardise investment and development of the site.

Aston Martin Lagonda Ltd

5. Support the general approach in CS 26 and in particular the uses identified for the Gaydon site. Jaguar Land Rover strongly object to the requirement that 'All development proposals on the site should take into account the need to (a) prepare a masterplan in conjunction with the owners of the site, local communities and other interested parties'. This requirement is unduly onerous and will put at risk the owner's ability to respond quickly to market conditions and circumstances. The need to prepare a masterplan removes the flexibility supportive approach suggested in Policy CS 22 of the plan.

6. The need for a Masterplan in connection with all development proposal on site is not justified. Many of these development proposals will be small scale and of no land use significance outside the site itself.

7. It is accepted that for larger scale proposals a scheme would need to consider potential impacts on surrounding areas and residents. These schemes would be subject to pre-application community engagement and consultation with other interested parties. Once again the need for a comprehensive masterplan would not be justified.

Jaguar Land Rover Ltd

8. Former Engineer Resources depot at Long Marston - In terms of education provision, WCC support the principle of residential development, subject to the form and scale being justified in relation to other on site uses. The residential proposals would require an expansion of the Quinton Primary School, with funding from developer contributions. Any further increase in residential development may require the construction of a new school.

Warwickshire County Council

9. Clarification is sought regarding the criteria for a large brownfield site.

Napton-on-the-Hill Parish Council

10. All the large brownfield sites listed have existing features that are important from a biodiversity perspective at County and Regional level, including supporting a range of protected species, such as water voles, white clawed crayfish and otter. Adequate consideration needs to be given to the existing ecological value of these brownfield sites, which are often more ecologically valuable than adjoining arable fields that may be located in the Green Belt. Any development should be built around these features, with long term management a fundamental consideration.

Environment Agency

Consultation Question: Q192

No comments received for this question

Consultation Question: Q193

1. There is a case for retaining the Napton Brickworks site which was allocated for mixed use development in the previous Local Plan. This will bring a derelict and damaged brownfield site back into productive use.

Noralle Traditional County Homes

2. Identify the Napton Brickworks site in the policy to provide live/work housing. The site already has outline planning permission (Ref. 08/00410/OUT) for 91 live work units with additional Use Class B1 accommodation. These units will be sustainable live/work living making a contribution to some of the 5,600 proposed dwellings.

Marson Rathbone Taylor

3. Yes, the former Napton Brickworks site.
Napton-on-the-Hill Parish Council

Consultation Question: Q194

No comments received for this question

Consultation Question: Q195

1. The policy must guarantee adequate police provision when planning new developments.
Mrs J and Mr M Buckley, Earlswood & Forshaw Heath Residents' Association

Consultation Question: Q196

No comments received for this question

Section 11 - Infrastructure

11.1 Community Facilities and Open Space

No comments received for this section

Topic: 11.1 Strategic Objective

No comments received for this section

Policy CS.27 Community Facilities

1. It is disappointing that the work carried out by Sport England and the LA has resulted in no contributions towards built facilities - Artificial Grass Pitches, Sports Halls or Swimming Pools.

2. The paragraph about playing fields is extremely weak and should refer to the adopted playing pitch strategy. The policy is unsound.

Sport England

3. The Woodland Trust's Woodland Access Standard (WAS_t) should be included within the Open Space standards (i.e. that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha and that there should also be at least one area of accessible woodland of no less than 20 ha within 4 km of people's homes. This should also be incorporated into a Trees & Woodland SPD.

Woodland Trust

4. The document needs a definition of communities facilities e.g. CF provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. Community facilities should include cultural facilities such as museums and libraries.

Theatres Trust

5. The policy is discriminatory with Stratford being allocated 5.24 ha of open space per 1,000 people in new housing but Main Rural Centres (MRCs) and Local Service Villages (LSVs) only being allocated 0.75 ha per 1,000 people.

Jeff Perks, Mrs J and Mr M Buckley, Ewen Cunningham, Earlswood and Forshaw Heath Residents' Association

6. I strongly support this policy.

Cllr S H Jackson

7. Support this policy and would like to input into any redesign of open space and outdoor recreation facilities to incorporate measured miles, green gyms, cycling and walking routes.

NHS Warwickshire - Health Development Manager (Health Inequalities)

8. Infrastructure requirements of the district and individual settlements need to be assessed properly and proposals be developed, consulted upon and made public before being initiated. The various settlements should consider developing infrastructure plans for insertion into their neighbourhood/village development plans to ensure growth occurs within a planned framework.

9. Mappleborough Green Parish Council will be seeking to take control of their own development by drawing a plan to reflect the desires of the village and define the obligations of developers to provide suitable infrastructure including local roads, enhancements to waste management, sustainable energy and building resources, enhancements to existing village assets etc.

Mappleborough Green Parish Council

10. The One Front Door approach sets out with the premise of taking key services to those members of the community in greatest need. WCC have also conducted surveys of need. Some One Stop Shops may evolve into One Front Doors provider a wider range of services. Using the 'Mosaic' software it is possible to determine which service providers will make the greatest difference and OFD can be tailored to each community needs. Though used for existing communities the principles are valid for new communities resulting from major new housing developments.

Warwickshire County Council - Senior Planner

11. WD welcome the flexibility built into policy CS 27 which indicates that open space can be provided off-site where appropriate. Site by site consideration of open space is important to pay attention to local circumstances including the quantity and quality of open space in the local area.

William Davis Ltd

12. We support the insistence that land will only be released for development if there is sufficient capacity within the local infrastructure and if there is not the capacity then only if improvements are made in parallel with the development.

Harbury Society

- 'It is expected that ...' These words should be deleted.
- Similarly under point (b) 'alternative type of service or facility' should be replaced with specific alternative parameters.
- Also: 'New housing development is expected to provide' - should say 'must provide'.
- Also: 'Provision should be made on-site' - the policy should say for what, presumably open space and outdoor recreational facilities. Also 'should' needs to be amended to must.
- In the final paragraph 'should' and 'will' are subjective and need to be changed to 'must'.

Earlswood & Forshaw Heath Residents' Association

13. The masterplan proposal for the representation site includes provision for a new community building along with outdoor recreation and sporting facilities.

Codex Land

Policy CS.27A Open Space and Outdoor Recreation

1. We welcome the provision of community leisure facilities and open spaces as a way of improving health provided proper resources are available to run and maintain them.

Local Strategic Partnership

2. We would not support pooled contribution to open space provision. If there is a need in a village it should be provided in THAT village. To do otherwise deprives people of that facility and it is unlikely that there would be public transport to the alternative.

Harbury Society

Topic: 11.1 Sustainability Appraisal Implications

1. We support the provision of suitable community infrastructure and green-space which can result in a robust benefit to community health and well-being.

NHS Warwickshire = Health Development Manager (Health Inequalities)

Topic: 11.1 Explanation

1. Infrastructure - school capacities, access to services, transport, built leisure facilities for young people - these are key and help to keep young people local.

Local Strategic Partnership

2. Community facilities should include cultural facilities such as museums and libraries. Para 11.1.5 only refers to open space, sport and recreation as providing health and well-being to a community.

Theatres Trust

- We support SDC's view that the planning system has a role in helping to create an environment where activities (sport, recreation and access to open space) are made easier and public health can be improved.
- We support SDC's view of making communities that are safe, healthy, sustainable and inclusive.
- We note that ongoing work is underway with partners to assess the impact on services of any new residential developments and urge that a link be made with both Clinical Commissioning Group and the National Commissioning Board on this issue if not already done so.

NHS Warwickshire - Health Development Manager (Health Inequalities)

3. We do not support the pooling of contributions for open space and recreation facilities, access to countryside and allotments.

Harbury Society

4. Additional housing in main rural centres will bring challenges in some locations as opportunities to expand certain schools are limited. However, these challenges can be met through the pupil place planning process with developer contributions to support expanded provision. Any increase in pupil numbers in Stratford town does bring significant difficulties in providing sufficient extra places at early years, primary and secondary levels and post 16.

Warwickshire County Council

Topic: 11.1 Development Management Considerations

1. The use classes order defines a public house as a premise where the primary purpose is the sale and consumption of alcoholic drinks. The policy classifies Public Houses as community facilities, seeking to avoid the loss of them. We find the categorisation of alcoholic consumption as a community activity disingenuous. We are disappointed there is no corresponding policy seeking to support the continuing operations or diversification of Public Houses. We suggest a statement supporting such diversification where this will help continuing operations.

Mr Mark Sandford

Topic: 11.1 Delivery and Monitoring

No comments received for this section

Consultation Question: Q197

1. The draft policies need to apply considerable weight to the viability of community facilities and their continuing operation. Policies should not be excessively protective to the extent that existing community facilities cannot either be reused for an alternative purpose or be re-provided in some way. It is suggested that a further point be added to the test within draft policy CS.27 as follows:
"(e) there is no realistic prospect of viable alternative proposals to operate the facility."

2. The Grieg Hall in Alcester, closed in October 2011, is an example of a situation where existing planning policy has been inflexible and has not fully considered the viability issue, thus contributing to the closure of a community facility.

Hannah Susan Greig Memorial Trust

3. The area around Bordon Hill needs greater protection.

Deborah Griffiths

4. There is no support for greenspace such as the Greenway.

Reuben Bellamy

5. No, the policies are not strong enough to support the retention of existing community facilities. SDC expect existing facilities to be retained, except where they are not commercially viable. This might not stop breweries selling off pubs for housing, or retain shops which are worth more as domestic dwellings.

Harbury Society

6. All existing playing fields should be protected from any building. Stratford town has already lost a lot of open space and preservation of what's left is vital.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Consultation Question: Q198

1. The draft policies do not support the provision of new community facilities and open space due to the wider dispersal to rural areas and the maximum estate size of 100 dwellings proposed by CS.16. Smaller scale development will not be able to deliver new infrastructure such as highway improvements, schools and community facilities.

Miller Strategic Land and Taylor Wimpey

2. Yes, the policies support the provision of new facilities as long as the finance is not pooled.

Harbury Society

3. Methods of provision of new public open space and community facilities should include local community initiatives including Neighbourhood Plans, as supported by the Localism Act and NPPF.

A J Mann, Eclipse Road Residents' Group - Deputy Chairman

Consultation Question: Q199

1. WRCC believes that Parish Councils should have an input into the assessment of the loss of a local community facility together with the benefits to the community that might accrue from that loss, for example the provision of rural affordable homes for local people.

