

**Directions for Stratford-on-Avon  
Consultation Core Strategy**

**Summary of Representations Received  
February – April 2010**

**Final Version 21-2-2011**

## **Topic: GEN Core Strategy as a Whole**

### **Summary of Matters Raised in Representations**

1. Wellesbourne's position within the hierarchy of Main Rural Centres is not properly reflected; there should be a more proactive strategy to enhance local facilities to assist self containment and assist in creating a more sustainable community.
2. If Stratford-upon-Avon is unable to accommodate the necessary level of development it is recommended that additional land is allocated adjacent to the Main Rural Centres.
3. Tell Stratford Voice to put a sock in it.
4. Council's approach to preparing the Core Strategy and in allocating sites to achieve the higher housing target proposed by the RSS Revision Panel is commended.
5. By pressing ahead now with this Core Strategy consultation, the District Council may have to carry out the exercise again if the housing allocations are revised.

## **Topic: 1.0 Section 1: Planning for the future of Stratford-on-Avon District - general**

### **Summary of Matters Raised in Representations**

1. Importance of District Council commitment to a plan led system
2. Important to address affordable housing issues and the District's housing growth requirements
3. Believes the Panel Report will remain a material planning consideration despite changes at a national level
4. Restricting inward migration is inappropriate
5. Supports paragraph 1.2.7 and that there is no justification to not provide the full 7,500 dwellings.

## **Topic: 1.1 Why another stage of consultation?**

### **Summary of Matters Raised in Representations**

1. Spatial strategy and policies for the District should consider waste in terms of:
  - efficient use of resources
  - providing suitable waste facilities in the right places
  - reducing waste
2. Although, the County Council is the Waste Planning Authority, there may be a need to deliver waste management infrastructure in the District and facilities need to be integrated into land uses proposed in the Core Strategy.
3. To ensure a 'spatial approach' SDC needs to ensure this infrastructure is specifically considered in the document and the County Council Waste LDF is taken into account.

## **Topic: 1.2 What happens next?**

### **Summary of Matters Raised in Representations**

1. The document is premature and should reflect the possibility of major policy changes at a national level following the General Election.
2. However, there is also support for the decision of the Council to pursue its Core Strategy programme and support for a further consultation opportunity.

3. It is essential the Council continues to provide a commitment to a plan-led system and addresses the problems of housing affordability and meeting housing growth requirements.
4. Delays to progressing the Core Strategy are likely to lead to a policy vacuum and leave the Council susceptible to 'planning by appeal'.
5. Although the future of the RSS is uncertain, the requirement for 7,500 dwellings over the plan period (as recommended by the RSS Panel) is appropriate.
6. The Panel Report will remain a material planning consideration. The Core Strategy should be in conformity with the RSS.
7. Restricting inward migration is inappropriate.
8. Regarding paragraph 1.2.8 - there is very little mention of sewerage infrastructure or protection of water quality. Before stating that "there are no fundamental infrastructure constraints to meet the initial scale of development" SDC needs to ensure that sewerage infrastructure is addressed and need to liaise with Severn Trent. Sewage Treatment Works may be at, or nearly at, capacity and with an outdated sewerage network may not be capable of transferring either clean water or foul effluent without upgrading. Recommend early discussions, particularly when housing numbers and locations have been confirmed.
9. The Environment Agency questions the statement that "there are no apparent significant impacts in accommodating this level of growth".
10. A further round of consultation needs to be undertaken prior to the submission draft stage of the Core Strategy to integrate a full Sustainability Appraisal into the process.

## **Topic: 1.3 National and regional requirements**

### **Summary of Matters Raised in Representations**

1. Targets must be accompanied by evidence of how they have been calculated. District Council should challenge national figures rather than simply accept them
2. Ref in 1.3.7 that RSS '*did not support a major new settlement*' is incorrect. Panel Report stated that '*new settlements should not be ruled out....the District should consider options to add a further 2,500-3,000 dwellings...through...selection of the most sustainable new settlement proposal*' (ref paras 8.65 & 8.74)
3. Core Strategy appears to have made allowance for more dwellings than RSS targets.
4. Re para 1.2.6 - Core Strategy should clearly state that a future review of the document is expected to be required to provide an additional 2,500-3,000 dwellings in the District over the period 2021-2026.
5. Opposition to an additional 2,500 - 3,000 dwellings post 2021.
6. New settlement would be the preferred option for accommodating growth post 2021; urban extensions on Stratford upon Avon would harm the character of the town and are not a suitable option for that level of growth
7. Core Strategy should be delayed until housing targets have been confirmed.
8. Accepting immigration as a means of counterbalancing the ageing indigenous population is not a long term or viable policy approach

9. Growth proposals should protect the standard of living for existing residents.
10. Not clear from paras 1.3.7, 1.4.3 & 1.4.4 whether or not expansion of Long Marston (perhaps into an eco town) is supported.
11. The Core Strategy builds on previous issues and options and previous consultation documents. It is based on further research and assessment undertaken by the District Council, as well as taking into account the comments received at the various stages of consultation.
12. It is acknowledged that the emerging RSS does not see Stratford District as taking a large proportion of the CSW Sub-Regions growth. As such, Stratford upon Avon has not been identified as a Settlement of Significant Development.

## **Topic: 1.4 Cross border and sub-regional planning arrangements**

### **Summary of Matters Raised in Representations**

1. Support for cross border and sub-regional planning arrangements. Due to Stratford District's links with Warwickshire, Gloucestershire, Oxfordshire and other areas of the West Midlands it makes sense for future planning to take account of development in these areas too.
2. The meaning of paragraphs 1.4.3 and 1.4.4 is not clear - it seems very up in the air at the moment, particularly in light of the RSS and whether it survives or not.

## **Topic: 2.0 Section 2: A Spatial Vision for the District - general**

### **Summary of Matters Raised in Representations**

1. The improvements made to Section 1 of the document are acknowledged - it is now more focused and succinct.
2. The portrait should clarify the key, critical issues that the Core Strategy will address. Some are mentioned but not all (for example, lack of public transport, provision of a quality education service, support for the tourism industry). Clarity over the priority issues should be set out to directly inform the vision and the strategy.
3. The visions for each market town should be included in the overall vision. A more locally distinctive and place based vision is supported.
4. There should be a link between the vision and the strategy - the spatial objectives should set out how different elements of the vision will be delivered. The Objectives remain a little 'bland' and could be made more meaningful.

## **Topic: 2.1 The challenges facing Stratford-on-Avon district - where we are now**

### **Summary of Matters Raised in Representations**

1. Paragraph 2.1.3 - There is no evidence to support that the proposals retain the character of the town and the quality of life for its residents. In fact, quite the opposite.
2. Paragraph 2.1.5/8 - The importance of heritage and the rural nature of the District as a local,

regional and national asset is supported.

3. Paragraph 2.1.7 - the pressures also relate to species, not just habitats, and this should be reflected.
4. Paragraph 2.1.9 - The Strategic Flood Risk Assessment should be referred to in this paragraph.
5. Paragraph 2.1.15 - should also mention Honeybourne station where Network Rail are adding two more platforms, extra tracks and a footbridge.
6. Paragraph 2.1.23 - There is support for supporting the local economy and providing opportunities for existing businesses to expand and new ones to set up and relocate in the District. there is agreement that the role of technology and knowledge based jobs will assist.
7. The change of economic circumstances in the UK warrants a complete review of the 'pace of growth' projections contained in this consultation. Despite new business premises being built, they are not necessarily occupied and other pre-existing business premises have been left empty.
8. Several paragraphs in this section should acknowledge the three canals that form part of Stratford upon Avon, namely the Stratford upon Avon Canal, the Grand Union Canal and the Oxford Canal. greater emphasis should be placed on the contribution they make to the historic environment, ecology, transport connections, tourism and the local economy of the area.
9. The priority issues of the Core Strategy need to be made clearer up front and should be distinctive to the District and the places within it e.g. improving the tourism potential in Stratford upon Avon by delivering the aims of the Urban Design Framework, rural accessibility, provision of affordable housing and addressing pockets of deprivation in Alcester. it is disappointing that the previous version of the Core Strategy, which took this approach has been changed.
10. The Objectives should clearly set out how the Vision will be achieved.
11. Lack of evidence there is a spatial approach.
12. Support is given to the long term Vision within the Sustainable Community Strategy. Support is given to the Vision for the District in 2026 which envisages that the large rural brownfield sites in the District will continue to be regenerated. The Harbury Estate provides an ideal opportunity to provide a self-supporting and inclusive community.
13. The terminology for the settlement hierarchy which is described in the 'Vision' is not consistent with that set out in Policy CS.2 and should be addressed. There should be reference to the terms 'Primary Rural Centres', 'Secondary Rural Centres' and 'Local Service Villages' within the Vision.
14. The last paragraph of the Vision does not reflect paragraph 5.2.3. later in the document which states some employment land may no longer be suitable and alternative uses could be more beneficial. It also fails to recognise the valuable contribution the redevelopment of identified MDSs could make, delivering employment and housing opportunities as well as providing other wider environmental and social benefits. Suggestion that the amended sentence reads as " The large rural brownfield sites and identified MDSs in the District will continue to be regenerated with new employment opportunities or other suitable uses."
15. Paragraph 7 of the Vision needs to be amended to allow for greater flexibility in considering the redevelopment options for large rural brownfield sites and MDSs, where they can enhance and make a positive contribution to the local settlement and wider area. Suggest Paragraph 7 should be amended to read "Our Local Service Villages will have retained their individual character, while providing homes to meet the needs of local people and wider area in the case of suitable rural brownfield sites or identified MDSs."

## Topic: 2.2 The future of Stratford-on-Avon District - where we want to be

### Summary of Matters Raised in Representations

1. Support is given to the general aims of the Vision. However, the importance of the 8 Main Rural Centres in securing rural regeneration in the District and the important function they perform together should be acknowledged further. The Vision fails to acknowledge the wider development strategy and significantly downplays the importance of the 8 main rural settlements.
2. Support is given to the recognition that large rural brownfield sites in the District will continue to be regenerated with new employment opportunities and other uses. A number of these sites, including the Long Marston Estate, provide a valuable source of land to accommodate the District's development needs.
3. Support for the principle of using large rural brownfield sites but the final sentence of the Vision should be amended to read " The large rural brownfield sites in the District will continue to be regenerated with new employment opportunities and other suitable uses including residential use".
4. Support for Shipston-on-Stour to be recognised as a primary Main Rural Centre. The town has a wide range of services and facilities, good public transport links and should be enhanced to meet the economic, employment, retail and housing needs of the settlement and surrounding rural areas.
5. Support for new housing in the larger settlements in the District to maintain their important role. New housing is essential for providing more affordable accommodation and to ensure a balanced population and economy. An enhanced social and economic role for Wellesbourne should be considered in light of its population being greater than Shipston. There is an opportunity to deliver enhanced community infrastructure and a more vibrant retail environment.
6. The reference to urban extensions should be deleted as there is a lack of infrastructure capacity. Further significant development to Stratford upon Avon would result in harm to the town.
7. A small but sustainable new settlement should be considered to accommodate the District's housing needs. It should use brownfield land where possible, with an appropriate level of public transport accessibility and provide on-site local employment opportunities and a sustainable local centre. This should be added after paragraph 4 of the Vision.
8. Town and Parish Plans should be a crucial part of the planning and land use process if local communities are to accept future development. This principle should be included in the Core Strategy Vision.

## Topic: 2.2a Our Vision of Stratford-on-Avon District in 2026

### Summary of Matters Raised in Representations

1. Suggestion from Natural England that the penultimate paragraph of the Vision reads "Our countryside will support a more diverse rural economy and an attractive, well maintained landscape with improved biodiversity **and enhanced green infrastructure**".
2. Support from the Regional Development Agency that the Vision seeks to preserve and enhance the existing quality environment whilst seeking to address the challenges for the Core Strategy. Support for the diversification of the rural economy, the provision of services and jobs in market towns and local centre villages and the need to address rural affordable housing issues is welcomed.
3. Support for the identification of transport as an important issue. The emphasis on sustainable transport modes in spatial objectives 14 and 15 are also welcomed.

4. Section 2.1.5 should acknowledge that business activities take place in the countryside and note that the attractive landscape is predominantly maintained by farming operations. Farming should be recognised as a priority area for economic development activity. There are a number of vibrant and expanding agricultural businesses and land based industries should be supported (food production, energy production and diversified farm enterprises). It should be acknowledged that farming and changing agricultural practices can enhance and protect biodiversity and habitats (agri-environment schemes). The Core Strategy does not give enough detail of how a diverse rural economy will be supported.

5. Agreement that there will need to be some urban extensions to meet the needs of future residents. These will need to be sensitively developed to protect the town's setting and character. However, concerns raised that some suitable, achievable and available sites known to the Council have not been identified as proposed residential development sites. Failure to take account of alternative sites could render the document unsound.

6. Support for the enhanced role of Shipston upon Stour in the Vision.

7. Support for new housing developments in the larger and smaller settlements in the District.

## **Topic: 2.3 Spatial objectives**

### **Summary of Matters Raised in Representations**

1. Support for Spatial Objectives 12 and 13 - if there is insufficient capacity within the wastewater networks and no upgrades programmed then development could result in adverse impacts such as sewer flooding and pollution of land and/or watercourses.

2. Support for the objectives to reduce traffic congestion, improve quality of life, increase tourist numbers and gain wider use of park and ride.

3. Objective 6 should be amended to refer to the promotion of 'business and leisure' tourism.

4. Disappointment that the reference to the need for all forms of development to make the necessary improvements to green infrastructure has been removed from this draft. It was in Objective 5 of the last draft Core Strategy. Natural England recommends that it is returned to Objective 12 and suggests the following amendments:

- Objective 12 - "to ensure development takes place.....or the necessary improvements to infrastructure (including green infrastructure) are made in tandem with new development".
- Objective 17 - the words "will not worsen" should be replaced with "reduces".
- A further bullet point should be added after 17 which reads "to increase the districts overall adaptability to climate change".
- Objective 18 - Insert the word "connectivity" after habitat in objective 18.
- Objective 20 - "To promote distinctive high quality design that enhances the appearance and image of the district and supports natural processes such as flood management".

5. The section could benefit from additional objectives to ensure that development

## Topic: 3.0 Section 3: Assessment of Spatial Options - general

### Summary of Matters Raised in Representations

1. The Core Strategy offers no adequate reasons for the Preferred Option.
2. The Panel were not provided with the 1996 Halcrow report which confirmed the feasibility of reopening a railway line. The Panel report did conclude that such a rail link would not be a problem that is impossible to achieve. Para. 3.65 should be amended therefore to record these observations.
3. The dispersal option should be favoured for any new housing.
4. Agreement with the dispersed approach but believe the balance of the report is wrong. Brownfield sites are said to be too far from existing services and facilities and heavily dependent on car borne transport. There is significant brownfield space available within close reach of the major towns in the District - report does not paint an accurate picture or highlight that the distances involved are less than 5-10 miles. There is no evidence that development at Stratford will reduce car dependency - recent development has shown an increase in traffic. Believe that the town-based development approach has been arrived at to increase revenue for the Council in the disposal of its own land interests.
5. Failure to undertake a Sustainability Appraisal and Strategic Environmental Assessment in relation to this stage of the draft Core Strategy is contrary to legal requirements and guidance.
6. The Preferred Option to direct a significant amount of development within and on the edge of Stratford on Avon is welcomed. Sites along Alcester Road and Shottery are both sustainable and of a scale appropriate to the size and character of the town. Sensible extensions to the urban areas is an approach consistent with national, regional and local policy and protects the wider rural environment and Green Belt. 3 sites are attached to the submission and attached can be accommodated within existing infrastructure and well-related to public transport corridors.
7. For any development option British Waterways would require development to not adversely affect the integrity of the waterway structure, water quality, result in unauthorised discharges and run off or encroachment, detrimentally affect the landscape, heritage, ecological quality and character of the waterways, prevent the waterways potential for being fully unlocked or discourage use of the waterway network. British Waterways would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community.
8. GOWM advise that the Options should be cross referenced to the relevant evidence base to provide an audit trail as to how and why the preferred strategy was arrived at. All assumptions within the DPD are justified by evidence.
9. Agree there will need to be some urban extensions to meet the needs of future residents - will need to be sensitively developed in ways that protect the town's setting and character. More suitable, available and developable sites known by Council have not been identified as proposed residential development sites (some are attached by consultee). Failure to take account of alternative sites may render the strategy unsound.
10. Draft Core Strategy includes a dispersal option across most settlements because it was the preference of 41% of those who responded to the previous consultation. However, 59% do not support this option. A piecemeal approach does not manage to provide the relevant infrastructure to support the dwellings proposed. There appears to be no robust analysis as to whether the facilities in these settlements can realistically accommodate further growth or whether they can be reasonably expanded to allow for greater use.
11. Support for Option C Moderate Dispersal which would give Local Service Villages 20% of the proposed new budget. Allows for effective levels of development to take place and feel it is a realistic option given that development would be spread out up to 2026.



12. Development in Stratford on Avon is inevitable. It is naive to lobby for no further development whatsoever. However, it is important to have an element of 'control' and therefore, there is support for extensive dispersal (Option D) and regular monitoring of windfalls is essential. Phasing should be backloaded.

## **Topic: 3.1 Context**

### **Summary of Matters Raised in Representations**

1. Clearly support from previous consultations for a new settlement - there is not majority support for extensions to Stratford upon Avon. A new settlement option should be assessed in the SHLAA, land parcels assessment and in a Sustainability Appraisal. The current draft of the Core Strategy appears to be at odds with the Issues and Options Study in May 2007 which stated "Concentrating an excessive amount of development in Stratford on Avon would be harmful to the character and setting of the town. There are also significant infrastructure constraints....."
2. Not clear on what the Preferred Option actually is in the Core Strategy? Is it spreading development around as the Issues and Options stage suggested?

## **Topic: 3.2 Identification of the Preferred Option**

### **Summary of Matters Raised in Representations**

1. It is most concerning that, whilst recognising that the dispersal Option 3 is clearly preferred, it is wrongly assumed that Option 1 can be treated as part of this Preferred Option. There are very strong objections to this from many residents and this should be reflected in the draft Core Strategy.
2. Support for the Preferred Option - it is essentially sound based on the principles of a robust settlement hierarchy and the use of urban extensions at Stratford. Further consideration should be given to a stronger focus on Stratford upon Avon and all available, suitable and achievable housing should be delivered there before a more decentralised approach to development in the villages takes place.
3. Support Preferred Option, in particular the dispersed approach across most settlements in the District. Also, it is important to re-use previously developed brownfield sites in the countryside (Option6) to ensure existing and future rural needs are met. Suggest 4th bullet is amended to read: "Scope for some housing development to be provided on the large rural brownfield sites specified in the Core Strategy and other appropriate brownfield sites based on meeting local need and related to the employment provided on these sites".
4. Support for the Preferred Option as it allows the majority of new development to be accommodated in the most sustainable locations i.e. Stratford and the Main Rural Centres.
5. There are clearly opportunities for locating more development in the larger rural settlements without detriment to their character. Question the ability of Stratford to absorb substantially increased development without harming its tourism role and heritage. Concerns regarding infrastructure funding. Options should be taken therefore to maximise development in larger villages where opportunities present themselves and are not subject to environmental and other constraints.
6. Object to the inclusion of a "a significant amount of development within or on edge of Stratford upon Avon" as a part of the Preferred Option. The dispersal strategy was specifically identified to prevent further significant development in Stratford upon Avon and based on a 5,600 housing figure. If there is additional development above this - consultation has shown support for a new settlement approach.

7. A flexible, non target-led, approach should be taken for Local Service Villages, particularly taking into account their character, location and services. Development, primarily for affordable housing, should be needs led for Local Service Villages in the Cotswold AONB.

8. Support for "a significant amount of development in larger rural towns and villages" as a part of the Preferred Option.

9. Welcome the statement that limited facilities in villages should not decline further and wish to preserve one shop and post office in Salford Priors. There is a need for 6 affordable homes in Salford Priors (based on a housing needs survey) and a small area of land has been identified through community consultation for such a scheme.

### **Topic: 3.3 Reasons for rejecting other options**

#### **Summary of Matters Raised in Representations**

- 1) There are benefits in relation to Option 6 and ensuring the re-use of rural previously developed land. Suggest this is incorporated in the Preferred Option.
- 2) The reasons for rejecting Option 4 are unsound. If a higher housing target is required it is incorrect to say that a new settlement approach would not be consistent with meeting local needs where they arise. Where is the evidence that the "cut off point" for needing a new settlement is 7,500 new homes compared to 5,600 new homes? A robust and credible evidence base in relation to capacity and impact would establish the appropriate "cut off point". The comment in relation to Option 6 is unsubstantiated by an evidence base or sustainability appraisal. Suitable greenfield sites should also be considered.
- 3) Support for Option B and feel it is the most appropriate to focus development at the Main Rural Centres. Agreement with the advantages outlined but believe any disadvantages can be mitigated. Do not believe the other options meet housing needs sufficiently across the District as a whole, particularly considering 80% of the District population lives outside the main town of Stratford upon Avon.

### **Topic: 3.4 Application of the Preferred Option for locating development**

#### **Summary of Matters Raised in Representations**

1. Welcome dispersal of future development throughout the District. This will support local services and create sustainable long term employment.
2. Would like to see opportunities for organic growth in smaller villages i.e. for people with local connections. This includes full market housing and affordable homes that would be identified through a housing needs survey. Would not want to see medium sized housing developments however (e.g. 40 dwellings and above).
3. Support the Preferred Option given the Core Strategy is looking to deliver 7,500 dwellings. Any alteration to this position should not be at the expense of locating housing development at Stratford through the use of SUEs.
4. Support for the Preferred Option as it is based on the principles of a robust settlement hierarchy and the use of urban extensions at Stratford and the Main Rural Centres. The approach to the rural areas should be to provide the focus for housing growth in the larger rural towns and villages (MRCs) with the higher order services and facilities. There should be a limited level of housing growth at the Local Service Villages and smaller villages to ensure an affordable housing supply is delivered. Should

be restricted to 100% affordable housing and exception sites. The integrity of the MRC settlements should be maintained.

5. The recent planning permission at the Long Marston Estate should be acknowledged in Table 1 as this contributes more than the 100% envisaged for all of the large rural brownfield sites in the District.

6. Believe paragraph 3.4.8 is too restrictive and the Preferred Option should not stifle development coming forward or restrict the future residential requirements of rural communities and reuse of previously developed land. The beneficial impact of development for the provision of improved services and attracting greater investment into an area should also be considered when assessing development proposals within rural areas.

7. The respective percentages in Table 1 vary from those set out in the housing trajectory for the revised draft of the Core Strategy. It is considered important that the scale of new development at the main rural centres is maintained at the proposed figure of 35% as set out in Table 1. May be appropriate therefore to reconsider reducing the scale of new allocations proposed at Stratford upon Avon and increasing the proposed allocations in the Main Rural Centres, in order to achieve the more balanced approach inferred through the Preferred Option.

8. To refer to the population as at 2001 is inaccurate and there has been a great deal of house building since 2001. The draft Core Strategy should refer to the latest estimate of population. The choice to base projections on a housing figure of 7,500 is also inappropriate. The percentage of housing proposed to be built on brownfield sites is too low. Should be increased to 15% for Option C and 20% for Option D with commensurate reductions in the % applied to Stratford, the Main Rural Centres and the Local Service Villages. Believe the figure of 5,600 should be used as there are over 600 vacant dwellings within Stratford District.

9. Support the reference to locating development at the Main Rural Centres - new housing is essential for the sustainable future for these settlements.

10. Methodology for identifying Local Service Villages is crude and inadequate - a new more detailed methodology with an emphasis on sustainability should be established to identify the Local Service Villages. the methodology should look at services and facilities, daytime, evening and weekend public transport, links between the villages and their role, proximity of villages to higher tier towns and villages, the impact of the Long Marston planning permission and the size of settlements to determine levels of development. There are factual errors in the background appraisal paper - Long Compton and Salford Priors have operating public houses and the public house in Great Alne is shortly to reopen.

11. Essential that rural communities do not lose their local services and facilities, or their young populations.

12. Concern that policies aim to locate development away from smaller settlements. Tight restrictions on economic development in small villages could result in rural decline and could make communities less sustainable. The Core Strategy (and Para.3.4.8) must recognise that the countryside is a working environment and is not simply a recreational resource. paragraph 3.4.6 appears to be at odds with paragraph 4.1.3 and should be cross referenced.

13. Support for 'Local Choice' - has worked well for Long Compton. The Parish Council strongly objects to the Local Choice policy being substituted by a target-led approach.

14. Object to panel recommendation of 7,500 homes, considered an enormous figure. Support moderate local needs growth only. Local people should have more ownership of the decisions affecting them. The Strategy should not prejudge and prejudice the Secretary of State's decision.

15. The suggested Preferred Option is all well and good but as a Parish Council would want to be involved in all stages of the development of any new housing programme. One would imagine others

would want to be too, as we are each updating our local housing needs requirements and finding places in our respective localities where these can be met.

16. Support preferred approach to the spatial distribution of development. Stratford upon Avon is the most sustainable and largest location within the District - additional development should be of a scale that is appropriate to the size and character of the town which can be accommodated by existing infrastructure or through improvements that can be delivered. A moderate dispersal option offers the most sustainable and effective balance in terms of reducing the need to travel and meeting housing needs in different parts of the District.

17. Support for a significant amount of development within and adjacent to Stratford upon Avon (3 omission sites were promoted).

18. Support for the principle of providing housing development in smaller villages to meet identified local needs but the development should not be restricted by the Council's 'Local Choice' approach.

19. It would appear that the 'two out of three' criteria for the selection of Local Service Villages is simplistic and as such, places insufficient emphasis on public transport. No consideration has been given to the fact that there is relatively little employment in the village and most people have to travel to work. Fenny Compton Parish Plan specifically highlighted traffic as a problem in the village and an increase in private car journeys can only exacerbate this problem. On this basis believe that the 'two out of three criteria' methodology should be replaced by a 'three out of three' criteria methodology and that any village that has insufficient public transport should not be considered a Local Service Village.

20. Support for paragraph 3.4.6 that larger rural settlements are more appropriate for locating development than the smaller settlements in the District. Believe this is particularly appropriate to Bidford on Avon - has the scope to meet the Preferred option and local housing needs and meeting the RSS housing target.

## **Topic: 3.4a Summary of Main Benefits and Disbenefits of Each Option**

### **Summary of Matters Raised in Representations**

1. Pressure upon services and infrastructure has not been listed amongst the negative factors for Option 1. This is clearly not an objective summary. The proposed building of 800 houses at Shottery and 500 houses at Bishopston Road is totally unnecessary and seriously damaging to this area.

## **Topic: Table 1 Housing Development Options**

### **Summary of Matters Raised in Representations**

1. Planning permission at Long Marston Depot for 500 dwellings contributes to more than the 10% envisaged for all of the large rural brownfield sites identified.
2. The choices in Table 1 cannot be supported as sustainable options. Whilst some dispersal is desirable, this should be on a local need basis and there should be no solution where more than 30% of new development should be outside the town of Stratford-upon-Avon.

## **Topic: 3.5 The role of new settlements**

### **Summary of Matters Raised in Representations**

1. It is for the local authority to decide on the future role of new settlements not the RSS Panel.
2. Parish Council should be included in any discussions on the need for a new settlement in the District.
3. There is no basis for a new settlement coming forward through the Core Strategy.
4. Likely to be lengthy lead-in times and probable legal challenges surrounding new settlement proposals.
5. There are more sustainable and practical solutions to accommodating development than a new settlement.
6. RSS Panel Report does not rule out the option of providing for a substantial new settlement in the District; it states that further work needed to be undertaken to demonstrate the suitability of new settlements.
7. Support statement that a new settlement would need to be considered if the assessment of sites in Stratford-upon-Avon shows they cannot be provided satisfactorily.
8. The proposed Eco-town at Long Marston should not be part of the Core Strategy.

## **Topic: 4.0 Section 4: Spatial Strategy - general**

### **Summary of Matters Raised in Representations**

1. Support is stated for the moderate dispersal strategy which includes enhancement of the main market towns including Shipston-on-Stour.
2. GOWM states that no reliance can be placed on the Local Plan in determining the settlement hierarchy, even though there may be some continuity. The hierarchy must be based evidence.
3. The strategy needs to be reconsidered in its entirety to include a firm commitment to address the delivery of the 7,500 dwellings sought by the RSS Panel before 2026.
4. CS needs to be clear about the order of priority to directing development having regard to the hierarchy of settlements.

## **Topic: 4.1 Spatial Strategy - overall approach**

### **Summary of Matters Raised in Representations**

1. Support is expressed for focusing the bulk of development in Stratford-upon-Avon and the Main Rural Centres as it allows for an appropriate balance to be reached between the need for generating sustainable patterns of travel and a District that has a sizeable rural area.
2. Recognition of Southam as a sustainable settlement is supported. This will enable the town to expand to meet the housing requirement and the local needs of its rural hinterland. However, the amount of growth assigned to Southam is seen as too small relative to its size, services and public transport connections.
3. Objection is made to the principle of defining built-up area boundaries for the Local Service Villages in either the Core Strategy or in a subsequent Development Plan Document (DPD). Instead, policies should make clear where and when development will be acceptable. Such boundaries may limit acceptable development and their definition will be take up time and resources unnecessarily. The only exception would be Local Service Villages in the Green Belt where insets are appropriate, as per PPS2, but details should be delegated to a separate DPD

## **Topic: 4.2 Spatial Strategy - Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. There is no evidence for the need for substantial volumes of additional affordable housing to address the local shortage of workers in the tourism, cultural and local services sector.
2. Stratford-upon-Avon does not have the infrastructure to support the proposed housing growth and the latter would reduce the appeal of the town to visitors and adversely affect tourism which is a major employer. It is not just schooling which is under pressure in the town but other infrastructure such as medical services and roads. If tourism were to grow, then that would add to the pressure on facilities.
3. There is no evidence that the impact of growth on the character of the town has been properly assessed. This evidence should be available for inspection and for comments by the public.
4. Stratford-upon-Avon should take the majority of the growth assigned to the district. It is the largest town and main urban area of the district. Such a strategy would accord with regional strategy objectives to achieve a greater urban focus to create more sustainable patterns of development and be in line with the RSS Panel's recommended policy SS1.

5. Reference to schools being a major infrastructure constraint should be deleted. It was not raised at the RSS EIP and should not determine the strategy. There is no evidence to support the notion of this being an insurmountable constraint on post-2016 growth. If there is, then it needs to be set out clearly and available for scrutiny, so too the influence of the schooling issue on the allocation and phasing of sites for development at Stratford-upon-Avon.
6. Reference in para. 4.2.5 to land phased post 2016 being deleted should be omitted. This is far too vague and uncertain and is contrary to the need to show where and when development will occur up to 2026 in line with guidance in PPS12. Such uncertainty impedes investment decisions. The case for sustainable urban extensions at Stratford-upon-Avon and the Main Rural Centres will remain, even if somewhere else is identified for development post-2021. There are no environmental or infrastructure reasons why urban extensions should be deleted. The District Council has not provided firm evidence to support assertions about inadequate infrastructure capacity.
7. If Stratford-upon-Avon is unable to accommodate the necessary level of development, then more land should be allocated adjacent to the Main Rural Centres.
8. The section is not sufficiently robust to justify the phasing of development of the proposed strategic allocations at Stratford-upon-Avon.
9. The absence of a Sustainability Appraisal (SA) makes meaningful site comparison at Stratford-upon-Avon impossible.

## **Topic: 4.3 Spatial Strategy - Main Rural Centres**

### **Summary of Matters Raised in Representations**

1. Support is expressed for the development of the Main Rural Centres because:
  - it is in line with the Rural Renaissance ethos of the RSS, especially Policy RR3, although the MRCs need to be assessed against the RR3 criteria to clarify the rural regeneration roles of the settlements and to assist in determining an appropriate level of development;
  - they contain infrastructure to support proposed development;
  - it will lessen reliance on Stratford-upon-Avon to address the economic, housing and social needs of the district.
2. There is no need to have two tiers of Main Rural Centres. They all meet the criteria of RSS Policy RR3 and should provide foci for rural regeneration through sustainable economic and housing development. They all provide a range of services that serve a wider rural area. The CS does not provide evidence that supports the distinction between the two tiers.
3. There is support for the CS's recognition of Alcester as a Main Rural Centre and for the development allocations on the basis of the need for housing to meet the needs of the town and its hinterland, and to provide funding for local community facilities.
4. Objection is expressed to the proposed extent of development at Alcester on the basis of:
  - a lack of infrastructure capacity in the town and within its catchment area, the schools and medical centres being at full capacity;
  - flooding is a big problem in the town;
  - highway congestion at peak hours.
5. Bidford-on-Avon should be treated as a Market Town because:
  - it meets the requirements of RSS Policy RR3;
  - it serves a rural hinterland;
  - it can provide opportunities for employment, housing and retail development and these can help to improve the natural environment;
  - the lack of a secondary school is mitigated by the provision of a dedicated secondary school bus

service to Alcester.

