

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

**Draft Core Strategy Consultation  
November 2008 - February 2009**

**Analysis of Representations**

## Analysis of Representations

Topic: GENcom

General comments

### Summary of Matters Raised in Representations

1. Whole strategy should pay more attention to rural and farming communities, and be proactive in making them more sustainable
2. Requests a telecommunications policy somewhere within the LDF, potentially within a suitable LDD.
3. General comments regarding the unsuitability of Salford Priors for further development.
4. Should provide policy headings and paragraph numbers.
5. Development is only sustainable where there is no overall damage to biodiversity.
6. Design information handbook should be produced by the District Council to guide development and set standards.
7. Surface water needs rectifying prior to additional building.
8. Would like to avoid any increase in traffic through the village of Hampton Lucy.
9. Implicit assumption that there should be more development is wrong.
10. General approach is to object to development which would affect countryside enjoyment or development outside of boundaries
11. Infrastructure should be in place before development begins.
12. Development is destroying communities.
13. No new housing is needed as there is so much empty homes and second homes that could be reused.
14. Local residents should be kept informed of proposals and Stratford should become a 'total learning community'.
15. Generally objects to differences between Local Plan format and LDF.
16. Document in its present form is very difficult to read and should be simplified.
17. Development should not always be developer led.

### Officers' Response

1. The overall approach to the spatial distribution of development in the Core Strategy is to concentrate most new development in Stratford-upon-Avon and the Main Rural Centres. Elsewhere, development is considered appropriate if they can be demonstrated that they are designed to meet the identified needs of a particular local community. The Council believes that this approach will allow scope for local communities to bring forward schemes to meet their needs in a sustainable manner whilst at the same time maintaining the essential rurality of the District. Schemes that could be brought forward through this community-led approach can include affordable housing, provision of community facilities and local employment development. Policies CS.2 and CS.3 are particularly relevant in setting the parameters for this approach. There are other specific policies in the Draft Core Strategy that takes a proactive approach to facilitate rural economic growth and encourage farm diversification. Policy CS.13 is a key example of such policies.
2. The current Local Plan Review includes a policy on telecommunications. This policy is saved until an equivalent policy in a Local Development Document is adopted to replace it. It is expected that this particular policy will be replaced in a detailed development control type DPD. A schedule of the Council's 'saved policies' and how they will be replaced can be found on its website ([www.stratford.gov.uk](http://www.stratford.gov.uk)). A programme for the preparation of LDDs are set out in the Council's 2008 Annual Monitoring Report, which is also on the Council's website.
3. See 1 above
4. Agree - policy headings and paragraph numbers will be incorporated in the Submission document to make the document more user friendly.
5. Ecological assessment of sites is one of the key evidence base used to inform the selection of sites to be allocated in the Draft Core Strategy. Furthermore, detailed ecological surveys will be required as part of planning application submissions where relevant. The Council will be concerned to ensure that the impact of development proposals on ecology is fully assessed and appropriate and adequate mitigation measures identified before planning decisions are made
6. A design information handbook has been produced in the form of the District Design Guide. This will be constantly reviewed to take account of new and emerging ideas about design.

## Analysis of Representations

7. The Council and its partners have commissioned consultants to carry out a Water Cycle Study to inform the Core Strategy process. The outcome of the Study will help refine the requirements of the various allocations in the Draft Core Strategy, before it is finally published. Furthermore, at the planning applications stage, applicants may be required to include information about how surface water in development schemes will be managed in a sustainable manner if this is considered relevant.

8. The Draft Core Strategy does not allocate sites for development in Hampton Lucy. Furthermore, any development elsewhere with significant traffic impacts that could potentially affect the village will be required to submit a Transport Assessment. This assessment will provide information on traffic generation, their origins and destinations and the appropriate mitigation measures that will be necessary to deal with any adverse impacts.

9. See 1 above.

10. See 1 above.

11. Infrastructure Development Plan is being prepared to show what, when, how and who will provide the necessary infrastructure to support the development proposals in the Core Strategy. An Implementation Plan is also being prepared with a similar purpose of demonstrating how each policy of the Core Strategy will be implemented.

12. See 1 above.

13. The Council has an obligation to make provision for the development of 5600 new homes between 2006 and 2026. The sites identified in the Draft Core Strategy are designed to meet this requirement. The Council also has a clear strategy to bring back empty homes into effective use. This programme is being managed by the Housing Section of the Council outside the Core Strategy process.

14. The Council has an adopted Statement of Community Involvement. This document has been considered by the Secretary of State at an Examination in Public and the Inspector's recommendations have been taken into account before it was adopted. The document sets out clear standards to be followed in consulting the public on planning matters. The Council will be concerned to ensure that the requirements of the document are followed when preparing LDDs.

The promotion of skills and learning in the District is a key objective of the Council. Stratford-upon-Avon is a key settlement in the District where this initiative will continuously be promoted through the allocation of a portfolio of sites including sites for high technology jobs and positive policies to facilitate a knowledge based economy.

15. There are national guidance about how Local Plans and LDF documents should be prepared. Within this framework, the Council will do its best to make the format of the Core Strategy user friendly and meaningful to its users.

16. See 15 above

17. See 1 above.

### Recommended Action

3. Add policy headings and paragraph numbers to Submission document.

5. The Council should continue to update its District Design Guide and other design guidance notes in the light of new standards and changing environment.

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### Topic: GENsup

### General support for the document

#### Summary of Matters Raised in Representations

1. Support in general for the contents of the Draft Core Strategy.

#### Officers' Response

1. Noted.

#### Recommended Action

None.

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## Analysis of Representations

**Topic: SPST1**                      **Spatial Strategy - Introduction**

### Summary of Matters Raised in Representations

1. Green infrastructure should be referred to as a part of achieving sustainable communities.
2. Should recognise that flexibility will be required in order to respond to an increased housing requirement in the RSS Revision.
3. Need to set out criteria used for identifying specific sites.
4. Henley-in-Arden satisfies the bullet points on page 7 so its status as a market town should be acknowledged and additional development sites identified.

### Officers' Response

1. The importance of green infrastructure is acknowledged but the definition given is taken from an established source.
2. This matter will be addressed at the next stage of preparing the Core Strategy.
3. It is important that the criteria and methodology used is clearly set out for all parties to consider. This will be published in due course.
4. The status of Henley-in-Arden as a market town is accepted. Further consideration will be given whether additional sites in Henley should be identified.

### Recommended Action

1. None
  2. Thorough assessment of options for meeting potential increase in development requirements set by the RSS Revision to be undertaken.
  3. Publish methodology used for assessing and identifying potential development sites.
  4. Carry out further assessment of land on edge of Henley-in-Arden to inform whether any is suitable for allocating for development in Core Strategy.
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## Analysis of Representations

Topic: SPST2

Our Vision of 2026

### Summary of Matters Raised in Representations

1. Spatial Vision should include a clear overarching reference to the importance of protecting and enhancing the natural, built and historic environment of the District.
2. Alcester should be highlighted as being the largest Main Rural Centre in the District.
3. Vision dealing with Stratford-upon-Avon should be amended to reflect the need to avoid further large-scale development due to impact on infrastructure, services and character.
4. Vision should be amended to provide a systematic and careful approach to the role of Main Rural Centres and reflect any specific characteristics that each may have.
5. Clear definition of 'green environment' should be given including commitment to conserving and enhancing wildlife and habitats.
6. Government Office is concerned that Draft Core Strategy does not show how vision for the District will be delivered so does not meet the requirements of a spatial plan.
7. Many of the assumptions on which Draft Core Strategy is based are now out-of-date due to credit crunch; current economic conditions could provide opportunity to deal with problems that Stratford town faces in relation to traffic and protection of its character.

### Officers' Response

1. The importance of this issue is accepted. In any case, the Spatial Vision will eventually need to be consistent with the Sustainable Community Strategy that is being prepared.
2. While this is the case it is not thought that Alcester is significantly distinctive for such a reference to be made.
3. Robust evidence would be needed to justify a case that further large-scale development in Stratford-upon-Avon is inappropriate - no such evidence is apparent at this stage.
4. Further work is being carried out to define the character and role of each Main Rural Centre; this will lead to a more refined approach to each one in the Core Strategy.
5. As for 1. above.
6. Ongoing process of preparing the Core Strategy will resolve this concern.
7. Economic situation will hopefully improve during lifetime of the Core Strategy; plan will seek to provide an approach that will meet future needs of the town.

### Recommended Action

1. Spatial Vision to be reviewed to make it consistent with the Sustainable Community Strategy.
  2. The definition, status and appropriate role of each Main Rural Centre will continue to be assessed.
  3. Continue to assess the scope for and impact of further large-scale development in Stratford-upon-Avon.
  4. Undertake detailed assessment of each Main Rural Centre and consider implications for their treatment in the Core Strategy.
  5. As for 1. above.
  6. Ensure that preparation of next stage of Core Strategy sets out a clear framework for delivering the spatial vision for the District.
  7. Continue to refine the approach to protecting the character of Stratford town while securing its economic prosperity.
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## Analysis of Representations

### Topic: SPST3 Core Objectives

#### Summary of Matters Raised in Representations

1. Objective 3 could be strengthened to show full commitment to meeting needs.
2. Canal network is a key constituent in the realisation of policies.
3. A Green Infrastructure Study of the District, or the key settlements and surrounding areas, should be undertaken to support Objective 5.
4. Too much emphasis on meeting local needs in the District. However Council has an obligation to meet its strategic requirements as set out in the RSS. A large scale proposal such as the eco town would meet wider needs as well as the Districts needs.
5. Objective 1 should be amended to reflect a more positive wording and accord with paragraph 38 of PPS3 and the RSS.
6. Objective 2 should include for 'local needs and demands'.
7. Objective 3 should be reworded to reflect that housing provision will be geared to meeting the needs 'and demands' of the Districts residents.
8. No reference to the requirements and needs for affordable housing in the District and adjacent to Stratford Town.
9. Objective to attract technology and knowledge-based jobs to the District must not be at the cost of any other employment opportunities, support must be given to any business which wishes to relocate to the District and to the expansion of any existing business. Sufficient land should be made available to meet these needs in full.
10. Should add that SuA needs to secure further development of its rail services to help relieve congestion and enhance tourism.
11. A key question in the Issues and Options questionnaire of Summer 2007 was 'are the objectives of the Local Plan Review still valid?' This was agreed with however these have not been carried forward. Proposed core objectives are not clear and simple and are not so well-directed at the needs of the District. Seem to be written as 'visions' and not properly expressed as 'objectives'. Therefore the objectives of the Local Plan Review should replace them.
12. Importance of meeting the District's housing demands is accepted but what should not occur is an over emphasis which blocks natural relocation initiatives supporting the ambitions of residents and others.
13. Concern at the intimation that new development should not increase the need to travel by private car; what is being put into place to negate that? Efficient public transport is more viable for an area if there are more people to use it.
14. Core objectives are too locally orientated and parochial. Stratford is not an 'island'. It is sited on the edge of 3 regions where there are strong influences from the south-east, south-west and the rest of the West Midlands region. This should be reflected in the objectives.
15. SUA.4 fulfils these objectives.
16. The negative factors given for 'concentration in/on the edge of Stratford Town' also apply to other settlements like Alcester.
17. Large scale development will be detrimental to the character of the town and the environmental assets.
18. Objective 1 should be reworded to 'reducing the need to travel by private car'.

#### Officers' Response

1. It would be unrealistic to give the impression that any form of need can be fully met.
2. This is acknowledged but it is too specific to mention in the objectives.
3. It is important to consider green infrastructure but the District Council does not have the resources at this time to undertake such a comprehensive study.
- 4/6/7. The emphasis of the RSS Phase Two Draft Revision dwelling requirement for the District is to meet the housing needs of the area, which includes market and social housing.
5. The provisions of the Core Strategy will be geared to meeting the development requirements of the RSS Revision in a manner that is consistent with the overall strategy it sets. It is not thought necessary to have an objective to confirm this.
8. This point is ingrained within Objective 3 which relates to the whole District including Stratford-upon-Avon.
9. This is accepted and is the approach taken in the Draft Core Strategy.

## Analysis of Representations

10. Because the District Council is not the transport authority it has little control over transport policy and implementation. This matter is covered in the County Council's Local Transport Plan.
11. It is held that the objectives in the Draft Core Strategy provide an additional level of expression that is appropriate. Consideration will be given to the tense used.
12. The planning system has limited control over who occupies properties but should provide an appropriate framework for regulating the amount and type of development in a particular area in accordance with strategic objectives.
13. The location of most development in the larger settlements in the District will help to make public transport services more viable and attractive as an option to using the private car.
14. While these influences are acknowledged it is not evident that any of them need to be reflected in the objectives. Certain objectives seek to make the District more self-contained and reduce the propensity to travel to larger towns outside the District for jobs and services.
15. It is intended that all of the development proposals identified in the Core Strategy should be consistent with these objectives.
16. This comment relates to Appendix A in the Draft Core Strategy. The point is accepted but the scale of development in Stratford town would be much greater under Option 1 than it would be in Alcester under Option 2.
17. While there would be some impact, the scale of development proposed in Stratford town in the Draft Core Strategy is thought not to be detrimental in overall terms.
18. In an area with the characteristics of Stratford District a reduction in the need to travel by car is unrealistic.