Warwickshire Rural Community Council

2. The policy test set out in CS.27 is broadly welcomed. It is suggested that point 9b) be amended to read "the land and/or property has been suitably remarketed or otherwise made available ...". This is because it may not be appropriate to market a community facility for sale where that marketing process will have a materially detrimental effect upon the business or operation of the community facility.

3. A new point should also be added:

"e) there is no realistic prospect of viable alternative proposals to operate the facility.

4. The assessment of viability of alternative proposals to operate a community facility should include a review of business plans to determine whether such plans fully address the commercial and operational issues underlying the potential closure of the facility. In carrying out its assessment, the Council should have regard to the trading projections in comparison with the existing situation and the financing proposals within the business plan.

Hannah Susan Greig Memorial Trust

5. How can the District assess the impact of the loss of facilities? It should look at local surveys, Parish Plans and ask the Parish Council.

Harbury Society

6. There should always be a presumption against the loss of any local facility and developers should be required to replace with substantially larger facilities.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Consultation Question: Q200

No comments received for this question

Consultation Question: Q201

1. Natural England the identification of 'more diverse forms of provision (e.g. community orchards, local nature reserves etc) in meeting the supply of open space and outdoor recreation facilities. These offer significant educational potential which ought to be reflected in the policy wording and its supporting text. We recommend the addition of the bold text: '... a positive contribution towards the quality, diversity **and understanding** of the local environment'.

Natural England - Land Use Operations Team

Consultation Question: Q202

2. Policies should address how the financial elements of community facilities and suggested alternative operating proposals should be assessed by the District Council and whether the Planning Department has sufficient resources and expertise to carry out such assessments.

3. Policy COM.2 imposed an excessively restrictive approach the potential for reusing community facilities. Draft policy CS.27 offers the potential for a more well-rounded assessment of proposals affecting existing community infrastructure.

Hannah Susan Greig Memorial Trust

4. SDC should consider Neighbourhood Plans when developing these proposals.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Consultation Question: Q203

1. It could be monitored by e.g. 'the percentage of residents finding it easy to access key local services'.

Earlswood & Forshaw Heath Residents' Association

2. Suggest formal report every 5 years.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Draft Core Strategy 2012 - Summary of Representations

11.2 Transport and Communication

1. Stratford town centre should be pedestrianised. Stratford is a cycle unfriendly town but does need to encourage residents to cycle to reduce traffic congestion, reduce fuel usage and of course live a healthier lifestyle. However pedestrianisation is implemented in the town, cyclists should be able to travel along town centre streets both ways, even where streets are limited to one way for vehicles, as per Waterside and all the gateway roads radiating from the Town should have proper recognised cycleways, both ways - not just advisory. Vehicles should not be allowed to park in cycle lanes.

Councillor Ian Fradgley

2. The key strategies are contained in the Warwickshire Local Transport Plan (LTP) 2011-16. Transport Planning are currently working with SDC on the Strategic Transport Assessment. The key matters are access and sustainability of the pattern of development for homes and jobs.

Warwickshire County Council

Topic: 11.2 Strategic Objective

No comments received for this section

Policy CS.28 Transport and Communication

1. Most developments seem to be on the edge of towns which means better public transport links will be required.

Local Strategic Partnership

2. Cycling to work feels dangerous with HGV lorries passing close and drivers sounding their horns trying to get by. The Greenway is classed as a cycle route but the surface material is not conducive to cycling on road bikes. In the dry the dust is a problem (I have no showering facilities at work) and in the wet it gets into the gearing of the bike causing damage. Now the surface is so badly damaged that it is only suitable for mountain bikes. More clarity on these vague mentions of sustainable transport changes (e.g. para 7.3 SAI) is required in the plan, and infrastructure should be improved before new homes are built.

Jan Phipps

3. It is essential the design expectations for any transport scheme are set out in this policy to ensure a sensitive, responsive and contextual approach is pursued to protect or, where appropriate enhance the historic environment, and public realm experience more generally.

English Heritage (West Midlands Region)

4. Bicycle lanes, over and above the Greenway, through and around the town should be made to encourage environmentally friendly transport.

J Robertson

5. The bus depot should be built on the land outside the current railway station, not used for housing.

Mr & Mrs D J Hammond

6. Two railway stations but no bus station – it's a joke.

How much longer before Lucy's Mill Bridge is upgraded? The bridge in Bancroft Gardens was replaced to facilitate pushchairs, wheelchairs etc. Why was this criteria not applied to Lucy's Mill Bridge?

Mr & Mrs D J Chamberlain

7. The Council should look into pedestrianisation of the main roads in Stratford Town Centre to improve conditions for residents and visitors and to reduce the environmental impacts in town.

Deborah Griffiths

8. There are several references to cycle use but not much sign of a vision for non-recreational cycle use as a substitute for vehicles for travel to school or work.

Charlecote Parish Council

9. The importance of Community Transport Initiatives is currently lost in Policy CS 28. Without voluntary and community transport schemes many of the most vulnerable and isolated people in our communities have no access to transport whatsoever.

Voluntary Action Stratford-on-Avon District

10. I would like to express my support for linking the current Stratford-upon-Avon to Leamington Spa train service into the proposed 'NUCKLE' (Nuneaton-Coventry-Kenilworth-Leamington) scheme, as supported by the LEP, County Council and Centro.

Paul Boness

11. In terms of all the centres, the Highways Agency (HA) welcomes the commitments given to providing new park and ride facilities, expanded and new rail services, improved cycle and pedestrian networks and proposals to more effectively manage transport. The HA is committed to working with local authority partners to help facilitate these aims.

Highways Agency

12. Walking and cycling facilities should be incorporated into development proposals not as presently stated 'expected'.

Councillor Hazel Wright

13. Stratford is very congested and needs a complete bypass around the whole town to reduce congestion.

The prices of oil and gas are rising so fast that we will need to pool transport and provide more public transport services so that people in villages can access supermarkets, banks etc. Population should be concentrated and served with public transport.

David Bugg

14. The Strategic Transport Schemes benefit Stratford substantially. We have no issue with this but we are concerned that no mention is made of improvements in Local Service Villages (LSVs) such as Earlswood which has little useful public transport infrastructure. The train runs between Stratford and Birmingham when most residents wish to go to Solihull. There is no bus service. The generally held view in Earlswood is that there are NO meaningful public transport links - how does this square with the Council's intended increase in the populations of LSVs?

Earlswood & Forshaw Heath Residents' Association

15. I support improvements to public transport for visitors and residents.

D R Myring

16. Comments relate to site being promoted adjacent to Long Marston Depot:

- The scheme will be supported by a detailed Transport Assessment to show that predicted traffic levels can be accommodated on the local road network.
- It will also have a Travel Plan (TP) with a range of measures to support sustainable travel and net reduction in peak time traffic flows.
- The TP will also relate to the employment provision.
- Parking will meet local standards with a range of on and off street visitor spaces.

Codex Land

17. The Sustainability Appraisal considers that the wider dispersal to rural areas could result in an increased dependency upon cars and this will need to be fully assessed. The evidence base work will need to be done before submission of the Core Strategy.

Miller Strategic Land and Taylor Wimpey

Policy CS.28A Transport Strategy

1. We agree that development must contribute to the transport strategies and priorities and encourage sustainable transport and 'modal shift'.

Harbury Society

Policy CS.28B Transport and New Development

1. The Local Strategic Partnership (LSP) considers that transport links/access to services are a very key issue for the district and in this regard is already working with SDC.

Local Strategic Partnership

2. It cannot be right to put 55% of new homes to be built in locations where there is no useful public transport. This just increases traffic on dangerous rural roads and increases emissions.

Diana Richardson

3. Where significant development is planned the existing road network must be considered to see if it is capable of supporting the development or being expanded to overcome current or forecasted congestion. Are there areas that are already at peak capacity or forecast to become so and if so, would this prohibit new developments? These factors are significant in the case of the M42 and M40 corridors.

Andrew Ashcroft

4. Lets have some real commitments and policies to improve cycling in the town. In particular, how are all the residents and children living south of the river going to cycle safely to the schools and shops north of the river? There should be no sites for housing south of the river (Plan 1:12-15) until there are safe and convenient cycle routes in place.

Reuben Bellamy

5. The requirement for Transport Assessments/Transport Statements (TA/TS) could be expanded to refer to the relevant guidance produced by Department of Transport (DfT) which provides the benchmark against which these will be assessed. This policy could also be expanded to refer to the benefits of pre-application dialogue with the highways authorities at the earliest stages in development proposals to clarify the nature and significance of transport issues.

Highways Agency

6. We approve of the recognition that development can add to congestion and are pleased to see an emphasis on contributions to public transport services.

Harbury Society

7. Policy CS 28B (first para) should be rewritten in plain English. What is an 'unacceptable transport impact' - sounds like a car crash - how can it be 'mitigated' as it has happened?

Point (a) 'where appropriate' is subjective and needs to be deleted or defined specifically.

Point (b) 'appropriate' is subjective and needs to be specifically defined.

Point (h) what is a potential railway siding? This needs to be specifically defined or amended.

Earlswood & Forshaw Heath Residents' Association

Policy CS.28C Parking Standards

1. The need to promote less use of the car should not overcome common sense. Provision should not lead to tandem parking or parking in court yards that cannot be easily policed by residents. People park where they can be seen and this causes traffic problems.

Councillor Hazel Wright

2. We approve of the flexibility on parking standards. Many villages have congested centres and homes with no off-street parking. Restricting provision on new sites can only add to these problems.

The statement that on-site parking should not be 'excessive' but should 'avoid unacceptable impact on the amenity of the local area or highway safety' needs more explanation and even enforcement.

We want more sensitivity about parking for villages. Their historic core usually doubles as the retail centre. Older homes are often in terraces, resulting in two cars needing on-road parking. New development should not force more cars onto already crowded streets.

Harbury Society

3. NPPF, para 39 deals with parking standards. Authorities should take account of the accessibility of the development, the type, mix and use of development, the availability of and opportunities for public transport, local car ownership levels and an overall need to reduce the use of high emission vehicles.

CALA Homes (Midlands)

Persimmon Homes (South Midlands) Ltd

4. The policy should be more specific and not use subjective wording.

Mrs J and Mr M Buckley

Earlswood & Forshaw Heath Residents' Association (see response for specific points)

5. Car parking is a major problem in Studley village, particularly where there are older houses as in High Street, Station Road and Redditch Road. Provision for car parking should be part of all planning application for dwellings. A recent application in Marble Alley proposed that home owners would use buses.

Councillor Hazel Wright

Policy CS.28D Strategic Transport Schemes

1. Policy CS 28D - "where appropriate". What does this mean?
2. Policy CS 28D - "as appropriate"? "presumption" could be a principle but would create a policy built on quicksand. This is bad policy and should be re-written.