6. The section should include a list of the Main Rural Centres with the primary centres comprising Alcester, Shipston-on-Stour, Southam and Wellesbourne. Wellesbourne should be included because of its main employment and service centre role.

7. There should be reference to the potential of development to deliver missing community infrastructure in the Main Rural Centres.

## **Topic: 4.4 Spatial Strategy - Areas of Restraint**

### **Summary of Matters Raised in Representations**

1. The Area of Restraint at Southam should be deleted, as with all these areas elsewhere in the district. The District Council has not provided the necessary robust and detailed justification for this designation. A criteria based policy will suffice.

2. Bordon Hill at Stratford-upon-Avon (including in particular the area not proposed for development) should be designated an Area of Restraint to protect strategic landscape views, including from Anne Hathaway's Cottage and its Registered Historic Garden.

## **Topic: 4.5 Spatial Strategy - Smaller Rural Settlements**

### **Summary of Matters Raised in Representations**

1. Dispersal of development throughout the district is supported because:

- it will support local services;
- it will create sustainable long term employment;
- claims that it will be unsustainable are unfounded because of use of the internet for accessing services and enabling home working;
- it will obviate the need for development on the edge of Stratford-upon-Avon;
- it will help to sustain the vitality and sustainability of the villages;
- it will have less impact on the capacity of local roads and services;
- it would reflect the historic growth of these villages over many years.

2. The admission that the local choice approach has been slow to deliver rural housing schemes is supported, so too the move to a more proactive delivery of housing in the villages. Sites should be identified in the LDF to support the delivery of the 950 rural dwellings.

3. There should be no threat of a "top-down" approach to housing provision in the villages. The local communities should still be allowed to determine the extent and type of housing to be built in the villages through a consultative process.

4. Growth in rural areas should be limited to very small groups of dwellings only where a need has been identified.

5. Dispersal should not be limited to existing built-up areas but allow scope for appropriate small-scale mixed tenure housing development in and around villages and the SHLAA should be extended to cover such areas.

6. Pillerton Priors should be a Local Service Village because it has a good local bus service, a garage, local shop and village hall and therefore meets the criteria.

7. Priors Marston should be deleted from the list of Local Service Villages because it does not meet the criteria. It does not have a general store and there is only a privately run primary school which



relies on charitable donations.

8. The identification of Welford-on-Avon and Long Marston as LSVs is supported. Some limited, small-scale development will contribute to their vitality and viability, help retain rural services and enable provision of affordable housing. The villages are moderately sustainable and are not covered by environmental designations.
9. Long Compton does not have good public transport and certainly not an hourly service. The village should not therefore be subject to significant development.
10. The LSVs within and adjacent to the Cotswolds AONB should be excluded from the LSV target, other than development to meet local need. This will help to protect their special character. They should also be subject to a restriction on new second homes.
11. The inclusion of Halford in the list of LSVs is supported.
12. The inclusion of Harbury in the list of LSVs is supported in that it will allow small-scale development to occur in the village, but development should not be allowed to compromise the character of the village and should not place undue pressure on local facilities including schools. Much of the need for housing in the village will be met through the current Local Choice housing scheme. The VDS and Parish Plans must still be taken into account when considering any future development.
13. The proposal to allow small mixed market/affordable housing schemes in Brailes is supported as it will help to sustain the school and other services.
14. There is insufficient clarity as to how and why the villages have been selected as LSVs. The methodology is crude and inadequate. It needs to be better related to sustainability and assess against:
  - a greater number of local services and facilities;
  - daytime, evening and weekend public transport;
  - links between villages and their role, e.g. are the focal points for a small hinterland;
  - proximity to larger settlements;
  - extent to which the permitted Long Marston development will meet their needs;
  - size of settlements - extent of development should be related to the size of the village.
15. Proven local need should be the basis for housing provision in the villages which means the 950 dwelling allowance should be reduced. The strategy would then clearly retain a justifiable emphasis on development at Stratford-upon-Avon, with a lesser proportion aimed at the Main Rural Centres to aid rural regeneration.
16. The CS is too vague about what it to happen in the small villages. Can they be proactive in any way?
17. Provision should be made for general market housing in the villages to assist the provision of housing and employment schemes for local needs and this may not just be small-scale in view of the scale of local needs in some places. Market housing from infilling and conversions should also be permitted.
18. There is a need for Parish Councils to be involved in the delivery of new housing programmes in the villages and in discussions to clarify the CS's stance on rural housing delivery.
19. Statement that village shops, pubs, schools and other facilities are the lifeblood of rural communities is supported and that planning policies will endeavour to support them and resist their loss to other uses.

## **Topic: 4.6 Spatial Strategy - Countryside**

### **Summary of Matters Raised in Representations**

1. The CS is too vague about future planning for those villages not listed as Local Service Villages. Does it mean no development or can such villages be proactive as regards some forms of development?
2. How active will SDC be in supporting tourism, e.g. providing grants, help those making planning applications? CS needs to provide more detail.
3. The section should acknowledge the economic role of the countryside, especially that provided by agriculture. It needs to describe and recognize this economic function to give more balance.
4. Support is expressed for CS's recognition of the distinctive landscape characteristic of the district. This underlines the need for development to be in sympathy with and to enhance those characteristics.

## **Topic: 4.7 Spatial Strategy - Large Rural Previously Developed Sites**

### **Summary of Matters Raised in Representations**

1. Support is expressed for the CS's positive stance on operations at Gaydon and the pragmatic approach of SDC in dealing with this site.
2. The planning permission for redevelopment of the Long Marston site should be acknowledged in this section.
3. The scope of this part of the CS is not comprehensive and should be amended to encompass all large rural previously developed sites.
4. The reference to the need for overriding benefits of large scale development on brownfield locations should be deleted. It is not supported by national policy.
5. The basic premise referred to in 4.7.3 is wrong. The proper approach is to compare, by way of a Sustainability Appraisal and other evidence, suitable sites for allocation in the CS.
6. The introduction of this section into the plan is welcomed. The RBS proposals take forward the site specific policies of the Local Plan Review.

## **Topic: 4.8 Spatial Strategy - Meeting the Needs of Redditch**

### **Summary of Matters Raised in Representations**

1. Objection is expressed to this section as it does not take into account the availability of many vacant commercial premises in Redditch and the fact that the industrial areas of the town are well separated from the housing areas. This would not be the case if the Winyates Green Triangle is redeveloped for employment.
2. Redditch is not the responsibility of Warwickshire and concern is expressed that it may be allowed to extend into this county. However, if boundaries are to be reviewed, Studley should be transferred to Redditch as they part of the same conurbation.

## **Topic: 4.9 Spatial Strategy - Green Belt**

### **Summary of Matters Raised in Representations**

1. Support recognition that land needs to be taken out of the Green Belt north of Alcester to meet employment needs of the town. Existing employment area is almost at capacity and extra employment land is needed to support housing growth.
2. The test applied to the removal of land from the Green Belt as referred to in 4.9.4 is wrong. It needs to be amended to "exceptional circumstances", although the circumstances described are correct as they apply to Alcester.
3. The section fails to address the likelihood of Local Service Villages in the Green Belt needing land allocations or community identified sites for local needs housing. PPG2 requires that such settlement will need to be inset from the Green Belt with appropriate boundaries being defined. The CS should refer to such changes being made through the Allocations DPD.
4. Reference should be included to an additional small area of land being removed from the Green Belt at the western end of ALC.1.
5. There should be no loss of Green Belt in the district and no support should be given to any proposal that might come forward from Redditch. This will be in line with the RSS Panel's recommendation which should be accepted.
6. The section should be amended to include the removal of 7.4 ha. of land south of Blacksoils Brook and north of the A4023 from the Green Belt close to the edge of Redditch to accommodate an employment site in conjunction with land within Bromsgrove District. This would be a better option than using the Winyates Green Triangle for employment because:
  - it would provide a defensible boundary for the Green Belt;
  - reduce pressure for additional development on Green Belt land in the future;
  - create a strategic employment area for Redditch;
  - allow the Winyates Green Triangle to be used for something acceptable to the local community;
  - could help to generate funding for the new access from the Coventry Highway.

## **Topic: 4.9/1 Green Belt - Removal of land north of Alcester**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: 4.9/2 Green Belt - Removal of land west of Henley-in-Arden**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: 4.10 Spatial Strategy - Cotswolds Area of Outstanding Natural Beauty**

### **Summary of Matters Raised in Representations**

1. The Cotswolds need to be included in the broader marketing plans for tourism development. This would benefit the economy of the district as a whole, more than one that relies too heavily on the

Shakespeare factor.

2. The CS should be clear that development within the AONB will be treated separately to other areas by placing particular attention to design, density and appropriateness.

3. There should be a policy restricting second homes in the AONB, justified by the AONB's national importance. It would help to stabilize the price of smaller cottages in attractive Cotswolds villages.

## **Topic: Key Diagram    Key Diagram**

### **Summary of Matters Raised in Representations**

No comments submitted.

## Topic: CS.1 Spatial Distribution of Development

### Summary of Matters Raised in Representations

1. Moderate dispersal approach to development is preferred. This will help to improve services in the Main Rural Centres in line with the increased development planned for them.
2. Stratford-upon-Avon should not be identified as the primary focus for development under a dispersal approach to development.
3. Scale of development proposed for Stratford-upon-Avon is inappropriate.
4. Development should be distributed around all towns and villages or a new, sustainable, new settlement should be built.
5. Part E should make it specific that Local Service Villages should be the location for local affordable housing only not market housing.
6. Brownfield sites, eg. Southam Cement Works and Harbury Cement Works should be used for development before greenfield land.
7. New development should take place on regeneration sites close to town centre.
8. Development should be permitted on sites on edge of Stratford-upon-Avon in addition to strategic sites identified.
9. Development of small sites on the edges of settlements should be acceptable in principle if no harm to character of locality.
10. Phrase 'small-scale' in relation to Local Service Villages should be deleted as larger sites may be appropriate.
11. There should be a reference to acceptable forms of development in all other parts of the District, ie. smaller villages and open countryside.
12. Allowing some growth within or adjacent to market towns and local centre villages is supported.
13. Stratford-upon-Avon does not have the infrastructure and services to support the proposed scale of development.
14. Stratford-upon-Avon is capable of accommodating strategic growth given its range of services, employment and accessibility.
15. Appropriate to identify small market towns and larger villages as the focus of most development in rural parts of the District.
16. The strategy needs to be clarified and strengthened to set out the order of priority to directing development having regard to hierarchy of settlements.
17. Part E should refer to sites 'within or adjacent to' Local Service Villages as sites on the edge of a settlement may be most appropriate to meet a local need.
18. Unclear why predicted inward migration is so high unless there is a big increase in jobs available.
19. References in parts C and D to 'primary focus' and 'secondary focus' are misleading and create an unnecessary distinction between the roles of settlements.
20. A clear definition should be provided in part E as to what would constitute 'small-scale' development.
21. Support the identification of the Main Rural Centres as the secondary focus for development.
22. Part B is supported as it is in accordance with Cotswolds AONB Management Plan.
23. Empty properties, including industrial sites, should be used for housing before other sites are developed.
24. Parts C, D and E deal with spatial distribution of development and should be placed first, whereas Parts A and B are restrictive and should be placed at the end of policy.
25. Should define what is meant by regeneration opportunities 'adjacent' to the Built-Up Area Boundary.
26. Part E should be extended so that those villages not classified as Local Centre Villages can benefit from development to ensure vitality of village.
27. Policy does not include provision for the rural economy.
28. Policy should acknowledge that existing businesses in the Green Belt may need to expand and restructure.
29. Amend part C to read 'Provide for development in Stratford-upon-Avon as the main town in the District.'
30. Insert in policy above Stratford-upon-Avon part: *'Provide a small but sustainable new settlement in a sustainable location (with a brownfield basis where possible) in the District, with appropriate provision of public transport accessibility, on-site local employment opportunities and a*

*sustainable new settlement local centre.'*

31. Scale of development proposed for Stratford-upon-Avon will fundamentally alter its character and harm its attractiveness.
32. Support protection of Green Belt from inappropriate development.
33. Use of 'primary' and 'secondary' terminology should be replaced with 'majority' and 'further' as it implies a degree of phasing of development which is not intended.
34. Stratford-upon-Avon does not require any additional housing.
35. Further large-scale housing development on the edge of Stratford-upon-Avon would damage the local economy.
36. New residents will have to travel elsewhere to work.
37. Scale of development proposed is in direct opposition to World Class Stratford project.
38. Strategy should pay more attention to rural communities as at the moment they are stagnating due to restrictive planning policy.
39. Scale of development in Stratford-upon-Avon will mean that tourists will go elsewhere.
40. Concerned about what the phrase 'overriding justification' means in part B of policy.
41. Would completely change the nature of the landscape for everyone in the area.
42. Stratford-upon-Avon has already had to shoulder more than its fair share of new housing compared to the rest of the District.
43. Should build the minimum number of homes to meet local need.
44. There has been enough expansion of the District's towns and villages.
45. A small amount of market housing should be allowed on previously developed land in all settlements.
46. Policy should include an option permitting a comprehensive mixed use development at the Harbury Estate.
47. Development in villages should not compromise the essential character of the village.
48. Development in Bidford, Alcester and Stratford-upon-Avon should be located to minimise the level of commuting, particularly on A46(T).
49. Should consider making the Main Rural Centres the primary focus for development considering the majority of population does not live within Stratford-upon-Avon.

## **Topic: CS.2 Spatial Policy Areas - General**

### **Summary of Matters Raised in Representations**

1. There has been restricted growth in areas of the District other than Stratford-upon-Avon and these should be considered for growth before adding more to the town.
2. Consider whether Major Existing Developed Sites in the Green Belt could be allocated for housing development in addition to employment uses.
3. There are hundreds of empty houses in the area for sale; new house will be over-priced and will not be affordable.
4. Need to assess the number of jobs in the Stratford area now and in the future; future housing should be built near to jobs in order to reduce commuting.
5. Brownfield sites only should be used and compulsory purchase and use empty properties.
6. Support primary focus for development at Stratford-upon-Avon as the main town in the District.
7. Choice of settlements as Local Service Villages lacks clarity and needs a clearer supporting evidence base.
8. Support designation of Alcester as a primary Main Rural Centre.
9. Support the identification and designation of the respective settlements in the policy.
10. A clearer distinction is requested with regard to the scale of new development proposed in each of the settlement categories.
11. Support policy as it is in accordance with the Cotswolds AONB Management Plan.
12. Policy replicates large elements of CS.1 and they should be amalgamated into one overarching development strategy policy.
13. Supportive of the provision of small-scale development in Local Service Villages.
14. Support the inclusion of criteria under which development in the countryside may be acceptable.
15. Concerned about restriction on new housing development in rural areas being confined to affordable housing provision.

16. The development of appropriate greenfield sites adjacent to settlements which would not harm the character of the locality should be acceptable in principle; a criteria-based policy should be included to control such development.
17. Support the aim of ensuring that local communities can continue to meet their own local housing and employment needs.
18. Provision should be made for a small new settlement to be promoted in a sustainable location.
19. Support the identification of Southam as a primary Main Rural Centre.
20. Use of various terms to describe settlements is confusing and inconsistent; use the term Market Towns' as a tier of settlement for Alcester, Shipston and Southam.
21. Support the specific recognition of Henley-in-Arden as being capable of supporting new development.
22. It is a disgrace that Stratford-upon-Avon does not have a bus station or a tourist office.
23. Terminology used for the settlement hierarchy is confusing and misleading; it should refer to 'Primary Rural Centre', 'Secondary Rural Centres' and 'Local Service Villages'.
24. Support identification of Bidford as being suitable for a modest amount of development.

## **Topic: CS.2/A Spatial Policy Areas - Green Belt**

### **Summary of Matters Raised in Representations**

1. Concerned that policy allows for development within or adjacent to villages in the Green Belt but there is no explanation as to how changes to Green Belt boundaries to accommodate such development will be made; PPG2 sets out possible ways of doing this.
2. Policy should specify that infilling and conversions will be permitted within envelopes defined for Green Belt villages.
3. The needs of agricultural and rural businesses must be considered and Green belt policy must be flexible enough to allow these businesses to develop.
4. Former Maudslay Works is a complete eyesore and a residential development on the site would appear to be the least bad option.
5. The Mill Industrial Estate is disgusting and should be cleared entirely and its occupants decanted to industrial estate at Alcester.
6. Object to paragraph 3 under Part A of the policy and associated criteria (ii) to (iv) under Part H as it is far more onerous than that set out in Local Plan Policy PR.2; as currently worded it is inflexible and unnecessarily restricts other uses by setting criteria that are over and above the requirements of PPG2, Annex C. This part of the policy should be amended.

## **Topic: CS.2/B Spatial Policy Areas - Cotswolds AONB**

### **Summary of Matters Raised in Representations**

1. It is important that the LDF gives full support to the achievement of the Cotswolds AONB Management Plan; reference to vernacular architecture and recreational assets should be referred to.
2. Insert reference to traffic congestion in second paragraph of Part B.
3. Some development is needed within the AONB in order to protect the future viability of farms and rural businesses that are responsible for managing the local landscape.
4. Distinct policy approach for the AONB with its particular attention to the nature and impact of development is welcomed.

## **Topic: CS.2/C Spatial Policy Areas - Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Stratford town does not have the infrastructure to support the proposed number of new dwellings.
2. Further development on the scale proposed would damage the town's historic character, reduce the appeal of the town to visitors and adversely affect tourism.
3. Town is already overdeveloped and there is little need for further housing.
4. Part C should be strengthened by referring to the vision of the Core Strategy which states that the town should be the focus of growth over the plan period.
5. Stratford has already had a large amount of growth in the last few years and this needs to be properly catered for before adding yet more homes to the town.
6. Support the promotion of Stratford-upon-Avon as the District's main shopping, service, cultural and civic centre; and also the provision of development within and adjacent to the urban area.
7. Support the approach to identifying Stratford-upon-Avon as the main town in the District, suitable for the highest level of development within and adjacent to the town.
8. Instead of focusing on housing more effort should be made on regenerating commerce in the town and help shops remain open.
9. With all the extra residents in the town, the job market will be even worse than it is now.
10. Too great an increase of houses would worsen traffic congestion and make Stratford even more difficult to move around.
11. Provision should be made for the development of appropriate greenfield sites adjacent to the edge of the town which would not harm the character of the locality.
12. Para 2 should be deleted and replaced with *'Development proposals in Stratford-upon-Avon will be focused on brownfield redevelopment opportunities, with small-scale greenfield development to meet local needs if appropriate.'*

## **Topic: CS.2/D Spatial Policy Areas - Main Rural Centres**

### **Summary of Matters Raised in Representations**

1. Growth of market towns makes sense since they already possess a certain level of infrastructure to support development and it will also alleviate reliance on Stratford-upon-Avon.
2. Agree that secondary rural centres are suitable for a modest amount of development but less than in the primary rural centre.
3. Support the recognition of the eight identified settlements but not the splitting of the tier into primary and secondary settlements as there appears to be little difference in their treatment and it unnecessarily confuses and complicates the plan.
4. There is no robust basis for sub-dividing the Main Rural Centre settlements as proposed.
5. Object to categorisation of Bidford-on-Avon as a secondary centre; there is no justification for this.
6. Support the identification of Bidford-on-Avon as a Main Rural Centre given its range of services, facilities, population size and employment base.
7. There is no definition as to what constitutes 'moderate' and 'modest' levels of development.
8. The approach taken presents an over simplification of the role MRCs perform in the District and how they inter-relate to outlying settlements as well as to each other.
9. Classification of Shipston-on-Stour as a primary Main Rural Centre is supported given it has a wide range of services and facilities and is well served by public transport.
10. Support identification of Wellesbourne as a Main Rural Centre but method for categorising it as a secondary centre is unclear and doesn't recognise the contribution that employment brings to the settlement.
11. Provision should be made for the development of appropriate greenfield sites adjacent to the edge of Main Rural Centres which would not harm the character of the locality.
12. Support the secondary focus of housing development on Main Rural Centres and the identification of Southam as a primary MRC.
13. Alcester, Shipston and Southam should be referred to as Market Towns.



## Topic: CS.2/E Spatial Policy Areas - Areas of Restraint

### Summary of Matters Raised in Representations

1. Designation of Areas of Restraint is contrary to national planning policy in PPS7; local landscape designations should only be used where a criteria-based policy would not provide sufficient protection.
2. Area of Restraint designation is not appropriate or necessary; whilst some areas make a valuable contribution to the character and setting of settlements, others could be developed without harm.
3. There is no credible evidence base to justify the need for Areas of Restraint or their boundaries; each will need specific justification.

## Topic: CS.2/F Spatial Policy Areas - Local Service Villages

### Summary of Matters Raised in Representations

1. Consideration should be given to appropriate development in and around villages and the SHLAA should be expanded to include those areas of land where necessary and appropriate.
2. Reliance on a community-led approach will stifle development and should not take precedence over the presumption in favour of development.
3. Small-scale mixed schemes in and around LSVs will be attractive places to live and provide low cost housing for local people.
4. Part F should include the wording *'Any assessment of the sufficiency of provision shall take into account whether a Local Service Village is within a Housing Market Area of a housing scheme outside the village.'*
5. Modest and sensitive development in LSVs is essential to promote and maintain a rural community's identity and secure current service provision.
6. A mix of housing provision is required to provide housing opportunities that will keep families together and rejuvenate rural communities.
7. Modest developments in LSVs will create employment for local trades people and suppliers spreading the demand on services across the district.
8. Stockton Parish Council does not want to see any medium-sized housing developments but wants the flexibility to allow slow, organic growth for people with local connections.
9. Welford Parish Council accepts that a need for affordable homes exists it wishes to see this need met by small developments.
10. Any land allocated for affordable housing should take account of any specific requirements of the local community identified in its Parish Plan.
11. Preparation of a DPD to allocate land for affordable homes is not supported as it could be in opposition to the express wishes of the local community.
12. Part F should be strengthened with the addition of the phrase 'local affordable housing needs and employment needs'.
13. An additional criterion should be inserted stating that *'The scale and location of housing is supported by a robust survey and appraisal of local affordable housing needs in the area.'*
14. Any development in LSVs within the Cotswolds AONB should respect the openness and character of the settlement.
15. Support the aim of ensuring that local communities can continue to meet their own needs
16. The methodology for identifying LSVs is crude and inadequate; a more detailed methodology with a greater emphasis on sustainability should be established.
17. Level of development appropriate to each LSV should be based on its sustainability credentials, size and own local need.
18. Provision should be made for general market housing to assist in the provision of housing and employment schemes and to meet identified local needs.
19. Infilling and conversions should be permitted in LSVs.
20. Policy is unlikely to provide sufficient housing in the rural areas to meet local needs and agree that allocations in some settlements will be necessary through a separate DPD.
21. The methodology for identifying LSVs lacks clarity as to how and why these particular settlements

have been chosen.

22. Reference to small-scale should be removed; the size of schemes should not be defined at this stage as it should be responsive to need and demand.
23. Housing development in LSVs should primarily be to meet local identified need but accept that there may need to be some market development to enable the affordable housing to be built.
24. The amount of housing identified for LSVs is nothing like enough to support local services.
25. Clarification is needed as to whether small scale schemes in Local Centre Villages are already committed or are windfall sites, and what is meant by allocating sites if there is insufficient provision.
26. Claverdon Parish Council is suitable for a small amount of housing development given the range of facilities it has.
27. Long Compton Parish Council does not believe the District Council should micro-manage through the identification of development sites; any such consideration must be made in consultation with the Parish Council and local community.
28. Approach taken may preclude development meeting local needs identified by other methods than a parish plan; policy should refer to 'alternative sources of reliable evidence.'
29. Harbury Parish Council broadly welcomes the approach but emphasises that any development should not compromise the essential character of the village or put undue pressure on local facilities.
30. Ilmington Parish Council has identified no need for large or small expensive houses and the present infrastructure in the village would not support such development.
31. Part E should be altered to refer to sites 'within or adjacent to' as many such villages may require development but have no appropriate sites within their confines.
32. There is no explanation of what 'small scale' might be and the phrase should be deleted as some larger scale schemes may be appropriate.

## **Topic: CS.2/G Spatial Policy Areas - The Countryside**

1. Criteria (i) and (iv) appear to place excessively strict hurdles for small scale development and it is unclear how they will be assessed.
2. Scope should be provided for single (self build) housing development outside the Local Service Villages with each proposal being considered on a case by case basis.
3. Policy should be amended to ensure that genuine needs, including market housing, can be met.
4. It would be appropriate to make a particular reference to supporting the farming industry wherever the planning system is able.
5. Policy is unduly restrictive and will damage the rural economy.
6. Approach taken may preclude development meeting local needs identified by other methods than a parish plan; policy should refer to 'alternative sources of reliable evidence.'
7. Market housing should be encouraged for all settlements if it involved previously developed land, development is limited to one or two units, and attracts a financial benefit to provide affordable housing or another community need.
8. Preston on Stour Parish Council favours growth limited to very small groups of new homes in rural areas only where a need has been identified.

## **Topic: CS.2/H Spatial Policy Areas - Large Rural Previously Developed Sites**

### **Summary of Matters Raised in Representations**

1. Part H should be deleted completely as there is no strategic justification for this generic policy from either national or regional planning policy and guidance; it is inconsistent with the plan's spatial distribution and proposes a far less sustainable development strategy than focusing housing growth on the established settlement hierarchy.
2. Approach is supported by Jaguar Land Rover Ltd.

3. The future economic benefits of the potential re-use of these sites and the assets they contain should be taken into account.
4. Aston Martin Lagonda supports the development and re-use of these sites, in particular the Gaydon site.
5. Not all the land identified on the maps associated with Part H can be classified as previously developed land; the introduction to Part H should instead read *'The re-use of extensive areas of previously-developed land in the countryside, outside the Green Belt, and adjacent land closely associated with the previous use, is acceptable where the proposed scheme...'*
6. Criterion (ii) is counterproductive because such sites are often in rural and less sustainable locations and would not be in accordance with the strategy but development options could offer improvements compared to the existing/permitted uses
7. Criterion (iii) is inappropriate because the planning process doesn't support a compensatory approach and is contrary to Circular 05/05: Planning Obligations
8. Criterion (iv) is a given because other planning policies would prevent harm to protected features.
9. Criterion (v) is an unfair and unrealistic test because proposals to redevelop such sites are not going to be able to minimise the need to travel due to their rural location.
10. Policy fails to be flexible in its treatment of these unique sites and does not properly and proactively consider how they can best be used and contribute to the wider spatial strategy.

## **Topic: CS.2/I Spatial Policy Areas - Land adjacent to Redditch**

### **Summary of Matters Raised in Representations**

1. Object to provision (ii) since the Core Strategy for Redditch and Bromsgrove has identified the area of land between the existing fringe of Redditch and the District boundary for development; it seems illogical that development is curtailed by an indefinite line on a plan without taking into account the reality of definable boundaries on the ground.
2. Redditch Borough Council requests that the strip of land between the District boundary and the A435 is made available for development in the Core Strategy plan period.
3. Intention to keep a space between Studley and Redditch is supported in order to protect the countryside.
4. Winyates Green Triangle site will effectively provide a cross boundary strategic employment site for Redditch Borough and provide an opportunity for wider economic benefits for Stratford District.

## Topic: 4.11a Scale, phasing and delivery of development - housing

### Summary of Matters Raised in Representations

#### Objections

1. The RSS Panel figures should not be used. They have no status and provide a only a very shaky basis for the Core Strategy. They are likely to be dropped by the next Government. The District Council should not meekly accept Government figures that are not supported by the evidence and which are derived from out-of-date data. The Government will take this as a sign of weakness and allocate even more development to the district.
2. Housing figures should be set at the local level by Town and Parish Councils and should not be imposed by a district-level plan.
3. Preferred Option figures (5,600 dwellings) should be followed.
4. Growth should not exceed 5,000 dwellings to reflect the many constraints on development in the district, particularly the lack of infrastructure.
5. Growth should only meet locally based needs. There should be no provision for in-migration, especially that sourced from outside the UK. The district already has high numbers of people who have moved in from abroad in the last few years.
6. Higher housing growth will merely encourage greater vacancy rates on top of the high number of vacant properties in the district. The existing vacant dwellings should be fully taken into account when assessing the need for additional housing.
7. Higher housing growth will encourage long distance commuting in view of the lack of local employment.
8. The District Council should not be obliged to plan for a continuation of previous high housing growth rates. The latter have brought more dis-benefits than benefits to the district.
9. Demographic change should be better managed to reduce the need for new housing, e.g. reduce the trend towards single parentage and reduce net international immigration.
10. Higher housing growth should be resisted because more people will mean more crime in the district, just when policing is being reduced.
11. Housing provision should be backloaded, not frontloaded. This would allow infrastructure and target issues to be properly resolved and give time for social integration. It will also allow for the housing market to recover and for the shift to local determination of housing provision to be completed. Lower housing growth would also match the current phase of disinvestment in public facilities forced by the need to cut public spending.
12. The District Council should be clear about how to deliver the whole of the 7,500 dwellings in the plan period and should not rely on windfalls or unknown sites in Local Centre Villages that may never happen. Specific sites should be allocated to meet the whole of the requirement. There is no reason why sites cannot be specifically identified.
13. The District Council should say clearly where the additional 2,500 to 3,000 dwellings post 2021 should go, at least in terms of broad locations in accordance with PPS3. This should be set out in a provisional timetable and strategy which would give a flexible response to these likely requirements.
14. The over-provision of housing against Panel figures should not happen. The reasons for this are not adequately explained.

15. There is no evidence to justify the use of the two arbitrary phases 2011 to 2016 and 2016 to 2021. These phases should be deleted. They are not required in terms of infrastructure planning and not required by the RSS. Use of this phasing could slow down housing delivery when it should be more rapid. It does not provide the certainty needed to assist investment decisions and does not meet the needs of PPS12. It implies that some allocations may be deleted in a subsequent review.
16. Housing development should only happen after constraints on highway capacity have been removed, particularly at Stratford-upon-Avon.
17. Over-development in urban areas means that the air ambulance will be unable to find landing spots at times of emergency.

### **Supports**

18. The over-allocation of employment sites will give wider choice for forms wanting to expand or to re-locate to the district. 95 hectares is close to the area of land that has been taken up for employment over the last 13 years.
19. The over-allocation of housing provision is supported as it allows flexibility of land supply with scope to make up for the non-implementation of some identified sites.
20. The front loading of housing growth is supported in the context of Stratford-on-Avon District. The Panel's assumptions for the region as a whole are not appropriate in the local context where the housing market is still strong.
21. The omission of windfalls in the first ten years is supported as being in line with PPS3.
22. The use of Panel figures mirrors the high need and demand for housing in the district.
23. Development should be mainly in the form of affordable two and three bedroomed family housing to assist stability in household structure within the local population.
24. More house building, if well designed, will provide more scope for the provision of more infrastructure and more affordable housing.

## **Topic: 4.11b Scale, phasing and delivery of development - employment & retail**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: Table 2 Housing Requirement for Stratford-on-Avon District 2006-2026**

### **Summary of Matters Raised in Representations**

1. Support is expressed for the use of the 7,500 dwelling target.
2. The number of dwellings subject to permission is challenged in that no evidence has been tabled to show that these sites are appropriate and properly assessed as meeting the tests of PPS3: suitable, available and achievable. Some of the sites may not be viable in current economic circumstances. There is a need for evidence to show that they are developable. If no such evidence, then a non-implementation discount of at least 15% needs to be applied, as it was for the Local Plan Review.
3. The omission of a windfall allowance for the first ten years is supported as being in line with PPS3.
4. The omission of a windfall allowance for the first ten years is criticised. Such an allowance can be justified because without such an allowance greenfield allocations are having to be made where land release is not considered appropriate. Also, there has been no sustainability appraisal of strategic sites to demonstrate that these are developable and that no alternative sites are developable. The use of such a windfall allowance would mean that there would be no justification for the 300 dwelling over-allocation against the 4,797 dwelling shortfall.
5. The windfall rate suggested for the last five years of the plan period is considered excessive. The SHLAA has already tried to identify large brownfield sites and there is no evidence to prove that this is a realistic allowance. Opportunities for urban brownfield windfalls are likely to decrease, particularly when planning policy is promoting the re-use of such sites for non-residential uses. 50 dwellings per year would be a more realistic allowance. One objector stated that the allowance ought to be dropped altogether.
6. Table 2 needs to be updated to allow for the grant of outline planning permission at Long Marston.
7. The table needs to give a more complete picture of housing land supply. However, according to another objector, the publication of the Housing Trajectory for the Revised Core Strategy does show clearly where the Table 2 figures are derived. The Trajectory needs to be referred to in the Core Strategy, especially as giving details of the SHLAA sites.
8. There is concern that there is double counting in line 5 with allocated sites. The line should either be deleted or added to the allocations figure.
9. An amendment to the allocation figure is suggested to add the capacity of an objector's omission site at Bidford-on-Avon in the form of an extra 75 dwellings.