### Recommended Action

- 1-18. Further consideration will be given to the detailed expression of the objectives but no significant changes to their scope and content are thought to be required.
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## Analysis of Representations

### Topic: SPST4 Distinct Areas of the District

#### Summary of Matters Raised in Representations

1. Would like to see far more reference to the importance of Green Space and Green Infrastructure.
2. In large rural settlements, greater importance should be given to the protection and enhancement of the natural environment and the provision of green space.
3. Natural England's Green Space Standards should be adhered to when allocating development.
4. Large Rural Settlements should be renamed 'Market Towns' and main rural centres should be reconsidered against Policy RR3 of the existing RSS which requires the identification of market towns.
5. Question Council's concern regarding Stratford's ability to take further large scale development indicated in second paragraph of Page 10. Not aware of any evidence that this is the case. Unaware of any indication as to the level of large scale development that the Council consider Stratford is unable to accommodate. Therefore if this is correct, it is a contradiction that should the RSS allocate extra housing to the District, that up to 500 extra dwellings could be provided in Stratford.
6. Stratford-upon-Avon section should be expanded to accord with the objectives of the emerging RSS to recognise that the town should accommodate the majority of the housing requirement in the District to achieve a strategy of greater urban focus to create more sustainable patterns of development.
7. Providing homes should be included in the list roles for Stratford-upon-Avon.
8. In the countryside section 'We and our partners could become more proactive' should be changed to 'we and our partners shall become more proactive in meeting the needs of rural communities'.
9. Can be difficult for developers/landowners with little capital to bring 'local choice' sites forward and undertake the necessary work to achieve development. The Council should be more proactive in such cases to ensure that local needs are genuinely met.
10. Where does the RSS Phase 2 Draft Revision expressly envisage some new housing development 'adjacent to the urban area' of Stratford Town as stated?
11. No reference is made to the natural environment including the need for biodiversity protection, enhancement and management.
12. Grassroots approach to new development is not always totally democratic or reflective of the actual need for housing in a given area. Needs to be a review of local choice mechanism to ensure housing is provided in the countryside including smaller settlements.
13. Providing local and accessible homes should be added to strengthen the section on the role of Main Rural Centres..
14. Suggest that specifically regarding job opportunities in villages, there should be a policy to promote live/work concept. This would provide an appropriate solution to meet the specific needs of the rural district.
15. Bidford and Wellesbourne do not have secondary schools. Based on facilities, retail and community, Alcester should take a higher proportion of rural housing provision for the western part of the District, as should Kineton and Studley.
15. In accordance with the RSS Revision the Green Belt should be reviewed with the scope for release for new development to ease the pressure on areas outside of the Green Belt.

#### Officers' Response

- 1/2/3. Greenspace and green infrastructure are important issues and referred to throughout the Draft Core Strategy, including provision in various development locations.
4. It is not thought appropriate to distinguish between those settlements that are Market Towns and the other Main Rural Centres. For example, in terms of population Bidford, Studley and Wellesbourne are larger than Shipston.
5. Further assessment needs to be carried out to decide whether Stratford town could or should take additional growth if the RSS Revision increases the development requirement for Stratford District.
6. The distribution of development put forward in the Draft Core Strategy is consistent with the emerging RSS Revision. The Regional Assembly has not expressed concern about the approach taken.
- 7/13. Such a reference to homes would be appropriate in relation to Stratford-upon-Avon and the Main Rural Centres.
- 8/9/12. This suggestion is well made and the emphasis should be changed. It is agreed that the District Council should consider how it can be more proactive and effective in bringing local choice sites forward.

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10. The RSS Revision places Stratford-upon-Avon within the category of 'other urban areas and market towns in the Region'. According to Policy CF.2, these towns should be the focus of housing development to be accommodated 'within and adjacent' to the urban area and there is limited scope to use brownfield land in the town.

11. These important issues are covered elsewhere in the Draft Core Strategy, particularly in Policy CS.24.

14. Policy CS.13 supports the principle of live/work schemes throughout the District.

15. While secondary schools are an important factor in the choice of Main Rural Centres and in considering the location of future development, there are many other relevant factors such as the provision of a wide range of shops, services and jobs.

16. This matter has been taken into account and further consideration will be given to identifying appropriate sites for development on the edges of Henley and Studley.

### Recommended Action

5. Undertake further assessment of the capacity and suitability of Stratford-upon-Avon to take additional development.

7/13. Add a reference to the provision of homes in the roles played by Stratford-upon-Avon and the Main Rural Centres.

8/9/12. Give greater emphasis to the District Council and other agencies being more proactive in meeting the needs of rural communities, including schemes to meet local housing needs.

All other points - no change.

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## Analysis of Representations

### Topic: SPST5 Overall Development Strategy

#### Summary of Matters Raised in Representations

1. Object to the bland statement made by the Council that a new settlement might be supported if the level of housing required in the District is significantly increased. If extra housing is required, it should carry on the dispersal option including allocations to larger villages not only MRCs.
2. Dispersal option offers the least scope to reduce use of the private car and must be clearly considered in the context of climate change. If this is chosen there should be a parallel commitment to ensuring it does not lead to a net increase in CO2 emissions. Sustainable transport solutions should be provided in line with the proposed growth.
3. Do not support Option 3 as the consultation was conducted in relation to the Draft RSS development requirements and these are likely to change. This option may not be suitable given higher growth requirements.
4. Options 5 and 6 of the Issues and Options consultation would allow an opportunity to consider the Harbury Estate in terms of development potential.
5. Council has chosen not to respond to the findings of the Nathaniel Lichfield Study which compounds the overriding importance of flexibility in the plan making process.
6. Strategy will lead to over-development in the rural areas of the District and unsustainable development in smaller settlements. The majority of development should be provided in Stratford where most services and facilities are provided, and some degree of development should then be allocated to the MRCs but to a lesser extent than is currently proposed.
7. The reason for selecting this option over and above others should be set out and the consequences of affording local opinion greater weight than national and regional policy should be reconsidered.
8. Reference to the dispersal of development across the District should be dropped and the strategy for concentration on SuA and the MRC's added and clarified to establish the priority of directing development and having regard to the hierarchy of settlements.
9. Development should be placed where a local need has been identified by a robust evidence base, balanced with the level of service provision in the area. Development should therefore be considered against the 2007 SHMA carried out by Rupert Scott.
10. The position in the submission DCS ought to be that if the RSS Phase 2 Revision ends up allocating additional housing the the District beyond the 5600, brownfield sites including those outside settlements should in principle take precedence over greenfield development.
11. If additional housing is allocated an assessment should be undertaken via the CS process as to where additional homes ought to be allocated. This should not be left to a review of the CS process but should be undertaken prior to the EiP.
12. Section fails to recognise the preference in national and regional policy guidance for brownfield over greenfield development and this should be expressly recognised.
13. Brownfield sites outside existing settlements, including Long Marston, should be assessed in the revised SHLAA and Core Strategy sustainability appraisal. An explicit statement that brownfield sites in sustainable locations are to be preferred over the release of greenfield sites should be included in the Core Strategy.
14. It is not clear whether the aim is just to 'maintain' the provision of facilities in larger rural settlements or in some cases to improve and/or attract further provision. Contradiction on page 13 and in Policy CS.1 which needs addressing.
15. Assessment in consultation with communities and businesses needed to ascertain what housing development would be broadly necessary to maintain, improve or attract further provision of facilities. Without this, the CS is unsound if the dispersal strategy is to be properly justified in PPS12 terms.
16. Dispersed basis gives greater likelihood of negative impacts on a large number of sites and this must be carefully considered in the ecological and environmental impact assessment. Whilst each development may have a relatively low ecological impact, the combined effect may be greater than if Option 2 was followed, concentrating development near larger towns and villages which should have better infrastructure.
17. Request that consultation with local parish councils would form part of such a process should housing figures be increased.
18. Reservations about the capacity of the District to take large-scale development due to pressures on the existing infrastructure and services and harm to the historic and environmental character of the District.
19. CPRE refer to Issues and Options response where an option to retain the existing settlement pattern with the housing requirement met by windfall permissions was proposed. Although Option 3 is not dissimilar to this, there is a danger that Option 3 will lead to greenfield housing allocations when they are not necessary or could be deferred.
20. Overall Development Strategy should make provision for the role of Middle Quinton Eco Town. It is not clear if directing

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growth towards Middle Quinton has been explored in the preparation of the DCS. It is likely that should the findings of the NLP report be accepted by the RSS, a new settlement may be required and this could be accommodated at MQ.

21. Appears that six arbitrary options were provided with some form of voting used to identify a preferred variant. A more researched approach as to how any future development might best support the local communities should be developed.
22. Favoured Option 3 represents a disproportionate level of housing growth to these MRC's. This is compounded by the fact that there are no specific locations identified for new housing development in Studley and Henley. The six MRCs which have allocations do not have the sustainability credentials of Stratford, which should take more development.
23. MRCs have undergone a disproportionate level of housing expansion in the last 30 years.
24. Dispersal is not the most sustainable option and is one which conflicts with central government guidance.

### Officers' Response

- 1/3. This is a matter that will be assessed in preparing the next stage of the Core Strategy to decide which option is the most appropriate to cater for any increased levels of housing development set by the RSS Revision.
2. The scale of development envisaged in smaller settlements is modest and geared to meeting other aspects of sustainable development, such as support for existing communities and services, including public transport.
4. It is accepted that the Harbury Estate would be consistent with Options 5 and 6 but these are not supported by the District Council for the reasons identified in Appendix A of the Draft Core Strategy.
5. This point is acknowledged and the next stage of the Core Strategy should show how any increased housing requirement would be catered for.
- 6/8. The District Council believes that the balance of development between different types of settlement is appropriate at this stage.
7. The reasons are outlined in Appendix A in the Draft Core Strategy although further clarification may be needed. Local opinion has not been given overriding weight but it is an important consideration.
9. The South Housing Market Area assessment identified a fairly consistent pattern of housing need across the whole District. The approach taken to locating development reflects the availability of services.
10. The District Council will assess all reasonable options in order to identify the most appropriate approach for meeting any increased housing requirement. This will include rural brownfield sites.
11. The intention is to assess the situation through the current Core Strategy process and identify additional land for development that might be required.
12. National policy, such as PPS3, does not prefer the use of brownfield land if it is inappropriate for development, such as locations that have poor access to jobs, services and infrastructure (see para. 36).
13. The assessment of options carried out by the District Council, as set out in Appendix A of the Draft Core Strategy, concluded that rural brownfield sites are not as appropriate for development as greenfield sites on the edges of the larger settlements in the District.
14. It is hoped that the provision of additional development in the larger rural settlements will lead to an improvement in shops and services but this cannot be guaranteed. Policy CS.1 states that such schemes would be supported to bolster the role of Main Rural Centres.
15. This is unnecessary since the preferred option does not require facilities to be maintained, improved or attracted in order for development to be appropriate. The focus of development on the largest settlements in the District is due partly to the wide range of shops and facilities they already support. The approach taken in the Draft Core Strategy is that small-scale development in villages should be based on local housing need and is not dependent on the availability of services.
16. This point is noted but it is envisaged that sites identified for development in villages will be small-scale and should not involve land that has significant ecological value.
17. Parish Councils will be involved in the process of preparing the next stage of the Core Strategy in any case.
18. These are matters of concern to the District Council and will be a major factor in identifying the most appropriate means of meeting any increased development requirements.
19. An allowance is made for windfall development but the extent of this has to conform to national policy which limits the reliance on this form of development.
20. The District Council believes a new settlement is not appropriate for meeting the current housing requirement but this option

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will be reconsidered to assess whether it is suitable in order to meet any increase in the requirement that might be set by the RSS Phase Two Revision.

21. The options identified and assessed are reasonable in the context of Stratford District. The notes to Appendix A in the Draft Core Strategy identify a range of other options that have been suggested and explain why they did not merit detailed assessment in their own right.

22. The scale of development identified in the Draft Core Strategy for individual Main Rural Centres is much lower than that for Stratford town. However, each MRC is a sustainable location for development in its own right.

23. This is acknowledged but as a matter of principle it does not make Main Rural Centres inappropriate for further development.

24. The preferred option supports small-scale housing schemes in villages to meet a local need but the scale of development involved will be limited.

### Recommended Action

14/15. No change

17. Continue to involve Parish/Town Councils in the assessment of development options and specific development locations.

19. Continue to assess the basis for setting a suitable windfall allowance.

All other points - continue to assess the Preferred Option for meeting the current housing requirement to ensure that it is appropriate. Also, carry out an assessment of options to identify the most appropriate approach for meeting an increased housing requirement that might be set by the RSS Phase Two Revision.

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## Analysis of Representations

### Topic: CS.1 Settlement Hierarchy

#### Summary of Matters Raised in Representations

1. Policy allows for new housing and employment on sites within or adjacent to the built up boundary of SuA and MRCs. No explanation is given as to how this might be applied in practice. If the policy is left unaltered then every site on the edge of all the towns could be put forward for development, which could undermine the housing strategy.
2. Reference could be made in the CS to sites identified in the SHLAA as being suitable for development. The SHLAA should be updated every year and therefore new sites being brought forward during the plan period could be included overcoming the need for the CS to be updated too frequently.
3. No allowance in the SHLAA for greenfield sites which come forward under this policy during the first 10 years of the plan. The Council may be able to say that sufficient land to meet housing needs until 2026 has been allocated and to grant planning permission would provide excess numbers of dwellings contrary to the RSS. Any site coming forward under this policy would therefore be refused even if in practice the site is more suitable than those allocated.
4. Aware that national planning guidance advises that windfalls should not be counted during the first 10 years but these can be included where there is genuine evidence that sites will come forward for development. If sites were identified in SHLAA and promoted this would provide clear evidence of availability and suitability. This should provide the evidence to warrant inclusion in the calculations.
5. It is noted that the Council's consultations were undertaken before the eco-town proposal was in the public arena therefore there has not been an opportunity for proper public consultation as an option for inclusion in the LDF. This could result in the CS being challenged as 'unsound'. A further round of consultation is therefore required with the eco-town as an option for the delivery of a much higher level of housing provision across the District.
6. Policy should include reference to complementary measures to reduce the use of the private car, provide necessary public transport infrastructure and promote walking and cycling.
7. MRCs should be the focus for improved shopping to meet the needs of local people. Day to day shopping needs should not be confined to top-up shopping only and the role given to MRCs should be reviewed.
8. MRCs should be reconsidered against Policy RR3 of the emerging RSS to allow identification as Market Towns where appropriate.
9. The problems, constraints and unsustainable nature of the proposed allocated sites result in the Council's approach to future development and the settlement hierarchy identified in CS.1 being unsustainable and unsuitable. A far more sustainable approach would be to reduce the amount of development proposed in rural settlements particularly Kineton, Bidford and Shipston. These should be replaced by sustainable development sites on the outskirts of SuA.
10. The Council should be open to opportunities adjacent to major centres that might fulfil the area's development requirement in a more satisfactory manner.
11. Question whether a ranking is required in terms of existing settlement size. A ranking system will enable an order of priority to guide future development into locations that can support the needs which arise from expansion.
12. 'Small scale community led schemes.....identified by a local community' could not be achieved due to the local community being against the development even if a need is identified.
13. The required development may not be small scale. If fully justified development of any scale should be permitted.
14. In rural settlements where land is identified as being suitable for development and able to meet local housing needs this should be allocated in either the CS, allocations DPD or through the SHLAA.
15. Confusion as to how specific the locations identified in the CS are intended to be. If there is not to be an allocations DPD then precise boundaries should be set for allocations to avoid uncertainty.
16. Should be a clear explanation as to how the SHLAA will be monitored and reviewed throughout the Plan period. This should include that as and when windfall sites are granted planning permission these will be reflected in the SHLAA and provided there remains a 5 year supply of housing land available the more sensitive greenfield sites in the CS should be 'saved' from 'reluctant development' by windfalls being granted planning permission.
17. These schemes should not only be those identified by the local community and query how such schemes will be identified through Policy CS.2.
18. The current policies do not address settlements where there is scope for small scale sustainable development to meet the needs of local people. Policy COM.1 exacerbates the situation and puts more pressure on the MRCs. A new settlement hierarchy should be introduced.
19. Should have a clearly defined village boundary to assist with the identification of suitable sites within or adjacent to this

## Analysis of Representations

boundary.