Earlswood & Foreshaw Heath Residents' Association

3. With the exception of (c), I support the transport schemes.

Richard & Margaret Smith

4. Coventry & Warwickshire Local Enterprise Partnership (LEP) considers that Jaguar Land Rover at Gaydon is of such strategic importance to the economy of the sub region in its provision of jobs, and its interface with other industries and suppliers, that the Core Strategy should contain a pro-active policy for future investment at Gaydon, and the support of the LPA for provision of associated infrastructure, including enhancements to the transport network at Junction 12 - M40.

Coventry & Warwickshire Local Enterprise Partnership

5. Southern Bypass for Stratford-upon-Avon from Severn Meadows Road to Wellesbourne (6 miles value £26 million)

W A Lowe

Policy CS.28D (a) Upgrade Shakespeare Line

1. Support upgrading the Shakespeare Line to provide a semi-fast train service between Birmingham and Stratford.

Stratford Voice, Michael Fulton, David Pedley, Ben Horovitz - Worcestershire County Council

2. The document should make clear that the Birmingham to Stratford Railway is a valued asset, but that neither The Lakes, Wood End nor Danzey stations would make suitable Parkway development in either the medium or long term, because of the unacceptable effect they would have on the Green Belt.

Tamworth-in-Arden Parish Council

3. We would strongly support the upgrading of the Shakespeare Line to provide a semi-fast train between Birmingham and Stratford-upon-Avon. We would also welcome all necessary improvement to the Stratford-upon-Avon to Hatton line to ensure a greatly enhanced service between Stratford-upon-Avon to Leamington Spa, including plentiful connections at Hatton with northbound trains to Solihull.

Stratford-upon-Avon Town Council Neighbourhood Plan Steering Group

Policy CS.28D (b) Quality Bus Corridors

1. Favour creating Quality Bus Corridors (QBC) between Stratford-upon-Avon and Warwick and between Stratford-upon-Avon and Evesham, providing that this does not utilise land which could be used for railways in the future.

Michael Fulton

2. Welcome the support of Quality Bus Corridors within the document. Centro would like to see greater reference to the role of buses making cross boundary journeys into the West Midlands Metropolitan Area. Centro's adopted Integrated Public Transport Prospectus identifies the importance of the 'Journey to Work' area bus services between Birmingham and Stratford. Continued support and

promotion of these services will help to reduce the use of the private car whilst encouraging sustainable travel options.

Jonathan Haywood - Centro (Economic Development Officer)

Policy CS.28D (c) Reopening the Stratford to Honeybourne railway line

1. Policy CS 28 needs to make it clear that subject to the outcome of the business study, developer contributions will be sought towards this scheme.

J R Morgan - Stratford Rail Promotion Group

2. SDC has commissioned a business case study on reinstatement of the railway. The outcome of this will guide the Core Strategy route safeguarding policy but it should not exclusively do so. Route safeguarding has been found 'sound' in the North Norfolk Core Strategy without a business case study. Shropshire Council's adopted CIL identifies a developer contribution of £4.5M required towards the £6M cost of reinstating the Gobowen-Blodwel railway line and assumes 75% CIL funding.

Mr J R Morgan - Stratford Rail Promotion Group

3. Stratford needs a much better public transport system, of which this a part. How could the town have ever allowed this railway to be removed in the first place?

J Rose, Janet Cottell, David E Solliss

4. Support the reference that safeguarded land will include " that necessary to reinstate a level crossing and revised road junction layout at Evesham place"

Rob Niblett, Planning Officer - Gloucestershire County Council, J R Morgan - Stratford Rail Promotion Group, Ben Horovitz - Worcestershire County Council, Trevor R Daw

5. Support CS 28 and the Core Strategy should give consideration to the following topics:

- future level crossings at Long Marston and Milcote
- bridges at Weatherby Way and Evesham Place to avoid road congestion
- minimise environmental impact and enhance safety.

Paul Boness

6. The detail of Strategic Transport Schemes will need to be refined following the outputs of transport modelling work, and will also need to reflect the underlying funding and delivery mechanisms (including CIL). The HA is a key stakeholder.

Neil Hansen, Highways Agency - Asset Development Manager

7. Worcestershire CC supports the introduction of new stations and infrastructure where they are affordable and have a strong commercial social and economic case for implementation. WCC is contributing to the initial business case and recommends that improving access to Honeybourne station is investigated as part of the proposal.

Ben Horovitz - Worcestershire County Council

8. Residents should be aware of the sponsorship of freight investors. Any representation stating that the trains will be for light goods and the line undergrounded at Evesham Place have not been confirmed and are unfair. Neither is the line being reopened for steam trains.

Suzanne Clutterbuck

9. Object to reinstating line. If there is 'rail' monies available, improve the state of Stratford Station - a lift would be good. Improve the number of trains direct to Marylebone - no changes. Enhance the station area as a welcome sight for tourists.

Mrs S Allwork

10. Even the relatively low cost of a feasibility study is not justified or a good use of public money.

Susan Blackwell

11. Impact on early hours, overnight of 24 hour operation would severely impact on peoples' sleep and health.

John Doyly, Maureen Clycon, Alistair Morrison, Stephen Hatcher

12. Consider using an electric train.

Mr J Pethard

13. Object

R & S Blackwell, Mr & Mrs Waddams, Ron Cockings

14. Proposal conflicts with the NPPF and Core Strategy vision for promoting health. It is therefore unsound

Reuben Bellamy

15. The loss of the Heart of England cycleway.

Mr G J Keedwell

16. It would seem sensible and fair for people or someone from the No Avon Rail group to be allowed onto the steering committee for observation status for feasibility study. Is it possible and would this be allowed?

Reg and Fiona Bidmead

17. Instead of completely focusing on tourism in the town, the council should turn its attention to occasionally enhancing the lives of the residents and this proposal would do the opposite.

Brenda Matthams

18. What would happen to the car parking at Greenway?

Lyn C Morrison

19. The Core Strategy should consider the preferred route for the HS2.

Centro (Economic Development Officer)

20. The proposal to reinstate the railway line southwards from Stratford to Honeybourne Junction has had a very mixed reception, some being in favour on economic grounds, other opposed for environmental reasons. Environmental concerns include impact on Greenway, Summerton Way, Briarcroft Residential Home and Evesham Road. This will need to be the subject of close scrutiny and debate by the Neighbourhood Plan Steering Group.

Stratford-upon-Avon Town Council Neighbouring Plan Steering Group.

21. Object - Crossing of urban areas by railways lines should be avoided by all means, giving preference to the building of 'ring-lines' that would keep the urban areas quiet.

Paula Cristina Sabino dos Santos

CS.28D(c) Matrix of OBJECTORS Responses Reopening the Stratford-Honeybourne Rail Link

- 1 passes very close to residential areas
- 2 take away the Greenway used for recreation, cycling and walking / health benefits
- 3 look instead at improving bus links
- 4 improve services on existing lines
- 5 disrupts walks to school / footpaths generally
- 6 too expensive / high cost / spend money in other ways
- 7 doesn't go anywhere / lack of demand / little economic or local benefit / slow
- 8 effect on local traffic / traffic congestion
- 9 noise / air quality impacts / vibration
- 10 visual impacts
- 11 disruption during construction
- 12 destroy the countryside / environment / wildlife
- 13 property values
- 14 idea developed to support developers at Long Marston / carry freight
- 15 look instead at new line: south of new park and ride station / west of Stratford
- 16 public safety impacts / dangerous
- 17 opposition to a level crossing
- 18 improve the road system

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Anna Hipwell	•	•	•	•														
Alison Castle		•			•			•										
Jane Eborall						•	•											
Christine Howell		•						•	•						•			
Jo Pearson					•	•	•	•	•		•							
Mr A B Clarke									•									
Janis McBride				•			•	•				•						
Robert Gullen				•		•	•											
John Ryder	•	•			•			•	•	•			•					
Edward Farr					•		•	•						•				
Jonathan Harris		•																
Ingrid Stevens		•											•	•				
David Clutterbuck	•	•			•			•	•		•					•		
Stratford Voice								•										•
David Stevens	•	•	•	•					•				•	•				
Earle Webster SE Webster					•			•										•
Paul Vaughan		•						•										
JD and SM Jones								•								•	•	
Mrs C Clifford							•	•										
David Monkhouse			•	•			•				•							

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P M Purves						•			•									•
Sarah Hughes-Clarke		•				•	•	•	•		•		•	•			•	
Robert Woodward	•	•			•			•			•				•		•	
S R Jennings		•			•	•			•				•			•	•	•
Noel Shaw	•	•							•									
Alistair McLaren	•	•				•	•	•	•									
Geoff Tracy	•	•			•	•	•	•			•							
Dr Dimitriy Rumynin					•	•	•	•						•		•	•	
M H Tune		•																
Suzanne Clutterbuck	•	•			•	•		•	•	•	•	•		•		•		
John & Jolanta Green					•			•								•	•	
Jonathan Rogers	•	•		•	•		•	•	•	•				•			•	
M V Tursner		•			•			•	•	•	•			•			•	
Brenda Payne	•	•			•			•	•	•		•	•			•		
Gabriel Payne																		
Elizabeth Payne																		
Martin Payne																		
Imogen Payne																		
Sarah Payne																		
Kate Payne																		
Nigel Payne																		
Russell Payne																		
Mr & Mrs M L Cooper	•	•			•	•			•				•					
Mike & Ann Watkins	•	•			•	•	•	•	•	•		•	•	•			•	
David Black						•												
J Checketts	•	•			•				•			•	•	•		•	•	
Alex Scott	•	•			•	•		•	•	•			•	•		•	•	
Gemma Gregory						•		•					•					
Charles Twigger	•					•		•										
Sarah Bidmead	•	•			•			•	•	•	•	•		•		•	•	
Philip Crisp		•			•	•							•				•	
Shirley Myatt	•	•			•			•								•	•	
D Simpson								•	•									
Mr & Mrs J Leadham	•	•		•	•	•	•	•	•	•						•		
Hazel Clare	•	•			•			•			•							
M P H Hughes	•	•			•			•	•					•		•	•	
Elizabeth Paisone						•		•		•						•		
Caroline Nottage		•			•		•							•	•			