## **Topic: Table 3 Employment Land Supply Assessment for Stratford-on-Avon District**

### **Summary of Matters Raised in Representations**

1. Table needs to be updated to reflect the planning permission for Long Marston Depot.

## **Topic: Figure 1 Housing Trajectory and Managed Delivery Target for 2006 to 2026**

### **Summary of Matters Raised in Representations**

1. The graph should not include an allowance for dwellings to be built west of Shottery and should not be based on the 7,500 housing target in the RSS Phase Two Revision Panel Report. Objection to the Shottery proposal is explained under Proposal SUA.7. The use of the 7,500 dwelling target is considered premature pending the Secretary of State Proposed Modifications and the adoption of the RSS.

## **Topic: CS.3 Managing the Delivery of Strategic Development**

### **Summary of Matters Raised in Representations**

#### **Housing Requirement**

1. There is a lack of clarity as to what level of housing provision is being planned for in this document and as to what will be considered as part of a review of the Core Strategy. This issue needs to be cleared up.
2. The RSS Panel figures should not be used. They have no status.
3. Preferred Option figures (5,600 dwellings) should be followed, as recommended by GOWM, although even these are based on excessive assessment of local needs.
4. Use of the RSS Panel figure of 7,500 dwellings is supported to provide flexibility and is in general conformity with the RSS.. They are underpinned by comprehensive research. The intention to accommodate an extra 2,500 to 3,000 dwellings in the 2021-2026 period via a Review is also supported. However, this should not entail a review of housing proposals for the period up to 2021. The threat of such a review will create uncertainty and make investment decisions more difficult, whether in the public or private sectors.
5. The requirement should not be increased above the 5,600 figure used in the Draft Core Strategy in view of the severe infrastructure and environmental constraints in the district.
6. The requirement for new dwellings should be reduced to take account of the potential re-use of 600 vacant dwellings.
7. Housing targets should be set by local communities, not by the District Council in a Core Strategy.
8. Over-provision against the RSS requirement would be acceptable because some sites may not come forward for development because of circumstances not known at this stage.
9. The very marginal degree of over-provision against the RSS requirement needs to be increased to ensure that the requirement will be met, allowing for the non-implementation of some sites.
10. In line with PPS12 the Core Strategy should properly plan for the whole of the RSS requirement and not rely on a future review to determine growth. Specific sites can be supplemented by general locations for development if necessary.
11. Policy should not seek to restrain growth in excess of targets as this would prevent much needed affordable housing coming forward but also development that would bring a range of environmental, social and economic benefits. It would also fail to conform with the RSS which does not support a moratorium style approach.
12. Housing growth should only relate to local demand in the form of existing residents and those who work in the district.

13. No decisions on housing growth should be made ahead of the outcome of the General Election.
14. Planning for higher housing growth levels would be contrary to public opinion.
15. Immigration levels should be reduced to lessen the demand for additional housing.
16. Larger settlements needs affordable housing to support lower paid workers who are already employed in the economy.

#### **Level of Housing Growth in Each Settlement Category**

17. Allocation of dwellings between the main centres is supported.
18. Allocation of land in any settlement should only be undertaken in consultation with PC and local residents.
19. Growth at Stratford-upon-Avon should be reduced because:
  - the planned growth is out of scale with the size of the town;
  - severe infrastructure constraints especially in road network with little prospect of these being resolved when public spending is being reduced;
  - lack of employment growth which would mean an increase in expensive commuting and an increase in number of retired people moving into the town, with a range of negative economic and social consequences that need to be fully assessed;
  - negative impact on the market town character of the place and its role as a centre for tourism. This would be contrary to the CS's Vision for Stratford-on-Avon District which refers to maintaining and enhancing the District's outstanding heritage and character. Growth would clash with intentions of the World Class Stratford initiative;
  - recent poor quality development has already had a bad effect on the character and setting of the town;
  - potential massive loss of greenfield land, the destruction of wildlife habitat and the increased flood risk which would arise;
  - notions regarding non-car access to services and facilities in the town are wholly unrealistic; pedestrian, cycle and public transport links in the town are actually very poor. More development in the town will merely encourage greater car use.
20. A greater proportion of the growth should to Stratford-upon-Avon because:
  - it is a more sustainable location than the Local Service Villages, the allocation for which should be re-directed to Stratford-upon-Avon;
  - there are a number of available, suitable and deliverable urban extensions that can be used to accommodate this growth, a fact recognised by the RSS EIP Panel;
  - it should include smaller sites that could be developed quickly to boost building activity.
21. A greater proportion than 30% (at least 35%) should be assigned to the Main Rural Centres as there is the capacity for this level of growth in these places.
22. The planned growth at Alcester has not been justified by evidence, and Alcester does not have the infrastructure to support this growth.
23. Allocation of 250 dwellings for Bidford-on-Avon is inconsistent with Policy C.2 which describes the village as a secondary rural centre. It would mean much higher housing growth than any of the other secondary rural centres. It would also mean the unwarranted loss of high grade farmland. The facilities in the village are declining, e.g. fewer shops, no secondary school and



declining employment. More housing would mean more long distance commuting and more local congestion. Public transport is limited, especially links to large hospitals. Infrastructure is at or over capacity. Local people do not want this level of growth. The housing figure should be reduced and limited to affordable housing. The village should only have modest development.

24. The housing figure for Henley-in-Arden is too low in that it does not reflect the true capacity of the Cattle Market site (HEN.1) which is approximately 48 dwellings.
25. The planned growth at Shipston-on-Stour is wildly excessive, especially when considered in the context of the huge growth of the town, 95% since 1981, which has placed services under much strain, and taking account of housing already in the planning pipeline (80 dwellings). Recent development has already seriously eroded the character of the town and its setting. Further housing will mean more long distance commuting because employment growth in the town will not happen.
26. The planned growth at Southam is insufficient relative to the range of facilities in the town, its high degree of self-containment and its good public transport links.
27. The planned growth at Studley is inadequate and would not cater for the village's medium and long term housing needs. There is no evidence to support the low level growth proposed for Studley in the CS.
28. The proposal for 20% of housing provision to be met in Local Service Villages is supported.
29. The use of the 20% figure in Part B is misleading in that 950 dwellings is only 20% of the shortfall, not the whole housing provision. This needs to be clarified.
30. There is no evidence to support the figure of 950 dwellings in the Local Service Villages. It clearly falls under the actual requirements noted in the SHMA.
31. The percentage of housing growth assigned to the rural settlements should be increased to help support local services and to lessen the pressure on services in the larger centres which are under a lot of pressure arising from recent high levels of growth.
32. There should be a needs-based approach to the provision of housing in the villages, not one based on targets imposed from above.
33. The District Council should adopt a more pro-active approach to bring sites forward in villages, with early commencement of work on a DPD to identify sites.
34. There should be specific reference to facilitating appropriate development in those villages that do not benefit from being identified as Local Service Villages.
35. The loading of rural settlements with additional housing is unreasonable and unsustainable in view of their lack of services, facilities and public transport. New housing should be confined to small groups meeting identified local needs.
36. There is no justification for additional housing in Fenny Compton implied in the document and it would be contrary to the Parish Plan. A housing scheme is underway to address existing needs for affordable housing.
37. Building more than 20 dwellings in Ilmington would compromise the principles of the Ilmington Village Design Statement. There is no need for expensive new build market housing in the village.
38. At Salford Priors the basic infrastructure is in very poor condition and the village could not accommodate development beyond the six affordable homes identified in the recent housing

need survey. Flooding is also a significant constraint around the village.

39. The provision of housing in Local Service Villages is too uncertain and the allowance should be reduced from 20% to 14%-15% with the dwellings assigned to other categories. This should include an additional 75 units for Bidford-on-Avon and additional dwellings at Shipston-on-Stour
40. There should be no allowance at all for housing in the Local Service Villages because this would amount to a windfall allowance which would be contrary to PPS3, and there is no evidence to support this figure.
41. Support for part B of the policy which allows for small-scale housing schemes in the Local Service Villages to meet the needs of communities.
42. Part B should allow for the allocation of 100% affordable dwelling sites in rural villages where there is a demonstrable need, as provided for in PPS3, in addition to "exception sites".
43. Part B needs clarifying as regards the status of the sites being referred to. Are the sites already committed or are they windfalls or something else?
44. Part B will mean that some places will see no affordable housing schemes because there is no evidence of need.
45. Part B should allow for housing adjacent to as well as within rural settlements.
46. In Part B the threat of using a DPD to identify sites is alien to the concept of local democracy.
47. The identification of housing need in villages should not be confined to parish planning because there are other ways to derive this information and the policy should allow for this.
48. Housing provision should be bid for by Parish Councils in the villages in order to achieve the 7,500 dwelling target.
49. There should be an allowance for development in the smaller villages, e.g. 5%.
50. The allowance for rural brownfield growth is supported as it reflects the dwellings permitted on the Long Marston site.
51. The table in CS.13 needs to be updated to recognise the planning permission at Long Marston.
52. The phasing at Long Marston should not be constrained by Policy CS.3 but should be allowed to be developed quickly in accordance with the developers' intentions.
53. The development at Long Marston should be delayed until later in the plan period to allow essential infrastructure to be developed .
54. The eco-town at Long Marston should be supported as a better alternative to development at Stratford-upon-Avon.
55. Heavy reliance on the Long Marston site to provide short-term housing growth is questioned as its non-implementation for whatever reason would mean other sites needing to be found elsewhere to supplement the land supply, probably in the Main Rural Centres.
56. An alternative distribution should be adopted based on locating most development in the M40 corridor in the form of a new settlement or re-using brownfield sites close to existing infrastructure. Development here would be practicable, less costly, easier to service with new infrastructure and more attractive to new employment.

### **Phasing of Housing**

57. The arbitrary and unnecessary Phases One and Two should be combined to give more flexibility and to recognise the impracticality of managing the release of sites in a fine grained way, taking into account the long lead times for larger sites. It will also help to accelerate development as sought by the RSS Panel.
58. For the management of five year land supply, a housing trajectory should indicated housing development will be brought forward, rather than the phasing shown in CS.3.
59. Phasing flexibility is required because in reality it will be difficult or impossible to manage the delivery of sites to match the phasing stated in the policy, especially where sites are supposed to span two phases. In these cases phasing would be better dealt with through the master plan.
60. Growth should be backloaded, not front loaded because of current recession and uncertainty regarding level of growth required in the district. In any case, windfall sites will help to boost housing provision in the first phase.
61. Growth should be frontloaded to provide a much need boost to building activity, even more so than indicated by Policy CS.3. Additional greenfield sites should be added to Phase 1 to boost delivery as we emerge from recession.
62. The release of the Shottery land for development should be delayed to no earlier than 2016 as in previous draft CS.
63. The fifth paragraph of the policy should be amended to refer to annual monitoring and also an ability for Phase Two sites to come forward early in order to deliver a total number of dwellings larger then the proposed shortfall.
64. Phasing is supported but it is unclear what mechanism is to be used to bring sites forward or to hold them back.
65. Development should be phased to post-date the provision and improvement of key elements of infrastructure including additional school capacity, road capacity including a ring road for Stratford-upon-Avon, a bus station and new hospital at Stratford-upon-Avon.
66. Reliance on windfalls in Phase 3 cannot be justified and does not provide security of supply. Windfalls will fail to deliver affordable housing in many cases.

### **Employment Floorspace**

67. Job growth should be sought in substantive settlements to provide employment close to where people live.
68. The planned job growth is in general conformity with the RSS.

### **Retail Floorspace**

69. The planning retail floorspace growth is in general conformity with the RSS.
70. Proposed provision in Stratford-upon-Avon for comparison retail floorspace would be excessive taking into account vacant floorspace, internet shopping, high car parking charges and expansion of the Maybird Centre.
71. Stratford-upon-Avon does not need further retail provision because of all the vacant shops in the town centre. Any more provision will mean even more empty shops.

72. Alternative solutions to retail decline in town centres are needed, particularly those that make conditions more favourable to smaller retailers rather than proposing big floorspace increases that favour the national chains.
73. The policy should make reference to 2,500 sq. metres of convenience floorspace at Shipston-on-Stour

## **Topic: 4.12 Provision of Infrastructure**

### **Summary of Matters Raised in Representations**

1. Paragraph should include reference to tests for planning obligations set out in Circular 05/05. New development should not be expected to remedy existing deficiencies or provide payments for provisions not related to the development. As currently worded the para suggests that developers may be required to contribute towards strategic infrastructure requirements not necessarily related to the development.
2. Ref in 4.12.10 that green infrastructure 'connects our towns and villages' is misleading. GI provides connectivity through the wider landscape to support populations of notable species and their associated habitats, and to encourage adaptation to climate change.
3. Para 4.12.13 should be related to LAA NI197 biodiversity target.
4. Reference should be made to the sub-regional GI SPD to provide guidance on achieving net gain of biodiversity and green infrastructure, both on and off site.
5. Must recognise out of District healthcare infrastructure such as the Horton General in Banbury and Coventry Hospital. Healthcare provision is not contained within the local authority area.
6. No mention is made of allotment provision or opportunities to grow your own food; a small amendment to para 4.1.12 could deal with this.

## **Topic: CS.4 Managing the Delivery of Infrastructure**

### **Summary of Matters Raised in Representations**

1. Wastewater infrastructure must be provided in advance of the occupation of new development, to prevent adverse impacts on land and watercourse pollution.
2. Reference in policy CS.4 to release of land being dependent on sufficient infrastructure capacity should be deleted, as para 1.2.8 claims that there are no fundamental infrastructure constraints to delivering the scale of development proposed. 2nd para of policy CS.4 provides sufficient control to ensure that improvements will be in place to mitigate against the impact of new development.
3. Further evidence is required to support the claim that no additional secondary school places can be provided post 2016. Release of strategic sites should not be deferred on this basis, and further research into secondary school capacity should be undertaken now.
4. A more equitable and consistent approach to contributions towards secondary schooling from new development must be adopted. It is not appropriate for some new development to merely be required to provide a financial contribution towards education in order to proceed, whilst the development of other sites in the same area is dependent on the existence of spare capacity.
5. In order to support economic development in rural areas, it is essential that high speed broadband coverage, improved rural transport and access to skills are provided.
6. Must make sure that the full range of infrastructure requirements are addressed at a strategic level to ensure their effective delivery. This includes green infrastructure and low carbon energy infrastructure.
7. Further new development must not be allowed until existing infrastructure deficits are addressed and sufficient additional capacity provided. In Stratford upon Avon town, local transport infrastructure, medical facilities and schools are already under significant pressure or at capacity.
8. Warwick hospital and the District Nursing Service are at capacity (there are no plans to expand the latter).
9. The district already has the highest population per police officer in the county; this will be

exacerbated by further development.

10. Local children should be able to go to a school within their local community, rather than being placed in schools that are further afield (even if they are in the same town)

11. Criteria A should be reworded to read '*The scale and nature of service provision should reflect and relate to the size, function and needs of the individual settlement **and also to the scale and impact of the development proposed in accordance with the hierarchy set out in policy CS.1***'

12. Para 4.2.4 suggests that a new secondary school can be deferred until after 2016, and that in the meantime planning permissions will continue contingent on S106 contributions towards existing schools, leading to a perception that the planning system is developer friendly

13. Allowance must be made for development as 'enabling' improvements to local services and facilities, in which case development will come before the provision of new infrastructure - particularly in smaller rural communities

14. Stratford upon Avon town needs a hospital and a bus station.

15. Core Strategy must clearly identify key infrastructure required to deliver strategic development sites, including how and when they will be delivered and the key partners involved. This is particularly important for sites expected to be developed in the short term.

16. The development plan needs to pay more attention to the infrastructure requirements and issues in Stratford upon Avon town.

17. S106 contributions are an inadequate solution for addressing school capacity issues as they lead to piecemeal development and the encroachment of school buildings onto land that is used for open space, sport and recreation. S106 should be put aside for new schools.

18. Development of new sites must give consideration to access by emergency vehicles.

19. Sufficient infrastructure capacity must be provided in advance of new development.

## **Topic: 5.0 Delivering specific types of development - General**

### **Summary of Matters Raised in Representations**

No comments received on this topic.

## **Topic: 5.1 Providing for the range of housing needs**

### **Summary of Matters Raised in Representations**

1. Paragraph 5.1.14 should be expanded to state that the Core Strategy will contain a criteria-based policy to guide the allocation of sites for gypsies, travellers and travelling showpeople and to be used to meet unexpected demand.
2. The District Council needs to engage with Parish Councils to identify in each parish the specific housing needs of that parish. These surveys would then establish the real housing requirements of the district, rather than having to accept figures derived at a strategic level.
3. The important role of the Rural Housing Enabler should be recognized in this part of the Core Strategy.
4. There must be scope for helping first time buyers by designing and building dwellings with at least two bedrooms which cost less than £100,000 each.

## **Topic: CS.5 Providing for the Range of Housing Needs - General**

### **Summary of Matters Raised in Representations**

#### **Policy in general**

1. The policy does not do enough to address the housing needs of households on lower incomes and the housing needs of the elderly.
2. The policy should not be so onerous as to prevent sites coming forward which will involve the re-use of brownfield land.
3. Affordable housing should be allowed within or outside the Green Belt to retain vibrant communities.
4. It would be useful if the policy were to advise on the ideal housing mix based on SHMA and the Market Review, subject to site specific negotiations.
5. The policy should set out separate targets for social rented and intermediate affordable housing to provide a more comprehensive and clear approach.
7. The policy should only allow housing development if it meets locally agreed criteria for affordability and suitability for first time buyers.

#### **Part A - Protection of the Housing Stock**

8. This is unreasonably restrictive. It would prevent the re-use of dwellings for alternative uses.

#### **Part B - Mix and Type of Dwellings**

9. Support for the intention that development should contribute to meeting the full range of

housing needs in the district.

10. The policy's greater flexibility regarding the mix of market housing is supported.
11. Objection to the blanket requirement for dwellings to meet the Lifetime Homes Standards in advance of the Government's timetable. This would be highly constraining and was not tested in the Development Viability Assessment Model (DVAM). It will certainly reduce viability. In any case, the Government is proposing to review this issue.
12. Reference to Lifetime Homes should be qualified by the phrase "where possible".
13. There is a need for more affordable two and three bedroom dwellings for families.
14. There should be more single level dwellings to enable older persons to live at home for longer.

### **Part C - Affordable Housing**

15. References to the need to assess viability of schemes is supported, especially in the context of Local Service Villages.
16. This part of the policy is not robust. The DVAM did not allow for 35% of floorspace to be used for affordable housing, rather than 35% of dwellings. The former will add to costs and could undermine the viability of some schemes. The legal requirement for affordable housing targets to be underpinned by viability assessment (Blythe Valley case) has not been met.
17. The use of floorspace rather than dwellings to measure targets is imprecise and the policy should provide a clear definition. It has not been tested elsewhere and will only help to undermine the viability of development. Its objective of avoiding the provision of very small affordable dwellings can be achieved by a policy defining the size and type of affordable dwellings, as encouraged by PPS3, and could exclude very small units
18. The blanket application of a 35% minimum affordable housing requirement does not accord with the findings of the DVAM which found that 35% is only achievable in favourable circumstances.
19. 50% target in Local Service Villages has not been tested in the DVAM for viability and cannot be sustained by evidence. The proportion should be determined by local need surveys but should not exceed 40% in line with emerging RSS policy R4.4. If the threshold is too low and the proportion too high, development will be uneconomic and the provision of single market dwellings will be stifled.
20. The target should be increased to 40% for Stratford-upon-Avon and 50% for rural areas.
21. The target should not be a minimum but a maximum which would allow for site specifics and individual viability to influence the proportion.
22. The minimum should be reduced to give more flexibility and to better match emerging RSS policy which seeks a proportion of 25-40%.
23. The scope of the policy should be extended to include self-build schemes intended to address needs and to allow people to remain in their own communities.
24. 100% affordable schemes should be encourage in rural areas.
25. Policy should not specify that all extra care schemes should contribute to affordable housing: this pre-determines the outcome of assessing the use class of such developments.

### **Part D - Specialised Accommodation**

26. As regards provision for vulnerable groups, the policy is not supported by PPS3 and by local evidence. Encouragement of provision should be downgraded to support for such schemes.
27. This part of the policy is supported as recognizing a special need.
28. A separate policy is preferred. This would give greater prominence to meeting pressing needs.
29. Sites outside the main centres should not be limited to addressing local needs. This would prevent rural brownfield sites from being re-used for specialised accommodation. Such a restriction would be out of line with other policies of the Core Strategy and those of the Government. It would make schemes unviable. The reference to local needs should be changed to needs at the district level.
30. A target for extra care provision should be included. 1000 units is proposed based on the Housing Strategy.

### **Part E - Provision for Gypsies and Travellers and Travelling Showpeople**

31. Policy should be supported as giving suitable criteria for assessing applications for accommodation.
32. Policy needs to be clearer on whether the provision target includes provision for Travelling Showpeople.
33. The provision target should be clear on what period is covered by the provision figure. Inclusion of a base year will then mean that there are likely to be sites which have contributed to the figure.
34. The policy should make some reference to post-2017 requirements and how they may be derived, e.g. via another GTAA or by applying an annual growth factor.
35. On-site play space for children should not be expected on small sites.
36. Reference should be made for the need for business space where appropriate.
37. Reference should be made to the need to assess for pollution and contamination problems.
38. The policy should state that sites will only be allowed in Flood Zone 1 where flood risk is minimal. Caravan sites can be highly vulnerable to flooding.
39. The policy should state that sites should be located close to sewage infrastructure to avoid pollution of the water environment.
40. Reference should be made to the potential use of S.106 contributions for affordable housing being used for RSL/LA operated traveller sites.

## **Topic: CS.5/A Providing for the Range of Housing Needs - Protection of the Housing Stock**

### **Summary of Matters Raised in Representations**

See comments on CS.5.



## **Topic: CS.5/B Providing for the Range of Housing Needs - Mix and Type of Dwellings**

### **Summary of Matters Raised in Representations**

See comments on CS.5.

## **Topic: CS.5/C Providing for the Range of Housing Needs - Affordable Housing**

### **Summary of Matters Raised in Representations**

See comments on CS.5.

## **Topic: CS.5/D Providing for the Range of Housing Needs - Housing for the Elderly and Special Needs**

### **Summary of Matters Raised in Representations**

See comments on CS.5.

## **Topic: CS.5/E Providing for the Range of Housing Needs - Provision for Gypsies and Travellers and Travelling Showpeople**

### **Summary of Matters Raised in Representations**

See comments on CS.5.

## **Topic: 5.2 Providing for Economic Development and Tourism**

### **Summary of Matters Raised in Representations**

1. Opportunities other than Shakespeare should be considered when marketing the district for tourism to spread benefits to areas outside Stratford town.
2. Position in relation to the Cotswolds should be considered in tourism marketing plans.
3. Text in 5.2.9 is inconsistent with policy CS.6 relating to large scale tourism developments outside Stratford town.
4. Contribution of the Stratford upon Avon canal to the tourist appeal of Stratford town and the World Class Stratford Initiative should be recognised.
5. Query Shipston marketing itself as a gateway to the Cotswolds and Shakespeare country.
6. Town Council is unaware of promotions referenced in para 5.2.7. Shipston has limited accommodation and is not a tourist centre.

## **Topic: CS.6 Providing for Economic Development and Tourism - General**

### **Summary of Matters Raised in Representations**

1. Policy is not underpinned by adequate appraisal to identify employment needs in the District.
2. Policy must acknowledge contribution to local economy and employment from business tourism as well as leisure and recreational activities.
3. Policy should allow the growth and development of major existing tourist facilities located outside Stratford town and Main Rural Centres.
4. Query the need for new office and retail space due to existing vacant premises in Stratford town centre and Main Rural Centres.
5. Policy requirements for expansion of firms in existing locations must make allowance for the fact that agricultural businesses may have limited accessibility.
6. Full range of uses included in PPS4 definition of economic development should be recognised, including leisure, retail and other uses.
7. Must improve opportunities for mid/high paid jobs in Stratford town by attracting and retaining high quality specialist manufacturing.

## **Topic: CS.6/A Providing for Economic Development and Tourism - Maintaining Economic Competitiveness**

### **Summary of Matters Raised in Representations**

1. Local employment opportunities must match the level of housing growth.
2. Policy should provide support for traditional agriculture, particularly due to renewed emphasis on local food production
3. New or mixed uses on existing employment sites which are under used, vacant or where there is little interest in reuse for employment should be considered.

## **Topic: CS.6/B Providing for Economic Development and Tourism - Promoting Tourism**

### **Summary of Matters Raised in Representations**

1. Recognition of the District's significant world class tourist attractions is welcomed.
2. Provision of access to historic sites must be provided, whatever their location.

## **Topic: 5.3 Supporting Town and Local Centres and commerce**

### **Summary of Matters Raised in Representations**

1. Support the emphasis on new retail requirements for the rural area, especially in relation to convenience floorspace.
2. Reference to 2,500 square metres is supported as recognition that a new type of convenience retailer is required that needs the needs of the community.
3. Acceptability of a store on the edge of Southam is supported.
4. Foodstore should be provided on the edge of Shipston to meet local retail needs.
5. Reference to Maybird Centre and local residents not having to travel further afield for this form of shopping is a vacuous statement.
6. Support the premise that a degree of flexibility could be justified in relation to the location or retail and commercial development in order to bolster their role.

## **Topic: CS.7 Supporting Town and Local Centres and commerce**

### **Summary of Matters Raised in Representations**

1. Some of the proposed increase in retail space is extremely inefficient in term so employment density and number of jobs provided.
2. Need to pay more attention to Stratford town centre and encourage new businesses into it.
3. Provision of a large retail store on edge of Shipston would kill off its role as a market town and its independent retail outlets.
4. No provision for a further foodstore at Bidford is appropriate.
5. Reference to providing a foodstore in Southam is no longer required or justified as permission for Tesco fulfils the need identified.
6. Provision for a new foodstore in Shipston is supported but policy should recognise that there is no scope to achieve it in the town centre.
7. Unclear why enhanced retail provision in Wellesbourne is not provided for given its level of population and employment.
8. Retail proposals in Main Rural Centres should not be capped at 1,000 sq.m. (gross) and more flexibility should be provided to attract investment.
9. District Council should consider placing restrictions on new retail development to ensure they only sell produce sourced from within the local area.
10. Support the need to direct retail and commercial development to the town centres.
11. Concerned about any expansion of existing out of town centre retail developments in Stratford-upon-Avon.

## **Topic: 5.4 Improving Transport and Access**

### **Summary of Matters Raised in Representations**

1. Endorse recognition of the problem of air pollution generated by road traffic and the need to encourage modal shift.
2. Supports route safeguarding of former Stratford to Cheltenham railway.
3. Private car will remain the major form of personal transport in rural communities and this should be recognised in the Core Strategy.
4. Stratford town is in desperate need of a proper traffic plan incorporating a ring road.

## **Topic: CS.8 Improving Transport and Access - General**

### **Summary of Matters Raised in Representations**

1. Aims of the policy are endorsed particularly in respect of encouraging modal shift, enhancing rail network.
2. Support reinstatement of railway south of Stratford-upon-Avon as it will bring major benefits for passenger and freight transport.
3. New park and ride and rail/bus interchange for Stratford-upon-Avon should be delivered before measures to reduce town centre parking are introduced.
4. Innovative transport solutions are encouraged to provide a public transport system to serve a dispersed settlement pattern.
5. District Council draws a considerable income from town centre parking and has little incentive to reduce it.
6. Needs to be a strong correlation between Core Strategy and Regional Transport Strategy in relation to land use planning and reducing the need to travel.
7. There is no viable alternative to car transport for people who live in rural areas especially if they wish to take up employment.
8. Farms and rural businesses are totally reliant on HGV and car transport and any attempt to move employment away from rural areas would affect rural economy.

9. Need to be more explicit about how transport planning can contribute towards attractive and pedestrian-friendly environments.
10. Policy should refer specifically to role of canal infrastructure for pedestrians and cyclists.
11. A46, A435 and A4300 all require major improvements to accommodate additional traffic that housing development will create and should be a condition of such development.
12. There does not appear to be much correlation with neighbouring authorities to achieve greater integration of transport.
13. Any transport schemes that are central to the delivery of the Core Strategy should be referred to.

## **Topic: CS.8/A Improving Transport and Access - Transport Strategy**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: CS.8/B Improving Transport and Access - Transport and New Development**

### **Summary of Matters Raised in Representations**

1. Policy should encourage the provision of cycle tracks and footpaths between villages and local centres.
2. Development north of Bishopton Lane will have negative consequences on traffic congestion and pollution.
3. Developers of any project in the District should pay into a fund that will see the restoration of train services south of Stratford-upon-Avon to Honeybourne.
4. Part (xii) about reopening railway line south of Stratford should be reworded in a more positive way.
5. Support continued safeguarding of route of former railway line south of Stratford.
6. Important that safeguarded land includes that identified in Stratford Rail Study to reinstate level crossing and revised road layout at Evesham Place.
7. Reference to securing 'contributions towards local public transport services' should be expanded to refer to reinstatement of railway south of Stratford-upon-Avon.
8. Parts (iii) and (v) should add that any developer contributions should be used to serve end users of the proposed development where necessary.
9. Part B should state that assessment of traffic generation for proposals to redevelop previously developed sites should take account of existing/permitted use of the site.

## **Topic: CS.8/C Improving Transport and Access - Parking Standards**

### **Summary of Matters Raised in Representations**

1. No guidance is provided on the level of parking provision in new residential development; reference should be made to the Council's adopted Parking Standards SPD.
2. Because of the special transport needs of rural communities, car parking provision must be more generous than in urban areas of the District.

## Topic: CS.8/D Improving Transport and Access - Stratford-upon-Avon Transport Strategy

### Summary of Matters Raised in Representations

1. Transport strategy for Stratford-upon-Avon should include a reduction in motor traffic, further pedestrianisation and a new river bridge to the east of town.
2. The term 'Western Relief Road' is inappropriate as traffic modelling has shown that it would not relieve town centre traffic.
3. Need for a major new road system around Stratford that links into northern bypass to cater for extra traffic that will be generated.
4. Provision of parkway railway station at Bishopton is supported to enhance accessibility and transport sustainability.
5. Lack of concept regarding Stratford town centre where there is a need to replace private vehicles with zero-carbon emission public transport vehicles.
6. Reason for Parkway station is unclear as it would seem to add little benefit for passengers.
7. Recent changes to traffic routes and parking policy have not helped to reduce traffic congestion.
8. Part (xii) should be reworded in a more positive way to read *'restoration of passenger rail services south of Stratford railway station to Oxford and London Paddington via the Cotswold Line, Worcester and Cheltenham. This will include further assessment of the scope to reopen the railway line southwards from Stratford railway station.'*
9. Amount of traffic on Clopton Bridge needs to be reduced.
10. Traffic management measures, particularly on Birmingham Road, are needed.
11. Stratford urgently needs an improved public transport network and a bus station is a priority to cut down road use.
12. More houses in the area would bring even more traffic to already overcrowded streets.
13. Car parking should be restricted in residential areas and not permitted on pavements.
14. Park and ride facility should be made more attractive to users.
15. Transport strategy must be formulated without an extra railway station.
16. What is urgently needed is an Eastern Bypass to take traffic out of the town and ease pressure on Clopton Bridge.
17. Part (xi) regarding a western relief road should be deleted as it is only needed if West of Shottery allocation is needed.
18. There is a complete lack of transport modelling showing the development of strategic sites in Stratford-upon-Avon on a cumulative basis.
19. Not persuaded that western relief road and southern park and ride will be sufficient to alleviate traffic flow problem in town centre.
20. Approach to parking policy does not pay sufficient attention to the overriding need to support the town's role as a shopping and service centre.
21. Park and ride is not convenient for local residents to undertake shopping trips.
22. Proper bus station should be provided next to the railway station.
23. A complete southern relief road connecting A46 and Warwick Road with a new bridge over River Avon should be provided.
24. A new route into the Recreation Ground is urgently needed, preferably off Seven Meadows Road.
25. Weight restriction should be placed on Clopton Bridge so that lorries have to use other routes.
26. The whole road system in the town is in a mess and needs to be upgraded.
27. Speed restrictions should be introduced on Evesham Road to slow traffic.
28. A southern park and ride facility would lose further money for the taxpayer.
29. Cycling should be the preferred mode of transport for short journeys in urban centres and policy should reflect that.
30. There should be investment in the existing railway station linked to any Parkway development.
31. Historic Spine should be mentioned as a separate but linked initiative within the 'walkable core'.
32. Provision of a southern park and ride facility is supported.
33. Increased capacity of Shakespeare Line will add to Stratford's ability to provide a high quality sustainable link to Birmingham.
34. Support the development of a Quality Bus Corridor between Evesham and Stratford.
35. Lack of an overall strategic transport policy into which the 'wish list' elements can sit comfortably.