20. Recommend that the settlement hierarchy stays with a four tier system i.e. main town, MRCs, local centre villages and other rural settlements. The housing and employment needs of the smallest rural settlements are generally different from the LCVs and therefore different policies should apply.

21. Insert after need 'above two units are...' This will avoid repeated local surveys to meet changing needs.

22. Do not agree that Green Belt should be excluded. Sequential testing should be carried out to ensure all viable brownfield sites have been identified. Where these have been exhausted Green Belt land should be made available for housing where local demand has been evidenced.

23. Policy CS.15 addresses large tourism sites in the countryside but this appears to conflict with CS.1. Request that CS.1 is changed to recognise that there are cases where large scale leisure proposals outside of the main town of SuA will be acceptable especially when related to existing complexes.

24. Policy should make reference to the role of Middle Quinton Eco Town in the settlement hierarchy.

25. Will be significant transport implications which are not identified in CS.1.

26. Scale of development should be tailored to meet the size and significance of the settlement concerned and therefore an option which combined the best of Options 2 and 3 would have been better.

27. Suggest deleting 'community led'. Schemes which meet a locally identified need do not necessarily need to be led by the community.

28. Flexibility should be incorporated to allow small developments to take place so that more opportunities are given to local builders to provide local employment and create a greater variety of built environment rather than standard housing provided by national housebuilders.

29. 'Small scale development' should be changed to 'a scale of development appropriate to the size of the settlement'.

### Officers' Response

1/19/22. Further consideration is being given to this approach and is likely to lead to the restatement of Built-Up Area Boundaries.

2. The amount of land identified in the SHLAA could far exceed the housing requirement for the District. In any case, the SHLAA is not intended to have the purpose of allocating sites but to provide evidence as a basis for doing so in the LDF.

3. While in theory it is possible that further suitable locations for development could be identified through SHLAA updates, in practice the District Council continues to assess the merits of all land on the edges of Stratford-upon-Avon and the Main Rural Centres, consistent with the current preferred option.

4. The scope for extending the windfall allowance is being investigated but it is imperative that the approach used is consistent with national policy.

5. The new settlement option was assessed at the Issues & Options consultation stage and was the least favoured approach. The District Council will have to take into account the Government's decision and the outcome of the RSS Phase Two Revision process regarding the principle of the Middle Quinton Eco-town.

6. These issues are covered in Policy CS.17. The preferred option for development is compatible with these objectives.

7. It is hoped that shopping provision in the Main Rural Centres will be improved but it would be inappropriate and unreasonable to expect these settlements to become higher tier centres. Indeed the current RSS and the emerging revision seeks to maintain a defined hierarchy of town and city centres.

8. The view is taken that in the context of Stratford District, the Main Rural Centres are comparable with the role of market towns as set out in Policy RR3 of the RSS Phase two Revision.

9/10. Further assessment is being carried out of the development locations identified in the Draft Core Strategy. However, the overall distribution of development between Stratford-upon-Avon and the Main Rural centres is thought to be appropriate and consistent with the objective of supporting the role of the MRCs.

11. While such a calculation provides a basis for determining the scale of future development in each of the main settlements in the District, in practice there are many other factors to be taken into account, such as the availability of suitable sites for development and infrastructure constraints and opportunities.

12. A number of such schemes have come, or are coming, through the process although it is acknowledged that a more proactive approach by the District Council and its partners may be required to make it more effective.

## Analysis of Representations

13. Given the nature of 'other settlements' it is not expected that the level of need identified for them will be extensive at any point in time.

14. Consideration is being given as to whether small-scale sites in villages should be identified in a separate DPD. The scale of development involved would be inappropriate to identify in the Core Strategy.

15. The manner in which development locations are defined in the Core Strategy and illustrated on the Key Diagram add/or Proposals Map is being addressed and advice will be sought from the Government Office.

16. This is the manner in which the process should operate as a matter of course. The scale of development on windfall sites will be a factor in deciding whether greenfield land should be released.

17/27. As things stand, the process for identifying sites for meeting a local need will continue in a similar vein to that set out in detail in the 'Local Choice - meeting the needs of rural communities' SPD.

18/26. The current approach in the District Local Plan allows for development in certain villages to meet a local need and the Draft Core Strategy proposes to extend this to all rural settlements. However, it would be inappropriate for the overall scale of such development to be excessive compared with that in Main Rural Centres which support a much wider range of shops and services.

20. The distinction between the current Local Centre Villages and smaller villages is being reconsidered but, generally speaking, the needs of all rural settlements are similar, albeit the scale may vary.

21. This level of detail is inappropriate to set out in a Core Strategy. In any case, more than one scheme may be justified to meet the level and nature of local need identified at any point in time.

23. The scope of Policy CS.1 does not override the provisions of other policies in the emerging Core Strategy, such as Policy CS.15.

24. The policy may have to be modified to reflect the status and role of the Middle Quinton Eco-town if it is eventually supported by the Government.

25. Transport issues will have to be addressed satisfactorily in relation to all development proposals.

28. This point is noted. It is not intended that small development sites should be restricted if they are in a location that is consistent with the overall strategy.

29. The definition of 'small-scale' in an individual case will be dependent on the level of need identified and the nature of the site being considered, not just the size of the overall settlement.

### Recommended Action

1/19/22. Consider the merits of retaining Built-Up Area Boundaries for Stratford-upon-Avon and the Main Rural Centres.

4. Ensure that the basis for the windfall allowance is appropriate given the circumstances that apply to Stratford District.

5/24. Continue to assess the detailed implications of the Middle Quinton Eco-town should the principle be supported by Government.

6/7/8/13/16/21/23/25/28/29. No change

12/17/27. Address the means by which schemes to meet the needs of local communities can be brought forward more effectively.

15. Consider how development locations should be defined in the Core Strategy.

All other points - the overall approach to the settlement hierarchy will continue to be assessed to ensure that it is appropriate to the overall circumstances faced by the District and their individual characteristics. Similarly, the manner in which provision is made for development in relation to the hierarchy will be considered further.



## Analysis of Representations

Topic: T1a Housing growth figures

### Summary of Matters Raised in Representations

1. Detailed comments received from Warwickshire Police which conclude that additional development will result in an increased population that will add additional pressure to existing police services. It may be necessary to create custody facilities within Stratford District as currently the custody facilities at Leamington & Rugby are used. Requests that developer contributions are sought to assist the police force in accommodating the population growth.
2. Pg 16 discusses the implications of the Redditch expansion. The evidence base states that Stratford will be required to meet some of the employment needs of Redditch and therefore RBC questions whether the use of 'possibility' is too weak
3. The table on page 71 states that 676 dwellings have been granted planning permission on sites providing 10 dwellings or more. It is assumed that a large number also exist on smaller sites although this is not stated. The number of dwellings given planning permission on sites of less than 10 dwellings should be added to the table to give an adequate overview.
4. It is accepted that the inclusion of a windfall allowance after the first 10 years of the Plan is permitted. It should only include windfalls being achieved after those 10 years rather than to cover all those which may come forward during the whole Plan period. Only once this information is included will it be possible to assess the accuracy of the figure included in the table.
5. There is no explanation within the DCS which highlights the SHLAA and the work undertaken within it. If sites identified in the SHLAA are effectively to be allocated for development there should be a policy explaining this.
6. The table on page 71 includes a number of brownfield sites identified in the SHLAA and then considered by the Council as acceptable for development. There is concern that the table does not include all brownfield sites within SuA and the MRCs identified in the SHLAA as appropriate for residential or mixed use development. Either all sites promoted by land owners, developers or their agents should be included or there should be an explanation as to why some sites are included and others not.
7. Support the recognition that not all of the identified sites will come forward. There is no justification for the discount figure. This should be included.
8. Natural England believes that the level of development in Stratford should take into account the need to use land as intensively as is compatible with the protection of the quality, character, environmental capacity and amenity of the area.
9. The DCS fails to address the likelihood of additional growth being allocated to the District as a result of the NLP report and the RSS Revision. The DCS is therefore unsound in that it lacks flexibility to deal with major change in requirements. This cannot be fixed at the next stage as the process so far will be flawed. The Core Strategy should not be progressed until proper consultation and consideration have been given to these issues and the public should have the opportunity to have an input into strategy matters with a different RSS context. Similarly the DCS fails to deal with the proposed ecotown. It is later recognised that the Long Marston site may not be the best site, however the Council has not considered Middle Quinton or the alternatives meaning that the process to date is unsound. The intention of the Council should be to identify further sites that can be released to meet the increased requirement.
10. The Strategy should seek to accommodate a higher level of housing provision within the District that maintains the focus on the market towns that is evolving within the CS in order to respond to the need and demand for housing in the rural areas and address existing deficiencies at source.
11. The windfall allowance is excessive and should be reduced. Allowance should be made for 250 dwellings for the period of 2021 to 2026. As a result the residual requirement would be increased by 500. What is the justification for the 150 windfall allowance stated?
12. In the current economic climate the Council should not be seeking to rely on past levels of housing completions when assuming that these units will be delivered. In order to properly reflect current market conditions a non-implementation rate of 30% should be included.
13. The basis of increasing housing numbers is questionable and is based on continued growth which is unsustainable in wider terms. The issue that the ecotown allocation would be in addition is not logical; it should form part of the total requirement, not be additional.
14. The 4500 additional dwellings proposed by the NLP report is still below the level in the current Structure Plan and is substantially less than was provided in the previous plans. The higher amount should not be beyond the capabilities of the District or the house building industry and will merely cater for the latent need.
15. A flexibility allowance of at least 15% should be applied to dwellings permitted but not yet started (row 4). This will decrease the figure to 665 (782 - 15%) and the residual requirement would be increased by 117.
16. As no flexibility is applied to allow for an increase in housing through the emerging RSS, it should be acknowledged in the table (on page 17) that this is a minimum residual requirement.

### Officers' Response

## Analysis of Representations

1. This point is noted and will be taken into account in considering infrastructure requirements.
2. Given that the RSS policy relating to this issue has not reached the adoption stage, it is appropriate for a measure of uncertainty to be reflected in the wording.
3. The schedule is available in the SHLAA which is its most appropriate location. Little point would be served in also including a schedule of small sites in the Core Strategy.
- 4/11. The windfall figure is derived from average annual windfall rates shown in the 2008 SHLAA, subject to a measure of discounting reflecting the possibility that the supply of windfalls may decline marginally in the long-term. However, the issue of windfall rates is being examined in the 2009 SHLAA Review and the outcome will be available for use in revised housing land supply figures.
5. The relevant sites are listed on page 71. Most of them are too small to be identified in the Core Strategy as Proposed Development Opportunities, while others are allocations in the Stratford-on-Avon District Local Plan Review and could be released in the short-term without the need for them to be included in the DCS, subject to the housing moratorium being lifted. However, it is accepted that additional explanation of the SHLAA in the CS would be useful background information.
6. The reduced figure is not based on any of the sites listed on page 71 being specifically excluded. It is derived from a notional discounting of the total capacity of all these sites to reflect the possibility of some of these sites not being developed during the plan period for a variety of reasons.
7. Discounting is considered to be justified in that although the sites have been identified in the SHLAA, some of their number may not necessarily be developed during the plan period. For example, some may be subject to unforeseen site specific constraints, site assembly issues, the presence of uses that will continue to be viable etc.
8. The point is accepted. The District Council is working to achieve a growth option in Stratford-upon-Avon that takes into account capacity limitations.
- 9/10. The District Council is undertaking more work on how the Core Strategy will address alternative growth scenarios. The outcome of this work will be subject to consultation before the Core Strategy is published. It will cover the issue of a new settlement.
- 12/15. Past completion rates are not reflected in the housing supply figures, apart from the windfall allowance. In the latter case the figure relates to the last five years of the plan period rather than the immediate future when the economic downturn will have most effect. As regards the use of a non-implementation allowance in relation to sites subject to planning permission, the current SHLAA Review process involves an assessment of whether these sites will come forward for development. Sites which are unlikely to deliver new dwellings will not feature in the figures. In this context a notional non-implementation discount would amount to double-discounting that would give rise to figures that would under-represent the contribution of these sites to the land supply. As regards applying a non-implementation allowance to the development opportunities, it is accepted that it cannot be asserted that all of these sites will contribute new dwellings during the plan period. There are several urban PDL sites where redevelopment may prove problematic and over-reliance on the contribution of such sites to achieving strategic housing requirements would not be reasonable. There are alternative methods of dealing with this issue: discount the supply figures resulting in a larger shortfall to be dealt with by means of additional land allocations; or leave the supply figure as it is but then allocate land in excess of that required by strategic policy so that the degree of over-provision is a "safety margin" to be released for development if monitoring indicates that completion rates are falling behind required rates. The latter approach is often tied to a listing of sites in priority order, with those of least priority only being released if there is a real prospect of under-provision of housing. The supply figures in the DCS reflected this style of approach. There was a modest degree of over-provision built into the figures. Clearly the figures will need to be reviewed in the light of the SHLAA Review.
- 13/14. Housing growth figures for the district are set in the Regional Spatial Strategy (RSS) and the Core Strategy will have to make provision for this level of development. The RSS is currently subject to partial review which includes housing growth figures for the districts and boroughs. The review is also considering the Middle Quinton "Ecotown".
16. This would make an assumption that the RSS Phase Two Revision will increase the housing growth figure for Stratford-on-Avon District. At this stage there is no definite indication that this will happen. It is also unclear whether that figure will be a minimum or a maximum level of growth. However, the RSS EIP Panel recommendations regarding the district's housing growth should be available prior to the publication of the Core Strategy and they will need to be taken fully into account in the publication document.

### Recommended Action

1. Provide additional information about the SHLAA.
2. Review and amend the figures in the light of the SHLAA Review and the RSS EIP Panel's forthcoming recommendations regarding housing growth in the district.