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R P Simmonds	•				•			•								•		
John C Duckett			•			•	•											
S Giles								•									•	
A G Spencer	•	•			•	•	•	•				•					•	
S Allwork				•		•		•	•					•				
Susan Blackwell		•			•	•	•	•	•								•	
Samuel Datta		•			•	•		•	•			•	•	•				
Wendy Datta		•										•	•				•	
Richard & Margaret Smith	•							•	•								•	
P Meenan								•	•									
Peter Keeley	•				•		•		•			•				•		
John Doyly		•							•									
Sally J Batchelor		•				•		•				•			•			
M Clycon		•							•		•	•	•					•
A Dowler	•			•		•		•	•							•		
J Pethard						•												
P Collins																	•	
R Dickinson	•	•					•	•	•	•	•		•					
A Wassell	•	•					•	•	•	•	•		•					
John E Green					•			•										
Jonathan French	•	•	•		•				•		•		•			•	•	
L Gourlay		•						•	•			•	•				•	
C Jones	•	•				•			•		•							
R & S Blackwell	•																	
Mary Zierhut								•			•							
Geraldene Townend		•									•	•	•					
Paul Townend								•			•	•						
Benjamin Townend	•							•			•	•						
Alistair Morrison		•						•			•							
Deborah Griffiths		•						•										
Justine & Jason Spencer		•			•	•		•	•		•					•	•	
Stephen Hatcher	•	•							•	•		•						
G J Keedwell	•				•		•									•	•	
S M Short		•	•					•		•		•						
S Aburto		•							•			•				•		
John Skellern	•						•										•	
Keith Kennedy					•			•										
N E Holloway							•	•			•							
Graham & J Medding	•	•			•	•		•	•	•	•		•	•				

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K & B Walker	•	•						•	•								•	
Jennifer Makin		•					•	•					•				•	
J V Mann	•	•				•	•	•				•						
Michelle Dale	•		•	•		•			•		•		•					
C J & W Tattersall							•	•				•						
Elizabeth Chambers									•		•							
Reg L Bidmead		•			•				•	•	•	•						
John Matthams	•						•	•	•									•
Jones		•			•				•							•		
Mr & Mrs S Pearce	•	•								•		•						
E Houghton	•					•	•	•				•						
Geraldine Davies	•	•				•			•	•	•							
H G Ratcliffe	•									•	•							
B E H Whitehouse						•	•	•	•				•					
J C & J Rogers	•			•			•	•				•						
Major & Mrs M Draper							•	•			•	•						
Brenda Matthams		•				•	•				•							
Frankie Johnson		•					•											
Megan Thirlway	•	•			•	•	•	•		•	•							
Ian Garrett								•								•	•	
Christopher Linpow	•	•				•	•	•			•						•	
Thomas Baxter	•	•		•								•					•	
Sue Tipping						•		•	•	•	•							
Mary Keeley	•	•				•	•	•	•	•	•	•				•	•	
L Westlake		•			•											•		
Robert Freeman						•	•											
Lynn C Morrison		•			•		•				•					•	•	
Laura Nicholson	•	•				•	•		•			•	•			•		
Cllr Hazel Wright							•											
Matt Castle	•	•			•		•									•		
Patrick & Susan Caden		•			•	•						•					•	
Douglas Waddell								•			•						•	
Richard Vos	•				•											•	•	
John & Flora Wilson	•	•					•	•	•							•	•	
A Chamellel		•						•									•	
L Martin	•	•	•		•													
M Simmonds		•				•	•	•										•
Mr & Mrs D H Cowan	•					•	•	•										•

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P C Sabino dos Santos	•	•								•		•						
Mr & Mrs Ireland	•	•				•			•	•	•	•	•			•		
Peter & Carole Marsh	•	•						•			•						•	
R Whitehead																		
Oliver Edwards	•	•			•	•			•	•	•	•				•	•	
Linda Edwards																		
Mr & Mrs Frazer																		
Philip Viner		•			•		•				•					•		
S Coleman	•	•			•	•		•										
John Roberts		•									•					•		
CLlr P Moorse	•							•			•					•		

CS.28D(c) Matrix of SUPPORTERS Responses Reopening the Stratford-Honeybourne Rail Link

- 1 Support
- 2 relieve traffic congestion (people and freight from road to rail)
- 3 important for tourism / increase visitor numbers
- 4 economic / employment benefits
- 5 Link Stratford by rail to the south west / Oxford / Cotswolds / Cheltenham / London
- 6 enhance local connections (development at Long Marston)
- 7 improve the public transport system for Stratford
- 8 reduce pollution/meet CO2 reduction targets / energy conservation
- 9 reduce traffic congestion caused by Global Gathering / Bulldog Bash
- 10 reopen Stratford Racecourse station
- 11 help meet increasing rail use for consumer freight
- 12 Link to Steam line from Toddington for tourism
- 13 Dual use of Greenway is feasible
- 14 Tunnelling + modern track and rolling stock will reduce noise

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Andrew Goode		•	•											
Frank Allen		•	•	•	•									
Andrew Pritchard			•		•									
Michael Fulton			•	•		•								
J Rose							•							
Richard Abbey					•	•								
John Atkinson			•		•	•								
David Shaw			•		•									
S M Ward		•	•											
Edward Eele					•									
G M Hayward		•					•	•						
Michael Brockington		•	•	•	•	•	•	•	•	•				

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Richard Parsons			•	•	•	•	•							
Philippa Edmunds – Freight on Rail				•				•			•			
Geoffrey Holroyde					•	•								
David L Austin							•	•						
Brian Osbourne		•	•		•	•								
R C Smith – Rail Freight Group		•			•	•								
Brian Mealing						•						•		
Richard Powderhill								•						
Neil Williamson		•			•	•	•							
J R Morgan – Stratford Rail Promotion	•													
Graham Nalty			•	•	•	•								
Andrew Dow					•								•	
A L S Orr	•													
Peter Honniball					•									
Caryll Oberst		•	•				•	•		•				
Paul & Jan Stanton	•		•	•		•								•
Janet Cottell					•									
David Pedley					•	•								
Rob Niblett – Glous CC					•			•						
Paul Boness	•		•	•	•								•	
Arthur Page – Shakespeare Line Promotion Group				•	•									
Brian Dobinson	•				•	•							•	
D Goodman – Stratford Rail Transport Group			•	•	•	•					•		•	
Trevor R Daw		•		•	•	•								
P J Holmes		•	•		•	•	•	•						
Roger Hughes	•	•	•		•								•	
Martin Brodrick			•		•	•								
David E Solliss	•		•		•								•	

Policy CS.28D (d) Parkway Railway Station in the Vicinity of M42 Junction 3

1. Network Rail welcomes investment in the rail network and takes a neutral stance on any proposals for new stations during initial business case development. The network planning teams will assist promoters of new stations and will support them if strategic fit is proved, funding is available and a robust case justifies the long-term investment in terms of revenue versus future running costs. All new stations need to be approved by network rail.

Network Rail

2. Support. This will provide a Park and Ride Facility for both Stratford and Birmingham and relieve traffic congestion.

Dr Maybelle Wallis

3. Worcestershire CC supports the introduction of new stations and infrastructure where they are affordable and have a strong commercial social and economic case for implementation. More details on a proposed Parkway Station in the Vicinity of M42 Junction 3 to understand the objectives of the proposal required but no objection to this.

Ben Horovitz - Worcestershire County Council Principal Planner

4. Congestion on the M42 at peak hours and the proximity of junctions is an important consideration in the proposal to develop a parkway station close to junction 3. There should not be a significant increase in local traffic.

5. Necessary to ensure that the existing road network can support development or be expanded. Where a parkway station is planned there is already congestion and compact junctions. There would be no benefit to the local community, or the West Midlands, in the development of such a scheme

Andrew Ashcroft

6. The absurd plan to develop a parkway station where it is unlikely to be used. This scheme should be consigned to the dustbin on the twin basis of lack of need and wasteful spending.

Jeff Parks

7. Object - do not consider that there is a need.

Michael Bird, Michael Andrews

8. Object - proposal will place further pressure on Clopton Bridge

Keith Kennedy

9. There is already a well used park and ride facility at Whitlocks End, which has been recently extended and is now more than adequate for our area, and will remain so for years.

Mr & Mrs Waters

10. The absurd plan to develop a parkway station in a location where it is unlikely to be used - unless SDC is keeping the development of a new business park under wraps. This scheme should be consigned to the dustbin on the twin basis of lack of need and wasteful spending. You should be aware that the Whitlocks End Station has been developed into, effectively, a parkway station with more than ample parking currently. The service between Birmingham and Whitlocks End is every 20 minutes. This could be cross boundary bit of joined up government previously alluded to in S2.

Earlwood and Foreshaw Residents' Association

Policy CS.28D (e) Widening M42 north of Junction 3A

1. Why is SDC broadening its remit and taking control of motorway development from central government. This cannot be correct policy.

Jeff Parks

Policy CS.28D (f) Improving the A46(T)

1. Support improving the A46(T) between Alcester and Stratford.

Stratford Voice

Policy CS.28E Other Transport Schemes

1. 'where appropriate' - this is subjective and needs to be deleted or given a detailed explanation as to the meaning.

Mrs J and Mr M Buckley

Earlswood & Forshaw Heath Residents' Association

Policy CS.28F Aviation

1. The policy appears to overlook the incidence of 'private' landing strips (e.g. Shotteswell) and private helicopters flying in and out of private residences in settlements.

Councillor S H Jackson

Policy CS.28G Information and Communication Technologies

1. The customer access terminal scheme is of interest to the police as an avenue of communicating with people.

Local Strategic Partnership

2. Absence of rural broadband will be a major limiting factor in achieving the stated aims of this review. In my parish the speed is pathetic - it is meaningless to make glib statements about 'encouraging broadband' - it must advance plans to commission a private sector partner and turn these ambitions into reality.

Paul Harvey

3. Broadband connection must be improved as this is relatively slow despite the facilities in the Bidford exchange.

Peter Chadwick

4. 'will encourage and support' is subjective and needs to be re-written or given a detailed explanation. Promote or drive would be more objective.

Earlswood & Forshaw Heath Residents' Association

Mrs J and Mr M Buckley

Topic: 11.2 Sustainability Appraisal Implications

No comments received for this section

Topic: 11.2 Explanation

1. We note the number of households without access to a car. We urge SDC to take this into account when planning locations of new residential developments. It is crucial for maintaining general health and wellbeing that people have access to transport, health, local facilities etc.

2. We support the extract and priorities from SDC's corporate strategy.

3. We note the 5% increase in traffic between 2000 and 2009 and would like to highlight concern around the potential for increased noise, visual intrusion and pollution.

4. We have ongoing concerns about the A435 and the impact any development would have on the local area in terms of noise, visual intrusion, pollution, road safety and transport related CO2.