36. Nothing can stem from or fall into place without a fully integrated transport assessment.

### **Topic: CS.8/E Improving Transport and Access - Transport Schemes outside Stratford-upon-Avon**

#### **Summary of Matters Raised in Representations**

1. Thought should be given to alternative methods of traffic reduction in Studley if a bypass is too costly.
2. This part of policy should be widened to cover other eventualities such as parking associated with a train station or tourist facility.
3. Efforts should be made to ensure more trains stop at Bearley and Claverdon Stations.

### **Topic: CS.8/F Improving Transport and Access - Transport Safeguarding Schemes**

#### **Summary of Matters Raised in Representations**

1. Should safeguard all disused rail routes either as walking or cycling tracks or to preserve the possibility of reopening in the future.
2. Investigate the provision of a station at Fenny Compton to serve south Warwickshire.
3. Need for a transport strategy relating to Leamington Station which serves the eastern part of Stratford District.
4. Safeguarding of former Stratford to Cheltenham railway line is supported.
5. Land to be safeguarded for reopening Stratford to Cheltenham railway should include that identified in Stratford Rail Study to reinstate level crossing at Evesham Place.
6. Doubtful whether reinstatement of railway will be affordable or welcomed by some Stratford residents.

### **Topic: CS.8/G Improving Transport and Access - Aviation**

#### **Summary of Matters Raised in Representations**

1. Policy to recognise the role of airfields is acknowledged given their established leisure uses in the District.
2. Inconsistent with current Government policy to encourage General Aviation because it prevents activity other than on existing sites.
3. There are many other airfields in the District used by General Aviation, e.g. Arden Heath Farm, which should be covered by the policy.

### **Topic: 5.5 Improving Green Infrastructure, Sport and Recreation**

#### **Summary of Matters Raised in Representations**

1. Need for a new sports and social club to replace the existing one in the Bridgefoot area and relieve pressure on Stratford High School.

## **Topic: CS.9 Improving Green Infrastructure, Sport and Recreation**

### **Summary of Matters Raised in Representations**

1. PPG17 para 2 requires all residential, commercial, retail and industrial development to consider the sporting needs of communities, workers and visitors.
2. Methodologies for any open space or sports assessments undertaken by developers should be signed off by Sport England prior to commencement.
3. Implied that indoor, outdoor recreation and open space needs to be provided; it should be sufficient for a developer to provide one or the other.
4. Policy title and text should be amended to reflect the full range of community and recreation facilities that it is intended to cover.
5. Policy should make provision for 'enabling' development in rural areas where this will help to deliver local facilities.
6. Policy should recognise the role of green infrastructure in protecting and enhancing the historic environment.
7. Policy does not include a proposal to extend the Green Belt around Stratford upon Avon, as recommended by the Nathaniel Lichfield report.
8. Policy should be amended to include reference to canal infrastructure and other blue infrastructure.
9. Insufficient evidence base has been provided in support of the policy.
10. Policy must be deliverable and provide an indication of key assets to be safeguarded and enhanced, refer to local standards and set out how new assets will be delivered.
11. Core Strategy should be supported by a comprehensive Green Infrastructure plan or strategy.
12. Policy should make reference to provision of allotments and community gardens.

## **Topic: CS.9/A Improving Green Infrastructure, Sport and Recreation - Protection of Open Space and Recreation Facilities**

### **Summary of Matters Raised in Representations**

1. Wording of (ii) should be changed to *'outdoor or indoor sport or recreation facilities, without suitable replacement being made, will be resisted unless it can be demonstrated by the applicant that the facility affected has been marketed for a period of not less than 12 months in a manner agreed with SuA's planning department and it has been robustly demonstrated that there is an over-provision of that particular facility in the local geographic area, as agreed by SuA's planning department'*. This will allow clubs which do not have their own facilities, secure tenure or on smaller sites to relocate onto a site which has an established sporting use, surety of tenure, and the ability to grow their club.
2. Policy should be amended in line with PPG17 para 2: *'all new development is expected to provide increased or improved facilities for indoor and outdoor recreation, and open space, to meet the needs of its future occupiers and visitors, having regard to local standards and existing deficiencies.'* New development includes commercial, retail, residential and industrial and 'occupiers' includes residents and workers.
3. Object to the resistance to the development of public or private open space. Each development should be considered on its merits. Where benefits of a proposal (such as providing housing) outweigh the value of the open space, this should be considered favourably by the Council.

## **Topic: CS.9/B Improving Green Infrastructure, Sport and Recreation - Enhancing Access to Natural Areas**

### **Summary of Matters Raised in Representations**

1. Authority must not overlook the role of natural settings in supporting a range of sporting activities. The 'bad neighbour' effects of some sporting activities and their environmental impact can be overcome by appropriate location and siting.
2. Additional point (v) should be added to the policy stating '*where sport already exists in natural areas and in the countryside in general, management plans will be drawn up with local clubs and national governing bodies that will allow the sports to continue, and under some circumstances expand their activities.*'
3. Where sport is proposed in the countryside it should be the expectation that a management plan and risk register is submitted as part of the application. Applicants should have the support of their national governing body, and a sequential feasibility test should be tabled at pre-application stage.
4. Policy should recognise the contribution of open space in preserving and protecting the historic environment.
5. Policy should be amended to include 'landscape features'.
6. Policy should make reference to Natural England's Accessible Green Space Standards (ANGST).
7. Policy should make specific reference to the important role of woodland in green infrastructure.
8. Consideration should be given to using the Woodland Access Standard as a policy tool, which complements Natural England's ANGST standards.

## **Topic: CS.9/C Improving Green Infrastructure, Sport and Recreation - New Recreation and Sport Facilities**

### **Summary of Matters Raised in Representations**

1. Object to wording of first sentence; there may be cases where the need for a national or sub-regional venue has been identified which cannot be located in an existing settlement due to the nature of the sport or land availability. Such facilities should be assessed on their own merits. Policy should be reworded to read '*the provision of new or extended recreation and sport facilities (built or outdoor) will be supported if they are robustly justified using an agreed methodology and are of a scale and nature that relates to the size and function of the individual sport concerned*'.
2. Policy approach to support small scale schemes that serve the local community in all locations is not robust or sustainable. Sentence should be amended to read '*small scale schemes e.g. changing pavilions and small sports halls which primarily serve the local community will only be supported in all locations, subject to proven need and robust justification*'.
3. Policy should give specific support to the relocation of Stratford Leisure Centre to the northern part of land west of Birmingham Road (see Proposal SUA.14B).

## **Topic: CS.9/D Improving Green Infrastructure, Sport and Recreation - Open Space and Recreation Facilities in New Development**

### **Summary of Matters Raised in Representations**

1. No policy guidance is provided as to what level or targets for open space new developments should achieve, and why it is appropriate to differ from national standards. Policy must be made more explicit and include open space requirements/ targets.
2. As per Circular 05/05, new development cannot be required to remedy existing deficiencies. Open space provision or financial contributions must be commensurate with the level of development proposed. Reference to existing deficiencies should be removed (see para 4.52 of PPS12).



3. Developments that does not provide adequate growing space will increase pressure on Parish Councils to provide allotments with associated increases in council tax. Provision of sufficient and appropriate land for allotments should be included in the policy.

## Topic: 6.0 Protecting the District's Environment - General

### Summary of Matters Raised in Representations

No comments were received on this topic.

## Topic: 6.1 Ensuring the Efficient Use of Land

### Summary of Matters Raised in Representations

1. Para 6.1.4 insert the word 'professional' before the word judgement in last sentence.
2. Reference to Berry Coppice near Dunnington should be removed until an overall development plan for mineral extraction has been adopted.
3. Strong support for the recognition of the potential ecological and geological value of brownfield sites.

## Topic: CS.10 Ensuring the Efficient Use of Land

### Summary of Matters Raised in Representations

1. To ensure most **effective** as well as efficient use of land, Council could usefully include development of greenfield sites adjacent to Stratford upon Avon urban area, where they are vacant, over grown and no longer fulfil their previous use or purpose. CS.10 should be amended accordingly.
2. Policy should reflect PPS3 guidance on the efficient use of land (para 46) which recognises the overall vision and housing need for the area and the availability of suitable land for development.
3. Use of the term 'maximum density' could cause a conflict between applicants and the Authority by allowing the Authority (i.e. not the applicant) to arbitrate the level of density to be achieved.#
4. If developments meet the minimum density requirement as set out in PPS3 (30dph), they should be acceptable in principle.
5. Bullet point CS10 (i) should be amended to read '*ensuring that the density of development is achieved in a manner that is compatible with the characteristics of the site, the locality and national minimum density targets*'.
6. Objection to CS10(iii) which seeks to maximise the re-use of PDL as a means to reduce greenfield development. Levels of development are such that the Core Strategy must make provision for greenfield development. As currently worded provision could preclude greenfield sites coming forward to assist in the 5 year land supply. PDL is a finite resource and its redevelopment raises issues such as loss of employment.
7. PPS3 emphasises the importance of good design and sustainable communities, rather than economising on land take as a priority. Focus on maximising land-take should be removed from policy, and replaced by a more flexible approach to housing density. Density should be judged on a site by site basis and allow for high quality development that matches local character and meets the requirements of policy CS.15
8. Objection to criteria (iii) which is not sufficiently flexible to deal with large rural brownfield sites and MDSs as they are not in the most sustainable locations. Policy is therefore unsound against PPS12 Effective test. Criteria should be amended to recognise contribution of LBFSs and MDSs to meeting targets and reducing greenfield development. Criteria should be amended to read '*maximising the use of suitably located previously developed sites **or previously developed sites that would secure other environmental, social or economic benefits** in order to reduce the need for development on greenfield land*'.
9. Consideration should be given to greenfield development where it has benefits for the local community.

## Topic: 6.2 Safeguarding the Water Environment

### Summary of Matters Raised in Representations

1. Support for content of Policy CS.11 and that para.6.2 reference to issues of pluvial flooding as well as fluvial flooding.
2. An additional sentence should be added to end of para 6.25 **'The Sequential test will be carried out by the applicant and decided by the District Council'**.
3. To strengthen para 6.2.7 following to be added at end of the paragraph ' The plan must include details of safe access and egress arrangements.'
4. Welcome reference in para 6.2.9 to 20% Recommendation strengthen paragraph by omitting 'around' and replace with 'a minimum'.
5. Welcome support for intention to apply run off restrictions to comparable to original green field rates. Recommend revision of para. 6.2.10, 6th sentence as follows 'Industry guidance ... to improve water quality and create biodiversity, **improve** amenity and **enhance** habitat benefits.
6. Little reference to water quality in the policy, should be remedied. The Water Framework Directive River Basin Management Plans require waterbodies in districts to show improvements in quality in line with quality standards. The Local Authority is a competent authority under Water Framework Directive (WFD) and as such has a role to play in ensuring waterbodies meet ' Good Status or Potential by 2027. It is imperative that adequate consideration is given to watercourses. No deterioration in water quality must be allowed (no deterioration from current status is allowed under WFD) ('Good Ecological Status or Potential' by 2027 on all waterbodies should be aimed for.) Where there are more rural areas, there should be no proliferation of small package treatment plants either privately or Water Company owned. If there is to be more rural housing, existing sewage works should be upgraded or new ones built to serve the new community. This would allow new technology and the separation of clean surface water and foul effluent as well. However, these would all obviously be subject a Consent to Discharge issued by the Environment Agency.
7. Para 6.2.11 study referenced in not named and out of date. (NB. This study has now be superseded by the Halcrow Water Cycle Study 2010 produced as evidence base for the Draft Core Strategy.)
8. Support for policy's requirement for water efficiency measures which support the Severn Trent Resource programme. Local infrastructure planning should be incorporated in its timeframes.

## Topic: CS.11 Safeguarding the Water Environment - General

### Summary of Matters Raised in Representations

1. Support- Consideration should be given to impact of future development on existing wastewater infrastructure and any necessary upgrades secured ahead of occupancy.
2. Support the extensive Policy and welcome the requirement for a sequential test. (see comment 6.2)
3. Comment - Consideration to be given to loss of natural drainage areas from existing and new housing development.
4. Council has duty to promote more frequent river dredging to mitigate flood danger.
5. Object - Would like to see specific reference to the important role of trees and woodlands in mitigating flooding, given the loss of porous or absorbent surfaces through development. **We would like to see this Policy recognise the role of trees and woodland in flood management.**
6. Comment - supportive of SUDS in policy, but clarification sought as whether Council will be pro-active in the adoption of SUDS schemes. Currently both Council and Severn Trent Water do not adopt schemes, resulting in the developers funding private management companies to maintain small areas.
7. Support and comment - policy should address water quality, particularly rural areas subject to significant discharges from sewerage works. Existing sewerage works should be examined prior to development. It is vital to meet the requirements of the Water Framework Directive.
8. Support - consideration should also be given to the drainage methods of new development so that it does not adversely affect the ecology of the waterways.

9. Support for specific comments regarding the need to maintain flood plains and natural river corridors. Comprise important wildlife corridors. Opportunities to enhance wildlife value, accessibility or functional aspects of river corridors should be considered as fundamental GI projects within the Infrastructure Delivery Plan.

## **Topic: CS.11/A Safeguarding the Water Environment - Flood Risk Areas**

### **Summary of Matters Raised in Representations**

1. Comment - support the control of run-off . Consideration should be given to maintaining the good working condition of mechanisms to remove water , such as ditches, ponds, swales, culverts, sewers etc. The core strategy lack clear way to ensure compliance with this issue.
2. Support of SUDs - important to protect communities from flood risk and economic losses.
3. Comment - Sports England finds requirement for water sports clubs to prove justifiable need to for development in flood plain onerous. Amendment requested thus: **'There is a presumption against inappropriate development on the flood plain within such areas. Any such proposal must satisfy the sequential and exception tests required by national policy to prove that there in no appropriate site outside the flood risk area that is available and suitable for the purpose. It is accepted that there is a need to locate boat houses and changing pavillions in flood plains where there is an established sports use or the area has been identified by reason of its natural environs as sports use. In either case, the design of the built facilities should consider reducing the impact on the natural drainage system of the land affected and ensure the foul water generated by such facilities does not contaminate the natural resources when affected by flooding.'**

## **Topic: CS.11/B Safeguarding the Water Environment - Surface Water Run-off and Sustainable Drainage Systems**

### **Summary of Matters Raised in Representations**

1. Object - Developer finds requirement for discharge of surface water to original greenfield rates overly onerous. Does not allow for site specific circumstances which may result compliance with requirement only achieve by significant compromise to other development objectives.
2. Object - Policy's requirement is unsound as it is inconsistent with PPS25. Suggest amendment '**Development on all greenfield sites over 1 hectare in area, must be designed to limit surface water discharge rates to the original greenfield run-off rates. In the case of developments on brownfield sites, water discharge rates should be no greater than the rates prior to the proposed development.'**
3. Comment - supportive of SUDs in policy, but clarification sought as whether Council will be pro-active in the adoption of SUDs schemes. Currently both Council and Severn Trent Water do not adopt schemes, resulting in the developers funding private management companies to maintain small areas.
4. Comment - addition to last line of paragraph to include following- '*Proposals for long term management and maintenance of the SUDs systems for the lifetime of the development, together with fail safe and fallback mechanisms in the event of exceptional flood events, must be proposed in relation to each development proposal'* This is a concern for the W. of Shottery scheme in view of the unreliability of the Bishopton SUDs scheme.
5. Support - SUDs are important in allowing communities to take responsibility for and manage their own surface water runoff.

## **Topic: CS.11/C Safeguarding the Water Environment - Protection of the Water Environment**

### **Summary of Matters Raised in Representations**

1. Developer objection - Reference to 8m maintenance access strip and the requirement to remove culvert where feasible should be deleted. All proposals should be treated on their merits.

## **Topic: CS.11/D Safeguarding the Water Environment - Connecting to the Water Environment**

### **Summary of Matters Raised in Representations**

1. British Waterways Support in principle. However greater flexibility required by policy to realise potential of navigable waterways. It should recognise their inherent constraints, i.e. fixed location and alignment, in that it is not always possible to locate development in urban areas, not appropriate with respect to addressing the needs of the network. Consideration of site development constraints, e.g. availability of water resources, navigational safety, geology, topography, canal profile should be addressed.

## **Topic: CS.11/E Safeguarding the Water Environment - Water Efficiency**

### **Summary of Matters Raised in Representations**

1. Support  
2. Object - remove reference to Code for Sustainable Homes, as this duplicates Building Regulations improvements. Policy should be more flexible, remove reference to 25% - allow for potential to maximise water efficiency and greater savings on major developments and a more flexible approach on smaller and more constrained sites in urban areas.

## **Topic: 6.3 Reducing Carbon Emissions and Promoting Renewable Energy**

### **Summary of Matters Raised in Representations**

No comments

## **Topic: CS.12 Reducing Carbon Emissions and Promoting Renewable Energy - General**

### **Summary of Matters Raised in Representations**

1. Policy should prioritise energy conservation and insulation  
2. Should prioritise those renewable energy resources with the greatest potential for the District (- ie Biomass and solar)  
3. Community schemes should be encouraged  
4. Policy must ensure that new development does not compromise existing installed renewable energy generation  
5. Large scale biomass is not necessarily always inappropriate in the AONB - it depends on the nature of a particular proposal.  
6. Sensitive landscapes outside the AONB also need to be protected from inappropriate renewable energy development.

7. Wind turbines over 80m in height should not be located within 1.2km of existing dwellings. Smaller turbines should be located at a distance to height ratio of 10:1 from existing dwellings.
8. Applications for monitoring masts should be submitted for approval with proposals for the intended wind turbines, rather than separately.
9. Development Viability Assessment Model should consider CSH levels above 4 if they are to be included in policy. Wider viability testing must be undertaken when setting broad policy levels and not left to site specific assessments at planning application stage.
10. Policy is contrary to PPS1 Climate Change Supplement as there has been no assessment of its impact on development viability.
11. Policy is unsound as it was drafted prior to an appropriate evidence base being in place.
12. Policy does not identify specific local circumstances to justify adopting CSH levels ahead of the national programme
13. Policy should have a stronger emphasis on implementing energy efficiency measures across all activities in the District
14. Policy should focus on types
15. The process of setting requirements for new developments and preparing the evidence base supporting them should include consultation with key stakeholders such as developers. PPS12 states that evidence bases should be informed through fact finding and participation.
16. Development Viability Assessment Model should have been informed by the renewable energy evidence base. It does not include a full assessment of the impacts of the CSH on construction costs and the impact on viability of adopting CSH levels ahead of the national programme.

### **Topic: CS.12/A Reducing Carbon Emissions and Promoting Renewable Energy - Designing for Climate Change**

### **Topic: CS.12/B Reducing Carbon Emissions and Promoting Renewable Energy - Carbon Reduction Targets**

#### **Summary of Matters Raised in Representations**

1. Criteria B(i) and B(iii) are already covered by Building Regulations and emerging national policy.
2. Specific local circumstances must be demonstrated to justify targets above the national programme; no evidence has been provided to justify CSH and BREAM requirements set out in B(i) and B(iii)
3. Unclear what is meant by sentence ....'where the location is of a scale and location to include technologies enabling higher standards....'. This is too imprecise and does not provide sufficient justification or criteria to assist in application determination.
4. Criteria B(iv) lacks justification or a mechanism for measuring how shortfalls are 'acceptable' or how contributions will be used elsewhere in the District.
5. Policy is contrary to PPS1 as there is no evidence of assessment of the impact of its requirements on development viability
6. Policy requirements in B(i) have been drafted in advance of an up to date evidence base; as such it is unsound.
7. The same renewable energy requirement may not be suitable for all development types; this is too simplistic and will not result in the best quality or most appropriate development.
8. Policy should not set standard or overly prescriptive renewable energy requirements. Policy should take staged approach that requires development to:
  - Demonstrate that measures have been taken to reduce carbon and maximise efficiency
  - Demonstrate how on-site community scale generation can be incorporated where feasible and viable
  - Demonstrate measures that have been taken to incorporate low carbon or decentralised energy supply
  - Demonstrate measures that have been taken into account to incorporate renewable energy sources on site
9. 15% renewable energy requirement must incorporate flexibility to allow for circumstances where it

is not viable or suitable. Requirements for on site renewable energy must be viable in respect of the type of development proposed, its location and design and should not place undue burden on developers.

10. There is no justification for increasing renewable energy target from 10% (as per RSS) to 15%

11. Requirements must be tested against their impact on housing delivery - including subsidised housing.

12. Requirement in (iv) is unclear whether financial contributions to offset shortfalls should cover the lifetime of the development or whether annual payments are required. Further information is required on how the payments would be spent and who would be responsible or spending them.

13. Query whether (iv) is compliant with requirements of Circular 05/05.

14. Part B should be replaced with the statement '*Subject to technical and viability constraints, all new residential developments will be expected to achieve CSH in line with adopted National guidance*'. This is more flexible in terms of responding to changes in national policy.

15. Second sentence of B(i) should be reworded as the current drafting is unclear

16. B(i) must be more specific about the locations and development thresholds where higher CSH levels will be expected. This must be supported by appropriate evidence.

## **Topic: CS.12/C Reducing Carbon Emissions and Promoting Renewable Energy - Renewable Energy**

### **Summary of Matters Raised in Representations**

1. Large scale biomass is not necessarily inappropriate in the AONB; it will depend on the particular characteristics of each individual scheme. If retained, the policy should outline reasons why they are considered to be inappropriate.

2. There are other sensitive landscapes outside the AONB that need to be safeguarded from inappropriate renewable energy development

3. Policy should include a requirement that turbines over 80m are not located within 1.2km of existing dwellings. A distance to height ratio of 10:1 should be adopted for smaller turbines.

4. Applications for monitoring masts should be required to come forward with details of the intended wind turbines, not as a separate application.

5. Section C should be a separate policy with an associated DPD.

6. Greater recognition should be given to large scale community based schemes, as per the 2009 Heating and Energy Strategy and revised PPS1 Supplement.

7. Safeguards for protecting AONB and Conservation Areas from inappropriate development are not sufficiently robust.

8. Policy should focus on types of renewable energy that will be encouraged and which areas of the District are considered to be most suitable.

9. Policy should be reworded to make its purpose clearer and more transparent.

10. Appropriate policy safeguards are required to protect the rural character of the District.

## **Topic: 6.4 Landscape and Natural Features**

### **Summary of Matters Raised in Representations**

1. Paragraph 6.4.4 is strongly supported but should include reference to the Act that gives public bodies a biodiversity duty, i.e. Section 40 of the Natural Environment and Rural Communities Act (NERC) 2006.

2. The section should contain reference to the canal infrastructure and its distinctive landscape character. The Stratford-upon-Avon Canal, the Grand Union Canal and the Oxford Canal are some of the District's important heritage features contributing to local distinctiveness and identity.

## **Topic: CS.13 Protecting Landscape and Natural Features - General**

### **Summary of Matters Raised in Representations**

#### **Policy in general**

1. Support. The policy is in line with the Cotswolds AONB Management Plan and the Cotswolds Conservation Board's Statement on Biodiversity Planning.
2. Policy should recognize canals as landscape and natural features of great importance.

#### **Part A - Landscape Character and Enhancement**

3. Policy should not preclude those sports that rely on natural landscapes. Management plans can resolve conflicts of interest.

#### **Part B - Trees, Woodlands and Hedges**

4. The first paragraph should be extended to include "and enhanced".
5. It should give absolute protection to ancient woodlands and veteran trees because they are valuable and irreplaceable.
6. It should require the expansion of native woodland to help climate change adaptation by buffering and extending fragmented ancient woodlands, to promote recreation, public health and the local economy.
7. Reference should be added to management plans enabling sports activities in woodlands to continue without harming biodiversity.

#### **Part C - Biodiversity**

8. Policy should not include provision for net gain in biodiversity as this is not embedded in national policy.

##### Criterion (b)

9. The criterion should be deleted as it is unclear who is responsible for classifying the "unique characteristics".

##### Criterion (c)

10. Amend "good reason" to "overriding reasons" to give extra protection.

11. The meaning of "good reason" should be clarified.

##### Criterion (d)

12. The approach to sites not subject to designation is too arbitrary, vague and wide ranging. It would give rise to too many objections.

13. Add "strategic" before "networks" and replace "wider area" with "the district" for greater clarity.

##### Criterion (e)

14. The word "habitats" should be deleted.



15. The policy needs to define what is meant by a “species of principal conservation importance”.
16. It is too wide ranging and unduly restrictive. It should be deleted.

#### **Part D - Geodiversity**

17. It should not preclude leisure activities which rely on features of geological interest.

#### **Other Issues**

18. The Ecological and Geological Assessment needs to be included in the evidence base as early as possible and shown to be influencing the selection of sites for development. A search for protected species will need to be undertaken on any site being considered for development.
19. All sites should be subject to a stringent environmental audit before decisions about their future are taken, with the development of sites being rejected where damage would occur.
20. There needs to be a Habitat Regulations Assessment (HBA) to examine the potential effects of the Core Strategy proposals on sites subject to European Natura 2000 designations.

### **Topic: CS.13/A Protecting Landscape and Natural Features - Landscape Character and Enhancement**

#### **Summary of Matters Raised in Representations**

See comments on CS.13.

### **Topic: CS.13/B Protecting Landscape and Natural Features - Trees, Woodland and Hedges**

#### **Summary of Matters Raised in Representations**

See comments on CS.13.

### **Topic: CS.13/C Protecting Landscape and Natural Features - Biodiversity**

#### **Summary of Matters Raised in Representations**

See comments on CS.13.

### **Topic: CS.13/D Protecting Landscape and Natural Features - Geodiversity**

#### **Summary of Matters Raised in Representations**

See comments on CS.13.

## **Topic: 6.5 Protecting Heritage Features**

### **Summary of Matters Raised in Representations**

1. The term "Historic Features" should be replaced by "Heritage Assets" to be consistent with the wording of the new PPS5.
2. The text that describes historic characterisations is strongly supported.
3. No allocation of land for development at Shottery should take place until an appraisal of Shottery Conservation Area has been undertaken.

## **Topic: CS.14 Protecting Heritage Features - General**

### **Summary of Matters Raised in Representations**

#### **Policy in general**

1. The policy needs to have its title changed to "Protecting Heritage Assets" to match PPS5.
2. Its title should reflect the historic significance of the district as a whole, rather than concentrating on individual assets. This would represent a change of emphasis, with a greater consideration of overall context.
3. The policy is supported as being in line with the Cotswolds AONB Management Plan.
4. The scope of the policy needs to be extended to match the scope of heritage assets in PPS5, i.e. it needs to include specific reference to non-designated assets.
5. The policy needs to give some clarity on status of locally listed buildings.
6. The policy should make clear whether SDC will seek Article 4 Directions in conservation areas.
7. The completion of conservation area appraisals and the reduction of heritage assets at risk could be quoted as targets and indicators for monitoring progress.
8. The policy is supported because the protection and preservation of conservation areas is very important to maintain local character.
9. There is a continuing problem of persuading developers to properly reflect local identity in their designs.
10. The references to historic characterisation are considered very helpful.

### **Part A - Preservation and Enhancement**

#### Priority (iv)

11. More information is needed on what is meant by "improving the land management of historic farmsteads". Historic farm buildings are often unsuitable for modern agriculture, so suitable alternative uses need to be found. Conversion may be the best option.
12. It should be amended to reflect the scope of legislation, i.e. Section 72 of the Listed Buildings and Conservation Areas Act 1990 refers to "preserving *or* enhancing", not "preserving *and* enhancing".

Priority (v)

13. This priority is supported but protection should not be so restrictive as to prevent the potential of waterway assets being unlocked.

## **Topic: CS.14/A Protecting Heritage Features - Preservation and Enhancement**

### **Summary of Matters Raised in Representations**

See comments on CS.14.

## **Topic: CS.14/B Protecting Heritage Features - Management and Interpretation**

### **Summary of Matters Raised in Representations**

See comments on CS.14.

## **Topic: 6.6 Securing High Quality Design**

### **Summary of Matters Raised in Representations**

1. Recommend including '*natural processes*' after landscape. (Clarify para 6.6.1?)

## **Topic: CS.15 Securing High Quality Design**

### **Summary of Matters Raised in Representations**

1. Support - Criterion (vii) 'connected' regarding the creation of green infrastructure as a benchmark for good quality design and biodiversity benefit.
2. Support - re. Ship.1 - master plan and design/development brief drawn up with council and local community to deliver well designed and locally supported scheme.
3. Support - but needs additional wording relating to respecting and safeguarding the historic assets and environment that contribute to distinctiveness of localities.
4. Support - the policy is in accordance with the Cotswold AONB Management Plan.
5. Fully support this policy.
6. Comment - Additional criterion: 'To secure high quality design advocate and adopt CABE Building for Life Standards as an indicator to monitor performance.' To address key design issues of scale, height and context and the impact on landscape/townscape.
7. Comment - large scale housing developments: high density, rooms too small, poor building standards, poor noise insulation, lack of private open space leads to poor community interaction and bad behaviour.
8. Comment - large scale housing developments: limited access/parking leads to on-street parking and restricts access for emergency vehicles.
9. Comment - Addressing the quality of architecture and provision of necessary infrastructure is essential for development proposals.
10. Comment - Change policy: 'the design approach should ensure that development incorporates the following factors where possible:' To ensure that design is flexible to meet local characteristics.
11. Comment - concern whether quality of design policy is adequate/workable to maintain local distinctiveness. Fear developers will pay scant regard to local identity in their designs.
12. Comment - take notice of other LDF components including the Urban Design Framework and a

revised Town Design Statement for Stratford.

13. Comment - sub standard designs must be resisted. Policy must be embedded in the planning process and developers obliged to adhere to guidelines before resources are committed.

14. Comment - this policy reflects British Waterways principles for high quality design. All criteria of this policy are applicable to the design of development adjacent to the canal corridors in the District. British Waterways already promote key design principles, both urban and rural, that could underpin any area specific design policy for local environments within a waterway corridor.

15. Comment - wherever houses are built the District Council should ensure that they do not have a negative aesthetic effect on surrounding areas.

## **Topic: 6.7 Controlling the Impact of Pollution**

### **Summary of Matters Raised in Representations**

1. para 6.7.5 - waterside lighting needs careful design to avoid unnecessary glare and pollution, prevent flood lighting the canal corridor to show consideration for bats, lighting should be efficient and sustainable.

## **Topic: CS.16 Controlling the Impact of Pollution**

### **Summary of Matters Raised in Representations**

1. Support - potential contamination of waterways should be avoided. Biodiversity, water quality and environment of waterways should be protected and enhanced.
2. Support - welcome determination to minimise light pollution. Designate areas of tranquillity.
3. Comment - require more information on how potential pollution will be assessed. Risk of repetition of assessments already conducted. Impacts of pollution are already adequately assessed by the environment agency - Environmental Permitting System.
4. Comment - identify AQMA on the proposals map so developers can see where an Air Quality Assessment is necessary.

## **Topic: 7.0 Proposals for Development - General**

### **Summary of Matters Raised in Representations**

1. Each proposed allocation should be appraised on the potential impact on natural habitats and species, geological, historical and landscape interest.
2. For each allocated site a statement should be provided about baseline surveys, improved green infrastructure and enhancement of habitats.
3. Would expect there to be a policy concerning the goals for Stratford-upon-Avon and the main rural centres.
4. Development proposals and information on site locations should be contained within a Development Control DPD.
5. Object to some proposed development areas overlapping with flood risk areas.
6. Development must not adversely affect the integrity of waterway structure, quality of water or result in unauthorised discharges and run-off.
7. Development should relate appropriately to a waterway and optimise the benefits such a location can generate for the community.
8. The evidence base for ecological information is not yet complete.
9. Include in each development proposal the need for 'a comprehensive assessment of the ecological value of the site, with appropriate provision made to protect and enhance important habitats and species.'