## Analysis of Representations

### Topic: SHLAA Strategic Housing Land Availability Assessment

#### Summary of Matters Raised in Representations

1. It is difficult to claim that the Joint Housing Assessment for South Warwickshire is up to date given that housing market conditions have changed so much since the work was done. If this is to have any sort of meaningful input in the Core Strategy, it needs to be updated. Otherwise it will be mostly irrelevant.
2. The SHLAA has not been tested through consultation but rather has been presented in the final form with no opportunity to participate in the outcome. This is significant in that a number of sites/broad locations are found suitable for development yet only a limited number are taken forward into the housing allocations made in the DCS on which consultation is taking place. Those sites not taken forward may have as much to offer yet no opportunity has been available to present views on a comparative basis.
3. The February 2008 SHLAA is unsoundly over-relied on and has significant flaws. There is no evidence that there has been a full consideration of the environmental conditions which would be experienced by prospective residents. This is a criteria stated in the DCLG Practice Guidance on SHLAAs dated July 2007.
4. There is no table of site by site information setting out what the policy restrictions, physical problems or limitations, physical impacts and the environmental conditions which would be experienced by prospective residents for each site so a proper understanding of these issues site by site can be undertaken.
5. The status of the Strategic Reserve Sites in the existing Local Plan has been incorrectly applied. The SHLAA contains inaccurate references to the land to the West of Shotton being 'designated' in the existing Local Plan and the assessment is thus inaccurate. The point is that Strategic Reserve Sites are not allocated and do need to be fully and properly assessed both in the SHLAA and then the more detailed sustainability appraisal of sites.
6. The full extent of the background survey and appraisal work undertaken as part of the Feb 08 SHLAA does not appear to be in the published appendices. There is no opportunity therefore to assess whether the survey and appraisal work has been undertaken in accordance with the DCLG Practice Guidance.
7. It is also notable that the Nov 08 Revised SHLAA Methodology does not propose calling for sites of 6 or more in any of the smaller settlements. Such sites would therefore be expected to come forward as windfalls as they will not be identified otherwise. Those communities in smaller settlements wishing to bring forward smaller sites of 6 to 10 have effectively been unfairly dis-enfranchised from having their site properly identified on a level playing field basis with other settlements in the District and are being unfairly forced into a windfall position rather than having the benefit of their site being considered.
8. The SHLAA has dealt inappropriately with Green Belt, Areas of Restraint or Special Landscape Areas by excluding these altogether from the study. This disregarding of such designations has been applied throughout the SHLAA assessment process and is a mis-application of the DCLG Practice Guidance.
9. In relation to the West of Shotton broad location, there are a number of parts of the SHLAA which need re-examining as the assessment is highly questionable, i.e. the landscape assessment.
10. The assumed densities for each site need to be more clearly explained.
11. There appear to be some sites put forward at the last Local Plan Inquiry which ought to be considered in the SHLAA but have not been. This raises questions of how extensive has been the sourcing of sites not initially put forward in the first call for sites. The SHLAA should not confine itself only to sites which are being put forward.
12. There appear to be some discrepancies between the historic brownfield windfall data at Appendix 12 to the Feb 08 SHLAA and the figures obtained by RASE. The figures by RASE are described as gross figures whereas the SHLAA figures are described as net figures.
13. The viability assessment of the sites needs to be re-assessed as the data is clearly out of date given the economic downturn/recession and significant reduction in land values which has at least short and medium term implications for the plan period.
14. In the SHLAA BID 705 was identified as an existing site which could be redeveloped. This site should be re-assessed as it would have the support of the B50 Parish Plan.
15. The SHLAA is flawed because it has discounted a number of sites purely because they are too small for 10 dwellings. Cumulatively these discounted sites have the potential to accommodate at least some of the proposed allocation for Bidford. The latest Government advice is to base such studies on the threshold of 6 dwellings.

#### Officers' Response

1. The District Council has commissioned a Market Review to update aspects of the Joint Housing Assessment. The outcome of this review will be available by early July. However, it is an over-statement to claim that the Housing Assessment is mostly irrelevant. The household survey which provides much of the data for the Assessment is still a valid source of information on aspects of housing need and demand that are still current.

## Analysis of Representations

2. There is no formal requirement to provide a draft SHLAA report for consultation. However, the District Council placed the report on its website with a request for comments on the document to be submitted. These would be taken into account in a future review of the SHLAA. Such a review is now being undertaken. In any case, the promoters of particular sites have had an opportunity to make a case for these sites in the form of submissions on the Draft Core Strategy and many have done so. These submissions are being given due consideration and are contributing to the Land Parcels Assessment being undertaken by the District Council.

3/4. As regards over-reliance on the SHLAA, the District Council took into account a range of information sources in identifying these sites, not just the SHLAA, although it is accepted that the process was not well documented. The current Land Parcels Assessment will rectify this deficiency. As regards effects on prospective residents, in para. 2.9.4 of the 2008 SHLAA report it is stated that the conditions experienced by potential occupiers were judged, and the consultants have confirmed state that they did take this factor into account either by discounting the site altogether, or reducing the dwelling capacity.

5. The SHLAA actually stated that the land "has been considered as a broad location rather than as an allocation for the purposes of this study". Even so, this land was identified in the Adopted Local Plan as having potential to provide long term housing and the Local Plan indicated that the Inspector concluded that this and the other two identified Strategic Reserve Sites "are suitable for development". They therefore have a status in the plan above that of other greenfield locations. Also, it is confirmed that the land is being assessed in the SHLAA Review and in the Land Parcels Assessment.

6. The methodology for the study should give a good idea as to whether DCLG Practice Guidance has been followed. The initial stages of the study pre-dated the DCLG Practice Guidance but, as para. 2.1.7 states the methodology was redrafted to reflect the stages of that guidance. As regards the survey and appraisal work, the consultants are not obliged to release all their documents into the public domain. Indeed, they may well include commercially sensitive information.

7. This point is academic. The absence of specific reference to these sites in a SHLAA will not prevent such sites progressing to development in line with current and proposed policies.

8. In para. 2.9.3 of the SHLAA report the consultants state that "review of relevant policy constraints and planning history indicates the potential restrictions to development and may identify physical problems or impacts on issues such as landscape character". The consultants have confirmed that these designations were taken into account in assessing the suitability of sites for development. In relation to the assessment of Broad Locations the consultants have stated that these policy-based designations were not used to determine areas; only clear-cut designations referred to in para. 21 of the SHLAA Guidance were used. The principle behind this approach is that the SHLAA should consider the maximum range of locations where development may be sustainable and not be constrained by current policy which might change. Therefore in considering Broad Locations it is only the clear cut designations which are excluded from consideration.

9. This view is not accepted. The points raised are insufficient in substance to support an assertion that the assessment is "highly questionable".

10. An explanation of how the capacity of sites was estimated is set out on page 16 of the SHLAA report.

11. If sites were not being promoted, then they would not be considered available.

12. It is confirmed that the figures in Appendix 12 of the SHLAA are net of losses.

13. A viability study has been commissioned.

14. This is a comment on whether the site should be allocated for development rather than a proposed amendment to the SHLAA. The site is likely to fall within the scope of the current Land Parcels Assessment.

15. The current SHLAA Review has a reduced site size threshold (>5 dwellings). This may result in additional sites at Bidford-on-Avon being identified in the SHLAA. It should be noted that all sizes of site will be accounted for in housing land supply figures once they are granted planning permission and will then have a bearing on the extent of land released for housing.

### Recommended Action

None arising directly from the comments. However, the 2008 SHLAA is being reviewed and the comments listed above are being taken into account during this review.

## Analysis of Representations

### Topic: T1b Employment growth figures

#### Summary of Matters Raised in Representations

1. As the housing requirement is likely to be increased through the emerging RSS in order to achieve balanced development the employment requirement may also need to rise. It would be helpful to recognise this and the implications for proposals in the Plan.
2. Note that the figures exclude provision for the post 2021 period which will need to be considered through a review of the Core Strategy.

#### Officers' Response

1. It is acknowledged that the level of employment land provision is likely to be increased if the housing requirement does so through the RSS Revision process. This will be considered in preparing the next stage of the Core Strategy.
2. This is accepted but the time period covered accords with that in the RSS Phase Two Draft Revision.

#### Recommended Action

1. Review the situation regarding employment land provision to correspond with the assessment of options for dealing with possible additional housing requirements.
  2. Ensure that this point is made clear in the Core Strategy.
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### Topic: T1c Growth distribution - general

#### Summary of Matters Raised in Representations

1. Section appears to be saying that windfall sites will generally be 10 dwellings or less and that larger sites will only be permitted due to 'site specific circumstances' There is no explanation of what those 'site specific circumstances' might be.
2. Unclear how windfalls will accord with Policy CS.1. This section of the Plan must make it clear that there will be windfalls of all sizes and how they will be considered.
3. Does not appear that comprehensive up-to-date habitat, Green Infrastructure or historical data has been used to assist in determining the allocation of strategic sites. Appendix B states that 'detailed site assessment work is still ongoing' but no further explanation is given.
4. Baseline data is required to inform the assessment of proposed areas.
5. Sites of 10 or less homes should be documented and made public to stimulate the provision of rural housing in village locations where a Housing Needs Survey may not have been conducted or is not thought necessary by the Parish Council.
6. Specific comments regarding SUA.3, SUA.4 and SUA.8 with regard to flood risk, phasing and use class.

#### Officers' Response

1. Examples of 'site specific circumstances' could be given, eg. redevelopment of redundant and vacant sites, but this may not be an exhaustive list.
2. Treatment of windfalls will be kept under review but this has to accord with national policy guidance on the matter.
- 3/4/6. Further assessment and consideration of all development opportunities identified in the Draft Core Strategy is being undertaken to inform the eventual allocation of land for development in the next stage of the document.
5. Further consideration will be given to the approach towards housing provision in villages, although this is highly unlikely to lead to the identification of sites in the Core Strategy because the size of the sites involved will be too small..

#### Recommended Action

1. Insert appropriate examples of site specific circumstances.
  2. Continue to assess the issue of how windfalls should be treated.
  - 3/4/6. Continue to assess which areas of land should be identified for development in the Core Strategy and refine the specific provisions of each allocation.
  5. Review the situation regarding the treatment of development in villages in the Core Strategy.
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## Analysis of Representations

Topic: T1d

Growth distribution - Stratford-upon-Avon

### Summary of Matters Raised in Representations

1. Sites identified as reserve sites in the Local Plan should be the subject of proper review in light of the changed circumstances rather than just rolled forward.
2. Lack of planning for increased numbers through the RSS is a major deficiency. This cannot be remedied through the submission stage as the process will be flawed.
3. CS should make greater reference to the Meeting Housing Needs SPD as a greater emphasis on the need for affordable housing provision is required.
4. There is no justification to support the statement that 5600 dwellings will only meet local housing needs in the District and will not provide housing for in-migration requirements. The Council cannot control who lives in the 5600 houses therefore it may be that some local residents needs are not met.
5. There is no justification to show why additional housing should not be provided in the MRCs.
6. Officers draft response to the RSS Spatial Options supported the highest housing option a total of 7200 dwellings between 2001 and 2026, or 372 per annum. The DCS allocates 280 per annum and concern is raised in the document that additional housing will place pressure on existing infrastructure, services and threatens the historic character of the District. Why does this contradiction occur?
7. Each site should be properly assessed re ecological impact. Check the ecological value to Milestone Meadow as this is proposed to be the access to land north of Banbury Road.
8. Object to any greenfield sites being developed for housing.
9. A more proportionate dispersal of residential development should take place between SuA and the surrounding towns and villages.
10. The Timothy's Bridge Road industrial and commercial area already has large quantities of empty buildings and more development of this sort is totally unnecessary.

### Officers' Response

1. All of the proposed development opportunities identified in the Draft Core Strategy are subject to ongoing assessment, including those that are Strategic Reserve Sites in the District Local Plan, in order to decide whether they should be identified at the next stage of preparing the document.
2. It is intended that the submission version of the Core Strategy will set out how the District Council intends to provide for an increased housing requirement in the RSS Phase Two Revision. This will be based on an assessment of all reasonable options for dealing with a range of scenarios. There is no apparent reason why this approach should be flawed although advice will be sought on this matter.
3. The SPD contains more detail than is appropriate to include in the Core Strategy. The intention is that it would be reviewed and updated once the Core Strategy is approved to ensure consistency and provide detailed guidance in interpretation and implementation.
4. It is acknowledged that a proportion of the 5,600 dwellings requirement reflects a modest provision for in-migration from other regions. However, the emphasis of the approach for Stratford District in the RSS Phase Two Draft Revision is to meet the housing and employment needs of the area in a sustainable way. It is accepted that planning policies cannot generally control the occupancy of market dwellings.
5. The manner in which an increased housing requirement is accommodated is the subject of ongoing assessment.
6. There is no doubt that the higher the housing requirement the greater will be the pressure on infrastructure, services and character. It is not necessarily the case that the District cannot cater for an increased level of development but detailed assessment has to be carried out to identify the most appropriate and satisfactory means of doing so.
7. Each potential development site will be assessed for its ecological value.
8. While the District Council will seek to maximise the use of brownfield sites for development, there is insufficient land of this nature in sustainable locations to meet the emerging housing requirement. Consequently the development of some greenfield land is unavoidable.
9. The overall basis for distributing future development is for it to be proportionate to the relative sizes of Stratford-upon-Avon and the Main Rural Centres as the most sustainable settlements in the District. Some adjustments to this distribution are likely to be necessary due to the particular circumstances in each settlement and the availability of suitable land for development.

## Analysis of Representations

10. The Core Strategy will cover the period to 2026 and more land will be required for employment development to meet the needs of the plan period. The RSS Phase Two Revision will provide a basis for this requirement.

### Recommended Action

1/7/9. Continue to assess all potential development land in order to identify the most appropriate sites in the next stage of the Core Strategy.

2/5/6. Analyse all reasonable options for meeting an increase in the housing requirement for the District set by the RSS Phase Two Revision. Seek advice on the manner in which this should be properly presented through the Core Strategy process.

3. No change

4. Ensure that the basis of the housing requirement is accurately described in the next stage of the document.

8. No change

10. No change

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### Topic: T1e Growth distribution - Main Rural Centres

#### Summary of Matters Raised in Representations

1. Core Strategy should make greater reference to the Meeting Housing Needs SPD as a greater emphasis on the need for affordable housing provision is required.

#### Officers' Response

1. This issue is dealt with in Policy CS.8 in the Draft Core Strategy. It would be inappropriate for the Core Strategy to cover the issue in great detail; it should set out the key principles upon which more detailed guidance will be based.