NHS Warwickshire

5. If the dispersed strategy is adopted, there will need to be a clear focus on optimising sustainable transport links between settlements and within local centres.

6. The transport elements of the Infrastructure Delivery Plan (IDP) should be driven by the outcomes of transport analysis to ensure that suitable measures for mitigating the CS transport impacts can be secured. The HA is currently working in partnership with the District and County Council on assessing strategic impacts of the strategy on the road network.

Highways Agency

7. The dispersal of population growth to rural areas and its impact on car dependency will need to be tested to ensure that the Council gives proper consideration towards the tests of soundness.

Miller Strategic Land and Taylor Wimpey

8. Radway has a parking issue which has caused disputes among residents for many years. Schemes to improve off road parking would be very welcome.

9. Rural transport also needs addressing, particularly in the evening, to enable young people to take part in social clubs and activities.

Radway Parish Council

10. Our strategic policies contained in the LTP and Growth Strategies support the improvement and the provision of strategic infrastructure such as junction improvements to strategic highway network and provision of new railway stations.

Warwickshire County Council

Topic: 11.2 Development Management Considerations

1. We support the development management consideration that walking and cycling facilities are expected to be incorporated into development proposals at the outset of the process. Such facilities will need to be safe, convenient to use and well connected to other parts of the settlement to attract significant usage.

NHS Warwickshire

2. The comments in (4) recognising the need to safeguard land for potential rail projects is supported. Route safeguarding is also in NPPF, paras 41 and 143.

Stratford Rail Promotion Group

Topic: 11.2 Delivery and Monitoring

1. The comments in (4) recognising the need to safeguard potential rail projects is supported. Route safeguarding is also included in the NPPF at paragraphs 41 and 143.

Stratford Rail Promotion Group

2. In addition to the number of Travel Plans completed there needs to be a measure for how the delivery of these Travel Plans is monitored.

Warwickshire County Council

Consultation Question: Q204

1. Policy CS 28A should make specific reference to the objectives of the Warwickshire Local Transport Plan and the recently adopted Coventry and Warwickshire Local Enterprise Partnership's transport priorities to "improve accessibility to key destinations by sustainable transport" and to "improve public transport in the north-south-corridor (bus and rail) including the Leamington-Warwick-Stratford corridor."

David & Angela Tucker

2. Transport services for villages. Developers should be expected to contribute to local councils to improve services.

Claverdon Parish Council

3. No mention has been made of improvements in LSVs such as Earlswood which has little useful public transport infrastructure. We would like to know how this squares with the Council's intended increase in the population of LSVs.

Mrs J and Mr M Buckley

4. No mention is made of the new Stratford Parkway Railway Station and the impact that this will have. People will only switch to public transport if there is sufficient such transportation available and at reasonable costs.

Stratford-upon-Avon Town Council

5. Opportunity to extend the proposed 'NUCKLE' (Nuneaton-Coventry-Kenilworth-Leamington) rail services to Stratford, which would add much-needed new destinations and extra business for local stations.

Stratford-upon-Avon Town Council

Consultation Question: Q205

1. At some point in the future, it would be helpful to have the ring road completed around Stratford.

B W & Y K Bates

2. More effective east/west links are needed.

Wootton Wawen Parish Council

3. The Council should include a new and improved Junction 12 on the M40, with direct access to Gaydon Site, to relieve the local road network.

Jaguar Land Rover Ltd

4. Provision should be made for a future Studley by-pass even if it does not get built for 20 years.

Philip Crook

Consultation Question: Q206

1. When looking at the delivery of ICT, alternative solutions to a BT infrastructure should be considered, eg. wireless or cable.

Country Land and Business Association

2. Easier access to competitively-priced Broadband has to be pursued both for businesses and residents. More people will start to work from home if High Street retail continues to struggle. With more people working from home, this will have an effect on transport as well. Organisations such as the LEP should be encouraged to find private sector partners to provide the facility.

Stratford-upon-Avon Town Council

Consultation Question: Q207

1. Any Section 106 or community infrastructure levy should not be levied at such a rate to affect the viability of the development. In addition, the lack of public transport in the rural area should not be seen as a reason to prevent beneficial rural development which addresses local employment and business needs.

Country Land and Business Association

2. More use should be made of the Shakespeare Line in preference to the Solihull route. Quality Bus Corridors should also include Redditch to Warwick.

Councillor S Thirlwell

3. The absurd plan to develop a parkway station in a location where it is unlikely to be used. Whitlocks End station next to Shirley has been developed as effectively a parkway station with ample parking and a very frequent train service. This meets all the criteria and the needs of the area.

Ewan Cunningham

4. Enhanced cross referencing is required between Section 11.2 (Transport and Communication) and 8.4 (Green Infrastructure) to emphasise the asset value of natural environment and the role it can play in transporting people between various parts of the District.

Natural England

Consultation Question: Q208

No comments received for this question

Consultation Question: Q209

1. Report every 5 years.

Stratford-upon-Avon Town Council

Draft Core Strategy 2012 - Summary of Representations

11.3 Infrastructure for Growth - Developer Contributions

Topic: 11.3 Strategic Objective

No comments received for this section

Policy CS.29 Infrastructure - Developer Contributions

1. Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such railway improvements; it would be appropriate to require contributions towards rail infrastructure where they are directly required as a result of the proposed development and where the acceptability of the development depends on access to the rail network. Network rail quotes PPG13 in support of this position.

2. The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore where a Transport Assessment is submitted in support of a planning application this should quantify in detail the likely impact on the rail network.

3. The policy should include the following:

- A requirement for developer contributions to deliver improvements to the rail network where appropriate including any development that occurs as a consequence of the Stratford-on-Avon District Draft Core Strategy 2012.
- A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.
- A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements.

4. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

5. Improvements to rail transport contribute to the public good and railway developments should not be expected to support other public projects. Our infrastructure projects and station developments and improvements support regeneration, increase the attractiveness of settlements and benefit communities.

Network Rail

6. I am concerned that the infrastructure systems may be inadequate. I refer to drainage for surface water and household waste in residential areas and surface water, commercial waste and floodwater in town and village centres and in the flood plain area of the Avon and other rivers and tributaries in the district. I appreciate that developers will be expected to contribute to provision but my concern is the aggregate of development planned and the additional pressures it will place on the underground services and the natural waterways. Eg. Bidford is expected to take substantial additional housing, commercial and social facilities and there is no evidence that these new needs can or will be met based on present infrastructural services.

7. Obviously developers will be expected to make provision for their own developments but the most important consideration, for which individual developers cannot be made responsible, is the means of disposal of surface water, waste water and sewage, similarly provision of conduits and cables for gas, electricity, telephones, broadband etc. These have to match the scale of ultimate development and I remain to be convinced that adequate thought has been given to this in the creation of the draft policy.

Hannah Susan Greig Memorial Trust

8. In principle Sport England is supportive of this policy but we have concern over some of the detail. We believe there needs to be a clear reference to Policy CS 27 (amended as per our recommendations). We are also concerned that the LA puts more emphasis on open space than it does for indoor and outdoor sports facilities. We would request that the wording is changed thus:
Where possible infrastructure, including community facilities, open space, indoor and outdoor sports facilities and affordable housing will be sought on-site. Where this is not possible off-site provision or financial contribution will be sought.

Sport England

9. The Cotswolds Conservation Board suggests that CIL should be used to provide and manage green infrastructure in general, not just 'open spaces and play equipment'.

Cotswolds Conservation Board

10. Safer Communities: The Police are concerned that the increase in housing will impact on financial resources and manpower.

Local Strategic Partnership

11. Developer Contributions should be sought through CIL to cover all relevant infrastructure provision, including affordable housing. (We do not agree with affordable housing being found as a % of development space, and would prefer to see a tariff based system where contributions can be collected and used by the existing Housing Needs process).

12. However, there is no point in seeking small developments in rural areas if the contributions render such schemes unviable.

13. Very small schemes of say 1-5 units will be the basis of this Plan and these are likely to be best delivered at high quality by small local developers. Such developers will need a clear understanding of the likely costs of CIL well in advance if they are to take the risks of securing sites and progressing development proposals.

Paul Harvey

14. CIL and S106 payments could render marginal rural developments unviable.

15. CIL should not be levied on agricultural buildings or dwellings and not applied to new business use in the countryside.

16. Money raised through CIL and S106 should be spent local to where the money was generated rather than the other side of the district.

17. A separate consultation should be had on CIL.

Country Land and Business Association

18. If a CIL is to be introduced, the council must produce a clear schedule and programme of infrastructure delivery and ensure that any S106 contributions sought from developers are reasonable and directly related to the site, are consistent with S122 and 123 of the Act and do not relate to facilities already included within the CIL programme.

Noralle Traditional County Homes

19. We see a mismatch between the provision of facilities from larger developments and the reality of such provision for small sites (in Long Compton the maximum development site would be for 6 houses which could not viably support significant infrastructure contribution). We see no corresponding contribution from smaller sites.

Long Compton Parish Council

20. Developers should contribute towards all elements of infrastructure.

Deborah Griffiths

21. S106 payments should be reduced in designs that demonstrate reusable energy - for heating and other environmentally sensitive approaches.

Kelly Stepney

22. Any CIL, developer contributions or tariffs must take into account individual circumstances and site viability. Developer contributions are finite and it may be that not all individual sites will be able to deliver the full aspirations of the Core Strategy. This position is recognised in NPPF para 173-177.

23. The following provision should be added to CS 29 in order to make the policy sound: *'A reduced level of contributions will only be considered where it is demonstrated that full provision would make the proposed development unviable'*.

David & Angela Tucker (move to Q210?)

24. Developers should be made aware of the potential need to invest in the relevant settlements infrastructure prior to submitting their plans for construction of new dwellings.

Mappleborough Green Parish Council

25. There are hundreds of vacant properties in towns across the country ready for development with utilities already in place. Sewage systems in villages are old and not big enough to cope with extra demand. With no mains gas supply in many rural villages, electricity is the main source of energy. Last year we were cut off constantly because demand for electric use was more than the substation could cope with.

26. Building more houses in villages is going to result in people having to use cars to commute to work or shop. Travelling to school, secondary education and colleges from rural villages costs hundreds of pounds a year on a very limited bus route. Most of the small industries in villages have gone, bus routes have been reduced or stopped so it is vital to have a car which is very costly and damaging to the environment. As a nation we have a duty to preserve our planet.

Denise Montgomery

27. We note that the Council intends to produce a CIL. This is welcomed but will clearly have to be supported by detailed viability analysis to ensure that development within the District as a whole is not stifled.