## **Topic: 7.1 Proposals for Development - Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. There is insufficient infrastructure for any more development affecting Birmingham Road.
2. A bypass is needed around Stratford at the top of Bordon Hill because town is gridlocked.
3. Core Strategy must focus housing delivery at Stratford-upon-Avon because it is the most sustainable settlement in the District before considering less suitable options.
4. Object to overall approach to developing Stratford as proposed because there are not enough jobs which will result in worsening traffic problems.
5. Goals for Stratford-upon-Avon provide no explicit commitment to policies in Core Strategy on sustainability and reduction of carbon emissions.
6. Should promote the idea that Stratford is a very special town with unique qualities and historical heritage.
7. Traffic, air quality, parking and over-urbanisation are destroying the town.
8. Many shops in the town centre are closed leading to visitors going to other towns.
9. Town has completely lost its identity in recent years.
10. Housing in Stratford is very expensive and provision should concentrate on needs of local people.
11. Should build no more houses as there is a lack of services in the town.
12. There is a needs for schools and medical facilities to be provided for the larger housing estates such as Trinity Mead.
13. Flats should be provided above shops for young people.
14. Empty buildings should be used for housing accommodation.
15. There should be no more out of town shops and supermarkets.
16. Bridge Street should be pedestrianised and a better bus area provided.
17. Stratford needs more civic amenities such as parks, gardens and allotments.]
18. Instead of creating more retail outlets on brownfield sites, the space should be used for residential property.
19. Further development would damage the historic character of the town affecting tourism.
20. Nature of Stratford can be maintained only by putting people at the centre as was always the case with small market towns.
21. There is no shortage of houses in Stratford but people are priced out of the market and are forced to move to cheaper areas and commute in.
22. Should not spend money on changes for the walkable core which will only further detract from the

character of the town.

23. Greenfield land on the edge of the town provide a buffer between the town and major roads bypassing the town.
24. Concerned about removing town centre parking as local people will be unable to use services.
25. Reference to the period after 2021 in relation to a possible major urban extension south east of the town should be deleted of a reference made to infrastructure to support it.
26. Should create marsh land to absorb the ever rising flood water from the River Avon.
27. Numerous small shops and family businesses have been driven out by retail parks on the edge of town.
28. Para. 7.1.9 should be deleted as there is no evidence presented to substantiate why West of Shottery is preferable to other sites.
29. Scale of additional retail floorspace proposed for the town is excessive and would be an economic disaster for the town centre.
30. Brownfield sites should be used for development first.
31. Even peripheral developments should reflect the town's particular distinctiveness, both cultural and architectural.
32. RSS Panel Report expresses concern that extensive development would harm the town's character.
33. Tendency to build on any tiny vacant space in the town is deplorable; even small gaps and green patches help to give air and balance in this historic town.
34. There are few attempts at creating streetscapes that relate to the centre of the town.
35. Little thought seems to be given to the design and layout of new housing developments.
36. Core Strategy does not touch on the fact that the number of tourists visiting Stratford has been dropping consistently for a number of years.
37. If there is to be a drive to encourage more long weekend stays some long term appraisal of the hotel situation is needed.
38. Seeking World Heritage status for the town is welcomed.
39. Historic fabric of the town requires urgent immediate attention and ongoing commitment.
40. Town could be a potential centre for offices for smaller professional firms, especially if the rail service can be improved.
41. Action is needed to encourage new, small shops to set up in the town centre.

## **Topic: 7.1a Proposals for Development - The Goals for Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Goal 7 fails to acknowledge that housing located in the town will be providing not just for the needs of the town but also the wider needs of the District.
2. Proposed development west of Shottery is not compatible with the goal of ensuring that development does not harm the town's historic character and tourist experience.

## **Topic: 7.1b Proposals for Development - Stratford-upon-Avon, Introduction**

### **Summary of Matters Raised in Representations**

1. Benefits of locating development west of Shottery are not identified.

## **Topic: 7.1c Proposals for Development - Stratford**

### **Summary of Matters Raised in Representations**

1. Development options for Stratford-upon-Avon will be tested against the new traffic model and any likely phasing of development will be taken into account.
2. This assessment will be used to inform the Highways Agency's input to the Infrastructure Delivery Plan and help to ensure that appropriate infrastructure improvements are identified.

## **Topic: SUA.1 Western Road/Wharf Road area (Canal Quarter), Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Area should remain in business uses.
2. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
3. Development of site will be important in improving the overall offer of the town.
4. Canal can provide a setting for new development and uplift in development values.

## **Topic: SUA.2 Rother Street/Grove Road area (Rother Quarter), Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
2. Development of site will be important in improving the overall offer of the town.
3. Support enhancement of the area.
4. Concerned about loss of police station.
5. Need to give consideration to security and noise at night for residents.
6. Will greatly diminish the value of property.
7. Development will impose itself on residential area.

## **Topic: SUA.3 Bridgeway/Bridgefoot area, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Development would destroy views across the river to Welcombe Hills from Tiddington Road.
2. Foolhardy to develop on a flood plain with increased likelihood of flooding in future.  
Proposal SUA.2
3. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
4. Development of site will be important in improving the overall offer of the town.
5. Early discussions with Environment Agency are necessary about how development of site will cope with flood flows compared to existing situation.
6. Concern about moving Leisure Centre because currently within walking distance for many local people and enhances visitor opportunities.
7. Bancroft Basin would contribute to delivery of tourist related activities in the area.
8. Agree in principle but reserve judgement in relation to treatment of Leisure Centre.

## **Topic: SUA.4 Town Square, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Development of site will be important in improving the overall offer of the town.
2. Support redevelopment of Town Square but hope that a significant supermarket with parking will be retained.
3. Could create an excellent visitor gateway for rail and bus users.
4. Need to give consideration to security and noise at night for residents.
5. Elimination of parking would be another nail in the coffin of town centre.
6. District Council's Retail Study does not support need for new retail development in town.
7. Concerns about scale of retail development due to possible issues of access and site specific constraints.

## **Topic: SUA.5 Former Cattle Market, Alcester Road, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
2. Network Rail supports proposed enhancements to station.
3. Site should be first and foremost the gateway to the town for visitors.
4. Proposed figure of 3,000 sq.m. of office space is too large to make the development a viable prospect and much of it would remain vacant.
5. Majority of site should be used for a transport interchange/bus station.
6. Should be used for the youth of the town, eg. skating rink, snow dome.
7. Development of site will be important in improving the overall offer of the town.
8. Pedestrian and cycle link to Canal Quarter is supported.

## **Topic: SUA.6 North of Banbury Road, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Will cause extra traffic on Banbury Road, Alveston Manor roundabout and over Clopton Bridge particularly during morning commute.
2. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
3. Development on south-eastern edge of town does not respond to existing built form or views of the town from open countryside beyond.
4. Site is available, suitable and deliverable and its development is supported.
5. Density should state 'up to 75 dwellings'.



## Topic: SUA.7 West of Shottery, Stratford-upon-Avon

### Summary of Matters Raised in Representations

1. Should be supported due to benefits offered such as a relief road.
2. Development will bring significant advantages to residents and visitors.
3. Detrimental impact on historic character of town and Shottery, including Anne Hathaway's Cottage.
4. Would reduce the appeal of the town for visitors and tourists.
5. Existing town infrastructure and services, e.g. schools, roads, doctors surgeries, hospital, are inadequate to support a development of this size.
6. Would reduce the ability of land to absorb rainfall and increase the risk of flooding.
7. Inappropriate given deep recession faced by the country.
8. Brownfield and similar sites should be developed not green fields around Stratford.
9. Traffic on Alcester Road is already bad enough.
10. There are many empty properties in Stratford already.
11. Cause serious traffic congestion and increased danger on Evesham Road/Bordon Hill.
12. People will have to travel out of town due to shortage of professional jobs.
13. Would have a serious effect on employment levels in the town and surrounding area.
14. Phasing of new building should be skewed to later years given current economic conditions.
15. Reference to 'electricity transmission lines' should be changed to 'electricity distribution lines'.
16. Rural aspect of Bordon Hill, the backdrop to Anne Hathaway's Cottage, will be irredeemably damaged.
17. New settlement is more appropriate.
18. Increase in traffic through Shottery will be intolerable.
19. Western Relief Road would not mitigate traffic flow but lead to pinchpoint at its junction with Evesham Road.
20. High density development degrades adjacent areas leading to a permanent loss of amenity value.
21. Building on agricultural land is inappropriate given future predictions about world food shortages.
22. Increased traffic congestion at top of West Green Drive.
23. Impact of noise pollution during development and from the additional traffic.
24. Would encroach upon and erode the open countryside surrounding Stratford.
25. Link road must be designed to minimise noise, light and visual intrusion due to sensitivity in relation to nationally significant heritage assets.
26. Coach park to rear of Anne Hathaway's Cottage is no longer wanted.
27. Latest traffic model shows congestion in the town will increase as a result of this development.
28. Would destroy the natural green boundary of Stratford which is enjoyed by tourists and local people alike.
29. Proposed relief road does not link up with any connecting through route.
30. Would spoil an area much used for recreation and abundant with wildlife.
31. Development should be spread more evenly throughout the District.
32. Appropriate that site is confirmed as a suitable location to accommodate future growth requirements.
33. Site would provide a measure of certainty and continuity in housing land supply.
34. Would assist in the maintenance and liquidity within the stock of market housing.
35. Would assist in the delivery of affordable housing.
36. There are no technical constraints to development of the site.
37. Site should remain in the long term reserve.
38. No evidence provided to substantiate why this site is preferable to others in the town or elsewhere in the District.
39. Unspecified traffic calming measures in Shottery are objectionable.
40. Any closure of Cottage Lane to traffic would be very significant to the local area and has not been modelled.
41. Link road severs existing rights of way with dangerous crossings.
42. Enhancement of ecological value of Shottery Brook is questionable.
43. No assessment of the viability of placing electricity transmission lines underground.

## **Topic: SUA.8 South of Alcester Road, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Keep all business uses in Timothy's Bridge Road/Masons Road/Birmingham Road areas.
2. There is enough empty business property and a vast amount of office space.
3. Strategy for the town should embrace brownfield and similar sites not green fields.
4. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
5. Site is physically detached from the town and more suitable land is available.
6. There is no robust or credible evidence base for this employment allocation; there is no PPS4 assessment undertaken as to why it is required.
7. It is an elongated intrusion into open countryside.

## **Topic: SUA.9 Egg Packing Station, Bishopton Lane, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Will cause additional traffic on Bishopton Lane and Birmingham Road which are already very busy.
2. Schools are already full.
3. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
4. There has been no assessment of alternative sites in and around the town to justify release of land in the Green Belt.
5. Significant level of development in this part of Stratford is not underpinned by a comprehensive vision for the area.
6. Development to north west of town will impact upon the Green Belt, reduce open areas and create urban form visible from Green Belt.
7. Do not object to building on brownfield sites.

## **Topic: SUA.10 Land off Bishopton Lane, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. There has been no assessment of alternative sites in and around the town to justify release of land in the Green Belt.
2. Proposed Parkway Station will do little to improve our lives and will increase traffic.
3. Scheme is unaffordable.
4. Inadequate evidence to support the creation of a Parkway station as few people use the train from Stratford for commuting purposes.
5. Limited resources should be spent on upgrading existing town station and Wilmcote station.
6. Visitors to the town will not want to arrive at such a remote location.
7. Vast majority of council tax payers will not use station and should not be forced to pay for it.
8. Bishopton Lane and Birmingham Road are already congested.
9. Concerns about the viability of the scheme.

## **Topic: SUA.11 South of Kipling Road, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Lack of infrastructure and service provision south of the river.
2. Traffic flow problems onto Banbury Road via Bridgetown Road.
3. Site supports various rare wildlife species which should be conserved.
4. Access should be from Shipston Road not via Bridgetown estate.
5. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
6. Impact on over-subscribed Bridgetown Primary School.
7. Too much housing development proposed for the town.
8. Does not represent a comprehensive development of the land available in the area.
9. Land should be used for community allotments.
10. Number of dwellings specified should be increased to about 112.
11. Proposal should include a definite commitment by the District Council to assume future responsibility for ongoing maintenance of Community Woodland and Meadowland.
12. Would be harmful to integrity and value of Stratford as Shakespeare's birthplace.
13. Benefits offered by developer will not compensate for overbearing nature of development on local residents.
14. Visual impact of development would mar the character of main southern approach to the town.
15. Traffic congestion at Alveston Manor roundabout and on Clopton Bridge.
16. Site should be reserved for development later in the plan period.

## **Topic: SUA.12 Milestone Road, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Increase in traffic and risk of accidents and injury.
2. Milestone Road is a quiet cul-de-sac where children play and unsuitable for the amount and type of traffic the development would create
3. Site is within the buffer zone relating to safety aspects of the landing strip north of the site.
4. Further retirement properties are not required in the town.
5. Would involve loss of a green field and spoil the landscape.
6. Parking on street would become more difficult.
7. Waitrose site on Shipston Road would be preferable because better access to amenities.
8. Loss of high quality, productive agricultural land.
9. Reduction in property values.
10. Use scrubland along Trinity Way.
11. Redevelop vacant land and buildings.
12. Impact on adjacent houses due to loss of privacy and overlooking, light and noise pollution.
13. Increase in traffic on Banbury Road/Shipston Road island and Clopton Bridge
14. Green spaces should be retained to protect health and wellbeing.
15. There is a justifiable need for the development.
16. Site is in a sustainable location.
17. Development will include supporting facilities.
18. Site is outside the built area of the town.
19. Form of development is out of character with its surroundings.
20. Would lead to complaints about noise from microlights.
21. Planning legislation gives protection to airfields from development that would affect their use.
22. Local services, e.g. nursing, are short staffed and there are no plans to increase this service.
23. Poor visibility at Banbury Road/Milestone Road junction.
24. Impact of development on views from open countryside beyond.

## **Topic: SUA.13 East of Shipston Road, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Foodstore south of the river is not needed given recent provision.
2. Foodstore will attract traffic from north of the river.
3. Site is not appropriate for a foodstore and community facilities because it is not situated near a residential area.
4. Foodstore would be contrary to national and local policy on location of retail development.
5. Site is inappropriate for a foodstore and community facilities because it is remote and severed from existing residential areas.
6. Kipling Road site should be used for a foodstore.
7. Would be harmful to integrity and value of Stratford as Shakespeare's birthplace.
8. Primary means of accessing the site would be by private car.
9. Foodstore would be damaging to village shops south of the town.
10. Foodstore would be harmful to the town centre and lead to further shop closures.
11. Site is located beyond the town boundary and development would encroach into its rural setting of town.
12. Development would have an unfavourable effect on first impressions of visitors.
13. Questionable whether a southern park-and-ride would be successful.
14. Road signage and traffic control features will create further urbanisation.
15. Foodstore will create immense traffic congestion.
16. Design of store would have to be very carefully handled.
17. Site presents an ideal opportunity to provide a mixed use development incorporating a foodstore and community facilities.
18. Foodstore is contrary to advice contained in the Council's Retail Study.
19. Principle of proposed allocation is supported.

## **Topic: SUA.14A North of Bishopton Lane, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. There are many other areas of the town that can be utilised.
2. Loss of green fields.
3. No mention is made of relationship to proposed parkway station or provision of bus links.
4. Infrastructure needs to be considered including impact on Birmingham Road.
5. Proposed quantity of housing and density is inappropriate.
6. Impact on properties fronting Bishopton Lane.
7. Will generate a large amount of traffic and pollution.
8. Must be planned in a comprehensive manner and released in small packages.
9. Open space and extensive woodland should be provided on the sloping part of the site.
10. Strain on schools, medical and other community services.
11. Unsympathetic urbanisation of hinterland of town which will threaten relationship with countryside.
12. Would destroy atmosphere as a country market town and a tourist attraction.
13. Would seriously compromise views of Bishopton Hill and surrounding open countryside.
14. Land is important for emergency landing of aircraft.
15. Rural footpaths are in constant use.
16. Site should be included for housing development as it is available, suitable and achievable.
17. Site is suitable for approx. 575 dwellings.
18. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
19. Site lies in an area of adopted Green Belt.
20. District Council has not carried out appropriate research on alternative sites in and around the town for development.
21. Loss of agricultural land and impact on wildlife.

22. Potential flooding and drainage problems given that drains overflow.
23. Field at Ridgway end of site should be retained as open space because it is higher.
24. Noise levels from bypass would be a big impact.
25. Canal bridge should be kept as it is as it controls traffic speed.
26. Shops, doctors surgery and a park should be provided as part of development.
27. Canal bridge is owned by British Waterways and its improvement or replacement must be agreed by them.
28. Brownfield sites elsewhere in the District should be used.
29. Land should remain as a buffer between northern bypass and the town.
30. Full consultation and public meetings are required to consider the issues raised.
31. Canal bridge is a heritage site of some merit.
32. Land is a green lung for northern part of town and there is a shortage of green space in Bishopton.
33. No provision for additional secondary education.
34. General quality of life of all current residents will be lowered.
35. Safety of pedestrians over canal bridge would be an even greater problem than it is already.
36. Development within the town should be limited to infill, brownfield and windfall sites.
37. Densities should be low and reflect semi rural location.
38. Structural landscaping should be a fundamental component of allocation.

## **Topic: SUA.14B West of Birmingham Road, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Further development in area will cause major problems to the environment.
2. Leisure Centre should remain in centre of the town.
3. Birmingham Road is already overloaded with traffic.
4. No further building should take place until major drainage problem has been resolved.
5. Should take into consideration the sporting needs of residents, workers and visitors; a PPG17 assessment will be required.
6. Site lies in an area of adopted Green Belt.
7. District Council has not carried out appropriate research on alternative sites in and around the town for development.
8. Proposed mix of uses could be incompatible and may not be deliverable.
9. Significant level of development proposed which is not underpinned by a comprehensive vision for area.
10. Area is prone to flooding and further development will cause substantial problems.
11. Generally support the proposals and will continue to co-operate with landowners to bring site forward for development.
12. Site should not be subject to a phasing policy.
13. Concerns that High School could not cope with increase in pupil numbers.
14. Development would encroach upon and erode open countryside surrounding the town
15. Development will impact upon Green Belt and be visible from Green Belt.
16. Full consultation and public meetings are required to consider the issues raised.

## **Topic: SUA.14C East of Birmingham Road, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Traffic congestion on Birmingham Road is already unbearable.
2. Risk of flooding in the area due to Racecourse Brook.
3. Loss of views from existing properties.
4. Lack of provision for community facilities, shops, playing fields and green space.
5. No further building should take place until major drainage problem has been resolved.
6. Site lies in an area of adopted Green Belt.

7. District Council has not carried out appropriate research on alternative sites in and around the town for development.
8. There is a wild abundance of wildlife in the fields.
9. Significant level of development proposed which is not underpinned by a comprehensive vision for the area.
10. Site is a sustainable location for development which would provide a natural extension to the town.
11. Generally support the proposals and will continue to co-operate with landowners to bring site forward for development.
12. Site should not be subject to a phasing policy.
13. Development would encroach upon and erode open countryside surrounding the town.
14. Full consultation and public meetings are required to consider the issues raised.
15. Town does not have the infrastructure to support further significant development.
16. Development within the town should be limited to infill, brownfield and windfall sites.
17. Site is in a sensitive and prominent location.

## **Topic: 7.2 Proposals for Development - Alcester**

### **Summary of Matters Raised in Representations**

1. Para 7.2.1 reference to 'burbage plots' should be '**burgage** plots'
2. Existing infrastructure constraints must be addressed prior to further development. This includes a new medical centre, more parking in the town centre, increased local school capacity and drainage capacity constraints.

## **Topic: 7.2a Proposals for Development - The Goals for Alcester**

### **Summary of Matters Raised in Representations**

1. Agree with all goals for Alcester.
2. Support proposals to improve shopping, new health centre and development of youth and sporting facilities in the context that Alcester is a service centre for local residents who live outside the town.

## **Topic: 7.2b Proposals for Development - Alcester, Introduction**

### **Summary of Matters Raised in Representations**

1. There are several infrastructure constraints in the town that should constrain the number of new dwellings. These include:
  - Over subscribed schools
  - GP at capacity
  - Local traffic congestion
  - Insufficient employment opportunities
  - Pressure on local policing
2. Further development will harm the character of the town
3. De-silting of existing drains may address flood risk and drainage issues.
4. Further development of the flood plain will exacerbate flood vulnerability. This is particularly relevant to town centre developments.

## **Topic: ALC.1 North of Arden Road, Alcester (Coughton Parish)**

### **Summary of Matters Raised in Representations**

1. Site development will exacerbate existing flood issues
2. Small area of adjacent additional land to west should be allocated for development and removed from Green Belt. Land is available and unconstrained and would enable development on both sides of access road.
3. Primary vehicular access to be provided via continuation of unnamed road running from Arden Road between existing industrial units on western edge of site. Alcester Estates Ltd have confirmed that they will make land available to provide necessary site access.
4. County Highways would prefer a secondary access. Possibility of access from north eastern corner of site (connecting to Tything Road) is being considered.
5. Lack of detailed assessment of potential impact on Coughton Court. This may result in site being considered unsuitable for proposed development. Suggested landscaping along northern boundary has not been demonstrated as adequate mitigation. Requirements for building height limits and off site planting may also need to be considered. Policy should clarify landscaping requirements (perhaps as per requirements for WELL.2)
6. Further industrial space may not be required as there are empty units in the town.
7. Supported by Alcester Town Council.

8. Support proposal for employment development.

## **Topic: ALC.2 East of Kinwarton Farm Road, Alcester (Kinwarton Parish)**

### **Summary of Matters Raised in Representations**

1. Development would exacerbate existing traffic and flooding issues
2. Retention of ponds on site is inadequate flood mitigation
3. No viable solution for surface or foul water drainage has been identified
4. Roads adjacent to site are already traffic blackspots
5. Existing deficiencies in youth facility provision will be exacerbated
6. Local demand for housing has not been proven. Housing has increased by 48% since 1981 and the population by only 20% - an indication that there is a significant number of vacant properties in the town
7. Town is at risk of being overdeveloped
8. Concerns over water supply constraints
9. Detrimental effect on the character and attractiveness of the town, its market character and wider landscape setting
10. Site has limited public transport links/ opportunities
11. Loss of a popular green space and area for informal recreation in a town where open space provision is already constrained
12. Site already has serious surface run off problems.
13. Site might be better suited to communal gardens or allotments
14. Development will lead to 420 increase in population (6%) and 240 vehicles which existing town infrastructure cannot support
15. Kinwarton Farm Road provides a natural settlement boundary for the town.
16. Development would dominate the skyline, be visible from the Heart of England Way and form a prominent feature within surrounding countryside
17. Encroachment into open countryside
18. There are other sites in and around the town that are more suited to development
19. Confirmation that there are no significant constraints to development on the site
20. Detrimental effects on the openness of adjacent Green Belt
21. Development would provide unattractive boundary to the town
22. Greenfield sites should be a last resort in terms of meeting local need; there are more sustainable locations for housing growth in the town
23. Development could conflict with nearby schools on Gunnings Road (safety of children, traffic congestion etc)
24. Impact on adjacent natural habitats
25. Road safety issues associated with elderly residents of nearby Oversley House and Jubilee Court
26. Specify amount of affordable housing - it should be more than the minimum %.
27. Subject to planning consent this site can deliver housing completions in the period 2011-16.
28. Supported by Alcester Town Council subject to specific requirements stated in the proposal.

## **Topic: ALC.3 North of Allimore Lane, Alcester**

### **Summary of Matters Raised in Representations**

1. Site is prone to flooding with associated impacts on adjacent properties.
2. Eclipse Road and Birmingham Road are prone to congestion at peak times, due to congestion with Alcester Grammar School
3. Site has informal recreation and amenity value, with access by public footpath.
4. Biodiversity value of site will be lost - site provides a habitat for some endangered species. Wildlife observed on site includes muntjac deer, bats, owls and cuckoos whose habitats are already threatened.
5. Access from Birmingham Road is not viable. Neither is Eclipse Road which is used by Alcester



Grammar school for parking.

6. Site may contain important archaeological remains
7. Risk of loss of market town and roman character if the town continues to be developed.
8. House price issues in Alcester will be exacerbated
9. Improved amenities and recreation space should be nearer the town centre
10. Impact on capacity of local schools to absorb increase in school pupil numbers
11. Town is unsuitable for large scale development because it isn't on a transport corridor
12. Knock on effects for wider road infrastructure due to increased out commuting.
13. Medical facilities and schools in the town are already at capacity.
14. Flooding issues must be satisfactorily resolved before further development takes place in the town
15. Any development must incorporate buffer zones to protect local wildlife.
16. Maximum number of dwellings should be no more than 250 due to local infrastructure constraints
17. Must take into account the cumulative impact of several large scale developments in the area on local infrastructure and services
18. Risk that Alcester will develop 'suburbs'. Clusters around main centre is a better approach
19. Site should be allocated in the first phase of development as there are no infrastructure constraints affecting it.
20. Site should be extended to the south as far as Spittle Brook.
21. High ground and Green Belt setting make the site unsuitable for large scale development
22. Inspectors have suggested that development of more than 100 dwellings would be inappropriate.
23. Greenfield development should be a last resort. Inclusion of the site in the Core Strategy is premature as there are more sustainable locations in the District for large scale development.
24. There is no demonstrable need for such a large development in Alcester.
25. Supported by Alcester Town Council subject to specific requirements stated in the proposal.

## **Topic: ALC.4 Land off Moorfield Road, Alcester**

### **Summary of Matters Raised in Representations**

1. Realignment of traffic island on Priory Road/ Swan Street and Evesham Street may be necessary
2. Extension of existing store is not going to be beneficial for those who cannot afford higher prices
3. Extension of existing store to cover majority of site may create a large and obtrusive road frontage which is out of character with the local area and does not provide a very good gateway to the town.
4. Potential for the site to accommodate smaller retail units should be considered.
5. Residents who visit Alcester for shopping and services welcome proposals to improve shopping in the town.

## **Topic: 7.3 Proposals for Development - Bidford-on-Avon**

### **Summary of Matters Raised in Representations**

1. Bidford is supposed to be a village but has grown so large that it is losing its character.
2. Village has seen a great number of houses built but little or no investment in infrastructure.
3. More development will lead to further overloading of the roads.
4. Proposed scale of development does not represent a suitable quantum to address local housing needs in Bidford and that of its rural hinterland.
5. Question whether sewer system and sewage works could cope with more effluent.
6. Areas proposed for development are prime agricultural land.
7. Wording of para. 7.3.11 is objected to as it can be interpreted as preventing the delivery of other development sites in the village until Friday Furlong is delivered.
8. Three and four bedroom detached private properties are not the type of housing that is needed in Bidford.
9. Further dwellings would mean that additional facilities would need to be put in place to cope with traffic and drainage problems, access to secondary school, need for medical, shopping and leisure facilities.
10. Proposed scale of development is entirely unsustainable due to decline in services, the level of commuting to jobs, traffic congestion, lack of public transport to reach hospitals, flood risk, and it is not needed by the community.
11. Village is being expected to accept far more than its fair percentage increase.
12. There has been no apparent consideration of the use of brownfield sites.
13. Proposed development will draw population from outside the village rather than serve more modest local needs.
14. Disagree with para.7.3.8 which states that the scale of development in the village is intended to be limited given the comparatively modest provision of shops and services, since it is recognised as a Main Rural Centre.
15. Cannot agree with statement in para. 7.3.4 that there is a reasonable range of shops and services which meet the needs of local residents and surrounding villages.
16. Adopted Parish Plan clearly states that planning authority should adopt a policy that safeguards the village qualities and rejects urban style developments.

## **Topic: 7.3a Proposals for Development - The Goals for Bidford-on-Avon**

### **Summary of Matters Raised in Representations**

1. The goals for Bidford are fine but not supported by Proposals BID.2 and BID.3.

## **Topic: 7.3b Proposals for Development - Bidford-on-Avon, Introduction**

### **Summary of Matters Raised in Representations**

1. There is already a significant delay in both BID.1 and BID.4, so BID.2 and BID.3 should be deleted as being examples of greed not need.

## **Topic: BID.1 Friday Furlong, Waterloo Road, Bidford-on-Avon**

### **Summary of Matters Raised in Representations**

1. Concern about increase in traffic and traffic speed.
2. Development in Bidford should be restricted to this area.
3. Traffic island should be provided at Waterloo Road/Tower Hill junction.
4. Misleading to include this site in Core Strategy as it already has planning permission.
5. Increased risk of flooding in village.
6. Provision of medical centre should be pursued with vigour given benefits to Bidford residents.
7. Should be given less priority in terms of phasing by more sustainable development options in Stratford-upon-Avon.
8. Accept that this site is required.
9. Development of site should be pursued more vigorously given its disgraceful state.
10. Infrastructure and services in Bidford are unable to cope with further substantial development.
11. Scale of proposed development in Bidford will lead to the loss of its rural character.
12. Bidford Parish Plan does not support further large-scale development in the village.
13. Inclusion of site is supported but its capacity should be increased to 275 dwellings by including land north of the track.

## **Topic: BID.2 North of Bramley Way, Bidford-on-Avon**

### **Summary of Matters Raised in Representations**

1. New houses should not be built without adequate new or improved services.
2. There is already sufficient housing in Bidford.
3. Concern about traffic and adherence to speed limits.
4. Identification of site is supported but proposed phasing of development is unreasonable and unnecessary.
5. Delivery is questionable as it is reliant on a third party landowner to provide the necessary access.
6. Proposed density of development is too high
7. Land in question has a high water table which could impact on adjacent properties.
8. Site supports a great diversity of wildlife, including bats.
9. Additional traffic passing the primary school.
10. Health centre cannot cope with more patients.
11. Bidford has very few shops and services.
12. More development should be provided in other large rural settlements.
13. Scale of development proposed in Bidford is not commensurate with its limited facilities and relatively poor accessibility.
14. Loss of Grade 2 agricultural land.
15. Site has landscape interest and its protection from development complies with Warwickshire Landscape Guidelines.
16. Site is affected by pluvial flooding and a Flood Risk Assessment should be carried out.
17. Traffic generated on Bramley Way would harm living conditions of existing properties fronting it.
18. Low water pressure in village already causes problems.
19. Identification of the site is supported.
20. Two access points should be provided in order to spread traffic load and for emergency access.
21. Infrastructure and services in Bidford are unable to cope with further substantial development.
22. Scale of proposed development in Bidford will lead to the loss of its rural character.
23. Bidford Parish Plan does not support further large-scale development in the village.
24. Will result in more residents commuting to work.

## **Topic: BID.3 North of Salford Road, Bidford-on-Avon**

### **Summary of Matters Raised in Representations**

1. Scale of development is inappropriate for a village and would harm its rural nature.
2. Danger of increased flooding and drainage problems being caused.
3. Would disrupt traffic flow through village.
4. Increase pressure on local services that are already stretched beyond capacity.
5. Would cause traffic congestion and danger.
6. Noise from building works and once built on houses facing development.
7. Would take away valuable recreational land.
8. Loss of a beautiful piece of unspoilt farmland.
9. Infrastructure and services in the village, eg. water pressure, sewers, primary school, medical centre, are unable to cope with additional residents.
10. Concerned about possibility of public footpath being created next to house.
11. Proposed closure of fire station is a reason for little more housing being provided in Bidford.
12. Access should be from existing estate road not from Salford Road otherwise a dangerous junction will be created.
13. Lowering of current house prices.
14. Visual impact when entering village from Marriage Hill giving the appearance of a sprawling development.
15. Site is poorly related to existing pattern of development and residents would be some distance from main employment area in the village.
16. Would cause an unacceptable encroachment into open countryside.
17. Land is designated as Green Belt.
18. Tree Preservation Orders should be placed on certain trees affected.
19. Involves the demolition of a house of architectural merit.
20. Affects sensitive landscape area due to rising topography.
21. There are no physical impediments to the development of the site.
22. Site should be extended northwards and its capacity increased to 150 dwellings.
23. Offers nothing to the people of Bidford in terms of correct type of housing.
24. Loss of high quality agricultural land.
25. Lack of secondary school which means that pupils have to travel outside village.
26. Site breaches built up area boundary and will lead to loss of space between Bidford and Salford.
27. Site should come forward during first phase of Core Strategy.
28. Loss of important local wildlife.
29. A twenty four hour traffic count should be carried out to assess present volume of traffic.
30. Would draw population from outside the village rather than serve more modest local needs.
31. Bidford Parish Plan does not support further large-scale development in the village.
32. Will result in more residents commuting to work.

## **Topic: BID.4 Land East of Waterloo Park Industrial Estate**

### **Summary of Matters Raised in Representations**

1. Would expand the boundaries of the village.
2. Provision of more employment in Bidford is welcomed.
3. Would increase traffic volumes on Waterloo Road.
4. There is a borehole on the site and pollution prevention measures may be required.
5. Development would act as a focus for commuters from elsewhere rather than provide local employment.