#### Recommended Action

1. No change

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## Analysis of Representations

**Topic: T1f Growth distribution - Smaller settlements**

### Summary of Matters Raised in Representations

1. Core Strategy should make greater reference to the Meeting Housing Needs SPD as a greater emphasis on the need for affordable housing provision is required.
2. It ought to be possible to identify suitable areas or settlements for smaller-scale or affordable housing using an up-to-date market assessment. This will assist in delivering housing in smaller settlements where this meets an identified local need and will assist in providing a spatial element to the Core Strategy.
3. Concern that extension of local needs policy will not allow all rural needs to be met. It can be difficult to engage local communities and when a need is identified, often the local community is against development. Some landowners struggle to promote sites and it can be difficult to fund the works necessary to achieve development.
4. Each site should be assessed for its ecological value.
5. There is likely to be an identified need for both affordable and open market homes.
6. Scope needs to be extended to include smaller villages in the District to provide meaningful, affordable and capital housing provision. If the new strategy does not embrace comprehensive development across all our rural communities and demonstrate a credible alternative to deliver all future housing needs and targets in our District then an eco town is a foregone conclusion.
7. The high density developments recently experienced in our principal town has failed to create community cohesion and has produced unrest and problems for the future. The proposed pockets of high density developments in larger villages will follow this failed model, only magnified by the limited resources and infrastructure available to these smaller communities.

### Officers' Response

1. The SPD contains more detail than is appropriate to include in the Core Strategy. The intention is that it would be reviewed and updated once the Core Strategy is approved to ensure consistency and provide detailed guidance in interpretation and implementation.
2. Further consideration is being given to an appropriate basis for making an allowance in the Core Strategy for residential development in rural settlements.
3. It is acknowledged that the 'local choice' policy raises a number of challenges in relation to delivery. It is for this reason that an allowance is made for this form of development in the Draft Core Strategy.
4. Each potential development site will be assessed for its ecological value.
5. This is why the local choice approach provides scope for the need for market homes to be met.
6. Policy CS.2 in the Draft Core Strategy extends the local choice approach to smaller settlements in the District. However, the scale of development involved needs to be consistent with national and regional policy that expects most development to be in larger settlements because they are more sustainable locations.
7. A wide range of policies in the Draft Core Strategy will seek to ensure that all development achieves community cohesion and the necessary infrastructure.

### Recommended Action

1. No change
  - 2/3. Undertake a thorough assessment of whether making an allowance for residential development in smaller settlements can be justified.
  4. Assess the ecological value of all potential development sites.
  - 5-7. No change
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## Analysis of Representations

Topic: CS.2 Parish plans & Local Choice schemes

### Summary of Matters Raised in Representations

1. The policy should commence with the words 'housing development will be resisted in the smaller settlements in the District unless' and then continue.
2. Unlikely to ever be a parish plan in some parishes as there is no means of paying for such a plan.
3. Only new development to come forward would be due to employment and business.
4. Support general principles but object to the weight given to 'local choice'.
5. Policy does not appear to include reference to 'special circumstances where a justification for development may legitimately relate to a wider catchment area' as included within the SPD 'Local Choice, Meeting the Needs of Rural Communities'.
6. Supporting text suggests a pre-determination that large scale developments within smaller settlements are inappropriate, despite that fact that a need could be identified.
7. Policy should be retained but should not be a determining factor if the scheme meets other planning objectives.
8. If locals are given a choice on whether to have new housing development, they will invariably say 'no'. To rely on this policy will result in inaction and stagnation.
9. Such policies will not demonstrate that small-scale, village-wide development is a viable alternative to an Eco Town or other large development.
10. The Core Strategy should contain presumption in favour of development in villages large and small.
11. Need to address the problem of a lack of affordable housing in rural areas. Policy is restrictive as it only addresses the issue where the landowner is prepared to offer land at less than market value.
12. Conversion of redundant traditional agricultural barns to housing to meet the needs of local people is not permitted and this is not fair. Conversions should be allowed and open market development makes a financial contribution for affordable housing elsewhere.
13. Propose a small change in line one 'in a parish plan, the primary document (or equivalent) or in the absence...'
14. Policy should be broken into 3 sections - one relating to parish plans, one relating to the provision of housing in the Local Centre Villages and one relating to the provision of housing in Other Rural Settlements.
15. Justification for housing proposals should not rest solely with parish plans, i.e. detailed Housing Needs Surveys should be considered.
16. Rural Exceptions Policy should be retained for Other Rural Settlements to allow the provision of affordable housing only.
17. Suggestion that the words 'small-scale' are deleted from the second sub-paragraph as this is not defined and any development should be judged against criteria a, b and c. If the proposal meets these criteria, then it will be of an appropriate scale.
18. Too focused on housing and not on wider LDF issues
19. Suggestion to change 'particularly' to 'such as' because there are other small scale schemes which meet housing needs and affordable housing is not necessarily the most important.
20. Where local need is identified through a parish plan or by community consultation, the Council should bear in mind commercial considerations which may affect the nature or type of development proposed.
21. Should build on COM.1 approach, expand on this scope for local market homes allowing suitable plots to be developed in villages rather than the blanket prohibition we have at the present.
22. Do not consider that parish plans should be used to assess the merits of new development, particularly if the parish plan is out of date. Parish plans do not form part of the statutory development plan and sometimes residents requirements do not reflect the reality of the development industry.
23. Local Choice policy does not always provide development where local needs exist. Allowance in CS.2 should be made to enable the Council to grant planning permission even where it is not supported by a local community provided it can be properly justified.
24. The policy only supports housing and employment.

## Analysis of Representations

25. Cross reference should be made between CS.2 and CS.19.
26. Content is CS.2 is inappropriate as a formal policy and should be presented instead as explanatory text.
27. Suggestion to insert 'apart from one-off housing applications for up to 2 units' and 'applications will be considered where a previous built situation existed or planning permission was granted but elapsed and an application is for a single unit'.
28. Suggests clarification of what 'other forms' of enhancement might be.
29. Policy could be strengthened if an independent housing needs survey was stipulated as an appropriate evidence of demand.

### Officers' Response

1. The Local Choice Policy should be seen in the context of the overall spatial development strategy of the Core Strategy and any proposal that will undermine the overall thrust of the Core Strategy will be resisted. Policy CS.1 deals with settlement categorisation and specifies the development approach for each category of settlements, including those that the local choice policy would apply. Policy CS.1 provides a positive framework for residential and employment development in the smaller settlements of the District but is clear to emphasise that such schemes should be small-scale and community-led to meet a housing or employment need of the local community. The positive intent conveyed by the policy is vital to its successful implementation. It is clear from the intention of the policy that the only justification for further development in the smaller category of settlements is if they can be demonstrated to meet locally identified need. In this regard, the positively worded approach of the policy should be retained. The need to recast the whole policy to emphasise each of its different aspects is being considered in response to other representations and an internal review of how the policy would apply.
2. The Council accepts that not all local parishes would have a Parish Plan even if funding were made available for their preparation. In this regard, the policy allows scope in the absence of a Parish Plan for alternative sources of reliable evidence to be used to justify a proposal. For example, an applicant can carry out a housing needs survey to justify a proposal for a residential development. The methodology used in undertaking such surveys and their outcome will be thoroughly scrutinised and verified by the Council before the can be used to inform the determination of any planning application. Details about the application of the policy is set out in the Council's adopted SPD for Local Choice - Meeting the needs of Rural Communities.
3. Parish Plans are supposed to provide useful local information including but far more than housing and employment matters. It could include matters such as community services, features of local historic significance that needs protection, distinct architectural features that forms the character of the area etc.
4. The spirit of the policy is to genuinely align development in small villages to meet identified local need. To achieve this objective, the views of local communities should be given significant weight when considering schemes to meet their needs. Of course any local choice scheme must satisfy all the adopted development control standards of the Council and all other policies of the development plan for the area. It also needs to be emphasised that the District Planning Authority remains responsible for determining planning applications, and in doing so would have to take into account a wide range of other planning matters. Policy CS.2 and/or its SPD would continue to emphasise this particular point.
5. Policies in the Core Strategy are supposed to be strategic in their nature and approach. Detailed clarification of policies where they are considered relevant are best set out in an SPD, a Development Control DPD or other LDDs. In the case of Policy CS.2 (and Policy COM.1), there is an adopted SPD that sets out detailed requirements of the policy. It is the view of the Council that this SPD should continue to be the appropriate level of document to clarify any detailed requirements of the policy.
6. A sensitive balance will need to be struck between development in rural areas and the protection/enhancement of the essential rurality and environmental assets of the District's countryside. The Council takes the view that large scale development with significant development impacts should be located in the Main Rural Centres and Stratford-upon-Avon where there are relatively good level of services and adequate infrastructure to support them. There are other sustainability benefits for taking this approach. Furthermore, it is essential that any local choice scheme does not undermine the overall spatial development strategy of the Core Strategy and the RSS. The scale and nature of a development is an important factor to take into account in this regard.
7. See 4 above
8. Contrary to the point made by the representation, there is an existing body of evidence to demonstrate instances where the outcome of housing need surveys have led to the implementation of local choice schemes. In these instances, local residents have expressed a need for some form of housing.
9. The Core Strategy has a development strategy that allocates sufficient land to meet its housing and employment land requirement in sustainable locations. The Eco-town is a national project which is presently being promoted outside the normal planning process. The Council's objection to the Eco-town proposal at Middle Quinton has been clearly made and this is emphasised in the Draft Core Strategy.
10. Generally, the Core Strategy takes a positive stance towards development if an in-principle support is given to it by reason of its allocation or whether it can be justified to meet a locally identified need or other policies of the development plan. Consideration of any proposal that comes forward will be balanced against the need to protect the built and natural environment of the District.

## Analysis of Representations

11. A minimum of 35% floorspace of all residential development of 10 dwellings or more, or on sites of 0.3 hectares or more will be secured for the purposes of affordable housing. In the smaller settlements of the District, residential development is designed to meet the identified needs of the local community. There is an implied assumption that this bottom up approach to determine housing need will truly reflect amongst other things the affordable housing needs of rural residents. There is evidence to demonstrate instances where 100% affordable housing schemes have been delivered through the application of Policy COM.1 of the Local Plan, which is similar to this policy approach. There is however a case for suggesting that for this policy to fully achieve its benefits and intended purpose, a more proactive approach towards its implementation will be necessary and in this regard, the Council may wish to set out how to do that and commit the necessary resources to its delivery.

12. The Draft Core Strategy does not include a specific policy on barn conversions. For a policy on barn conversions to be effective, it would need specific detailed requirements to be clearly set out. Such a policy will be too detailed to qualify as a strategic policy in the Core Strategy. The Council recognises the importance of having a robust but positive policy on barn conversions, but it is considered that this will best be dealt with in a Development Control Policies DPD rather than in the Core Strategy. A programme for preparing the Development Control Policies DPD is set out in the Council's Local Development Scheme, which is included in its Annual Monitoring Report.

13. The word 'preferably' in line one of the policy is a clear demonstration of the weight that the Council attributes to Parish Plans as a source of local information. At the same time, the Council recognises that not all parishes have adopted Parish Plans. Alternative sources of local information could be useful and acceptable in such circumstances but such information will have to be scrutinised and verified.

14. There may be merit in considering breaking up the policy into parts to emphasise its different aspects and the message that each seeks to convey. Consideration should be given to this in any revision to the policy.

15. See 2 above.

16. The current rural housing exception schemes policy (Policy CTY.5) in the Local Plan Review requires a justification of local need for local affordable housing provision in the smaller settlements of the District. This form of justification is similar to what is being sought in the Core Strategy in the context of Policy CS.2. The difference between the two approaches is that the policy in the Core Strategy does not prevent market housing coming forward if they can be justified to meet local need whereas Policy CTY.5 relates only to affordable housing. It needs to be emphasised that Policy CS.2 of the Draft Core Strategy does not prevent 100% affordable housing schemes. What it does not do is to assume that the only housing need in small rural villages is for affordable housing. Rural housing delivery should be underpinned by evidence of need.

17. The policy is clear in its intent and the use of the word 'small-scale' is deliberate in this context. The word 'small scale' is therefore appropriate in this context. Also see 6 above.

18. The first part of the policy emphasises the importance of Parish Plans as a source of local information when assessing the merits of development schemes and/or making planning decisions. The second part of the policy makes specific reference to both housing and employment development. There is no special focus on housing development in this regard. Consideration is however being given to breaking up the policy to emphasise its different aspects. (See 14 above)

19. The use of the words 'particularly affordable housing' could be presumptuous and consideration should be given to its removal. The justification of all forms of development should be determined by evidence.

20. See 4 above.

21. Policy CS.2 is a similar policy to Policy COM.1 in the Local Plan. There are however, some marked differences between them. In the Core Strategy, there is no distinction between the Local Centre Villages and the all other settlements. Furthermore, Policy CS.2 allows scope for local market housing in the small villages if it can be justified to meet local need.

22. Parish Plans are a useful source of local information and one of a number of material considerations to be taken into account in planning decisions. Planning decisions are primarily informed by the requirements of the statutory development plan but also other sources of local, regional and national guidance notes. Examples are SPDs. (Also see 4 above).

23. The spirit of the local choice policy is to provide development where it is needed and a form of development that is designed to meet locally identified need. The Council accepts that there could be instances where development could be granted permission even if it does not have local support. (See 4 above).

24. The policy is about the weight to be given to the views of local communities in considering all development schemes, and not only housing and employment proposals.

25. Policy CS.2 relates to a number of other policies than just policy CS.19. Cross referencing it to only Policy CS.19 could be misleading. A general and consistent approach to cross referencing however should be considered.

26. The policy has a clear and important purpose that merits its retention.

27. Policy is about meeting locally identified need. Such need should be founded on credible evidence. Setting specific requirements before evidence is gathered to support proposals would be unnecessarily prescriptive.

## Analysis of Representations

28. No purpose would be served by specifying the 'other enhancements' schemes that may come forward since such a list would not be exhaustive and could be misleading. For information, there are a number of social and economic enhancement projects that could be given as examples. Improvement to a community hall to facilitate social cohesion is a useful example.