Gloucester Diocesan Board of Finance

28. New development must not be expected to contribute towards meeting problems with existing infrastructure, only that related to new development. It is unlikely that contributions to the police are capable of passing the three tests of Reg 122 namely that it is a) necessary to make the development acceptable in planning terms b) directly related to the development and c) fairly and reasonably related in scale and kind to the development.

29. As the policy approach is worked up it is important that the policy and evidence base are clear how required infrastructure will be funded ie. what will be delivered via CIL as opposed to S106 and vice versa.

30. The final para of CS 29 refers to infrastructure having regard to the phasing of housing delivery in the plan. Clarification is required as the Draft Core Strategy does not include a policy which suggests the phasing of housing would be appropriate and offers no evidence to suggest that a phasing policy is required. Our view is that to artificially constrain development coming forward through an inflexible phasing policy which 'holds back' suitable development sites would not be consistent with the NPPF and would be unsound. We would urge the Council to avoid this approach as the LDF is advance.

CALA Homes (Midlands), Persimmon Homes (South Midlands) Ltd

31. 'Should' is subjective (needs to be changed to 'must'), as is 'having regard to'. Specific definitions please.

Mrs J and Mr M Buckley, Earlswood & Forshaw Heath Residents Association

32. The infrastructure needs of the district in terms of open space, flood prevention, renewable energy, transport mitigation measures, climate change mitigation and adaptation and sustainable development have to be considered in the CIL and Allowable Solutions tariffs.

33. Urban Drainage for water attenuation is only a sustainable decision where facilities are managed and maintained for the purpose for which they were developed. This will require a funding arrangement for future management to be added as part of any planning condition.

Councillor S A Juned

34. WWT welcomes a specific policy to secure developer contributions towards infrastructure and supports the introduction of CIL to mitigate impacts on the district's infrastructure network. We believe CIL will be important for securing contributions towards green infrastructure in the district and sub-region so this provision will be necessary to ensure cross-compliance with policies CS 12 and potentially CS 13. It may be also necessary to specifically outline that green infrastructure contributions will be sought alongside any grey infrastructure thereby ameliorating any ambiguity in relation to the provisions of the policy.

Warwickshire Wildlife Trust

35. The proposed development will make all necessary contributions to provide for local services and facilities where they are relevant to mitigate any impacts arising from the development.

Codex Land

36. Western Power Distribution (WPD) may have / has a number of strategic electricity distribution circuits (which can operate of 132,000 Volts, 66,000 Volts and 33,000 Volts) in some of the area's being considered for development. These circuits may run both underground and as overhead lines, (on either towers/pylons or wood poles). Generally, WPD would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary.

37. WPD would normally seek to retain the position of electricity circuits operating at 132kV and 66kV and in some cases 33kV, particularly if the diversion of such circuits placed a financial obligation on WPD to either divert or underground them as WPD would not be party to any planning application and any such obligation would also go against the statutory and regulatory requirement on WPD to operate an economic and efficient electricity distribution system.

38. Assuming the required minimum statutory clearances can be maintained and WPD can access its pylons/poles, WPD does not generally have any restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for planning guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines, e.g. parking, estate roads, commercial uses of open space, within their immediate proximity.

39. It is worth noting that any existing circuits crossing the proposed development areas in the document may run both overhead and underground. In any case WPD should be consulted on detail at an early stage and WPD are always keen to discuss larger site with the local authority at an early stage, so that constraints can be taken into account and sites planned in the most effective way.

Western Power Distribution

Topic: 11.3 Sustainability Appraisal Implications

No comments received for this section

Topic: 11.3 Explanation

1. Para 11.3.8 claims:

"The "granular" nature of development intended for the district (with new housing limited to sites of 100 dwellings or less) will enable an efficient use of existing infrastructure. Spare capacities can be more fully utilised than might be the case with major concentrations of new development.

RPS would strongly disagree with this statement as:

- a) whether spare capacity can be fully utilised will always depend on a number of factors and will not necessarily be helped by a dispersed approach;
- b) where spare capacity does not exist it may be very difficult to secure additional capacity, especially where a substantial amount of land is required on which to provide that additional capacity; and
- c) larger scale development can provide on-site facilities and infrastructure which can meet identified needs. This presents a key opportunity for the achievement of some infrastructure - e.g. a new primary school.

2. We do not agree with para 11.3.9 which recognises the difficulties that will be caused by the proposed dispersal of development, and consider it entirely unsatisfactory that the proposed response to a lack of capacity (which could be in any one of several different areas) is likely to be to simply stop development in that area of the district.

Miller Strategic Land and Taylor Wimpey

3. We are please to see the Strategy acknowledging the possibility that communities may reach capacity and that development will then not be allowed.

4. We note the reference to the likelihood that the CIL will provide a significant resource for LOCALLY determined priorities and hope that this proves to be the case.

5. We would ask that the District takes account of needs revealed in Parish and Neighbourhood Plans when these financial bonuses are being shared out.

Harbury Society

6. Developer obligations can be used to build infrastructure such as healthcare facilities, parks or cycling routes. There should be an overarching policy that promotes health and wellbeing for communities in the District. Spatial planning policies can promote and provide opportunities for healthier lifestyles.

Warwickshire County Council

7. In Stratford town most schools are already at or near capacity. Therefore, a dispersal policy with a 100 homes cap would not assist in the proper provision of school places. Consequently the County Council would prefer a more concentrated pattern of residential development which would bring the opportunity to provide new school sites and a focused application of developers' contributions.

Warwickshire County Council

8. There is a concern that the emerging suite of policies and Infrastructure Delivery Plan do not take account of the cumulative effect on the viability of bringing forward sites for development (para 173 of NPPF is quoted). We are concerned that development may be thwarted.

The only evidence in relation to viability produced by the authority dates back to Sept 2009 and was prepared by Baker Associates. This work concludes, at para 6.5, that in relation to brownfield sites the 35% affordable housing floorspace requirement may be too onerous and not viable. Since that time the requirements on developers have increased, e.g. education costs have escalated significantly. There is therefore a need for an up to date and robust consideration to be given to the cumulative viability impact of policy on development proposals.

CALA Homes (Midlands)

Topic: 11.3 Development Management Considerations

No comments received for this section

Topic: 11.3 Delivery and Monitoring

No comments received for this section

Consultation Question: Q210

1. Developers should be expected to contribute towards transport, education/training, health, open space and play equipment, policing and village halls/community centres.

Wootton Wawen Parish Council

2. Policy CS 29 should make it clear that infrastructure delivery includes green infrastructure and that it is eligible for CIL/S 106 developer funding. The draft NPPF states 'LPAs should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure' (para 167). The Environment Minister Richard Benyon and Planning Minister Bob Neill launched the Green Infrastructure Partnership in Oct 2011 to support the development of green networks in urban areas and to help communities make better use of their local infrastructure. The adopted Exeter Core Strategy DPD (Feb 2012) states in Section 11 Infrastructure CP 18 that: 'Developer contributions will be sought to ensure that the necessary physical, social, economic and green infrastructure is in place to deliver development'. Contributions will be used to mitigate the adverse impacts of development (including any cumulative impact). Where appropriate, contributions will be used to facilitate the infrastructure needed to support sustainable development. We would therefore like policy CS.29 to make it clear that green infrastructure is eligible for CIL and other developer obligation funding.

Woodland Trust

3. CIL should only be used to fund infrastructure that is required as a result of new development, not to bring facilities that are already core up to a reasonable standard, nor is it to be used for projects which should be funded through an alternative route. CIL should just fund what is additionally needed to facilitate infrastructure for that particular development. It is difficult in this instance to see how there is a requirement to provide training or additional policing and many of the open space and equipment requirements should be funded through S106 not CIL.

Country Land and Business Association

4. Drainage and flood prevention should be included in the facilities to which the developer must be expected to contribute. Highway improvements and road safety could be included in the infrastructure of a development.

Snitterfield Parish Council

5. Add Biodiversity remediation measures in conformity with CS 11?

Councillor S H Jackson

6. Transport services for villages should be added to the list. Also, developers should be expected to contribute to local councils to improve services.

Claverdon Parish Council

7. There is a need to secure developer contributions to fund a new police office/post following the recent closure of Wellesbourne police station. This could be at the fire station, the County Council Depot or the library. Provision should be made for this through CIL. Extracts from the recently adopted Shropshire CIL are provided in which funding will be sought for the upgrade of 7 police stations.

Mr J R Morgan

8. In addition to education and training, contributions should be made to Early Years and Childcare as in many cases extra facilities will be needed to provide adequate and suitable education provision to address the growth in population. The infrastructure developments will need to have the flexibility to expand to meet any future demand.

9. It is also recommended that SDC consider mechanisms to support and deliver local employment and training support and opportunities as part of the development process. In addition and where appropriate, pre-employment training to on-site construction training through local supply chain and procurement initiatives should be supported.

Warwickshire County Council

10. Policing is a population-based service and any new housing growth creates additional demands on Warwickshire Police. Current funding arrangements provide for ongoing policing services but there is no surplus that could be redirected towards capital infrastructure projects. If developer contributions are not available to contribute towards this there will be a policing infrastructure gap.

Warwickshire Police

10. Funding from Home Office and Council Tax precept only covers revenue expenditure. The police therefore require impact mitigation through S106 or CIL, as is the case with other public infrastructure providers subject to similar resourcing arrangements. The NPPF paras 69 and 156 are quoted in support, also a British Property Federation report 'Planning for social infrastructure in development projects' (2010). Page 7 of this document states that social infrastructure (which it has previously identified as integral to the creation of sustainable communities) includes emergency services. It is therefore vital that the Stratford District Draft Core Strategy policy covers this.

- This is endorsed by Government which is of the view that developer contributions towards police infrastructure and facilities are NPPF and CIL Reg 122 compliant.
- CIL: An Overview, DCLG May 2011, para 12 explicitly identifies policing infrastructure as a legitimate element of infrastructure that can be funded by developer contributions.
- A list of core strategies is provided (including Rugby) that cover police and other emergency services as legitimate infrastructure/service providers entitled to developer contributions.

West Mercia Police

12. We want a specific policy that CIL and/or S106 contributions should be provided for the building, improvement and/or extension of Village Halls and other community buildings, and believe this should be linked specifically to the community in which the development takes place as this will be where the facilities are under pressure from the increased population.