## **Topic: 7.4 Proposals for Development - Henley-in-Arden**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: 7.4a Proposals for Development - The Goals for Henley-in-Arden**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: 7.4b Proposals for Development - Henley-in-Arden, Introduction**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: HEN.1 Former Cattle Market, Warwick Road, Henley-in-Arden**

### **Summary of Matters Raised in Representations**

1. Design must be in keeping with local area. Residential units must be low rise.
2. Provision of smaller affordable units suitable for older people would be appropriate
3. Must consider whether a large proportion of family housing is suitable given capacity of local schools and limited supply of local employment opportunities
4. Scheme could incorporate rear access and parking for existing properties 261-277 High Street.
5. Capacity of the site for housing is greater than 20 dwellings. 2008 SHLAA suggested between 34 and 56 units, which was revised downwards to 30 in 2009 review, although there was no justification for doing so.
6. Current proposals for the site incorporate 48 dwellings and 420 sq.m. foodstore. Proposed scale of development is achievable and in keeping within the local area.

## **Topic: HEN.2 West of Bear Lane, Henley-in-Arden**

### **Summary of Matters Raised in Representations**

1. Limited access to site via Bear Lane, beneath a low railway bridge to the north of the station. Existing access rights to serve the old coal yard and residential building plots. New or additional access rights over Network Rail property on Bear Lane will require prior approval from Network Rail Property.
2. Residential development is inappropriate in the Green Belt. RSS did not provide a strategic case for Green Belt release in Henley in Arden.
3. The major land owner and developer supports making the land available for a range of development proposals as detailed in Proposal HEN.2.

## **Topic: 7.5 Proposals for Development - Kineton**

### **Summary of Matters Raised in Representations**

Broad support for proposals, in keeping with the growth of an important rural settlement. Important the village retains its secondary school.

## **Topic: 7.5a Proposals for Development - Kineton, The Goals for Kineton**

### **Summary of Matters Raised in Representations**

The goals for Kineton are supported in full by one respondent.

## **Topic: 7.5b Proposals for Development - Kineton, Introduction**

### **Summary of Matters Raised in Representations**

No comments

## **Topic: KIN.1 North of Banbury Road, Kineton (Site of Kineton High School)**

### **Summary of Matters Raised in Representations**

1. Recommend a pre-commencement archaeological survey to investigate the possibilities of Civil War remains on site.
2. Comment design of future housing should be in keeping historic village dwellings.
3. Comment-new dwellings should be built to 'green' standards, with renewable energy generation.
- 4 Objection to proposal - development of site would result traffic congestion on a cramped existing road network, which are congested by parked cars, e.g. buses forced on pavements to get through village centre at times.
- 5 Infrastructure and services for existing residents at full capacity, further development would be detrimental.
6. Access into proposed site has not been fully explored.
7. Proposed replacement school should be sited further back into site to safeguard residential amenities. Development will devalue existing properties in Green Farm End and Short Acres.
8. Objects - development would exacerbate current flooding problems.
9. Objects - Existing cemetery at full capacity - no additional provision is provided.
10. Object - development would result in unsustainable forms of travel patterns by new residents as no employment in village.
11. Object - No guarantee that there is investment to relocate the High School, this is contrary to PPS3 test of certainty of deliverability. Site should not be included.
12. Impact on children's safety and security from new development.

13. Not feasible to build out site without an alternative access or relief road as development would produce untenable traffic congestion.

14. Support - Broad support for development as keeping with the growth of an important rural settlement. It's important that the village retains its secondary school. Reasonable option to site 75 new dwellings on vacant site and located new school behind. Kineton could be a model of rural development.

## Topic: 7.6 Proposals for Development - Shipston-on-Stour

### Summary of Matters Raised in Representations

1. The District Council should protect the town centre and support the local producers who do business there. This will help the local economy.
2. Development should be geared to meeting the needs of the local community, including provision of more jobs and better education. Only local needs housing should be catered for, otherwise the town will become even more of a dormitory settlement.
3. Shipston should not have to bear further housing development after doubling its size since 1981 with hardly any infrastructure improvements to go with that development, while flooding has become worse and employment has decreased. Growth has also coincided with disinvestment in public services, e.g. withdrawal of subsidized education transport for the 16+ age group, withdrawal of anti-drug abuse funding, closure of SDC's Telegraph Street office, together with a reduction of on-street policing.
4. Concern is expressed about the potential impact of the proposed housing on the two schools at Shipston-on-Stour. The Primary School is already very large, while the High School's relatively small size is seen as a positive quality which is helping towards its recent improvements. It is unclear how any new development will fund increased capacity in the schools.
5. It is accepted that Shipston will need to take a share of the district's housing requirement. 250 new homes is not an unreasonable number.
6. There is support for the recognition of Shipston-on-Stour as a sustainable settlement which should receive more development.
7. At the moment the settlement does not encroach on its natural setting. However, the addition of 250 houses will change the character of the town and require additional infrastructure. Because of this, development of this scale would be inconsistent with the Core Strategy's Spatial Objectives.
8. The need for more affordable housing is accepted. However, 250 new dwellings will merely increase vacancy rates and reduce property prices which is not good for most residents.
9. Specialist accommodation for the elderly would be very useful and would be in line with demographic trends.
10. A new and improved medical centre is seen as being a great asset for the town and would also help to address trends towards an aging population.
11. Shipston needs the economic support that would come from more jobs being located in the town, otherwise spending is lost to other places and more housing would just mean more commuting. However, the town is poorly placed to attract employment growth from outside, so every effort should be made to encourage the start-up and growth of local businesses.
12. The car parking situation in the town centre is usually good. The small charge at Telegraph Street keeps a turnaround of spaces. It is much cheaper than Moreton-in-Marsh, and the free parking in Mill Street is a big benefit.
13. Support is expressed for The Goals for Shipston-on-Stour as they are considered appropriate for the enhancement of the town, although there is some concern that a riverside walk would be too formal and too urban in character.
14. Goal 1 for Shipston-on-Stour. An edge-of-town supermarket will not protect the character of the town centre. Goal 4 - The Co-op should be able to improve the existing town centre shopping facilities by re-organizing their existing formats. On the other hand, Proposal SHIP.1 is seen as



ensuring that many of the goals are met through the delivery of the range of uses required for the site.

15. The general principle of an additional foodstore is supported but there is a need to assess a range of potential edge of centre sites in accordance with the requirements of PPS4.
16. Any development will need to incorporate properly controlled drainage systems.
17. The soil around Shipston may be unsuitable for concrete foundations.
18. Speeding traffic is a big problem in the town, especially along Campden Road.
19. The town needs more leisure and recreation facilities for young people.

## **Topic: 7.6a Proposals for Development - Shipston-on-Stour, The Goals for Shipston-on-Stour**

### **Summary of Matters Raised in Representations**

See responses to Topic 7.6.

## **Topic: 7.6b Proposals for Development - Shipston-on-Stour, Introduction**

### **Summary of Matters Raised in Representations**

1. The rationale for the identification of the Campden Road land for development is strongly disputed by the Town Council. The existence of the Norgren site cannot justify the allocation of the land for development as an exception to the town's historic pattern of growth and in the face of the damage that will arise to the setting of the town through the development of this rising ground.

## **Topic: SHIP.1 North and South of Campden Road, Shipston-on-Stour**

### **Summary of Matters Raised in Representations**

After general comments on the potential impact of development at Campden Road, the representations are grouped by the part of the proposal they concern. Most comments related to the proposal to include a foodstore on part of the land.

#### **A. General Issues - Objection to Development**

- A1 The drainage infrastructure of Shipston-on-Stour has very limited capacity and is very outdated, particularly in the centre of town with drains backing up regularly. It will not be able to cope with a large development on the Campden Road and it is likely that such a development will give rise to more flooding in the town. The land at Campden Road is already subject to flooding, with run-off affecting properties in Oldbutt Road. There is much scepticism about the scope of the development to be designed to avoid making this situation worse on and off site. The sewage treatment works will probably need extending to cope with this scale of development. Development could also give rise to changes in the water table leading possible subsidence of adjoining properties.
- A2 Shipston-on-Stour is in dire need for further employment following the recent demise of Norgren, Turbine Blading and Pettifers. To help compensate for these job losses and to exploit skills in the local workforce, the Norgren site should be retained for employment and used for business starter units. If this does not happen, the town will become nothing more than a dormitory settlement.
- A3 Development of this rising ground will have an adverse impact on the setting of the town and will be at odds with the historic north-south linear form of the town. The Norgren site was always a distinct entity which has never been part of the town and should not be linked to the town. This would set a precedent for further development along Campden Road. Development would harm views of the skyline from the town centre and views across the town from the Campden Road and from the Cotswolds AONB from which it is highly visible, particularly if it is located above the 85m. contour. The outlook of many existing properties will be ruined. The Local Plan Inspector commented that development in this location would be especially harmful to the appearance of the town. It could weaken the landscape screening of the Norgren site and increase light pollution. Because of the negative impact on the landscape, the development would be contrary to Objectives 11 and 19 of the Consultation Core Strategy, i.e. locating development where impact will be minimized and protecting the character of local landscapes, especially the quality and setting of the Cotswolds AONB.
- A4 The development will increase traffic on Campden Road which has a very poor alignment and joins the A429 Fosse Way (a "High Risk Crash" route) at a very dangerous junction in the form of Portobello Crossroads. Unless improvements are made, the likelihood of accidents will increase, but if such improvements are made it will urbanize the junction and cause negative impact on the Cotswolds AONB. The development will also increase traffic in the town centre, including h.g.v.s, especially along West Street which is very narrow in places. Greater congestion in the town centre will deter use of town centre shops and businesses. It will also cause more noise and air pollution.
- A5 Much of the development will use farmland which should be retained for food production in the face of increasing difficulties in securing food supplies nationally and globally.
- A6 The greenfield element of the scheme has not been clearly justified by a sequential test which provides evidence that there are no brownfield options available.
- A7 Norgren gained permission for the expansion of their factory at Campden Road by threatening to leave the town if they failed to gain permission. Now that they have deserted the town the site should revert to farmland.

- A8 Development will have an adverse impact on protected wildlife species and wildlife in general that currently inhabits or uses the land.
- A9 There is a need to keep the town small-scale and well linked to the surrounding countryside because there is very little greenspace within the town.
- A10 The Norgren site should be considered as a location for a new enlarged High School including a sixth form.
- A11 The pavements on Campden Road are inadequate and poorly maintained.
- A12 Large scale development at Shipston-on-Stour would fly in the face of the current dis-investment in the town's public services, e.g. closure of SDC's sub-office, closure of the Registrar's office and reduced police presence.

**B. General Issues - Support for Development**

- B1 This side of the town is the best option as a location for development on the edge of the town in terms of least impact on the Cotswolds AONB and the setting of the town.
- B2 The land is not subject to any landscape or planning policy designations. It does not contain any protected wildlife habitat. It will have no direct impact on Shipston-on-Stour Conservation Area or its setting and will be seen in the context of modern development.
- B3 The land is not subject to known physical constraints. It is not within subject to fluvial flooding and the proposed development area is large enough to provide sustainable drainage to manage run-off. The RPS Preliminary Drainage Appraisal showed how drainage issues can be addressed.
- B4 Highway access is not a constraint as this can be achieved direct from Campden Road.
- B5 The development would be large enough to justify a bus stop being created on Campden Road.
- B6 The site is within easy reach of Moreton-in-Marsh railway station.
- B7 Campden Road already has a wide pavement which provides pedestrian access all the way up to the Norgren site.
- B8 Development of the site will accord with Policy EC6.2 of PPS4: locate most new development in or on the edge of existing settlements where employment, housing (including affordable housing), services and other facilities can be provided close together.
- B9 The size of the development is sufficient to provide a comprehensive package of facilities.
- B10 The proposal has a brownfield element unlike other options for development on the edge of the town, while the greenfield element is necessary because the town cannot accommodate the required level of growth on brownfield land.
- B11 The small sites which would provide an organic form of development would not be large enough to support significant community benefits.
- B12 The RPS Masterplan shows how the development can be integrated with the town and the local landscape. It shows that the development is contained below the ridge line.
- B13 Development is in conformity with Policy RR3 of the West Midlands RSS by strengthening the role of Shipston-on-Stour as a market town.

- B14 The Norgren part of the site is most suited to residential development in view of the sensitivity of the site, but mitigated by landscaping and use of open space. Business uses should be located close to the edge of the town as part of an integrated hub.
- B15 The Norgren buildings do not meet the locational and space requirements of modern businesses and needs to be redeveloped. It is also well served by mains services.
- B16 The SHIP.1 proposal is consistent with the moderate dispersal objective of the Core Strategy.
- B17 It will be an opportunity for the creation of a decentralized energy supply for the site and for the existing community.

### **C. Foodstore - Objections**

- C1 The proposal is inconsistent with SDC's objective to protect the well-being of residents and communities. It will discriminate against the elderly and disabled by locating a retail facility where it can only be easily accessed by means of the private car.
- C2 The proposal will undermine the viability of many of the town centre businesses, particularly the specialized food retailers such as the butchers, greengrocers, fishmonger and delicatessens. These businesses operate at narrow margins but provide a very good, knowledgeable and personal service which is much valued by regulars and visitors. They will be vulnerable to the undercutting competition of an edge-of-town national chain foodstore which will attract and keep people out of the town centre, especially through the provision of on-site free car parking. Objectors cite many examples of market towns where edge-of -town or out-of-centre "foodstores" are seen as having reduced the vitality of town centres. Stratford-upon-Avon and Stow-on-the-Wold are the most frequently quoted examples.
- C3 The tendency of large "foodstores" to stock non-food products such as household goods, toiletries, clothes and medicines will undermine the viability of the non-food retailers in the centre of the town. The ability of the District Council to limit the range of goods to be sold at the "foodstore" is called into question in the light of experience with other large stores of this type. The closure of such businesses would mean a reduction of choice for shoppers, a quality that also much valued by those who use the town centre.
- C4 The decline of retailing in the town centre which would arise through an edge-of-town foodstore will have some serious and harmful effects on the town as a whole:
- The small-scale specialized retailers contribute greatly to Shipston-on-Stour's character and are the main attraction for visitors to the town. These visitors are drawn from any different places and their spending helps to retain local employment and a new foodstore would not compensate for the loss of employment that would arise through the closure of shops and other businesses in the town centre.
  - The town centre is a vibrant and attractive place in which to shop and do business. It has a strong social role where people have opportunity to meet each other and pass the time of day. This role is appreciated by everyone who uses the town centre and a big foodstore could fulfil this function.
  - Decline of the town centre could give rise to social ills such as anti-social behaviour.
- C5 Allowing the edge-of-town foodstore in the knowledge of potentially damaging effects on the health of the town centre would be wholly contrary to the stated objectives and policies of the Draft Core Strategy relating to:
- maintaining the role of the larger rural settlements as providers of a wide range of shops and services for their local areas;

- promoting tourism;
  - maintaining the distinctive character of places.
- C6 The proposal would also be contrary to “The Goals for Shipston-on-Stour” in the Draft Core Strategy, particularly:
- protecting and enhancing the character of the historic town centre;
  - diversifying the local economy;
  - promoting tourism in the town.
- C7 Location of a foodstore on the edge of the town fails to meet all of the criteria of Policy CS.7 of the Draft Core Strategy, particularly those relating to impact on town centres and non-car accessibility.
- C8 The proposal would be contrary to the will of the majority expressed through responses to the Town Plan questionnaire when 60% of respondents said they did not want an out-of-town supermarket. It would also be contrary to the Town Plan objective to support the existing broad spectrum of retail businesses.
- C9 The proposal would be contrary to the views of the clear majority (8 to 1) expressed during the town centre poll undertaken by Transition Shipston and Surrounding Communities.
- C10 The Stratford-on-Avon District Retail Study by Colliers on which the foodstore proposal is based is questioned for the following reasons:
- it was based on a very small sample of people living in the area;
  - it did not make allowance for the reasons why people shop out of town, particularly the tendency to for people to shop where they work;
  - in any case the places where people do their “big shop” are relatively close by, e.g. Stratford-upon-Avon, Banbury and Stow-on-the-Wold and does not involve a great deal of car use and such specific journeys are not frequent;
  - the study is already outdated in that it does not take into account the much increased use of the internet for monthly food shopping;
  - as a consequence the study overplays the potential impact of the foodstore on “big shop” shopping, particularly when the proposed store would be much smaller than those in Stratford-upon-Avon and Banbury;
  - the view that “overtrading” represents a problem is disputed in that it can be regarded as a sign of a healthy town centre which is attracting a good level of trade;
  - the view that “leakage” is a problem is seen as mistaken in that it represents bulky goods with lower margins being bought in larger supermarkets often near where people work or via the internet, with the rest of the shopping taking place in Shipston-on-Stour which represents a sensible and sustainable pattern of retailing;
  - the study fails to properly examine the potential impact of additional food retailing floorspace on existing town centre retailers;
  - it only provides a partial of retail issues in that it concentrates on convenience goods shopping and does not examine other forms of shopping that are important in the context of market towns.
- C11 The RPS Retail Assessment is questioned for the following reasons:
- it is poorly researched and partly inaccurate;
  - the study does not represent an impact assessment in that it does not fully consider the potential effects of an edge-of-town foodstore on the town centre businesses;

- its assumptions regarding spin-off benefits of an edge-of-town foodstore are very doubtful. There is no substance to the claim that it will increase trade in the town centre.
- C12 An edge-of-town foodstore would be contrary to the principles of sustainability such as those espoused by the Draft Core Strategy and embodied in Shipston-on-Stour's Transition Town status because:
- it would encourage car dependency by locating the store where it would be difficult to access other than by the motor car and would discriminate against those without cars;
  - it would support large retailing companies that rely on practices that are carbon-rich such as importing out-of-season crops from all over the world;
  - it would cause the closure of businesses that are much "greener" in ethos because they sell products that are locally produced and which do not have to be transported long distances;
  - "big shopping" should be seen as something unsustainable and out-of-date and the District Council should not be encouraging it to continue;
  - if "big shopping" has to happen, then its negative effects could be reduced by improving bus services to big stores in Stratford-upon-Avon and Banbury.
- C13 A report by the Competition Commission found that dominant single supermarkets do not give lower prices because they are not in a competitive situation.
- C14 The foodstore will have a harmful effect on small retailers in Moreton-in-Marsh and Chipping Campden.
- C15 The employment that the foodstore would create would be low paid and not an adequate substitute for the jobs that will be lost in the town centre. A survey by Transition Shipston and Surrounding Communities indicated a possible loss of 26 shops would occur as a result of an edge of town foodstore, leading to a loss of 170 retail jobs and over 100 jobs in local businesses that supply these shops. A new foodstore would not compensate for these job losses.
- C16 An alternative more sustainable approach to improving food retailing in the town would be to permit one of the big chains to use a town centre location for a small format "metro" style store.
- C17 An edge-of-town location for a foodstore conflicts with PPS4 because its links with the town centre will be minimal and because of this it will only support "one stop shopping". In fact the new PPS4 has not been properly taken into account in the identification of this site for a foodstore.
- C18 The site is a less sustainable option than sites at Stratford-upon-Avon which should be given priority for short-term release.

#### **D. Foodstore - Support**

- D1 It will avoid people having to travel some distance to other places for their main food shopping. This will be of convenience for local people, reduce the use of the motor car and save on energy costs.
- D2 It would raise profile of the town and bring in people who never shop in Shipston at the moment. By so doing it will make more people aware of the small specialized shops in the town centre and thereby increase use of these businesses.
- D3 The fact that many local people are having to rely on internet shopping shows that the existing do not provide all of the day-to-day essentials.
- D4 The town needs a petrol filling station and construction of a foodstore would create an

opportunity for a filling station to be provided.

- D5 Public transport to supermarkets in other places is very poor. Providing a foodstore in Shipston-on-Stour would make life easier for those who do not have daytime access to a car.
- D6 The claim that such a store will harm town centre businesses is belied by the continued vitality of places like Moreton-in-Marsh and Stow-on-the-Wold which have off-centre supermarkets.
- D7 The two existing supermarkets have poor and cramped layouts and provide poor and slow service. The proposed foodstore would be much more suited to families with young children as there would be more room to manoeuvre pushchairs.
- D8 Prices in the foodstore would be cheaper than those in the town centre shops, an important issue for those who are on lower incomes.
- D9 The foodstore would provide competition for the two supermarkets in the town centre and force them to reduce their excessive prices for day-to-day essentials.
- D10 The existing shops do not cater for many basic items, e.g. clothes for teenagers.
- D11 The RPS Retail Study concluded that a foodstore would not be detrimental to existing shopping centres and that no in-town locations are available to cater for this type of retail format.

#### **E. Medical Centre - Objections**

- E1 An edge-of-town location would make the medical centre and dispensary much more difficult for many people to reach on foot, particularly the elderly.
- E2 The medical centre needs to stay close to the Ellen Badger Hospital to assist efficient management of health services and to maximize use of the hospital. The Pettifers building would have made an ideal site.
- E3 It will generate more traffic through the town centre and help to create congestion.
- E4 There is no evidence that the PCT will provide funding for a re-location.

#### **F. Medical Centre - Support**

- F1 It will provide much needed additional car parking, the lack of which creates so many problems for residents of the Donnington Road area around the existing Medical Centre.
- F2 It will provide additional local health facilities which cannot be accommodated on the current cramped site.

#### **G. Housing - Objections**

- G1 Shipston-on-Stour has seen massive growth in housing over the last thirty years (95%) and it not be subjected to further significant growth in the next ten years which will further erode the town's small-scale character. Small-scale organic housing growth for local needs would better suit the character of the town.
- G2 There is no local need for 250 dwellings. Most of them would be occupied by people moving in from other areas and then commuting out-of-town in all directions because of the lack of local employment.
- G3 Housing growth should not be concentrated at Shipston-on-Stour. A better alternative would be to spread housing around the villages where it is needed to accommodate local people.

- G4 There is no clear evidence that housing growth of this scale will bring benefits to the town and it is unclear what kinds of planning gain for the local community will arise.
- G5 250 dwellings will mean extra pressures on the town centre in the form of traffic congestion and greater demand for parking places. These pressures could deter people from using the town centre.
- G6 This scale of housing growth will create more problems for the schools in the town. There is little or no capacity to take more pupils without substantial investment to expand facilities.
- G7 Business uses should not be surrounded by residential uses. This will cause conflict in the future.
- G8 Extra housing will mean more health problems for residents because the town's river valley location encouraged the incidence of respiratory problems.
- G9 An extra care development on the Norgren site would be too far from facilities in the town centre.
- G10 Re-use of the Norgren site for residential would represent a breach of faith on the part of the owners, IMI. The residential development of the Norgren site in Station Road was permitted because it helped to fund the expansion of the Norgren factory at Campden Road and thereby retain the IMI presence at Shipston-on-Stour.

#### **H. Housing - Support**

- H1 Shipston needs to grow to help keep local businesses viable.
- H2 Growth will help to support the High School and strengthen the case for the school to be expanded to include a sixth form.
- H3 More family housing will help to provide a more balanced age structure in the town. At the moment it is skewed towards the older age groups.
- H4 Site is available to be built now, being in the hands of developers, and can provide an important contribution to the five year housing land supply.
- H5 The Land Parcels Assessment supports allocation of this site for development.
- H6 The impact of housing on the part of the site south of Campden Road can be mitigated through sensitive design and landscaping.
- H7 Additional accommodation for the elderly is much needed in the town.

#### **I. Other Comments**

- I1 The Norgren site should be used to provide better leisure facilities for the town and surrounding area. The existing Leisure Centre is too small.
- I2 The Norgren site is unsuited to employment development because of its impact on the landscape. Tilemans Lane is a better location.
- I3 Development at Campden Road will increase the need for weight limits on roads in the town centre, to avoid use by h.g.v.s.
- I4 The District Council's consultation exercise on the SHIP.1 proposals was wholly inadequate and could form the grounds for a judicial review.



## **Topic: 7.7 Proposals for Development - Southam**

### **Summary of Matters Raised in Representations**

1. Support for para 7.7.9
2. Note that Proposal SOU 1 and 2 are residential led mixed- use schemes with no reference to further food retail development.
3. Support for the identification of Southam as a sustainable development to contribute towards housing needs and local needs of its rural hinterlands, but object to the insufficient amount of development proposed. Population level, service base and public transport connections provides evidence Southam able to accommodate more than 300 new dwelling.
5. The proposal for additional retail floorspace will be fulfilled by the granting of planning permission for a Tesco food store on business park off Kineton Road, Southam.
6. The need for a retail outlet would need to be demonstrated.

## **Topic: 7.7a Proposals for Development - Southam, The Goals for Southam**

### **Summary of Matters Raised in Representations**

No Comments

## **Topic: 7.7b Proposals for Development - Southam, Introduction**

### **Summary of Matters Raised in Representations**

No comments

## **Topic: SOU.1 West of Banbury Road, Southam**

### **Summary of Matters Raised in Representations**

1. Concerns about flooding on this site due to history of water logging - alleviation required.
2. Separate consultancy report concludes proposal is within Flood Zone 1- therefore not a constraint to development.
3. Use of SUDs recommended. Ecological investigation to be undertaken.
4. Proposed location of sports facilities to south of site providing interface with development and wider area- act as mitigation for noise disturbance from potential HS2.
5. Support for principle of development as mainly non- residential as supported by evidence base
6. Object to development of larger site - not supported by evidence base (Accessibility Appraisal in Appendix 8 of SHLAA 2008) - development of more southerly extension of site would not accord with sustainability objectives, ie located too far from town centre, education and medical services. Other sites score higher, therefore no need to include the south extension of SOU.1.
7. Objects that the site would extend beyond the town's natural limit
8. Proximity to main industrial area incompatible with residential development - SHLAA needs further refinement to consider this issue.

9. Noise impact from HS2 route adjacent to southern extension of SOU.1 - need to consider alternative sites as it may be incompatible with residential use.
10. Landowner concern that SOU.1 states that provision of specialist care is optional. It will not adequately meet the level of need within Southam and its rural hinterlands, particularly in light of the County Council report of future care for elderly, highlighting a substantial gap in the level of existing and future provision.
11. Objects that proposal would be segregated from the rest of Southam due to the increase of traffic on A425 from site development. No regard to quality of life for neighbouring properties adjacent to A425 - SDC and Planning have legal requirement to protect quality of life. Upgrading of traffic network required - propose that A425 junction between Kineton Rd and Bypass is repositioned to ameliorate situation.
12. Landowner objects to redevelopment of land with existing sporting facilities provision, in light of findings from open space audit showing a deficit in provision. Site should be reserved for quantitative expansion of existing use rather than qualitative improvement by enabling development.
  1. concerns about the impact on proposed HS2 route on future residential amenities.
  2. Siting of recreational uses to situated in north of site.

## **Topic: SOU.2 West of Coventry Road, Southam**

### **Summary of Matters Raised in Representations**

1. Object - Loss of historic ridge and furrow, part of the local agricultural heritage and important remains of the area's social and economic history.
2. Object to loss of green space and children's playing area which is a safe place close to homes. Comment- concerns about proposed access through Ploughmans Holt and emergency access from Mayfield Road.
3. Landowner objects to proposed access to site, not considered suitable for traffic for proposed 100 houses. Seeks access off Coventry Road. Gap between allocated site and Coventry Road may be possible access without the need of 3rd party.
4. Object - loss of amenities and impact on wildlife.
5. Comments - concerns about noise and disturbance from development construction.
6. Object- New development will bring increase in parking problems in Ploughmans Holt, present situation at maximum capacity, resulting in danger to residents, especially children- suggest traffic calming measures.
7. Object - existing infrastructure problematic- flooding at bottom of Ploughmans Holt.
8. Support - but site is capable of greater development as identified by SHLAA and Assessment of Land Parcels. Site is in a sustainable location, walking distance to services and amenities
9. Landowner objects the land is highly visible.
10. Landowner objects - SHLAA concluded land is highly visible and not well related to the settlement.
11. Object - development is restricted by rights of way across land and to the replacement of existing open space in close proximity to dwellings, proposed new open space would extend settlement boundary to west.
12. Object - concern that SHLAA 2008 reported site not available until 2018.

## **Topic: 7.8 Proposals for Development - Studley**

### **Summary of Matters Raised in Representations**

1. There is no demonstration of how the stated goals for Studley will be met - particularly relating to air quality and traffic congestion
2. Proposals for development in Studley conflict with the stated objectives for the village - e.g. reducing traffic congestion and improving air quality.
3. Text contains some inaccuracies relating to service and facility provision in the village. There are 3 primary schools and one secondary school and two doctors surgeries.

## **Topic: 7.8a Proposals for Development - Studley, The Goals for Studley**

### **Summary of Matters Raised in Representations**

1. All the goals for Studley are soundly based but traffic is the major concern.
2. Goals are admirable but no proposals to meet them.
3. Protecting the Studley/Redditch gap is contradicted by Proposal STUD.1.
4. Agree with goals to reduce traffic and improve air quality but Proposal STUD.1 will make them impossible to achieve.

## **Topic: 7.8c Proposals for Development - Studley, Introduction**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: STUD.1 West of Birmingham Road, Studley**

### **Summary of Matters Raised in Representations**

1. New development must be sensitive to the needs of neighbouring employment uses.
2. Existing businesses on adjacent sites may require space to expand; if this is not provided then they will be forced to relocate. UKS Ltd will require land adjacent to existing premises for expansion.
3. Impacts of increased traffic generation must be suitably mitigated.
4. Hedgerow fronting Redditch Road should be retained.
5. Site has biodiversity value in its current state
6. Development will result in increased traffic congestion and associated impacts on local air quality
7. Impact on visual amenity and local views from neighbouring properties
8. Development must not increase downstream flood risk
9. Land should remain undeveloped to preserve physical separation between Redditch and Studley
10. Site should be retained wholly in employment use. The site provides a good opportunity to improve the local employment offer in the village; residential development may cause existing employment uses to relocate
11. Proposal for a cycle and pedestrian link through the site is incompatible with existing business uses on site and would not provide useful access to the village
12. Opportunities for housing development within the village itself should be explored first; alternative sites for housing in the village have been put forward by the Parish Council.
13. Site is inappropriate for specialist accommodation for the elderly
14. The local community object to housing on this site.
15. Traffic issues on the A435 must be addressed first. If a bypass is unachievable, then development feeding onto the A435 should not be permitted.
16. Site is suitable for a sheltered elderly scheme with extra care provision of up to 100 small units.
17. Broadly support this proposal to put this site to better use.

## **Topic: 7.9 Proposals for Development - Wellesbourne**

### **Summary of Matters Raised in Representations**

1. The recognition that Wellesbourne is a sustainable settlement suitable for growth is supported. However, the level of growth is too low when the size of the settlement (fourth largest of the Main Rural Centres), its services, employment opportunities and public transport connections are considered.

## **Topic: 7.9a Proposals for Development - Wellesbourne, The Goals for Wellesbourne**

### **Summary of Matters Raised in Representations**

1. While the Goals for Wellesbourne are supported, the provision of separate meeting and storage facilities for the Wellesbourne Scouts and Guides Groups is urgently needed and could be part of a proposed development scheme.
2. The Parish Council suggests the following changes to the Goals for Wellesbourne:
3. The first goal should be extended to include reference to the River Dene Valley remaining the "green lung" of Wellesbourne.
4. The second goal should be extended by referring to flood risk reduction being supported by proposals for any future storm water management that future development would bring.
5. The third goal should include reference to the need to upgrade the appearance and all facilities located within the village centre and to promote the viability and vitality of all commercial and retail activities.
6. The fifth goal refer to the provision of a new community and leisure centre as detailed in the Dene Valley proposals.
7. The eighth goal should refer to the need to implement a traffic management arrangement throughout the village to include additional parking facilities.
8. The ninth goal should refer to the provision of low cost affordable housing, both to rent and for shared equity, with a direct link for people with an identified local connection.
9. An additional goal should be included referring to upgrading the established facilities to meet enhanced population needs both at the infant and junior school and the medical centre at Hastings House.

## **Topic: 7.9b Proposals for Development - Wellesbourne, Introduction**

### **Summary of Matters Raised in Representations**

1. Wellesbourne is already at saturation point with housing. The infrastructure just about copes with all the recent development.
2. There should certainly be no development of the allotments site in Kineton Road which represent a vital village resource. There is already a long waiting list for allotments.
3. The allocation of the land at Ettington Road for development is supported as it will address the imbalance in community and service provision between the north and south of the village.