29. Policy is about need not demand. The policy does not rule out independent housing need surveys where relevant.

### Recommended Action

The following changes are suggested at this stage. However, it needs to be emphasised that further work is on-going to test the feasibility and operational effectiveness of these proposed changes before they are confirmed:

1. For clarity of purpose, it is suggested that the Policy could be split up to emphasise its different aspects.
  2. Policy be cross referenced to the general strategic housing policy by highlighting the contribution that the policy makes towards meeting the overall housing requirement.
  3. Policy be cross referenced to its SPD. Future review of the SPD should consider including measures that the Council wish to undertake to promote the delivery of the policy.
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## Analysis of Representations

### Topic: CS.3 Development in the countryside

#### Summary of Matters Raised in Representations

1. Development in the countryside does need to be controlled and this policy gives some guidance
2. The policy is too restrictive and may constrain appropriate development in rural areas
3. British Waterways request that marinas and dry docks are specifically debated and recognised as development to be supported in the countryside.
4. It is important to demonstrate in this policy that appropriate land on the edge of settlements which is sustainable should not be considered against CS.3 which would by its definition preclude any form of development because it technically lay in the countryside
5. The first paragraph should be amended as follows; 'proposals for a form of development or activity in the countryside should be consistent with planning policies, fully justified and show that...' This amendment will help to maximise development opportunities in appropriate rural locations and will help to maintain and improve the range and quality of services in rural areas, and promote rural regeneration
6. Warks Wildlife Trust require proposals to show that there is no net loss of biodiversity and proposals should preferably have a biodiversity gain and enhancement as contribution to local area and LBAP targets
7. Safeguards should be put in place with regard to planning restrictions to prevent the enlargement of sites built on greenfield areas and agricultural buildings should be kept together and not scattered around. Development in the countryside should be carefully monitored to ensure that development that requires planning permission is regularised
8. 'A development proposal on an existing employment site' should be added to the list of criterion
9. There is a considerable problem with the loss of smaller affordable dwellings for communities which unrestrained replacement and extensions exacerbate in the countryside
10. Asks what level of protection is given to the countryside that is outside of the AONB and the Green Belt

#### Officers' Response

1. Support for policy is noted.
2. The policy is designed to be used to resist development only where it is not supported through other planning policies. The key forms of development to be encouraged in rural areas are supported through policies elsewhere in the Core Strategy so will not be affected. There is scope for other forms of development where they are judged to be appropriate though the criteria set out in the policy. Some control is necessary to meet Objective 12 of the Draft Core Strategy (protecting the countryside for its own sake and enjoyment of everyone) and national guidance.
3. This level of detail is not necessary in this policy. The policy's criteria seem useful and appropriate for considering applications for marinas and dry docks, and the accompanying discussion mentions recreation and leisure activities as potential use for rural areas. Further consideration could be given to mentioning canal related development in the tourism section of the Core Strategy.
4. We have reviewed how the Core Strategy could allow such land to come forward for development where suitable through Policy CS.1 and there will not be a conflict with Policy CS.3. In any case, this policy specifically states that it will not prevent development consistent with other planning policies.
5. The intention of this policy is to allow development which brings benefits to the local area/ district but at the same time protect the character of the countryside from development which does not provide benefits and could be located in more sustainable locations. A restrictive aspect is therefore necessary to achieve Objective 12 of the Draft Core Strategy (protecting the countryside for its own sake and enjoyment of everyone) and national guidance. Policies elsewhere in the Core Strategy encourage development to improve services in rural areas and promote rural regeneration. We accept that policies should be worded in a positive manner where possible and we will consider rewording to emphasise the positive aspects of the policy.
6. This issue is dealt with in Policy CS.24 of the Draft Core Strategy.
7. We consider that CS.3 will prevent the enlargement of sites unless there are good reasons why this should take place and the impact is acceptable. For example, Policy CS.13 encourages the expansion of existing businesses in their established locations unless this would cause unacceptable impact. This could result in enlargement of sites on green field, but we consider that in this case support for the local economy needs to be balanced against protection of the character of the countryside. Where agricultural buildings require planning permission they will be determined against landscape policies such as CS.24 and national policy which aim to minimise their impact. Unauthorised development should be reported to the Planning Services Enforcement team.
8. This form of development would be considered under Policy CS.13, so does not need to be readdressed by CS.3.

## Analysis of Representations

9. This form of development would be considered under Policy CS.11.

10. Outside AONB and Green Belt areas, the landscape and less-developed character of the countryside is still strongly valued by residents and visitors of the district and CS.3 is therefore intended to protect the countryside and prevent unnecessary development. However it is not designed to prevent all forms of development in the countryside as some will be beneficial to support rural areas. National and regional policy supports the direction of most development to locations with better access to services and transport. To do this will require some greenfield land around settlements to be used for development.

### Recommended Action

1/2. No action

3. No action on this policy. Consider reference to canal network in tourism section.

4. No action.

5. Consider alternative forms of wording which more clearly encourage appropriate forms of development without losing the message that inappropriate development will be resisted in the countryside.

6/7/8. No action.

9. No action on this policy. Refer comments to policy CS.11 to consider whether we should identify the enlargement of smaller dwellings in rural areas as a particular issue to be addressed by policy.

10. No action.

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## Analysis of Representations

Topic: CS.4

Green Belt

### Summary of Matters Raised in Representations

1. Object to the paragraph which states that there is no justification to change the existing Green Belt boundaries. Alterations are essential to enable future development needs of the District are met beyond the plan period. It is indicated that there is sufficient land already excluded from the Green Belt to meet the Districts needs to 2026 but no consideration has been given to meeting the needs beyond that period and thus no consideration has been given to altering the Green Belt to meet those needs. This approach does not conform with the emerging RSS and therefore land should be removed from the Green Belt to meet future development needs
2. Breathing space should be given in drawing Green Belt boundaries to allow essential medium and longer term development for homes and jobs - some additional land in the Green Belt will need to be released to allow access to ALC.1
3. Core Strategy states that there is no justification for reviewing the Green Belt boundaries which takes no notice of the NLP report. The Green Belt boundaries around Stratford should be reviewed as part of the Core Strategy
4. The Bird Group intend to promote the development of a major new resort hotel with outdoor leisure facilities at land adjoining Wildmoor Day Spa and very special circumstances apply to allow this development to go ahead. CS.4 should be reworded to reflect the support for this proposal
5. The enjoyment of the Green Belt should be improved through the establishment of strategic green links between settlements and the peripheral countryside. A Green Infrastructure Study could highlight where this would be of most benefit.
6. Settlements in the Green Belt should be extended rather than infilled. The protection of Green Belt in the past has led to the overdevelopment of green spaces within these villages, eroding their rural nature. Remaining green spaces or derelict plots should be protected.
7. Criterion on limited infilling and redevelopment of major existing sites should not refer to other uses as this implies housing may be appropriate, and should include criteria against which the proposal would be tested. The policy should be reworded to require major developed sites to be considered through the development plan process to allow sites to be considered in a consistent and comparative manner, and should be reworded to bring it into line with CS.5 Large Brownfield Sites in Rural Areas by including a criteria based approach.
8. The approach towards the redevelopment of Major Developed Sites needs to be more flexible in order to recognise the benefits that can be delivered to meet wider needs rather than a strict adherence to 'Local Choice'. This more flexible approach reflects the position that MDSs are typically large and are therefore likely to meet more than local needs as a result of their redevelopment.
9. The lack of Green Belt to the west of SuA is a concern with proposed developments along the A46 towards Alcester as it is important that Alcester does not form part of a ribbon development
10. The current planning restrictions on development in the GB should be maintained and enforced
11. British Waterways would wish to see marinas included within the definition of housing and employment
12. Small-scale needs to be defined either through numbers or percentages i.e. 6 houses, 10% of settlement size
13. Small-scale development should be changed to 'a scale of development appropriate to the size of the settlement'. This will recognise that small-scale will differ depending upon the size of the host settlement
14. The 5 purposes of Green Belt do not rule out development
15. Remove 'major' as this is not defined and until it is discrimination will occur re interpretation

### Officers' Response

1. There are a number of considerations which may justify a review of the Green Belt boundaries. These include a study on the future of growth for Redditch recommending that the Green Belt is extended, and potential higher figures for housing through the RSS process. At this stage we expect the Core Strategy will set out options conforming to the possible housing requirements from the emerging RSS, including Green Belt issues. Beyond 2026 we do not have sufficient evidence of needs to inform designation of land.
- 2/3. As above
4. This proposal will be considered as an omission site.
5. Discussion of Green Infrastructure study is equally relevant for areas outside the Green Belt and has been discussed under Policy CS. 21
6. The inclusion of an additional exception to allow for local need development in accordance with Core Strategy Policy CS.2 has

## Analysis of Representations

been included to allow extension rather than infilling of villages in appropriate circumstances. The Core Strategy does not make provision for other development to take place within these villages. The larger settlements within the Green Belt have been identified as suitable for employment and housing growth. When seeking to identify suitable sites for development in these settlements we will take character into account, and not treat Green Belt as an absolute barrier to development.

7. Annex C of PPG2 provides guidance on the future of major developed sites in the Green Belt, and we have identified which sites will be considered using this guidance.

The Draft Core Strategy policy makes it clear that uses must not conflict with the overall strategy for the area, meaning housing (other than small scale schemes in accordance with draft policy CS.2) would be unlikely to be appropriate in countryside areas. Many of the sites identified as Major Developed Sites are not of a sufficient scale to be addressed individually through the Core Strategy.

8. The criterion relating to Major Developed Sites follows the national guidance set out in PPG2. The policy does not state that the Local Choice principle will be applied to Major Developed Sites. Instead it explains that other uses should not be contrary to the overall strategy.

9. Policy CS.3 in the Draft Core Strategy, in addition to national policy, restricts development in the countryside even if it is not in the Green Belt.

10. The current Local Plan approach is carried through into the draft Core Strategy, apart from a suggestion that extensions to existing houses should not be limited to 30%.

11. The reference to small-scale housing and employment is defined in CS.2 which sets out how housing and employment to meet a need identified by the local community will be supported.

12/13. As above

14. The policy follows the guidance given in PPG2.

15. The sites within the district which will be considered as major existing developed sites are set out in a list above the policy.

### Recommended Action

1. Review boundary of Green Belt once we have considered if there is any need for allocations within the Green Belt, while recognising that some development may take place due to exceptional circumstances without altering the boundary of the Green Belt.

2/3/4. As above

5. No action

6. Continue to look at sites within the Green Belt when considering suitability of sites adjacent to settlements for development.

7. Consider whether it would be appropriate to consider Maudslay, Great Alne under Policy CS.5 as well as, or instead of, Policy CS.4. The site is larger than the other MEDs and the criteria of Policy CS.5 may be more appropriate for determining the future of the site.

8. As above

9. No action

10. Discuss further whether it is appropriate to continue to restrict the extension of existing houses to a percentage increase.

11/12/13/14. No action

15. Consider additional wording in policy to clarify that criterion b refers to a list given within the explanatory text.

## Analysis of Representations

**Topic: CS.5 Large brownfield sites in rural areas**

### Summary of Matters Raised in Representations

1. Draft Core Strategy recognises that there are significant flaws in Option 6 to 'focus development on large brownfield sites in the countryside'. Such sites are often unsuitable for large scale development due to their location and resulting reliance on road based transport for access. Therefore Harbury Cement Works would be in conflict with the DCS' expressed aim to reduce road transport.
2. Support policy but the intention to protect environmental assets would be better articulated if the policy were to make reference to mitigation of unavoidable impacts. Suggest rewording of (d) to include '... and minimises, and adequately mitigates, its impact on features of local importance'.
3. Preamble makes reference to CTY.20 in respect of the former Harbury Cement Works, should this also make reference to the sites Masterplan.
4. Parts (a) and (b) appear at odds with the Middle Quinton Eco Town statement. LDF needs to resolve this.
5. Draft Core Strategy recognises that there are significant flaws in Option 6 to 'focus development on large brownfield sites in the countryside'. Such sites are often unsuitable for large scale development due to their location and resulting reliance on road based transport for access. Therefore Harbury Cement Works would be in conflict with the DCS' expressed aim to reduce road transport.
6. Brownfield land often has great importance for bio-diversity and would like more protection for wildlife within this policy.
7. Each of the sites identified here require a proper policy to prevent a policy vacuum and uncertainty further down the line. Greater certainty is required. This section is rather vague and make no allowance for change.
8. In line with Core Objective 6, CS.5 (d) should say 'would not be harmful .... and enhance features of local importance'.
9. Notes that the policy is carried forward from the Structure Plan. Should be expanded to require that proposals for re-use of extensive areas are to be considered through the development plan process to be fully assessed.
10. Biodiversity should be included within this statement i.e. minimise negative impacts on biodiversity and on features of local importance.

### Officers' Response

1. There are a number of large brownfield sites in the District with potential strategic significance. This includes the Gaydon Proving Ground, Engineer Resources Depot at Long Marston, Southam Cement Works and the Harbury Cement Works at Bishops Itchington. All these sites are located in the countryside, away from the Main Rural Centres where most new development are encouraged. The overall spatial strategy of the development plan for the area seeks to concentrate large scale development in the Main Rural Centres where there are relatively adequate level of services and infrastructure to support development. This policy approach is supported by national policy. The key issue has always be how to maximise the efficient use of these large brownfield sites without undermining the overall development strategy for the area and also protect the essential rurality of the District. It is also important to note that many of these sites include significant areas of high ecological and geological value of either local, regional or national significance that are worth protecting. The balance of considerations in determining the appropriate use and scale of development on these sites will continue to be a challenge and the Core Strategy (and the Local Plan) seeks to strike this delicate balance by ensuring the appropriate scale and use of these sites whilst at the same time protecting the impacts of such development on the environment and nearby settlements.

Policy GD.7 of the Warwickshire Structure Plan is a 'saved policy' and provides the strategic policy guidance for the redevelopment of large brownfield sites in the countryside. The policy clearly emphasises that the redevelopment of these sites for a strategically significant purpose will only be accepted where a number of criteria are met. In particular, development will only be accepted where it does provide for needs not accommodated elsewhere in the Plan. The need to ensure that the redevelopment of large brownfield sites in rural areas does not undermine the general locational strategy of the development plan for the area is therefore paramount. It is within these general strategic principles that policies guiding the redevelopment of these sites are formulated.

The Local Plan Review includes specific enabling policies for:

- \* Gaydon Proving Ground (Policy CTY.16)
- \* Engineer Resources Depot at Long Marston (Policy CTY.18)
- \* Southam Cement Works (Policy CTY.19)
- \* Harbury Cement Works at Bishops Itchington (Policy CTY.20)

It is intended that these site specific policies will be carried forward in their entirety into the Core Strategy because of the strategic significance of their redevelopment. In this regard, the final version of the Core Strategy will include the full texts of the above policies.