Harbury Society

13. All those facilities listed should be included together with leisure facilities where appropriate.

Mrs J and Mr M Buckley, Earlswood & Forshaw Heath Residents Association

14. Infrastructure contributions from developers should include transport, open space, cycle ways & green provision (e.g. solar panels, water harvesting etc). Education, health and police should be funded by central government.

Stratford-upon-Avon Town Council

15. The list should include a community centre for each ward in Stratford upon Avon. New town has 17% of population below poverty line (approx 1 family in 6). Education & training. Not street art.

W A Lowe

16. Police contributions are unlikely to pass the 3 tests of Reg 122 namely that it is a) necessary to make the development acceptable in planning terms b) directly related to the development and c) fairly and reasonably related in scale and kind to the development.

CALA Homes (Midlands)

Persimmon Homes (South Midlands) Ltd

Consultation Question: Q211

1. The answer to Q211 is contained in the CIL regulations.

Noralle Traditional County Homes

2. Negotiated contributions are preferred in consultation with Parish wishes.

Claverdon Parish Council

3. The complexity and interdependencies of policing infrastructure mean that a standard charge approach is more flexible and effective.

Warwickshire Police

4. Wherever possible contributions to improvements to community infrastructure and facilities should be site specific. We would not want them pooled and provided elsewhere unless the provision was very close to the community and/or public transport was provided.

Harbury Society

5. Site specific contributions are preferred. Minimum contributions as a standard charge - extras dependent upon the site.

Stratford-upon-Avon Town Council

Consultation Question: Q212

1. There will be no scope for additional tariffs as well as the CIL charge.

Noralle Traditional County Homes

2. A standard tariff rolled into a CIL would provide the most flexible and effective approach whilst helping to minimise bureaucracy.

Warwickshire Police

3. We believe there could be a standard BASE tariff but it should be made clear that this would just be a starting point and that contributions might well need to be higher dependent on what the proven local needs for improvements were judged by the community itself.

Harbury Society

4. So far as possible, every site should pay directly for its own contributions - having monies passed to any local authority tends to cloud the issue and the monies get lost in the 'pot'.

Stratford-upon-Avon Town Council

Consultation Question: Q213

1. To be discussed.

Warwickshire County Council

2. The delivery of affordable housing and CIL should remain separate. AH is a planning requirement, needed to secure mixed and balanced sustainable communities. CIL is designed to raise money to pay for infrastructure needed to support development. The delivery of AH through CIL would confuse the two and dilute the Council's ability to deliver AH through individual schemes, not least because the Council would be obliged to use CIL to pay for any infrastructure. Although the council may choose to spend any 'affordable housing increment' on AH, in many cases it would not do so.

3. Commutation would also pose a serious threat to the supply of land for affordable housing.
Tetlow King Planning, West Midlands HARP Planning Consortium

4. WRCC believes that affordable housing in rural areas should be exempt from CIL.
Warwickshire Rural Community Council

5. It would seem sensible to deal with AH through S106 as there may be instances where on site provision is the most suitable solution whether partly or in full and this could lead to a double charging for AH if it is provided through CIL.
Country Land and Business Association

6. There is probably a case for incorporating AH within the CIL charge, if future regulations permit. This will create a more even playing field for the collection of land value.
Noralle Traditional County Homes

7. Affordable housing, especially where retained for local needs, should be negotiated separately as we would want all such development to be tied.
Harbury Society

8. Negotiated separately - don't dilute opportunities.
W A Lowe

Draft Core Strategy 2012 - Summary of Representations

Appendix 1. Infrastructure Delivery Plan

In addition please see related matrix from 'RASE' Consultees.

1. I support pedestrian improvement in the town generally, not just along historic spine.

John Oldfield

2. All of the items listed in the matrix will protect Stratford and our heritage from further exploitation by developers. An excellent draft Core Strategy at last. Please do keep it!

Mr & Mrs D J Cholerton

3. Improve the existing station without compromising its Victorian features.

Jeannie Farr

4. Visitors have to carry bikes and prams over LM Bridge. Also would be so good for wheelchair users if it had no steps.

Mrs Helen Petitjean

5. Please stop and prohibit the motorcross development at Cophams Hill Farm. The noise is appalling.

Bill Tucker

6. A bus station is a priority for the town.

R Burman

7. I oppose pedestrianisation - there should be easy access including by car to all areas of the town centre. Stratford should retain its character as a market town where people can call in to shops easily.

Mrs P West

8. An ideal option for a bus station would be next to the railway station.

Mrs J Wood

Anna Candy

9. The town urgently needs a second crossing over the river to relieve Clopton Bridge and enable heavy traffic coming from the Shipston direction to access the motorway etc.

Mrs Margaret Ann Smith

10. Action is required to improve traffic flow in the town. Through traffic must be diverted from entering the town centre area (i.e. a ring road is required).

John Priest

11. We particularly support:

- pedestrian improvement along the 'Historic Spine'
- Bridgeway improvements (including new link road between Warwick Road and Bridgeway, improvements for pedestrians on Bridgefoot) and traffic management on Clopton Bridge
- potential Park & Ride facility to the south of the town near Trinity Way/Shipston Roundabout
- potential bus station in the town
- examine potential of upgrading of Lucy's Mill Bridge

Stratford Voice

12. The list in the Appendix 1 of Section 11 is too expansive and not sufficiently specific. A much clearer financial programme is required which costs out each item. Viability is a critical issue. Any CIL charge may need to be offset against affordable housing and S106 payments. An onerous levy will dry up development.

Noralle Traditional County Homes

13. Lucy's Mill Bridge desperately needs access for disabled, pushchairs & bikes so everyone can do the circular walk.

Tony & Sue Holmes

14. Bus station - only feasible location is adjacent to the existing railway station.

15. Lucy's Mill Bridge - only replace if necessary for health and safety.

Mrs E J Allard

16. I am in support of extending rail services to and from Stratford.

Ann Jones

17. I do feel, long term, this could be beneficial to the town (sic).

Mrs V Brandon

18. In Section 11 Schedule of Infrastructure Projects, there are several references to an increased provision of play space for children and young people, sports pitches etc. as per the PPG17 study. We would like to see VASA recognised as a potential partner in enabling these projects through our funding advice function and access to charitable grants.

Voluntary Action Stratford-on-Avon District

19. Increasing the shared use of buildings e.g. Southam could be a way of maintaining services.

Local Strategic Partnership

20. The suggestion of creating a "Country Park" around Earlswood Lakes is utterly pointless and would severely damage this extremely sensitive natural environment. Two of the sites have SSSI status and the area, which is carefully maintained by WWT, is already easily accessible to visitors.

Mr & Mrs J T and C A Waters

21. We are concerned that a number of education projects have been included with no consultation with the WCC Access & Organisation team which appear to have been left over from the previous strategy and SDC had been advised that these were no longer relevant. These are:

- a) New Primary school - while it is certain that a further increase in residential development in Stratford will lead to the need for a new primary school, it would be premature and unhelpful at this stage to refer to a specific location;
- b) Replacement or major refurbishment of Kineton School - it is very unfortunate that this remains in the new schedule. This is a hangover from the last strategy. Unfortunately there are no current plans by WCC to undertake this project. Unless SDC are aware of other discussions, I would ask that this project is removed from the schedule as it is likely to raise expectations that certainly cannot be met by WCC in the foreseeable future.
- c) Expansion of Shipston High School - once again there has been no consultation on this and while it is possible that Shipston High continues to grow in pupil numbers and new proposals may have to be considered, there are currently no agreed proposals for expansion. It is WCC policy that 6th form provision would not in the current situation be sustainable in Shipston. Once again I would ask that this reference is removed at this time.

Warwickshire County Council

22. Para 1.3 states that detailed assessments of transport and infrastructure are ongoing or are about to be commissioned. Therefore there is not a robust evidence base to support the proposed infrastructure included within the Table in Appendix 1.

23. The table of infrastructure projects refers to a new primary school in Stratford and expansion of secondary provision serving Stratford-upon-Avon catchment. How will this be delivered if development sizes are to be restricted to no more than 100 dwellings?

Miller Strategic Land and Taylor Wimpey

24. The IDP, as currently set out, has little if any justification and evidence provided about the schemes proposed within it, the costs involved, whether those costs are justified and who will be responsible for funding. Indeed there is no way of knowing, at this stage, if or how consideration has been given to the impact that the schedule will have on the viability of development proposals. There is clearly a considerable amount of work to be undertaken in relation to viability before it could be considered sound. Our client therefore reserves the right to consider the evidence base relating to the IDP as it is published.

CALA Homes (Midlands), Persimmon Homes (South Midlands) Ltd

25. We support the proposal in section 11 to assess the scope for a third river crossing. This would facilitate the trunk routeing for the A46 and probable increases in HGV weight to 60 tonnes (European Regulations) which will render Clopton Bridge unsuitable for heavy vehicle use.

26. We believe Stratford Town station improvements, a bus station (feasibility study completed by WCC in 2011) and Lucy's Mill footbridge 'accessible to all' are critical.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

27. A bus/rail interchange and bus station are overdue in Stratford-upon-Avon.

Councillor S A Juned

Consultation Question: Q214

1. The CLA is concerned that projects listed within this section covers projects that are needed currently. Developer contributions should not be used to fund existing projects but should be linked to specific developments within the timescale of the core strategy. The schedule of infrastructure projects should be rural projects related to development rather than a long wish list that has not been able to be funded from elsewhere eg. the creation of a country park, creation of a leisure centre, creation of bridleways and contributions to the national cycle network etc.

Country Land and Business Association

2. The Council should include a new and improved Junction 12 on the M40 as a Critical Infrastructure Project. It should be phased for as early as possible and led by the Highways Authority / Highways Agency, funded by the Department of Transport.

Jaguar Land Rover Ltd

3. The provision of the Extended Greenway should feature on the list of infrastructure projects. The proposals form part of the ongoing redevelopment of the Long Marston Estate. Once complete the works will provide a 2km continuous cycle/pedestrian route through the site from the north western corner to the south eastern corner and provide a traffic free link between the site and Stratford town centre. It will provide a significant benefit to occupiers of the residential dwellings proposed, existing employees on site, future leisure activities and to those who make use of the existing Greenway north of the Long Marston site. The proposals also include works to the watercourse banks to improve biodiversity and create a green corridor through the site between 15 and 45 metres wide which will assist in delivering the objectives of Policy CS 11.

St Modwen Developments Ltd & The Bird Group

4. Lower speed limit in town.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

5. Birmingham Road development. How much S106 monies available for New Town Ward? Education & Training.

W A Lowe

Consultation Question: Q215

1. Critical, priority and desirable infrastructure items - this is considered too weak - all of the community's requirements should be met - developers will always argue special cases.