## **Topic: WELL.1 East of Ettington Road, Wellesbourne**

### **Summary of Matters Raised in Representations**

#### **A. Objections to Proposal**

- A1 The scale of the proposed development is too great for one of the secondary Main Rural Centres (MRCs) identified in Policy CS.2 of the Consultation Core Strategy and is inconsistent with the notion of “moderate dispersal”. It has a much larger dwelling capacity than sites identified in Henley-in-Arden and Kineton which are secondary MRCs with secondary schools, unlike Wellesbourne which only has a primary school. For consistency the Wellesbourne housing requirement should be halved.
- A2 Only the northern part of the Ettington Road land is identified in the SHLAA as a Broad Location for Development. The Assessment of Land Parcels is therefore wrong to state that the whole of the site is within a Broad Location and decisions should not be based on this faulty assumption.
- A3 Much of the site is visually prominent, particularly from the A429 on the descent of Redhill, and also from public footpaths, much more so than alternative sites on the edge of the village. The SHLAA Landscape Appraisal highlighted this problem. There is no obvious outward boundary to the site on the south-eastern side and the necessity to create a new edge to the village by means of extensive planting would close down options for future expansion of the village in this locality. Development here would suburbanize the Walton Road area which has a very rural appearance at present, thereby harming the setting of the village.
- A4 The site comprises high grade agricultural land (Grades 2 and 3A) which should not be used for development ahead of other land of lower grade.
- A5 The site is distant from many of the village’s services and will encourage people to use their cars to access those services instead of reaching them on foot or by bicycle. Also, there are no bus services running past the site. Other sites at Wellesbourne are better placed to encourage non-car access to services.
- A6 The choice of development options at Wellesbourne should not be governed by a perceived need to minimize objections by local residents. It should be based on a proper consideration of a range of relevant factors.
- A7 The scale of this development will overwhelm local services, particularly the school, medical centre and dentist which are already at full capacity. In relation to the school, any development that leads to further traffic congestion in the vicinity of the school should be resisted.
- A8 There is a lack of infrastructure at this end of the village.

#### **B. Support for Proposal**

- B1 The site is the safest option as regards road safety. A roundabout can be constructed on the A429 to give access to the site. This feature, together with a 30mph speed limit on the A429 extending to the edge of the village and a pedestrian crossing will improve safety for pedestrians in this locality.
- B2 This site will allow scope for further extension of the village in a south-easterly direction.
- B3 The site is immediately available for development and is not subject to any ownership or legal constraints.
- B4 Use of this site for development is better than using alternative sites that would involve loss

allotments and other areas of land much valued by local residents for their amenity.

### **C. Other Comments**

- C1 Run-off from the development should not be allowed to enter the River Dene above the Bridge Street bridge to avoid accentuating the risk and scale of flooding.
- C2 The development should provide and/or fund much needed improvements leisure facilities in the village.
- C3 The development should provide a green buffer for the edge of the village in this locality.
- C4 It is best not to define the exact boundaries of the development at this stage. This should be left to the Masterplan and the outcome of detailed landscape appraisal. The outer boundary shown on the Proposals Map is very arbitrary and unrelated to existing features, something that is inconsistent with the treatment of other strategic development allocations.
- C5 The development should not be allowed to encourage more traffic on Walton Road which is a narrow rural lane which is valued for its amenity.
- C6 Key infrastructure should be in place before dwellings are commenced.

## **Topic: WELL.2 Horticultural Research International (HRI), Warwick Road, Wellesbourne**

### **Summary of Matters Raised in Representations**

#### **Representations on WELL.2**

##### **A. Objections to Proposal**

- A1 The scope of the allocation should be limited to the retention of the existing established use as a research centre for plants and environmental services. B1a and B8 uses should only be acceptable if necessary for this main use.
- A2 No development should be allowed in or near Wellesbourne that would increase traffic congestion in the vicinity of Wellesbourne Primary School.

##### **B. Support for Proposal**

- B1 Expansion of this centre of excellence to include a science park is supported, but not to include general offices, housing or hotels.
- B2 The bar on B8 storage is supported. This use would blight the landscape and increase HGV traffic in the area.

##### **C. Other Comments**

- C1 The site is located close to a high pressure underground gas transmission pipeline and this raises health and safety issues. The developers should be informed.
- C2 Any proposals for redevelopment of this site will require a detailed Level 2 Flood Risk Assessment (FRA) to define the precise extent of Flood Zones 2 & 3.

## **Topic: 7.10 Large Rural Previously Developed Sites**

### **Summary of Matters Raised in Representations**

1. More thought should be given to building on former cement works sites as further development around Stratford will damage its character.
2. Some appraisal of the historic environment of other rural brownfield sites may also be necessary.

## **Topic: RBS.1 Gaydon Site**

### **Summary of Matters Raised in Representations**

1. Continuing support to be given to operations at Gaydon is welcomed.
2. Improvements to B4100 and upgrade to M40 junction 12 are historic and do not recognise highway works that have taken place. Sixth and seventh bullet points should be replaced with *'assess the impact of traffic arising from the proposed development on the local road network and the need for any off-site highway improvements.'*
3. Unclear why housing development is being constrained. Site should be considered for a potential new settlement as a reasonable alternative to greenfield strategic extensions to Stratford-upon-Avon.

## **Topic: RBS.2 Former Engineer Resources Depot, Long Marston**

### **Summary of Matters Raised in Representations**

1. Endorse the proposal to make provision for and use of existing and potential rail services at the Long Marston Depot site, along with reinstatement of the Stratford to Honeybourne railway.
2. Should be updated to reflect the planning permission granted for a site wide leisure-led mixed use redevelopment scheme and to reflect what is illustrated on the approved Masterplan.
3. Specific requirements should include reference to the need to mitigate the impact of development and the users of the site on the tranquillity of the adjoining Cotswolds AONB.
4. In the absence of a sustainability appraisal comparing the relative merits of sites, there is no clear explanation as to why the housing component of brownfield sites is being significantly constrained. Their potential should be considered for a new settlement as a reasonable alternative to Greenfield strategic extensions to Stratford-upon-Avon.
5. If development is going to be brought forward on the site it should be developed later in the plan period which would allow for essential infrastructure to be provided.

## **Topic: RBS.3 Former Southam Cement Works, Long Itchington**

### **Summary of Matters Raised in Representations**

1. Comment - In the absence of a sustainability appraisal comparing the relative merits of sites, there is no clear explanation as to why the residential housing component of these brownfield sites is being significantly constrained. The potential of one of these sites, amongst others, should be considered for a potential new settlement as a reasonable alternative to greenfield strategic site extensions to Stratford Upon Avon.
2. Support- all efforts should be made to share development around district, support for development of rural brownfield sites.
3. British Waterways - support the proposal and the production of Masterplan, subject to conditions to protect and enhance the waterways environment and associated infrastructure.

## **Topic: RBS.4 Former Harbury Cement Works, Bishops Itchington**

### **Summary of Matters Raised in Representations**

1. Support redevelopment of site for housing.
2. Unclear why housing development is being constrained. Site should be considered for a potential new settlement as a reasonable alternative to greenfield strategic extensions to Stratford-upon-Avon.
3. Housing and employment development on the site should not be constrained to meeting local needs.
4. Proposal should identify following uses as being appropriate: *leisure, tourism and recreation; storage and distribution; other forms of employment that make use of the rail connection to the site; residential development of a form and scale that meets local needs or is justified in relation to other uses on the site. A Housing Market Area assessment should be carried out to establish local needs; other uses including waste disposal and management will be acceptable if they satisfy the provisions of Policy CS.2H.*
5. Reference to new buildings being restricted to the previously developed parts of the site should be omitted.
6. Harbury Estate should be allocated as a strategic site for a comprehensive mixed use development incorporating a connection to the main line railway and improvements to existing public transport, infrastructure and community facilities, a range of affordable and market housing for sale and rent, employment opportunities providing a range of jobs to local people, efficient use of land, protection and enhancement of biodiversity and geological features.
7. Important to retain in full the Harbury Cement Works Masterplan and it should be referred to in the proposal.
8. District Council must provide a full explanation of reasons for setting the Masterplan aside if it intends to do so.

## **Topic: RBS.5 Former Napton Brickworks**

### **Summary of Matters Raised in Representations**

1. Comment - In the absence of a sustainability appraisal comparing the relative merits of sites, there is no clear explanation as to why the residential housing component of these brownfield sites is being significantly constrained. The potential of one of these sites, amongst others, should be considered for a potential new settlement as a reasonable alternative to greenfield strategic site extensions to Stratford-upon-Avon.

## **Topic: 7.11 Meeting the Needs of Redditch**

### **Summary of Matters Raised in Representations**

1. Figures quoted are from the WMRSS Preferred Option and have been revised in the Panel Report to 68 hectares, of which 12 hectares should be provided in Stratford District.

## **Topic: REDD.1 Winyates Green Triangle**

### **Summary of Matters Raised in Representations**

1. Industrial and residential areas should be well separated.
2. There are a lot of unoccupied industrial units in Redditch that should be redeveloped instead.
3. Site is important for its flora and fauna, including hedgerows, ditches that support Great Crested Newts, a colony of bats and a pair of buzzards.



4. Site would be completely visible from the A435 at Gorcott Hill approaching Redditch.
5. Access should be from the A435 rather than from Far Moor Lane which is an access road to residential properties.
6. If development is to satisfy the employment needs of Redditch it should be used for industries that require skills abundant in Redditch.
7. Site is a green barrier to the road noise from the A435 and should be maintained as a woodland to improve amenity.
8. If more business and industrial units are needed in the Redditch area, there are several brownfield sites as yet undeveloped.
9. Access Study suggests that due to costs involved it is likely that it will not be economically viable to develop the site for employment purposes for the foreseeable future. It may therefore be necessary to consider alternative uses such as housing. Proposal should allow flexibility for an alternative use should employment not be viable.
10. Employment uses should be restricted to B1 (Business) use only.
11. Reference to mature hedgerow should be amended to read 'retain and where necessary, replace the mature hedgerow along the western boundary of the site which is a designated Special Wildlife Site'. Reference should also be made to a study that has been commissioned on this feature.
12. Extra traffic on the A435 would be treacherous for those who access roads to reach the local school.
13. Land acts as a floodplain protecting nearby housing.
14. Excessive noise and pollution caused by construction and from traffic
15. Noise from industrial units will impact on quality of life.
16. Detrimental impact on house values.
17. An alternative access would be a roundabout on the A435 replacing the existing junction with the Coventry Highway.
18. This is a strategic site which will effectively provide a cross boundary employment site for Redditch Borough and wider economic benefits for Stratford District by providing a location where high technology industries could locate and expand.
19. Would cause greater traffic congestion at various junctions.
20. Site should be designated as a Special Wildlife Site with the scope to create a future linear park, public open space and nature reserve.
21. Would lead to more chance of opportunistic crime.
22. Development must not increase downstream flood risk.
23. Site needs to be supported by a full ecological assessment of habitats, protected species and designated sites to enable an adequate assessment of the developable area; this will require collaboration between Redditch and Stratford Councils.
24. Housing development is preferable to employment to meet needs of young people.
25. Allocation of land to north of Coventry Highway may generate the funding required for a new access into Winyates Green site.
26. Explanation should make it clear that uses should be restricted to those described under Policy PA6 in emerging RSS Revision; large scale office uses would not be appropriate.
27. Bus services in this area have historically been poor.

## **Topic: 8.0 Infrastructure Delivery, Implementation and Monitoring - General**

### **Summary of Matters Raised in Representations**

1. If a tariff based system is adopted by the Council to address the delivery of infrastructure, this must meet the tests of circular 05/05.
2. Should recognise that new waterside developments place extra liabilities on waterway infrastructure in relation to managements and maintenance. This cannot always be addressed via planning conditions.

## **Topic: 8.1 Implementation**

### **Summary of Matters Raised in Representations**

No comments on this topic.

## **Topic: 8.2 Infrastructure Delivery Plan**

### **Summary of Matters Raised in Representations**

1. Infrastructure delivery plan reference in para 8.2 must include reference to green infrastructure (GI) and the importance of developer contributions to creating and maintaining GI.
2. Infrastructure project schedule should include GI projects.
3. Reference to sub-regional GI SPD should be made in para 8.2.

## **Topic: 8.2a Schedule of Infrastructure Projects**

### **Summary of Matters Raised in Representations**

1. Provision should be made for access to Winyates Green Triangle in the Schedule of Infrastructure Projects.
2. Reference to 'Western Relief Road' should be deleted from Schedule of Infrastructure Projects if SUA.7 site is removed from the Core Strategy.
3. The "Western Relief Road" is not planned for Phase 1. The current planning application states that it will not be completed until the end of the development period, leaving 10 years without relief from the extra traffic generated by the Shottery development. The Infrastructure Schedule should be amended accordingly.
4. The Infrastructure Schedule only shows small scale schemes that are proposed as part of specific development schemes. Infrastructure elements of proposals that may determine whether or not a development can go ahead should also be included (e.g. SUA.14A is dependent on improvements/replacement of Bishopston Lane Bridge).
5. Developments at Shipston-on-Stour should not be used to meet the infrastructure requirements in non-related areas of the District.

## **Topic: 8.3 A dedicated delivery vehicle for World Class Stratford projects**

### **Summary of Matters Raised in Representations**

No comments have been received on this topic.

## **Topic: 8.4 Planning Obligations**

### **Summary of Matters Raised in Representations**

1. Latest CIL proposals prohibit the ability to have a tariff/ S106 contribution from any more than 5 S106 agreements. Tariff based approach cannot therefore be relied on for pooled contributions if CIL remains.
2. CIL must be considered as a delivery mechanism for the sub-regional Green Infrastructure (GI) SPD. The wording of para 8.4 may need to be redrafted to reflect this. Delivery mechanisms for PCT and Works Police may also adopt the CIL approach.
3. The relevant navigation authorities need to be asked for information regarding the current infrastructure capacity and on specific requirements for new or improved infrastructure over the plan period.

## **Topic: 8.5 Monitoring**

### **Summary of Matters Raised in Representations**

1. As regards the set of indicators referred to in para 8.5.3, the District Council will need to ensure that the indicators must incorporate or be compatible with the requirements of CLG's Core Output Indicators, including the indicator relating to changes in areas of biodiversity importance which will require up-to-date environmental information about the District.
2. Clarity about monitoring indicators - including contingencies, is required.

## **Topic: Appendix 1 Relationship between "saved" policies from the expired District Local Plan and policies in the Core Strategy**

### **Topic: Prop Map 1 Proposals Map for Stratford-upon-Avon**

#### **Summary of Matters Raised in Representations**

1. Town boundary should be repositioned to directly behind Stratford Rugby Club's current clubhouse to allow for the principle of housing development on the land enclosed.

### **Topic: Prop Map 2 Proposals Map for Alcester**

#### **Summary of Matters Raised in Representations**

1. Poor labelling of online maps makes it difficult to identify areas in Alcester and work out the effects of proposals.
2. Both ALC1 and ALC2 developments pose a risk of flooding.

### **Topic: Prop Map 3 Proposals Map for Bidford-on-Avon**

#### **Summary of Matters Raised in Representations**

1. Further consideration should be given to the development of greenfield sites where this would benefit the local community and help to meet RSS housing targets.

## **Topic: Prop Map 4 Proposals Map for Henley-in-Arden**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: Prop Map 5 Proposals Map for Kineton**

### **Summary of Matters Raised in Representations**

No comments

## **Topic: Prop Map 6 Proposals Map for Shipston-on-Stour**

### **Summary of Matters Raised in Representations**

1. The promoters of part of the SHIP.1 development allocation suggest that the latter be delineated in outline form as it was in the first draft of the Core Strategy to accord with the advice in PPS12 which refers to delineating sites in outline rather detailed terms. This approach would give more flexibility and allow a detailed master planning exercise to determine the precise land take and development area. For example, the area could be extended to take in more land to address needs for open space and allotments, while master planning could also consider potential for integration with the High School facilities.

## **Topic: Prop Map 7 Proposals Map for Southam**

### **Summary of Matters Raised in Representations**

Object - Area of Restraint policy to reviewed as it is a long standing policy from previous local plans. It should be deleted in line with PPS7.

## **Topic: Prop Map 8 Proposals Map for Studley**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: Prop Map 9 Proposals Map for Wellesbourne**

### **Summary of Matters Raised in Representations**

1. Small field off Lowes Lane, Wellesbourne (WEL716) should be included within the Built-up Area because:

- it is within the conservation area but of no amenity value;
- it is visually and functionally part of the lane;
- development will help to enhance its contribution to the conservation area.

2. The definition of the outer boundary of Proposal WELL.1 is arbitrary because:

- it does not follow any existing physical boundary, contrary to how other sites are treated;
- actual position of the boundary needs to be determined through detailed landscape appraisal and through masterplanning.

## **Topic: LRPDS Map 1 Large Rural Previously Developed Site Map - Gaydon Site**

### **Summary of Matters Raised in Representations**

1. Definition of a boundary for the location of buildings is welcomed and consistent with the stated flexible and positive approach to be adopted by the District Council.

## **Topic: LRPDS Map 2 Large Rural Previously Developed Site Map - Former Engineer Resources Depot, Long Marston**

No comments submitted.

## **Topic: LRPDS Map 3 Large Rural Previously Developed Site Map - Former Southam Cement Works, Long Itchington**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: LRPDS Map 4 Large Rural Previously Developed Site Map - Former Harbury Cement Works, Bishops Itchington**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: LRPDS Map 5 Large Rural Previously Developed Site Map - Former Napton Brickworks**

### **Summary of Matters Raised in Representations**

Object- Careful consideration of the site should be made with reference to the Inspector's appeal decision 04/01653/FUL. Ecology constraints prevents full 6ha of allocated site accommodating development. Allocated area should be reduced in size, or at least the explanatory text should reflect situation and identify what size/area can be developed. Parish Council consultation with village may be useful information.

## **Topic: Prop Map 10 Proposals Map for East of Redditch**

### **Summary of Matters Raised in Representations**

No comments submitted.

## **Topic: MEDSGB Map 1 Major Existing Developed Sites in the Green Belt Map - Bearley Mill**

### **Summary of Matters Raised in Representations**

No comments submitted.

**Topic: MEDSGB Map 2 Major Existing Developed Sites in the Green Belt Map - Saville Tractors, Bearley**

**Summary of Matters Raised in Representations**

No comments submitted.

**Topic: MEDSGB Map 3 Major Existing Developed Sites in the Green Belt Map - Earlswood Trading Estate**

**Summary of Matters Raised in Representations**

No comments submitted.

**Topic: MEDSGB Map 4 Major Existing Developed Sites in the Green Belt Map - Maudslay Works, Great Alne**

**Summary of Matters Raised in Representations**

1. Development at Great Alne would put pressure on doctors and school services in Alcester.
2. Surface water from development would run into the River Alne.
3. Core strategy should promote a positive planning framework for considering alternative development options on MDSs where redevelopment could secure environmental, social and community benefits. E.G Extra care development at Maudslay Park

**Topic: MEDSGB Map 5 Major Existing Developed Sites in the Green Belt Map - The Mill Industrial Park, Kings Coughton**

**Summary of Matters Raised in Representations**

No comments submitted.

**Topic: MEDSGB Map 6 Major Existing Developed Sites in the Green Belt Map - Troy Industrial Estate/Chestnut Farm, Sambourne**

**Summary of Matters Raised in Representations**

No comments submitted.

**Topic: MEDSGB Map 7 Major Existing Developed Sites in the Green Belt Map - Poplars Trading Estate/Green Lane Farm, Studley**

**Summary of Matters Raised in Representations**

No comments submitted.

**Topic: MEDSGB Map 8 Major Existing Developed Sites in the Green Belt Map - Green Lane/The Slough, Studley**

**Summary of Matters Raised in Representations**

No comments submitted.

**Topic: Airfields Map 1 Existing Airfields Map - Long Marston**

**Summary of Matters Raised in Representations**

No comments were received on this topic.

**Topic: Airfields Map 2 Existing Airfields Map - Snitterfield**

**Summary of Matters Raised in Representations**

No comments submitted.

**Topic: Airfields Map 3 Existing Airfields Map - Wellesbourne**

**Summary of Matters Raised in Representations**

No comments were received on this topic.

## **Topic: OMSITE001 Marina & Housing adj. Stratford-upon-Avon Canal north of Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Possibility of a canal marina and canal-side housing development on the northern edge of Stratford.

## **Topic: OMSITE002 South of Salford Road, Bidford-on-Avon**

### **Summary of Matters Raised in Representations**

Land to the south of Salford Road, Bidford should be considered for housing development:

- permission for glasshouses on the site is unlikely to be built due to changes in horticultural industry.
- opportunity to improve amenities of houses fronting Salford Road
- site is a short walking distance from major shops and services and there is a bus stop adjacent.
- there is no risk or history of flooding on that part of site close to Salford Road.

## **Topic: OMSITE003 Foodstore, Conway Estate, Alcester**

### **Summary of Matters Raised in Representations**

1. Rather than extend the Waitrose store, provide another store closer to small Tesco on Kinwarton Road to serve this part of Alcester (Conway Estate area) more easily, as well as the whole of Alcester. Waitrose is expensive and this would reduce the need to drive to Redditch Tesco.

## **Topic: OMSITE004 Between Waterloo Road & Victoria Road, Bidford-on-Avon**

### **Summary of Matters Raised in Representations**

Land between Victoria Road and Waterloo Road, Bidford should be developed instead of sites proposed:

- although it consists of Grade 2 agricultural land it is never farmed.
- part of area could be used for recreation particularly as Big Meadow is inaccessible for most children because of busy roads and water frontage.
- housing will assist in meeting the needs of ever expanding Redditch.

## **Topic: OMSITE005 East of Brickyard Lane, Studley**

### **Summary of Matters Raised in Representations**

1. Refers to SHLAA 2009 site STUD703. Green belt land. Capable of infilling with 10+ terrace type, affordable properties.

## **Topic: OMSITE006 West of Kineton Road, Southam**

### **Summary of Matters Raised in Representations**



The land owner proposes land to west of Kineton Road, Southam, comprising 3.2 hectares for residential and employment uses. Justification : the land is adjacent to existing employment land.

### **Topic: OMSITE007 East of Bidford Road, Broom**

#### **Summary of Matters Raised in Representations**

Land between Bidford and Broom is appropriate for a modest housing development:

- it is a brownfield site comprising commercial buildings on short term leases.

### **Topic: OMSITE008 Trinity Way, Stratford-upon-Avon**

#### **Summary of Matters Raised in Representations**

Land along Trinity Way, Stratford should be used for housing development:

- it is scrub land.
- convenient for local services.

### **Topic: OMSITE009 Land off Alcester Road, Wootton Wawen**

#### **Summary of Matters Raised in Representations**

1. The Chapel Field, Alcester Road, Wootton Wawen. Site in Green Belt, on the edge of the village. Boundary unclear, approx 0.49ha. Small scale mixed residential development of social housing, low cost rented and private housing to meet local need. Open space/park.

### **Topic: OMSITE010 Land off Knights Lane, Tiddington**

#### **Summary of Matters Raised in Representations**

Land either side of Knights Lane, Tiddington is available for housing development:

- a number of primary schools south of the river have spare capacity.
- a new High School could be provided on HRI Wellesbourne site that would serve new developments south of river.

### **Topic: OMSITE011 Land north of Shipston**

#### **Summary of Matters Raised in Representations**

1. Land north of Shipston-on-Stour should be identified for development in preference to land on the Campden Road because it is less harmful to the setting of the town, better for drainage and it would be better located in relation to commuting to Stratford-upon-Avon, avoiding the potential for further congestion in the town centre at peak hours.

### **Topic: OMSITE012 Land east of Shipston beyond Council depot on Banbury side**

#### **Summary of Matters Raised in Representations**

1. Land east of Shipston-on-Stour beyond the Council Depot on Brailes Road should be identified for development in preference to land on the Campden Road because it is less harmful to the setting of the town and it would be better located in relation to commuting to Banbury, avoiding the potential for further congestion in the town centre at peak hours. The land is also closer to the town centre than the Campden Road land.

### **Topic: OMSITE013 Old Pettifer Building, Shipston**

#### **Summary of Matters Raised in Representations**

1. The former Pettifer building in Stratford Road, Shipston-on-Stour is proposed as a replacement doctors' surgery as it would be more accessible than the proposed site on the Campden Road.

### **Topic: OMSITE015 Unit 21 Western Rd, Stratford**

#### **Summary of Matters Raised in Representations**

Land at Unit 21, Western Road, Stratford should be used for residential redevelopment:

- the existing building is becoming a little tired and dated.

### **Topic: OMSITE016 Land south of High St, Fenny Compton**

#### **Summary of Matters Raised in Representations**

Land owner proposed land adjoining and south of High Street, Fenny Compton as housing site. Justification well related to scale and location of existing housing. Proposes site for inclusion in SHLAA.

### **Topic: OMSITE017 Bearley Mill**

#### **Summary of Matters Raised in Representations**

Land at Bearley Mill should be allocated for a mix of uses including the intensification of the current commercial uses and housing development to meet an identified local need:

- site is not being used efficiently.

### **Topic: OMSITE018 Land parcels 10 & 12 Bidford on Avon (west of Waterloo Road)**

#### **Summary of Matters Raised in Representations**

Land between Victoria Road and Waterloo Road, Bidford should be allocated for residential development:

- being Grade 2 agricultural land is a consistent feature around Bidford so does not represent an issue that warrants withholding development.
- landowners are all committed to the early delivery of the site and there are no legal ownership issues to prevent development.
- there are no policy restrictions which render the site unsuitable.
- site is generally well enclosed to the wider landscape.
- development would not impact upon the setting of the conservation area or on local landscape

character.

- site is bounded on three sides by existing development.
- there are no highway safety or capacity issues.
- site is close to village centres and there are a number of services within walkable distance.
- site could provide land with the potential for a new secondary school.

## **Topic: OMSITE019 Land off Brick Yard Lane, Studley**

### **Summary of Matters Raised in Representations**

1. Sibcas Ltd own 2.3 ha site, Brickyard Lane, Studley. Considering relocation and propose that site is allocated for residential development instead of, or in addition to, Stud.1. Site is brownfield, within built-up area boundary. Benefits would be reduced traffic, removal of heavy goods vehicles, improved air quality. Housing would include affordable.

## **Topic: OMSITE020 Remainder of land parcel 43, adj to SUA.14C**

### **Summary of Matters Raised in Representations**

Land to the east of Birmingham Road, Stratford (ie. north of SUA.14C) should be considered as part of a longer term strategy to meet future housing requirements.

## **Topic: OMSITE021 Pensions Fund Site, Kineton**

### **Summary of Matters Raised in Representations**

The land owner is proposing part or all of land, comprising 3.9 hectares to the east of KIN.1 site for use as housing with scope for provision of wider community facility or school refurbishment or redevelopment.

Justification

1. More viable site to maintain 5 year land supply.
2. KIN.1 site is not deliverable in 2016-2021 phase as Kineton High School not WCC redevelopment priority and uncertainty of BSF programme.
3. Site would assist towards Affordable Housing supply.

## **Topic: OMSITE022 Land at Arrows Works, B'ham Road, Studley**

### **Summary of Matters Raised in Representations**

1. 7.3 ha of land at Arrow Works, Studley. Northern part of STUD.1.

Consider the draft core strategy does not make the most efficient use of land in line with planning policy and that this part of the site should be allocated for:

- Up to 144 dwellings on the rear of site facing Redditch Road (residential and elderly care)
- 1,560 sq.m of employment floorspace accessed from Birmingham Road for B1 use

## **Topic: OMSITE023 Tiddington Road, inc Loxley Road Allotments and SRFC Clubhouse**

### **Summary of Matters Raised in Representations**

Land off Loxley Road, Stratford should be allocated for residential development:

- site is bounded to north and west by existing residential uses.
- lies on the edge of defined built up area boundary.
- is a sustainable location being within a convenient walking distance of town centre and other facilities.
- site is not regarded as being an important space within or on edge of settlement.
- partly comprises previously developed land.
- former private allotments are now largely overgrown with no prospect of reverting back to that use.
- scheme would involve the relocation of Rugby Club's clubhouse thus removing previous constraint to development.

## **Topic: OMSITE024 Land parcel 16, Kineton**

### **Summary of Matters Raised in Representations**

Land owner proposes land to the north of burial ground and east of Southam Road, Kineton, to be used in addition to KIN.1 site for new school, playing field, market and affordable housing. Justification: The site would enable access for a relief road to east of Kineton and old railway line is no long a distinct barrier to settlement.

## **Topic: OMSITE025 Long Marston**

### **Summary of Matters Raised in Representations**

1. The LDF should include the Ecotown at Long Marston to provide affordable housing for the younger generation.

## **Topic: OMSITE026 Expansion of Trinity Mead, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

Land at Trinity Mead, Stratford should be developed where there is a lack of facilities and other amenities. This might reduce traffic across the congested bridge.

## **Topic: OMSITE027 Claverdon Village sites**

### **Summary of Matters Raised in Representations**

1. Claverdon want to sustain community facilities and activities in the village with a small increase in population and suggest 3 small sites for private low cost residential development. Size of properties less than 100 sq.m. floor area.

- Hercules Farm, Henley Road
- Rear of Crown Inn, Henley Road
- South of Claverdon Hall
- 

## **Topic: OMSITE028 SHLAA Site WEL905, Lowes Lane, Wellesbourne**

### **Summary of Matters Raised in Representations**

The landowners propose that land to the east of Lowes Lane, Wellesbourne be allocated for development for the following reasons:

1. The site was included in the SHLAA as WEL905. It is 4.15 ha. (gross) with a net developable area of 2 ha. with a potential capacity of 80 dwellings.
2. It is visually well integrated with the existing village and would be seen as natural infill and in this respect compares very favourably with the proposed allocation WELL.1.
3. It is closer to the services and facilities of the village than WELL.1.
4. It would help to regulate surface water in the vicinity.
5. Access could be provided to Walton Lane, although the creation of a full width access road would require land in an adjoining ownership.
6. There are no known environmental constraints or designations although the part of the site fronting Lowes Lane falls within the Conservation Area.
7. The site is readily available, the owner being willing to release the land now.
8. It is close to the public transport network.
9. The site is very marketable. and has the potential to deliver a high quality and sustainable development.

## **Topic: OMSITE029 M40 Distribution Park, Loxley Road, Wellesbourne**

### **Summary of Matters Raised in Representations**

A developer proposed that land and buildings at the M40 Distribution Park at Wellesbourne be allocated for:

- Foodstore (approx. 2,500 sq.m.);
- Class B units (warehousing/distribution);
- Other commercial floorspace;
- Community facilities.

Reasons:

1. There are a number of vacant units on the Airfield Estate and others will become vacant. These buildings are of poor quality and are commercially unattractive and would be replaced by higher density and better quality buildings.
2. It would comprise the re-use of previously developed land which is encouraged in PPS4.
3. It would provide higher quality sustainable development, more job opportunities and widen the locality's economic base. It would therefore be in line with the Draft Core Strategy's aim to restructure the local economy to support knowledge-based industries and small businesses to compensate for the loss of jobs in traditional industries.
4. It would increase choice for food retailing customers and reduce leakage to other centres.
5. It would reinforce the role of Wellesbourne as a Main Rural Centre by providing extra facilities and employment.
6. The site is available and suitable for this type of development and is not subject to physical or ownership constraints.

## **Topic: OMSITE030 Site of Namco Tooling Factory, New Road, Studley**

### **Summary of Matters Raised in Representations**

1. 0.8ha site - Namco Tooling, New Road, Studley. Existing factory site available for redevelopment. SHLAA(Review 2009) concludes site is suitable for mixed use, providing 18 dwellings in the short term.
2. Supports inclusion of site in the list of SHLAA urban sites to come forward during the plan period.
3. Suggests a list of SHLAA sites is included as an appendix to the Core Strategy rather than separate document - *Housing Trajectory for Revised draft Core Strategy*.
4. Development of this site for housing would provide:
  - protection for houses in Westmead Avenue
  - convenient footpath/road link from New Road to Pool Road
  - enhance the village

## **Topic: OMSITE031 Land parcel 17, Southam**

### **Summary of Matters Raised in Representations**

Land owner proposes land comprising 1ha, east of Banbury Road, Southam for employment or care home facilities.

Justification

1. included in first draft core strategy.
2. Questions SHLAA and Assessment of Land Parcels findings.
3. Provides ecological enhancement.

## **Topic: OMSITE032 Land parcel 16, Southam**

### **Summary of Matters Raised in Representations**

The site comprise 2.6 hectares land to west of Wattons Lane. Requests that this site is reassessed in context of the redevelopment of the old sewers site at Wattons Lane, which the Assessment of Land Parcels did not take into account.

## **Topic: OMSITE033 Land parcel 19, Southam**

### **Summary of Matters Raised in Representations**

Landowner proposes site comprising 12.06 hectares, immediately east of bypass.

- Objects to failure of Assessment of Land Parcels to take into consideration of existing influence of urban settlement,
- its failure to recognise the benefits of consolidation with the existing urban settlement from the development of this site.