The scale and complexity of the issues surrounding the redevelopment of these sites have meant that the preparation of

## Analysis of Representations

Masterplans for the sites are considered essential. These Masterplans will set out the specific detailed requirements for the redevelopment of the sites. There is a viable motor industry at the Gaydon Proving Ground which is of local, regional and national significance. A Masterplan for the Harbury Cement Works site has already been prepared and adopted by the Council in December 2007. This Masterplan has the support of the local communities which will be affected by the redevelopment of the site. There is an on-going process for the preparation of a Masterplan for the Long Marston site. This process is at an advance stage. A masterplan for the Southam Cement Works is yet to be programmed. The objectives of these Masterplans amongst others are to:

- \* enable development proposals for the sites to be assessed in a comprehensive manner;
- \* promote a form of development that has close relationship to the history, culture, local character and landscape quality of the area;
- \* bring uses and building together to create a unique sense of place;
- \* enable appropriate and adequate mitigation measures to be identified to overcome adverse impacts and to identify all necessary infrastructure support for the development of the sites, in particular, transport infrastructure.
- \* provide a clear guidance for determining planning applications.

The suitability of any redevelopment scheme that would come forward will be measured against how well they meet the above broad tests.

2. This suggestion is considered appropriate and is agreed with.
3. Revisions suggested in 1 above will address this concern.
4. Parts (a) and (b) do not specifically refer to the proposed Eco Town at Middle Quinton and could apply to other large scale developments such as a new settlement.
5. See 1 above.
6. This is an important point to make, but will be addressed by revisions suggested in 1 above.
7. See 1 above. Details regarding what type and level of development that is appropriate will form the basis of supporting SPDs/ Masterplans.
8. This suggestion is considered appropriate and the wording of criterion (d) should be reviewed. This will be addressed by revisions suggested in 1 above.
9. See 1 above.
10. This suggestion is considered appropriate and will be addressed by revisions suggested in 1 above.

### Recommended Action

1. The specific policies in the Local Plan Review covering these sites be repeated in their entirety in the Core Strategy because of the strategic significance of these sites.
  2. The Council has already led in the preparation of a Masterplan for the redevelopment of the Harbury Cement Works site. When it is necessary to do so, a similar approach be applied for the preparation of a Masterplan for the redevelopment of the Southam Cement Works site. There is an on-going process being led by the promoters of the Long Marston site to prepare a Masterplan for the redevelopment of the site. The Council should ensure that this Masterplan meets the requirements of Policy CTY.18 before it is used to inform planning decisions.
  3. Policies covering the large brownfield sites to be reviewed against any relevant new information to see if further emphasis on biodiversity is needed because of the ecological value of the sites.
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## Analysis of Representations

Topic: CS.6 Redditch growth

### Summary of Matters Raised in Representations

1. Implementation will fundamentally make it impossible for any cross boundary provision of additional housing to be met by SoA adjacent to Redditch Town Centre.
2. Outcome of RSS should be waited for before WYG study is endorsed by Policy CS.6.
3. Requires a coordinated approach across administrative boundaries based on sound evidence. Cross boundary issues do not appear to have been agreed and evidence base may not be sufficiently robust to underpin the strategy currently proposed.
4. Stratfords submission document will be required to take on board any further recommendations coming from the EiP Panel which may affect the District.
5. Green Belt should be retained. Support proposal to extend Green Belt along the boundary with Redditch.
6. Question whether 'possibility' may be too weak as the evidence base states that Stratford will be required to meet some of the employment needs for Redditch.
7. Would like to see that development of this site accords with Circular 2/07 and that the Highways Agency is involved with joint local authority discussions relating to its delivery.
8. No justification for Green Belt extension towards Redditch, does not appear to be any exceptional circumstances.
9. Questions soundness of evidence base and supporting studies.
10. Area of alnd identified for employment oportunities needs to be reviewed regarding biodiversity value.
11. Site is a wetland and an environmentally rich location which should be protected from any development under 'Special Places, Special Areas' in the Core Strategy.
12. Redditch Town Centre is a strategic centre however the Borough as a whole should be referred to as a 'settlement of significant development'

### Officers' Response

1. The RSS - Phase Two Revision Preferred Option proposes that 3300 out of 6600 of Redditch's housing requirement should be met in Bromsgrove Borough and/or in Stratford-on-Avon District. Similarly, it proposes that 8ha of its 17ha five year reservoir of employment land should be met in Bromsgrove Borough and/or Stratford-on-Avon District. Stratford-on-Avon District recognises the need and importance of working in partnership with Redditch and Bromsgrove Borough Councils to identify the right mix of uses and sustainable locations to meet the requirements. Furthermore, it needs to work together to identify adequate infrastructure to support the development. It is in the spirit of this partnership working that the three authorities commissioned White Young Green consultants to carry out a study to identify the most sustainable locations to meet these requirements. There is no doubt that the scale of development and where they should be located should be informed by credible evidence, in particular, since the RSS did not sought to share the requirements between Bromsgrove and Stratford. This is a view shated by all the partners. The outcome of the White Young Green Study provides such evidence and indeed it is the only available evidence to help inform decisions about the scale and location of the development that should be assigned to each of the two authorities.

Stratford-on-Avon District Council have used the recommendations of the White Young Green Study to inform its policy position in its Draft Core Stratyegy. Redditch Borough Council has taken a similar approach to that of Stratford District Council. Stratford District Council accepts that concerns have been raised about the White Young Green Study and consequently the position taken by the Council in its Core Strategy. However, none of the representations provide an alternative source of evidence to inform our Core Strategies. There is therefore no credible evidence to suggest why the White Young Green Study should not be relied upon at this stage.

The EiP of the RSS began in April of this year and this topic is one of the topics identified for debate. Stratford's position together with the White Young Green Study and all other relevant evidence will be presented to the EiP Panel for consideration. The Panel's recommendation will be used to inform any necessary revisions to the policy in the Core Strategy. Stratford District Council's Core Strategy has an inbuilt flexibility to accommodate the implications of the RSS EiP if a policy review becomes necessary. The timing of the RSS process will enable its outcome to be taken into account before Stratford's Core Strategy is adopted.

2. See 1 above

3. See 1 above

4. See 1 above

5. The White Young Green Study recommends modifications to the Green Belt boundary. This is reflected in the policy approach taken in the Draft Core Strategy. This will be considered as part of Stratford District Council's evidence at the EiP for the RSS. The

## Analysis of Representations

outcome of the EiP will be taken into account when finalising this policy in the Core Strategy. (Also see 1 above).

6. Policy does not include the word 'possibility'.

7. Circular 02/07 is about Planning and the Strategic Road Network. The District Council will be concerned to ensure that the development of this site and all other allocated sites which impacts on the strategic road network accords with the provisions of this circular. There are a wide range of other standards and requirements that development to meet Redditch's growth will be expected to meet. A Working Group of stakeholders, including the Highways Agency has been set up to determine the transport infrastructure necessary to support Redditch's growth. Other agencies are also being consulted.

8. See and 5 above.

9. See 1 above

10. The Council is carrying out detailed ecological and geophysical assessment of all the development opportunity sites to inform the Core Strategy process. Any ecological issues that will emerge as a result of this exercise will be taken into account in any revisions to the allocation.

11. See 10 above.

12. This distinction is noted

### Recommended Action

Policy be retained but to be reviewed to take into account the outcome of the RSS EiP.

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### Topic: CS.6a East of Redditch Proposals Map

#### Summary of Matters Raised in Representations

No representations submitted.

#### Officers' Response

No response required.

#### Recommended Action

None

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## Analysis of Representations

Topic: T1g Middle Quinton Eco-town

### Summary of Matters Raised in Representations

1. The Core Strategy does not address the Eco Town issue. Officers do not appear convinced that this is the preferred and most suitable site. This is another reason why this stage is premature and lacks flexibility.
2. This section is vague and the Council does not appear to be planning for the possibility of an Eco Town. This is a major potential strategic development and the process is unsound by effectively ignoring it.
3. The rigorous assessment of alternative sites should already have been done to inform each stage of the Strategy.
4. It is premature to state that if more than 1000 more homes are required through the RSS then a new settlement is likely to become a potential option as the Council has not provided any evidence that there are physical or infrastructure limitations on how much development could take place in the Districts existing towns and villages
5. Insinuates that housing requirement is only to meet the needs of people wanting to move into the area and not local needs arising from within the District and therefore it appears a conclusion that housing can be located in one location.
6. New Town option was the least preferable in Issues and Options therefore the strategy should not alter with an increase in housing requirements.
7. Eco Town must meet ecological and sustainability principles set. Site had recent records of water voles and has been approved as a Local Wildlife Site/SINC.
8. Masterplan for site should be produced that considers its ecological aspect fully and is innovative in development of enhancements for biodiversity and the implementation of sustainability principles.
9. Benefits of development should be distributed across the entire District and not just in one location.
10. Site is brownfield and under-used, redevelopment would mean loss of less greenfield land and provide an excellent quality, well planned, environmental community testing new technologies on a larger scale.
11. The potential of developing Middle Quinton should not be limited to addressing higher growth options only.
12. Middle Quinton should be included in the spatial distribution of development to meet the current draft housing requirement set out in Draft Phase 2 Revision of RSS.
13. If the eco Town doesn't go ahead and additional housing is to be developed around SuA, this will place additional pressure on retail services.
14. Concern that employment could not be accommodated within new town and that would add extra pressure to the existing infrastructure.
15. Draft PPS lacks guidance on landscape and historic environment, given this deficiency it is all the more important that the LDF contains robust policies.
16. Proposals at Middle Quinton specifically should be considered through the development process.

NB. In addition to specific representations received on this topic, an additional 200 standard cards were received from local residents supporting the position taken in the Draft Core Strategy on the Middle Quinton Eco-town proposals.

### Officers' Response

1. The Eco-town project is a government project which is presently being considered outside the development plan process. However, the Government have said that when the chosen sites are confirmed, they will be implemented through the planning process. A Sustainability Appraisal has been carried out by Government to assess the locational merits and the package of schemes of the various proposals. A Planning Policy Statement (PPS) setting out the key principles to judge the suitability of any scheme that would come forward is presently going through a consultation process. The consultation process is due to be completed by end of the year. When published, this will be a significant material consideration in determining Eco-town planning applications. The District Council working in partnership with all the neighbouring authorities that will be affected by the Middle Quinton proposal have made representations to the Government in this regard.

Stratford District Council have made its position very clear about the Middle Quinton proposal by objecting to it for a number of reasons. In particular, it believes that a case is not yet proven to justify an Eco-town at this particular location and that such a scheme could undermine the development strategy of the development plan for the area. It also believes that if a new settlement were to be needed as part of its overall spatial development strategy, then the appropriate planning processes should be followed, in particular, with the consideration of alternative sites. The Draft Core Strategy articulate this position very clearly.

The proposed location of the Eco-town is presently covered by a policy in the Local Plan. The proposed Eco-towns and their viability is one of the key assessments that have been carried out by the Government to inform its selection of preferred sites. It

## Analysis of Representations

is acknowledged by the District Council that the Core Strategy will have to be reviewed to consider the Eco-town proposal at Middle Quinton and address its implications if it were to be confirmed by the government. In this regard, the position taken in the Draft Core Strategy at this stage is reasonable until a decision is made by the government.

2. See 1 above.

3. The District Council have always argued that the Eco-town project should have been considered as part of the development planning process, including the consideration of alternative sites. However, as emphasized in point 1 above, it is a government scheme that is legitimately being pursued through parliamentary processes. The case about whether the Government has followed the right procedure with the eco-town project has already been debated at the High Court as a result of a legal challenge to the process. The Judge ruled that the government had not followed an unlawful procedure. This judgment cannot be ignored when considering whether the right procedure has been followed in considering the Middle Quinton proposal.

4. The Core Strategy should allow flexibility to accommodate potential increases in housing and employment growth. The final version of the Core Strategy will include a clear statement about how different options for growth will be addressed.

5. See 4 above.

6. See 1 and 4 above.

7. The Government have carried out a sustainability appraisal of the Eco-town proposals. If the Middle Quinton proposal is confirmed and a planning application is submitted, the Council will be concerned to ensure that the ecological and infrastructure implications of the proposal are fully assessed and appropriate mitigation measures introduced to overcome any significant adverse impacts. Support will only be given to proposals that meets all the planning requirements and standards of the Council.

8. See 7 above.

9. Point should be noted and taken into account if the Eco-town scheme were to be implemented.

10. The current Local Plan Review includes an enabling policy (Policy CTY.18) to guide the redevelopment of the site. This policy is carried forward into the Core Strategy in its entirety. The District Council considers this policy to be in line with the overall strategy of the development plan for the area. It is therefore not intended that the site should not be redeveloped.

11. See 1, 3 and 10 above

12. See 1, 3 and 10 above

13. See 1, 3 and 10 above.

14. See 1 and 7 above.

15. The Draft PPS for Eco-towns have been published for public consultation. If there are any potential deficiencies in the Draft PPS, that would be a matter for the Government to consider and resolve. The Council has made its representations to the Government for them to be taken into account before finalising the document. It is hoped that the public will do the same with any concerns that they may have with the document. Having said that, the Council will be concerned to ensure that the Core Strategy and other LDDs contains adequate and robust policies to assess the suitability of development proposals.

16. See 1 above.

### Recommended Action

Council's position be retained but to emphasise that it will be reviewed when the PPS on Eco-towns is published.

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## Analysis of Representations

**Topic: T2** **Theme 2 - Providing for the Needs of Communities - general**

### Summary of Matters Raised in Representations

1. Theme 2 should be amended to include the word 'demand' when referring to providing for the need and demands of communities. This would reflect the diversity of all settlements particularly rural settlements in planning for new homes.
2. Would stress the need to ensure all community development is green and sustainable, and reference is made to all infrastructure including green.
3. This section needs to be clearer and stronger regarding protection of areas of quality environment and of County or local significance.

### Officers' Response

1. As things stand the emphasis of the RSS Phase Two Draft Revision in relation to Stratford District is to meet the housing and employment needs of the area (see para. 3.47). For this reason it is appropriate to use the term 'need' rather than 'demand'.
2. This is a reasonable point.
3. This is a reasonable point.