Stratford-upon-Avon Town Council - Neighbourhood Plan Steering Group

Consultation Question: Q216

No comments received for this Question

Appendix 1 Matrix (RASE consultees)

The 'Residents Against Shottery Expansion' group sent Stratford District Council a Comment Form, where local residents registered their comments on certain aspects of the Draft Core Strategy.

Under '**Infrastructure Projects and Transport Schemes**' residents were asked to delete as applicable:

I support: pedestrian improvement along the Historic Spine / Park & Ride facility to the south of town / bus station in the town / upgrading of Lucy's Mill Bridge / improvement of rail services and facilities.

A summary of these findings is presented below. This matrix supplements the general consultation response on Appendix 1 Infrastructure Delivery Plan.

- denotes support for the item of infrastructure listed.

I support:	Pedestrian improvement along the Historic Spine	Park & Ride facility to the south of the town	Bus station in the town	Upgrading of Lucy's Mill Bridge	Improvement of rail services and facilities
Peter & M J Donaghue	•	•	•	•	•
Mrs Valerie Lageard	•	•	•	•	•
John Armitage	•	•	•	•	•
R.K. Fisher	•	•	•	•	•
Peter Condron	•	•	•	•	•
Mr & Mrs P Hill	•	•	•	•	•
Miss F Longmore	•	•	•	•	•
R Burman	•	•	•	•	•
Mr & Mrs F & L Edwards	•	•	•	•	•
Mr & Mrs D. J. Cholerton	•	•	•	•	•
Susan Marks	•	•	•	•	•
Bill Tucker	•	•	•	•	•
B E H Whitehouse	•	•	•	•	•
S.J. Wiseman	•	•	•	•	•
Mr DCM Young	•	•	•	•	•
Patricia Young	•	•	•	•	•
Mrs B Wood	•	•	•	•	•
P Wiltsliel	•	•	•	•	•
Stefan Law	•	•	•	•	•
Mrs M G Tattersall	•	•	•	•	•
M B Lewis	•	•	•	•	•
Mrs Valerie Lageard	•	•	•	•	•
B.W. + Y.K. Bates	•	•	•	•	•
Mrs Mary Boddington	•	•	•	•	•
Alan Boddington	•	•	•	•	•
Mr Peter Pearce	•	•	•	•	•
Monica M Beckett	•	•	•	•	•
G K Allen	•	•	•	•	•

I support:	Pedestrian improvement along the Historic Spine	Park & Ride facility to the south of the town	Bus station in the town	Upgrading of Lucy's Mill Bridge	Improvement of rail services and facilities
Andrew Davies	•	•	•	•	•
J Steele Nicholls	•	•	•	•	•
Mrs Helen Petitjean	•	•	•	•	•
Andrew Waterhouse	•	•	•	•	•
Mrs S.J. Sreeves	•	•	•	•	•
Julia Shearing	•	•	•	•	•
Mr E R Green	•	•	•	•	•
John D Jones	•	•	•	•	•
Peter Taylor	•	•	•	•	•
Mrs J Wood	•	•	•	•	•
Anna Candy	•	•	•	•	•
Mrs D Geldard	•	•	•	•	•
John Harris	•	•	•	•	•
Bernard R Pumfrey	•	•	•	•	•
S Venus	•	•	•	•	•
Mrs Diane Rogers	•	•	•	•	•
R J Beresford	•	•	•	•	•
Mr Clive Wootton	•	•	•	•	•
Nicholas Smith	•	•	•	•	•
Mrs C C Scott	•	•	•	•	•
Mrs S.M. Cragoe-Jones	•	•	•	•	•
R.D. Heppell	•	•	•	•	•
Mrs J Calvert	•	•	•	•	•
Mrs A Murray Watts	•	•	•	•	•
Harry Nicholls	•	•	•	•	•
Anne Cooke	•	•	•	•	•
SM + PV Wall	•	•	•	•	•
Mr D + Mrs JH Smart	•	•	•	•	•
Mrs Margaret Ann Smith	•	•	•	•	•
Mr Richard L. Smith	•	•	•	•	•
John Oldfield	•	•	•	•	•
Mrs C.A. Cooper	•	•	•	•	•
Mr Derrick Burford	•	•	•	•	•
Mrs G Pawley	•	•	•	•	•
J Robertson	•	•	•	•	•
Paul Kershaw	•	•	•	•	•
Mr B G Harrison	•	•	•	•	•
F Hodgson	•	•	•	•	•
Mr & Mrs R Stephenson	•	•	•	•	•
B Escott	•	•	•	•	•
Mr Clifford Rose	•	•	•	•	•
Norman & Freda Kitcher	•	•	•	•	•
Mr PF & Mrs MM Williams	•	•	•	•	•
A M Tudor	•	•	•	•	•
Mrs D E Bonham	•	•	•	•	•
D Daniel	•	•	•	•	•
Anastasia & Peter Hunter	•	•	•	•	•
Mrs JM & Mrs JA Kent	•	•	•	•	•

I support:	Pedestrian improvement along the Historic Spine	Park & Ride facility to the south of the town	Bus station in the town	Upgrading of Lucy's Mill Bridge	Improvement of rail services and facilities
B Lomas	●	●	●	●	●
Mrs & Mrs DJ Chamberlain	●	●	●	●	●
B Stewart	●	●	●	●	●
J M Hind	●	●	●	●	●
P F Wyatt	●	●	●	●	●
A McIntyre	●	●	●	●	●
Mr & Mrs G & W Mazey	●	●	●	●	●
Michael Stockhill	●	●	●	●	●
James Pullin	●	●	●	●	●
Sylvia Leighton	●	●	●	●	●
Peter Landsman	●	●	●	●	●
David Goodman	●	●	●	●	●
Steve Taylor	●	●	●	●	●
George W Sykes	●	●	●	●	●
ALS Orr	●	●	●	●	●
B Rossington	●	●	●	●	●
Mrs Mary Austin	●	●	●	●	●
H Carragher	●	●	●	●	●
A Chaplin	●	●	●	●	●
A J Whiting	●	●	●	●	●
WE & BO Cave	●	●	●	●	●
G I Chamberlain	●	●	●	●	●
J M Stocks	●	●	●	●	●
Dai Gistiws	●	●	●	●	●
Ann C Curtis	●	●	●	●	●
J C Edwards-Broome	●	●	●	●	●
Caroline Stewart	●	●	●	●	●
H R Beach	●	●	●	●	●
R Dawney	●	●	●	●	●
Malcolm J Wilkes	●	●	●	●	●
Dave & Mo Sargent	●	●	●	●	●
RD & RJ Langman	●	●	●	●	●
Mary Monteith	●	●	●	●	●
Brian P Edwards	●	●	●	●	●
Don Hanson	●	●	●	●	●
Mary Jeffery	●	●	●	●	●
Carol Conn	●	●	●	●	●
Wyndham Perring	●	●	●	●	●
John Miller	●	●	●	●	●
B Littlewood	●	●	●	●	●
D E Swimbourne	●	●	●	●	●
Mr & Mrs RC & JD Hawkins	●	●	●	●	●
W Alan Head	●	●	●	●	●
D Pearson	●	●	●	●	●
Alan & Sharon Morris	●	●	●	●	●
Mary & DAR Morgan	●	●	●	●	●
E A Foster	●	●	●	●	●
Miss N Whittard	●	●	●	●	●

I support:	Pedestrian improvement along the Historic Spine	Park & Ride facility to the south of the town	Bus station in the town	Upgrading of Lucy's Mill Bridge	Improvement of rail services and facilities
Mrs Elizabeth Brace	●	●	●	●	●
Mrs D Leuets (or Lever?)	●	●	●	●	●
Edwina Nicholls	●	●	●	●	●
R Green	●	●	●	●	●
AL & JK Page	●	●	●	●	●
Mr Frank Woodhall	●	●	●	●	●
Mr C White	●	●	●	●	●
Mrs D J Ockendon	●	●	●	●	●
Sylvia J Cooper	●	●	●	●	●
P R Gilmore	●	●	●	●	●
Ken & Mary Ryman	●	●	●	●	●
George & Bryony Fisher	●	●	●	●	●
Penny Gildea	●	●	●	●	●
Barbara & Peter Dodd	●	●	●	●	●
Kevin Gildea	●	●	●	●	●
Mrs BA Sylvester	●	●	●	●	●
Freda Douthwaite	●	●	●	●	●
Mrs G M Reid	●	●	●	●	●
Maureen & John Hill	●	●	●	●	●
Fiona Mackie	●	●	●	●	●
B H Richardson	●	●	●	●	●
Mrs C M Richardson	●	●	●	●	●
E W Head	●	●	●	●	●
Graeme Ramsey	●	●	●	●	●
Miss E M B Sellar		●	●	●	●
Mr & Mrs R E Cain		●	●	●	●
Mr & Mrs J S Orchard		●	●	●	●
Joan Graham		●	●	●	●
Mrs M Childs		●	●	●	●
T F R Crossley		●	●	●	●
Mrs Vera E Hawkins		●	●	●	●
Michael Crutchley		●	●	●	●
Mrs G Woodhall		●	●	●	●
C.M. West			●	●	●
Mrs P West			●	●	●
John Priest			●	●	●
Patricia Jebb			●	●	●
S J Warrilow			●	●	●
Mrs E J Hart			●	●	●
Jeannie Farr	●	●			
Dr D Kalderon	●			●	●

I support:	Pedestrian improvement along the Historic Spine	Park & Ride facility to the south of the town	Bus station in the town	Upgrading of Lucy's Mill Bridge	Improvement of rail services and facilities
Mrs E Kalderon	●		●	●	●
Gordon Harrington	●		●	●	●
Mr B Childs	●		●	●	●
Mr & Mrs J. Farrar	●		●	●	●
Mr & Mrs DJ Hammond	●		●	●	●
Mrs Barbara Spencer	●		●	●	●
Tony & Sue Holmes	●		●	●	●
R Dyer	●		●	●	●
Michael & Sheila Mills	●		●	●	●
Roger & Susan Blackwell	●		●	●	●
Mr & Mrs DA & RE Atkinson	●		●	●	●
Pat & Michael Bird	●		●	●	●
Eric Ward	●		●	●	●
Stephen Parker	●	●	●		●
Alan Spreadbury	●	●	●		●
Mrs MS Wade	●	●	●		●
Peter Dingley		●	●		●
M J Bunce		●	●		●
W Macdonal		●	●		●
S Watts		●		●	●
Peter J Hudson			●	●	
E J Allard		●			●

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