## **Topic: OMSITE034 Land parcel 18, East of Banbury Road, Southam**

### **Summary of Matters Raised in Representations**

Landowners controlling land to the south eastern edge of Southam, object to the omission of the site from the draft Core Strategy.

The site is proposed for the care provision, particularly for the elderly, comprising approximately 2.43 ha.

The proposed development comprises a care village, with a traditional accommodation for 60 beds and associated facilities, e.g. library, cinema room and treatment rooms; approximately 30 'extra care housing' and apartments; no. of bungalows for sheltered accommodation, community and leisure facilities; multi purpose surgery; minibuss provision for residents and staff to and from the site. Access provided from the existing roundabout.

- There is a significant need for new accommodation that meet the needs of an ageing population which will increase in the coming years. Detailed report by WCC identifies a care gap (Appendix E[3] 2).
- Type of care provision is changing as people prefer to live in their own homes for as long as possible, with appropriate levels of support. Further care accommodation provided in the form of sheltered/retired homes, extra care housing (care available at different levels, up to 24 hours), residential care and finally nursing care. Dementia units should also be provided. Site is flat agricultural land, has no structures and has mature hedgerows.
- Each development should help to meet the required level of provision.
- Existing requirements in Southam are high, three homes, one sheltered housing scheme and a dementia care unit proposed.
- Proposal SOU.1 states that land should be provided for specialist accommodation for the elderly (optional), therefore the Council accept that there is a genuine need for additional facilities in Southam. However, concern is expressed that it is viewed as optional and it will not adequately meet the needs of the town and its rural hinterland, particularly in light of the existing gap in provision and predicted need for facilities. Provision of a care village would better meet the needs that a single care home.
- Do not consider that the land west of Banbury Road is suitable for care provision. ( see separate representations on this issue)
- Land is adjacent to the existing employment use where operations are generally quiet and has a better outlook than land west of Banbury Road. Moreover, the site is owned by the same company who own the land adjacent and thus future occupation of the site could be controlled if necessary.
- Site is close to Galanos House, an existing care home, so development of the site would allow for consolidation of facilities.
- If land developed, a new and more attractive buffer could be planted, creating a softer edge to Southam than exists presently.
- The development of site would open up access to land to east of bypass, giving further opportunity for future housing , helping to round off existing development east of the bypass and could provide a pedestrian bridge increase connectivity with the services and facilities in town, overcoming the only objection to the site.
- Development of the site would enhance sustainability of the existing development.
- The land has visual and functional relationship with the existing development and is well contained within the landscape.
- The land is not subject to any policy constraints

## **Topic: OMSITE035 SHLAA Site SHP703, Stratford Road, Shipston-on-Stour**

### **Summary of Matters Raised in Representations**

The landowner proposes that land at Stratford Road, Shipston-on-Stour be allocated for residential development. The site is 0.6 ha. in area of which 0.44 ha. is developable. The following reasons are given in support of the proposal:

1. The Core Strategy should recognize the potential contribution of small sites such as this one to the land supply in that they can provide housing in a relatively low key way compared with the proposed larger allocations.
2. The site will contribute to a sustainable pattern of development being on the edge of one of the Main Rural Centres, within walking or cycling distance of its facilities, services and employment.
3. The site lies on a main bus route.
4. The site is immediately available and could be developed in the short term.
5. Development would not harm the wider area, or be harmful to the character and appearance of the locality, the site being relatively well screened and close to existing housing, a view accepted by the Local Plan Review Inspector.
6. A safe means of vehicular access is achievable.
7. Most of the site is unaffected by flooding.
8. There would be no negative effects on ecology and archaeology.

## **Topic: OMSITE036 SHLAA Site SHP707, Hornsby Close, Shipston-on-Stour**

### **Summary of Matters Raised in Representations**

A developer proposes the allocation of approximately 1.15 hectares of land off Hornsby Close, Shipston-on-Stour for residential development for the following reasons:

- it is bounded on two sides by existing residential development and on a third side by Shipston Rugby Club and a children's nursery and would thereby form a natural infill;
- on the northern side it is separated from open countryside by a strong mature hedgerow;
- services are available to the edge of the site;
- there are no known ecological, archaeological or flooding constraints;
- development would not harm the character or appearance of the locality and would not be prominent in the landscape;
- development would actually enhance the northern edge of the town;
- the site is within walking and cycling distance of many of the town's services and facilities;
- the SHLAA considered that the site falls within a Broad Location for Development, is suitable for development, and is capable of accommodating approximately 30 dwellings;
- it is available for immediate development;
- it would be a more appropriate form of development in the small-scale market town context of Shipston-on-Stour than the large-scale SHIP.1 proposal.



## **Topic: OMSITE037 Land parcel 21, Wellesbourne (land off Kineton Road)**

### **Summary of Matters Raised in Representations**

An alternative or additional housing land allocation is proposed by the landowner south of Kineton Road, Wellesbourne, comprising approximately 5.6 ha. with a potential capacity of 100 dwellings. The information given to support the proposal is as follows:

1. It is located within a sustainable settlement that has a good range of services and facilities, together with good public transport.
2. Wellesbourne is capable of absorbing more than the 175 dwellings proposed on WELL.1.
3. The site can also be seen as a better alternative to WELL.1, with the Council failing to provide evidence that the latter is better than the Kineton Road land.
4. The site was supported as a potential development site by the SHLAA as being within one of the broad locations for development and seen as available, suitable and achievable.
5. Development will provide opportunity to provide open space and enhancement of the wildlife corridor along the River Dene, and there would be no negative impact on ecology.
6. It is nearer to most of the village's facilities than WELL.1, being within easy walking distance of the school, library, surgery and most of the shops.
7. It is close to existing bus stops.
8. Highway access can be provided without difficulty.
9. Flood Risk Assessment (FRA) shows only a narrow strip is subject to flooding and states that there would be no off-site effects on flooding because sustainable drainage would be used to manage run-off from the site.
10. Development would have a low impact on the landscape as the site is partly concealed from wider views by existing housing, or seen against a background of existing housing.
11. Development could be tied to the use of Walton Estate land at Mountford Close for additional school facilities such as car parking and/or for open space.

## **Topic: OMSITE038 Land parcel 26, Wellesbourne (land at Mountford Close)**

### **Summary of Matters Raised in Representations**

1. The site (2.2 hectares) is proposed by the landowners as a car park and dropping off point for Wellesbourne C of E Primary School, and also for associated outdoor activities. This proposal is made by the landowners as part of a general strategy for the village. They see it as enabling more room being made available on the school site for school expansion in response to housing growth in the village. They also see it as reducing the amount of traffic congestion in Mountford Close which arises twice daily through people and children arriving at and leaving the school.

## **Topic: OMSITE039 East of Ettington Road, Wellesbourne**

### **Summary of Matters Raised in Representations**

Land east of Ettington Road, Wellesbourne (42 hectares) is proposed by the landowners as an area for development for the following reasons:

1. It would provide a longer term solution for the development requirements of the village.
2. It would give flexibility in respect of the layout and location of the substantial landscape planting proposed as part of Proposal WELL.1.
3. It is available for development, contrary to the incorrect information in the Land Parcels Assessment.
4. It would have a similar impact as WELL.1 as regards the landscape.
5. It would have direct access to the A429 and to Walton Lane.
6. It is not subject to any environmental designations.
7. It is not subject to specific constraints on development.
8. It is not subject to flooding.
9. Development would be economically viable.
10. The land between WELL.1 and this site also looks to be suitable and available for development and would not constrain development on this additional site.

## **Topic: OMSITE040 Land parcels 11, 12 & 13 Wellesbourne (South & South-West of Dovehouse Farm Estate)**

### **Summary of Matters Raised in Representations**

Land south and south-west of the Dovehouse Farm estate at Wellesbourne is proposed for development by several different landowners. The land amounts to 20 hectares in total and would have a potential capacity of approximately 500 dwellings. The reasons given for this proposal are:

1. Wellesbourne is a sustainable settlement capable of supporting development in addition to that proposed in WELL.1. Wellesbourne is the fourth largest of the Main Rural Centres and has a good range of facilities and employment.
2. Wellesbourne has easy access to high technology employment opportunities.
3. The village has good public transport links to larger centres.
4. The western part of the land (parcel 11) falls within a Broad Location identified in the SHLAA.
5. There is no evidence to demonstrate that WELL.1 is a better option for development than this land.
6. Parcel 11 satisfies all three tests in the Land Parcels Assessment. Access from Loxley Road would be achievable, together with a direct link with the Dovehouse Farm estate which would assist integration with the existing community.
7. In landscape terms the land is less exposed than WELL.1 and development would have a more

localized impact.

8. The land is sustainably located in relation to the village centre, to the main employment area in the village, to the main foodstore (the Co-op), to leisure facilities and to bus services.

9. The land is not subject to any environmental designations and is not subject to flooding.

10. There are no known ecological constraints and the development could be designed to mitigate any impact on Wellesbourne Wood, and on other trees and hedgerows, e.g provision of a buffer planting area.

11. Mains services are available to the site.

12. All the landowners have agreed to release the land for development.

## **Topic: OMSITE041 The Precinct, Wellesbourne**

### **Summary of Matters Raised in Representations**

The landowners propose the redevelopment of the Precinct in Wellesbourne to provide new retail units, offices, two dwellings, car parking spaces, together with a public car park on land by the Village Hall. The reasons for this proposal are:

1. This would overcome parking problems in the centre of the village.
2. It would provide a modern and attractive shopping centre to revitalize the centre of the village.
3. It would support the existing facilities of the village centre.

## **Topic: OMSITE042 Land parcel 6, Dog Close Wellesbourne**

### **Summary of Matters Raised in Representations**

The landowner proposes the redevelopment of 0.4 hectares of land at Dog Close, Wellesbourne for specialist accommodation for the elderly with remainder (1.7 hectares) to be used for public use in the form of car parking and open space. The reasons for this proposal are:

1. It would meet an unmet local need for accommodation offering full-time care for the elderly and others with special needs, and avoid people having to leave the village to find this type of facility.
2. It is well located for such accommodation being close to facilities of all types in the centre of the village and is much better placed than WELL.1 to meet this need.
3. It would bring much needed additional parking to the centre of the village.
4. It would enable environmental enhancement of the river corridor and the public open space would provide an attractive amenity for local people.
5. The land in its current state serves little purpose and this proposal would mean that it would meet the outstanding needs of the community.
6. It would provide an opportunity for the Conservative Club to be provided with some outdoor amenity space.

## **Topic: OMSITE044 Claverdon Hall Farm Buildings**

### **Summary of Matters Raised in Representations**

Farm buildings at Claverdon Hall and Heart of England Farm should be considered for domestic dwellings to support the sustainability of Claverdon.

## **Topic: OMSITE045 SHLAASOM701, Land parcel 22 Daventry Road, Southam**

### **Summary of Matters Raised in Representations**

Landowner proposes development on the land off Daventry Road, comprising 23.3 ha.

Notwithstanding the comments made in the SHLAA 2008 and 2009 regarding the site, the site is available and no great distance from the town's centre and services and facilities.

## **Topic: OMSITE046 SOM701, land parcel 21 Daventry Road Southam**

### **Summary of Matters Raised in Representations**

Land proposes development on land at Welsh Road, Southam, comprising 1.8 ha. which has been subject of representations in SHLAA 2008 and SHLAA 2009 (site reference SOM702 in SHLAA). The site is outside the development boundary of the town .

## **Topic: OMSITE047 Land parcel 10, SOM703, Warwick Road, Southam**

### **Summary of Matters Raised in Representations**

Landowner proposes land off Warwick Road, Southam, comprising approximately 15 ha., which has been subject of representations in SHLAA 2008 and SHLAA 2009 (site reference SOM703 in SHLAA). The site is outside the development boundary the town

## **Topic: OMSITE048 Land parcel 4, WEL702, off Stratford Road, Wellesbourne**

### **Summary of Matters Raised in Representations**

Land north of Stratford Road, Wellesbourne is proposed for residential development by the landowners. The reasons for this proposal are:

1. The 2009 SHLAA indicated that the site (in part) is suitable for development.
2. Part of the land is unaffected by flooding and flood mitigation measures could reduce this area, subject to appropriate flood compensation measures.
3. The site is not subject to high level environmental designations, e.g. national designations such as S.S.S.I.
4. Apart from flooding affecting part of the land, there is an absence of physical constraints.
5. Development would not give rise to significant negative impacts on landscape character,

biodiversity and residential amenity.

**Topic: OMSITE049 Land north of Kings Lane and west of White Horse Hill, Snitterfield**

**Summary of Matters Raised in Representations**

1. 1.95ha site at Kings Lane, Snitterfield commended for housing development.

**Topic: OMSITE050 South of Bordon Hill (Parcel 10), Stratford-upon-Avon**

**Summary of Matters Raised in Representations**

Land south of Evesham Road/Bordon Hill, Stratford should be included alongside Proposal SUA.7 for residential development as it would benefit from improved infrastructure provision in this sector of the town.

**Topic: OMSITE051 Between Shottery Road & Evesham Road, Stratford-upon-Avon**

**Summary of Matters Raised in Representations**

The area of workshops off Shottery Road, Stratford should be developed as it is very derelict and a meeting place for drug use.

**Topic: OMSITE053 South of Stockton Road, Long Itchington**

**Summary of Matters Raised in Representations**

Landowner proposes land south of Stockton Road, Long Itchington, adjacent to the School and Community Centre. The site is approximately 4 ha, located in Flood Zone 1, and could deliver approx 120 new dwellings. The site is a greenfield site, adjacent to the well established settlement of Long Itchington, which offers a significant range of local services, facilities and employment opportunities. Industrial Estate is located within 450m from site. Development opportunity to improve existing services and facilities.

**Topic: OMSITE052 South of Napton Road, Stockton**

**Summary of Matters Raised in Representations**

Landowner proposes development on land to south of Napton Road, Southam, comprising 1.2 hectares, 0.2 hectares contains farm buildings and can therefore be viewed as previously developed land.

Proposal is an opportunity for sustainable small scale housing development for approximately 40 dwellings, subject to clarification on density and developable. The site has access onto the existing road and is situated with Flood Zone 1.

The site is located directly adjacent to the existing settlement which has a range of services and infrastructure.

## **Topic: OMSITE054 South of Alcester Road, Stratford-upon-Avon (West Part of Parcel 2)**

### **Summary of Matters Raised in Representations**

Land at Shottery (Dudfields Nursery), Stratford should be allocated for housing development:

- development is feasible and would accord with objectives of Core Strategy.
- there are no physical constraints to development.
- site is a sustainable location.

## **Topic: OMSITE055 South of Alcester Road, Stratford-upon-Avon (East Part of Parcel 2)**

### **Summary of Matters Raised in Representations**

Land south of Alcester Road, Stratford (west of driveway across Shottery Fields) should be allocated for housing development:

- development is feasible and would accord with objectives of Core Strategy.
- there are no physical constraints to development.
- site is a sustainable location.
- has good access off Alcester Road
- represents a defensible extension of existing built form without encroaching into countryside.

## **Topic: OMSITE056 Church Lane, Shottery**

### **Summary of Matters Raised in Representations**

Land south of Alcester Road, Stratford (east of driveway across Shottery Fields) should be allocated for housing development:

- development is feasible and would accord with objectives of Core Strategy.
- there are no physical constraints to development.
- site is a sustainable location.
- has good access off Alcester Road
- represents a defensible extension of existing built form without encroaching into countryside.

## **Topic: OMSITE058 Land at Manor Road, Bishops Itchington**

### **Summary of Matters Raised in Representations**

Landowners proposes development on Land at Manor Road, Bishops Itchington, comprising 2 ha.

Satisfy tests in PPS3 available immediately to contribute to housing land supply.

Suitable - situated on the developable edge, natural extensions to village settlement, no restrictive constraints, well located to strategic transport network including public transport.

Achievable - desirable locations for housing market. The site performs better than other surrounding land in terms of sustainability criteria. The site would allow for significant opportunities to improve local services, transport and education through planning obligations. It is recognised that not all of the site would be developed once housing growth figures are known.

The site can deliver 40 dwellings, 20 of which could be affordable houses. The site can be accessed off Manor Road and Mount Pleasant. Development would be confined to lower less visually prominent areas, and incorporate high quality design. The site is also well placed to accommodate any further development either as large strategic sites or as smaller sites in the Small Sites DPD to meet local needs.

It is considered the site is more suitable for development in comparison to the former Harbury Cement Works, which result in development which is detached from village, loss/threat of significantly important ecological land, scale of development in the Master Plan is unsuited to much smaller scale housing development required by satisfy local needs appropriate to a Local Service Village. Development of cement works relies on the success development of rail freight transshipment or passenger railway station, for which there is no evidence.

## **Topic: OMSITE059 Land at Gaydon Road, Bishops Itchington**

### **Summary of Matters Raised in Representations**

Landowners proposes development on Land at Manor Road, Bishops Itchington, comprising 2 ha. Satisfy tests in PPS3 available immediately to contribute to housing land supply. Suitable - situated on the developable edge, natural extensions to village settlement, no restrictive constraints, well located to strategic transport network including public transport. Achievable - desirable locations for housing market. The site performs better than other surrounding land in terms of sustainability criteria. The site would allow for significant opportunities to improve local services, transport and education through planning obligations. It is recognised that not all of the site would be developed once housing growth figures are known. The site can deliver 40 dwellings, 20 of which could be affordable houses. The site can be accessed off Gaydon Road or Plough Lane. Development would be confined to lower less visually prominent areas, and incorporate high quality design. The site is also well placed to accommodate any further development either as large strategic sites or as smaller sites in the Small Sites DPD to meet local needs.

It is considered the site is more suitable for development in comparison to the former Harbury Cement Works, which result in development which is detached from village, loss/threat of significantly important ecological land, scale of development in the Master Plan is unsuited to much smaller scale housing development required by satisfy local needs appropriate to a Local Service Village. Development of cement works relies on the success development of rail freight transshipment or passenger railway station, for which there is no evidence.

## **Topic: OMSITE060 Ravensbank Drive/Gorcott, Beoley**

### **Summary of Matters Raised in Representations**

1. Land bounded by A4023, A435 and Ravensbank Estate. 7.4ha in Stratford District and the remainder in Bromsgrove.
2. Remove the area of 7.4ha of land from the Green Belt and allocate for employment use. To be developed in association with adjacent land already promoted by Bromsgrove District to create a strategic employment site to the east of Redditch.

## **Topic: OMSITE061 Queen Street, Halford**

### **Summary of Matters Raised in Representations**

1. The landowners seek the allocation of a parcel of land (0.15ha.) at Queen Street, Halford, for a small-scale sensitively designed residential development. The reasons quoted in support of the allocation are that it would be of benefit to the community by supporting local services and any proceeds from the development would be used to support the Ellen Badger Hospital at Shipston-on-Stour.

## **Topic: OMSITE062    Wattons Lane, Southam**

### **Summary of Matters Raised in Representations**

Land to the west of Wattons Lane comprising 2.63 ha.

Area to the west of Southam is subject to an Area of Restraint policy in consultation document, although not identified as clear cut designation in SHLAA which may restrict development. It is noted in the landscape study, but not used as reference when assessing suitability of land.

The site is not form part of the flood plain, nor is it included in the area of open space identified the SHLAA. It comprises agricultural land with two small agricultural buildings situated in south east corner. Existing residential development is immediately, further housing is sited south, beyond the River Stowe, and immediately east is the redeveloped former sewage works. Site is contained within the built edge of the settlement and would provide a logical extension to the development currently ongoing. Site shares a similar steep topography to adjacent development site. Proposed development would be capable of delivering up to 60 to 70 dwellings. Land is in single ownership.

Site assessed by SHLAA prior to redevelopment of former sewage works, resulting in changes to the landscape and visual setting to the site. Site is not subject to SHLAA Clear Cut Designation, this change of circumstances is significant to the Area of Restraint designation, which should be deleted in accordance with PPS7.

SHLAA supports site as broad location in terms of accessibility. The site is the only area that lies within the 300-600 m isochrone for accessibility.

Other than not being identified in SHLAA as a broad location, the site performs well in the Assessment of Land Parcels, identified as delivering specific benefits to the rest of the settlement. This should carry significant weight, and in the need to find sites, could outweigh the failure to be a broad location.

Access can be achieved through adjacent land currently under construction, having secured agreement over access with that site. Land can be adequately and safely accessed without adverse impact on highway safety.

Land is situated north of Designated Ecosite (8/46) and would not intrude into ecosite. Full ecological survey to be carried out at prior to submission of any planning application. Development is not considered harmful to the river habitat given the redevelopment of adjacent site. Applicant has already carried out a full ecological survey and no adverse impact on ecology resulting from development was identified.

Opportunity for remainder of land to be available to public use, including enhancement to existing public footpaths, planting and landscaping and improvements to habitat

It is considered that development would not adverse impact on the wider landscape, land closely related to existing settlement and with no encroachment into the countryside. Area is screened on western boundary by mature hedgerows and some hedgerow trees. Significant boundary enhancement proposed to improve edge of town.

Site development would contribute to need to identify housing sites in sustainable locations.

## **Topic: OMSITE063    South of Allimore Lane, & East of Bypass, Alcester**

### **Summary of Matters Raised in Representations**

1. There should be additional allocations to the edges of the Main Rural Centres (in the region of 300 dwellings). 3.2 ha of land south of Allimore Lane/north of Spittle Brook, Alcester could meet part of this increase, it has already been removed from the Green Belt.

2. This site is preferable for development to ALC.2.



3. If this land is not required during the plan period it should remain unallocated and removed from the Green Belt until required to meet future housing need.

### **Topic: OMSITE064 Land parcels 4 & 5 Southam**

#### **Summary of Matters Raised in Representations**

- Land south of Welsh Road West, Southam and south of Glebe Road, Southam, comprising 11 ha for proposed housing and open space.
- Creation of new access off Welsh Road Welsh to serve housing scheme to east of existing residential area. Landscape buffer zone of approx 0.7 ha to countryside in west.
- Land south of Glebe Road to incorporate 'L shaped' open space area (4.2 ha).
- Combined sites could deliver 300 dwellings and is put forward as an alternative to Proposal SOU.1
- Cycle and pedestrian route connections proposed at various points into the existing urban settlement ( indicated by yellow arrows on map)
- Land south of Welsh Road West to be delivered in Phase 1 of the Plan up to 2016 and Phase 2, along with the delivery of its associated open space provision.
- It is recognised that land south of Glebe Road is included in Area of Restraint policy, but considered that development would not affect openness or setting of Stowe river valley and maintains principle vistas on west of town.
- Development would enable creation of open space for informal use and access to the River Stowe.
- Topography of land provides opportunity for the use of solar power generation on new properties.
- land relates to existing urban settlement and has good accessibility to services and facilities in the town centre.

### **Topic: OMSITE068 Land to the N of BID.2, Bidford on Avon**

#### **Summary of Matters Raised in Representations**

Land north of Bramley Way, Bidford is suitable for housing development and should form an extension to Proposal BID.2:

- relates well to existing and committed developments and the village centre.
- Bidford is a suitable and sustainable location for additional housing development.
- it would help to support services and social and community facilities
- within walking distance of employment opportunities
- access from Bramley Way would be satisfactory.
- there are no drainage or flooding impediments.

### **Topic: OMSITE070 Land between Waterloo Road & Grafton Road (land parcels 16 & 17) Bidford on Avon**

#### **Summary of Matters Raised in Representations**

Land between Waterloo Road and Grafton Lane, Bidford should be allocated for residential development and community and education uses as required:

- it is well located to the village centre, bus and other services.
- well located in respect of jobs at Waterloo Road Industrial Estate.
- would not have a detrimental effect on historic village centre or river setting and views towards it.
- would assist in improving the drainage infrastructure in order to reduce flooding.
- help to tackle local housing needs, especially for affordable housing.

## **Topic: OMSITE073 Land to South-West of Shipston-on-Stour**

### **Summary of Matters Raised in Representations**

1. The landowners propose a south westerly extension of the SHIP.1 allocation to include land adjoining the built-up area of the town as far as land in the vicinity of the Cemetery on the A3400. This is seen as a more environmentally sensitive option than development north of the Campden Road. The latter would use higher and more visible ground than the land to the south-west of the town. This development might also include a link road between the A3400 and the B4035 to provide relief for the town centre.

## **Topic: OMPOL001 New Bridge over River Avon east of Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. A new river bridge is needed to the east of Stratford-upon-Avon.
2. A new road should be considered between Banbury Road and Wellesbourne Road to provide an alternative route to the M40 at Longbridge.

## **Topic: OMPOL002 Community Leisure Centre at Wellesbourne**

### **Summary of Matters Raised in Representations**

1. The Core Strategy should include provision for a leisure and social centre at Wellesbourne that will provide a crucial amenity for the local community, e.g a venue that could be used for meetings held by local Scouts and Guides groups.

## **Topic: OMPOL003 New settlement on brownfield land**

### **Summary of Matters Raised in Representations**

1. A new settlement should be built on brownfield land if it is not possible to meet housing demand in the District in existing towns and villages.
2. A new settlement would prevent the strangulation of existing market towns by peripheral development.
3. Development of a new settlement allows all aspects to be considered for the future population.
4. Strategy virtually ignores the possibility of meeting increased housing requirements through the provision of sustainable new settlements; this should be revisited.
5. RSS Revision Panel Report states that new settlements should not be ruled out if they can be demonstrated to be at least as sustainable as alternative development patterns such as urban extensions.
6. Previous consultation showed a real preference for a new settlement but that option has not been taken forward in the strategy.
7. Core Strategy should revisit the possibility of a new settlement that will reduce the demand for building in Stratford town.

## **Topic: OMPOL004 Eastern Bypass for Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. A new road should be considered between Banbury Road and Wellesbourne Road to provide an alternative route to the M40 at Longbridge.

## **Topic: OMPOL005 Telecommunications policy**

### **Summary of Matters Raised in Representations**

Object - Mobile Operations Association would like to see the retention of telecommunications policy within the emerging LDF. Telecommunications plays vital role in economic and social fabric of communities and its importance is recognised in PPG8.

## **Topic: OMPOL006 Canals**

### **Summary of Matters Raised in Representations**

Object - British Waterways considers that as a number of policies in emerging Core Strategy relate to canal infrastructure, it would be appropriate to have a specific policy for canals in the district.

## **Topic: OMPOL007 Traffic Mitigation in Studley**

### **Summary of Matters Raised in Representations**

Introduce mitigation measures to reduce problems from traffic and improve Studley village environment.

## **Topic: OMPOL008 Restore Railway from Redditch to Evesham**

### **Summary of Matters Raised in Representations**

Reintroduce a rail link to Redditch, Alcester and beyond to help the viability of Studley village centre.

## **Topic: OMPOL009 Traffic Management on Bishopton Lane, Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Bishopton Lane should be made one-way from Bishopton roundabout to The Ridgway in order to reduce vehicle numbers and speeds.

## **Topic: OMPOL010 Bus Station at Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Stratford should have a big bus station and a hospital.

## **Topic: OMPOL011 Mineral Sites Restoration**

### **Summary of Matters Raised in Representations**

1. The Core Strategy should include better reference to the need for land previously subject to mineral extraction to be restored for useful purposes and to the need for full restoration to follow quickly as extraction proceeds.

## **Topic: OMPOL012 Southern Bypass for Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. There is a need for a west to south bypass of Stratford, west of the racecourse and crossing the river to join Shipston Road.

## **Topic: OMPOL013 Article 4 Direction for Centre of Stratford-upon-Avon**

### **Summary of Matters Raised in Representations**

1. Need to consider implementing Article 4 Directions to ensure that design standards are improved and maintained in Stratford town centre.

## **Topic: OMPOL014 Restriction on the Extension of Existing Dwellings**

### **Summary of Matters Raised in Representations**

1. There should be a restriction on enlarging dwellings. The affordability of the housing stock is being continuously eroded by large extensions being permitted to small dwellings. This is increasing the need for small affordable properties. The 30% limit currently applied in the Green Belt should be applied more widely.

## **Topic: Other Other topics**

### **Summary of Matters Raised in Representations**

#### **Consultation Process**

1. Some respondents saw the Core Strategy as being deliberately rushed out prior to the General Election to ensure that important decisions could be made before a change of Government and that the District Council would gain financial benefit through government sourced funding for affordable housing.
2. Complaints were made concerning the way in which the Core Strategy was presented on the District Council's website. Legibility was an issue and also it was stated that comments could not be submitted in the right context.
3. Complaints were made concerning the nature and scope of the Core Strategy consultation exercise. In particular the "drop-in session" at Shipston-on-Stour was seen as inadequate, poorly publicised, re-scheduled with little prior notice and poorly organized with people being prevented from talking to SDC officers because of sheer weight of numbers. A properly structured open meeting about potential development options at Shipston with good advanced publicity was seen as a much better way of handling the consultation.
4. An objector argues that much more extensive consultation with local residents is required in the form of public meetings convened to discuss each of the proposed developments prior to the Core Strategy being submitted to the Secretary of State.
5. Consultation would have been assisted by the publication of a summary version of the Core Strategy because the main document was seen to be complex and unfriendly.
6. The "Notes on the Status of this Document" section indicates that the consultation on the Consultation Core Strategy was not a formal stage of consultation. This is regarded as making unclear the degree of weight that this consultation is to be afforded and how it fits into the pre-production stages of the Core Strategy as prescribed in the Local Development Regulations and as advised in PPS12. It is therefore unclear whether this is a Regulation 25 consultation. The statement on the status of the document gives the impression that making representations is optional. If it is not a Regulation 25 consultation, when will this be done?
7. This stage of consultation does not comply with the Statement of Community Involvement which

refers to Sustainability Appraisal (SA) as a parallel process. An SA on the Consultation Core Strategy has not been undertaken, and this represents a clear procedural defect.

8. Sufficient time should be set aside for consultations to enable all options to be considered and to address local concerns.

### **Sustainability Appraisal**

9. The absence of a Sustainability Appraisal at this stage is contrary to the District Council's Scoping Report for the SA of Development Plan Documents dated March 2007. The Report refers to a multi-disciplinary group appraising options and provisions against the established sustainable development framework and determining the appropriate set of mitigation measures that may be necessary to address any negative impacts. This has not been done.

10. The failure to undertake a Sustainability Appraisal of the Consultation Core Strategy at this stage is contrary to legal requirements and guidance, including provisions of the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment Regulations 2004.

### **Timing of Publication of Consultation Core Strategy**

11. The District Council should have awaited the Secretary of State's Proposed Changes to the RSS Revision before publishing the second draft of the CS. The Council has no basis for assuming that the Panel's housing figures will be confirmed by the Secretary of State, as claimed in para. 1.2.6 of the CS. This was a very premature assumption.

12. There is no evidence that the West of Shottery option has been re-examined as promised in the District Council's response to the comments submitted in relation to the first draft of the CS.

### **Scope of Core Strategy**

13. The development management policies need to be considered for deletion or refinement. The CS should only include policies that directly assist in delivering the Strategy or which add a local dimension to national or regional policies. Policies could be more delivery focused rather than merely providing a supportive framework for development to take place.

14. Some of the allocated sites are not strategic sites central to the delivery of the strategy. They should be moved to a Sites Allocations Document, while the CS should merely set out the amount of development for each settlement, rather than specific locations.

15. The Justification Document indicates that Option 1, concentration on Stratford-upon-Avon should have been chosen instead of the moderate dispersal option. Concern is expressed that the chosen option will have an adverse effect on the character of the rural settlements.

### **Evidence Base**

16. Concern is expressed about the lack of a comprehensive evidence base, although the CS is said to provide a good and sound explanation of the thought processes and available evidence underpinning the proposed policies. It is also said that the Assessment of Land Parcels is an objective basis for analysing the different credentials of peripheral sites.

17. The Colliers Retail Study is seen as defective in that it only covers convenience goods and adopts an inconsistent approach to the treatment of retail commitments.

18. The CS needs a demographic and analysis of present and future population trends.

19. There should be a register of empty and derelict properties which should be re-used for housing.

## **Other Matters**

20. Objection is expressed to the proposed extension of gravel extraction near Bidford-on-Avon on the basis of potential landscape and traffic effects.
21. The District Council's attention is drawn to the policies of the East Midlands Regional Plan, March 2009. Of most relevance is Policy 11, Development in the Southern Sub-Area which states that development should be concentrated in, or in planned extensions to, existing urban areas.
22. One respondent states that many dwellings in Stratford-upon-Avon are rented by persons who have moved in from abroad and that these properties are not properly maintained and that this is having a negative effect on property values.
23. The District Council does not properly assess the likely consequences of its actions, e.g. granting permission for so much development in the Birmingham Road area and to Waterside in Stratford-upon-Avon.
24. The District Council should focus more on spending cuts and taxing retail development.
25. A general concern is expressed that Stratford-upon-Avon is losing its character through modern development.
26. One respondent would like to see land made available for allotments.