### Recommended Action

1. No change
  2. Add a reference to development being sustainable and providing the necessary infrastructure.
  3. Add a referenc to the protection of significant environmental features.
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**Topic: T2a** **Homes - context**

### Summary of Matters Raised in Representations

1. Natural England would like to see reference to the need for green infrastructure planning as part of planning for sustainable communities, in line with Policy SR2 of the West Midlands RSS Phase 2 Revision
2. The last paragraph discusses flexibility in dealing with changing housing requirements through the emerging RSS. This strategy clearly does not have flexibility (as the NLP report and options are not discussed)
3. The GTAA identifies a need to provide 44 pitches but suggest that 10 should be provided as short stay temporary stopping places which will have a very limited period of stay. The assumption seems to have been made that the Irish Travellers identified who need accommodation only have a need for temporary stopping places. The GTAA states that Irish Travellers are under-represented and this must cast doubt on these assumptions. The Core Strategy should therefore pay due regard to the probable need for more than 34 permanent pitches.
4. The Joint Housing Assessment conducted for the South Housing Market Area estimated the annual shortfall in affordable housing to be 954 dwellings per annum which equates to more than the total allocation for the District. Hence a sharp increase in allocated housing will be necessary, well beyond the current RSS proposal of 5600 dwellings (280 per annum).

### Officers' Response

1. The point is accepted. Green infrastructure is covered in Policy CS.21 and it is proposed to strengthen the reference to this issue in the policy.
2. The District Council is undertaking more work on how the Core Strategy will address alternative growth scenarios. The outcome of this work will be subject to consultation before the Core Strategy is published.
3. This point is considered under Policy CS.12 (point 11).
4. The RSS Phase Two Revision will determine the scale of housing to be met in the district during the period up to 2026. The Core Strategy will have to make provision for that requirement. The Phase Two Revision will take into account the extent of the need for affordable housing in different parts of the region. It will also have to take into account a range of different factors that will act to constrain the provision of affordable housing, not least of which will be limitations on public subsidy and the economic viability of housing development. High levels of need for affordable housing are prevalent in much of the region and the realities mean that it is very unlikely that provision can be made to address the overall need for affordable housing.

### Recommended Action

1. The reference to green infrastructure is strengthened in Policy CS.21.
-

## Analysis of Representations

### Topic: CS.7 Housing requirement & distribution

#### Summary of Matters Raised in Representations

1. NLP report proposes a higher level of growth to reflect what it describes as significant affordability issues, under supply against national housing projections and capacity within the market. The DCS does not provide options for dealing with this proposed growth and therefore lacks flexibility.
2. The provision of affordable housing in all village settlements is supported provided there is an identified need.
3. 5600 dwellings will be insufficient to meet the RSS requirements. The policy should be amended to accommodate a potential increase in additional houses as part of the RSS process which in such circumstances should make provision for rural housing need and demand.
4. The areas allocated have not been properly reviewed and the evidence base is not sufficient.
5. The windfall allowance is not explained and is not appropriate
6. Policy CS.7 should also refer to housing 'demand' in the first sentence to be consistent with PPS 3.
7. A housing trajectory should be included to ensure that it is clear when particular sites are expected to contribute to the supply.
8. The windfall allowance is excessive and should be reduced. RPS recommends allowance is made for 250 dwellings for the period 2021 to 2026. As a result the residual requirement would be increased by 500. Large windfall sites will have already been identified through the SHLAA to deliver 750 dwellings in the last 5 years of the plan period from sites of less than 10 dwellings requires about 15 sites to come forward a year. No information is presented in the evidence base to demonstrate that this is realistic.
9. It would be beneficial to see that housing schemes are developed in accordance with PPG13 and DfT Circular 2/07 Planning and the Strategic Road Network.
10. Objection is raised by RASE to the lack of consideration in the Feb 08 SHLAA and the DCS of brownfield sites in non-settlement locations.
11. There is a need to regulate and monitor the increase and decrease the supply of housing land as appropriate throughout the Plan period to prevent over-development as well as under development.
12. The windfall allowance is an underprovision. The Feb 08 SHLAA assumed that beyond 2017 there would be 180 dwellings per annum coming forward as brownfield windfalls. These predictions should be treated with caution however there is no sound reason why the figure has been discounted to 150 by the Council. If a similar level of windfalls were assumed from the likely end of the moratorium in 2011 until 2021 then another 1500 dwellings would arise and there would be no need to allocate Strategic Reserve Sites.
13. It is not clear what has been assumed in relation to bringing back empty dwellings into the housing supply and what assumptions have been made in relation to conversions of homes into flats/homes of multiple occupation. This needs to be made clear.
14. RASE and Cllr Atkinson suggest detailed re-wording of the policy which may occur when reviewing the DCS
15. Development must be undertaken following sustainability principles.
16. The concentration of development in existing towns and MRCs may not be the only sustainable delivery mechanism for new housing development in the District. Consideration should be given to the role of eco-towns as an opportunity for delivering growth that can mitigate and adapt to the impacts of climate change.
17. The policy relies on sites that have not been fully assessed in respect of deliverability
18. Not meeting the housing need as identified in the housing market area will lead to the vision for the Region where all the populations needs and aspirations being met will remain unachieved.

#### Officers' Response

- 1/3. The District Council is undertaking more work on how the Core Strategy will address alternative growth scenarios. The outcome of this work will be subject to consultation before the Core Strategy is published.
2. Noted. This is an approach that the District Council already follows through application of current policy.
4. The District Council is undertaking a Land Parcels Assessment, while the compilation of further evidence has been commissioned from consultants.

## Analysis of Representations

5/8/12. The windfall figure is derived from average annual windfall rates shown in the 2008 SHLAA, subject to a measure of discounting reflecting the possibility that the supply of windfalls may decline marginally in the long-term. However, the issue of windfall rates is being examined in the 2009 SHLAA Review and the outcome will be available for use in revised housing land supply figures.

6. Given that the Core Strategy has to work within the policies of the Regional Spatial Strategy (RSS), it is doubtful that a CS policy that states that housing demand will be met in this district will be in conformity with the RSS. As regards this district, the RSS is seeking to limit housing provision to a level significantly below demand. Only if the RSS housing strategy shifts to a demand-led approach in this part of the region will the suggested amendment to CS.7 be appropriate.

7. A housing trajectory will be included in the Core Strategy in line with PPS3.

9. PPS12 states that if it is the intention of the local planning authority simply to apply national and regional policy in its decision making it does not need to reiterate it in DPDs in order to do so. The Council is fully aware of the requirements of PPG13 and Circular 02/07 and will be concerned to ensure that they are fully taken into account when considering proposals for housing development.

10. The Draft Core Strategy covered these sites in Policy CS.5. The supporting text referred to the difficulties that derive from the location of these sites in the countryside away from existing centres of population. The lack of sustainability of these locations was the main reason for rejecting a locational strategy that would have focused development on these sites. The SHLAA did not cover these sites because its geographical scope was confined to Stratford-upon-Avon and the 8 Main Rural Centres to reflect those places most likely to be selected for further growth on grounds of sustainability, and taking into account the need to make best use of the resources available for the study. However, the absence of these rural brownfield sites from the SHLAA does not mean their potential suitability for development has been ignored by the District Council. It already has much information about most of these sites and this can be used in considering which sites should be identified for development.

11. Local Planning Authorities are required to monitor housing land supply. The issue of phasing the release of development sites is dealt with under OMPOL008.

13. The District Council's Empty Homes Strategy includes a target to bring 50 empty properties back into use by 2011. However, it has been regional monitoring practice to disregard the re-occupation of dwellings in relation to housing land supply unless involves a net increase in the number of dwellings, e.g. through sub-division. If the WMRA agrees that they should all be taken into account in housing land supply assessment, then the District Council will adjust its figures accordingly. As regards sub-divisions into flats, then they will be included in figures for completions, dwellings under construction and sites with planning permission. They have also contributed to the calculation of the windfall allowance. On the other hand, splits of dwellings into non-self-contained bedsits would not contribute to the housing supply figures in line with regional monitoring guidance.

14. Councillor Atkinson wants the policy to allow scope for new build schemes up to two units in all other settlements. Such an amendment to the policy would have wider implications and the issue of the Core Strategy's scope for development in rural areas is subject to on-going consideration. The comments by RASE relate to matters such as phasing, monitoring and windfalls and have been considered elsewhere.

15. The Draft Core Strategy has been fashioned on this basis.

16. This is a strategic matter that is being considered at both the national and regional levels, although it will be some months before the position becomes clear. The Core Strategy will need to reflect any policy steer from the higher levels. In the meantime, the District Council is undertaking further work on potential options for addressing alternative housing growth scenarios and this includes the assessing the possible use of new settlements.

17. The 2009 SHLAA Review will add to the information on deliverability, so too new information being provided by those promoting the sites and arising from studies being undertaken by consultants and by the District Council.

18. This is a strategic issue which is being addressed through the RSS Phase Two Revision. The Core Strategy has to conform with national and regional planning policy. At this point the housing requirements for which the District Council has to make provision are not pitched at a level that would meet needs identified in the Strategic Housing Market Assessments for the South Housing Market Area or for South Warwickshire.

### Recommended Action

1. A housing trajectory to be included in the Core Strategy.

Otherwise, no changes to the policy specifically arising from these comments, although many of the issues raised are already being considered by the District Council in its preparation for publication of the Core Strategy and changes to the policy may be a consequence of this work, and also in response to future changes in the national and regional policy context.

## Analysis of Representations

Topic: CS.8 Affordable housing

### Summary of Matters Raised in Representations

1. The policy should be more strategic and give scope for detailed aspects to be determined in other development plan documents.
2. Within this policy or elsewhere in the Core Strategy a target for the provision of affordable housing should be set. This would meet PPS3 (para. 29) requirements.
3. The policy should establish that affordable dwellings should normally take the form of general needs housing, but there should be scope specialized housing in some circumstances.
4. The definition of "affordable housing" should include low cost homes for private sale to accord with the Government's definition in PPS3. If not, the policy will thwart the aspirations of those wishing to be owners and occupiers.
5. The scope of the policy should exclude extra care schemes that fall within Use Class C2, otherwise the policy is contrary to Government policy and RTPI guidance.
6. The percentage requirement for affordable housing should not relate to floorspace but to number of dwellings. In some cases this will mean over 50% of the dwellings being in the affordable sector which would lead to developments that are insufficiently mixed. Also, the Meeting Housing Needs SPD which is the source of the policy was not properly tested for soundness. Measuring by floorspace lacks clarity and certainty, and there is no definition of what constitutes floorspace. Furthermore, there is no evidence that the approach is viable in the current economic conditions when taking account of all potential elements of planning gain.
7. The affordable housing requirements have not been subject to a viability assessment. The 10 dwelling threshold is too low (below PPS3 figure) and the 35% share is too high. They may constrain housing delivery, especially in the current economic conditions. This would be self-defeating, taking into account the sub-region's heavy reliance on mixed tenure S.106 sites to deliver affordable housing.
8. The 35% affordable housing proportion should be increased to 40% in view of the considerable shortage of affordable homes in the district, though allowing for as low as 25% if a financial appraisal indicates that a lesser proportion is all that can be provided. However, if the latter were to be the case, then there should be scope for the District Council to claw back finance for affordable housing if profit margins are higher than initially anticipated.
9. The threshold of 10 dwellings should be reduced to as low as 2 dwellings to pick up more small sites in the rural areas. For schemes comprising less than 10 units there could be flexibility to allow off-site provision.
10. Principle (b) relating to schemes being achieved without recourse to public funding should be deleted. It is unrealistic in current economic conditions and the expectation that land values will be reduced will merely constrain the release of sites and hold back the delivery of affordable housing.
11. Rather than the inflexible application of a standard affordable housing requirement, site specific financial appraisals should be undertaken to determine affordable housing requirements.
12. An additional principle should be added relating to no net loss of biodiversity.
13. Rather than increase affordable housing proportions and thresholds, the delivery of more affordable housing is better achieved by increasing the extent and range of residential land allocations.
14. The extent and type of affordable housing sought on a site should be related to the scale and type of need identified in the locality and to the need to achieve a balanced mix of tenures on the site in the face of competing priorities.
15. The requirement for affordable housing on sheltered homes and extra care sites should be deleted in view of the current economic situation.

### Officers' Response

1. This point is accepted, particularly in the light of the Government Office's comments on the need to be more strategic and less detailed in policy content.
2. It is agreed that there is a need to include a target for the provision of affordable housing in line with Government guidance and reflecting the latest corporate targets. This will underline the District Council's commitment to a programme of affordable housing provision to reduce the significant shortfall in the supply of affordable dwellings. However, the target needs to be tied to a realistic view of what is likely to be delivered, taking account of the potential availability of funding from both public and private sector sources.
3. This view reflects the "Optimum Stock Profile" which is set out in Principle MHN13 in the Meeting Housing Needs SPD. The intention is to address imbalance in the size profile of the District's existing stock of affordable housing. It is likely to be a justifiable approach for much of the period covered by the Core Strategy.

## Analysis of Representations

4. Annexe B of PPS3 defines the term "affordable housing" as to include "social rented housing" and "intermediate housing". The latter includes dwellings provided by private sector bodies but only if they meet the two specified criteria, i.e.

- meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices;

- include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.

The Housing Needs of Stratford-on-Avon District volume of the Joint Housing Assessment for South Warwickshire states clearly that discounted sale homes cannot be regarded as affordable dwellings in this district because they are more expensive than open market private rented dwellings, even with a 30% discount. This local circumstance suggests that it is reasonable to omit reference to low cost market housing in this policy, although at the time of writing this response the District Council was awaiting the outcome Strategic Housing Market Assessment Market Review which will give new information about housing need and affordability in the district. A final decision on the issue will need to take this new information into account.

5. There are different interpretations of the legislation and of the Government guidance in relation to the Use Class of extra care schemes. Classification is related to the differing character, size and balance of facilities on the site, as well as the extent to which the accommodation falls within a single "planning unit". The RTP1 Good Practice Note No. 8 on Extra Care Housing: Development Planning, Control and Management relates C2/C3 classification to the degree to which a scheme is subject to a fully registered care provider. On the other hand, the District Council's Meeting Housing Needs SPD explains that a requirement for affordable housing will be applied if the accommodation is clearly self-contained but not if the accommodation clearly falls within Class C2. The latter approach gives greater clarity than the wording of the policy in the Draft Core Strategy and better reflects national practice.

6. The justification for the use of floorspace as a measure of assessing the affordable housing requirement is that it provides the District Council with an ability to maximize the extent of affordable housing within a development scheme relative to the overall site coverage. As regards viability, the District Council has commissioned research into the economic viability of development opportunity proposals, taking account of planning and infrastructure requirements, including those relating to affordable housing. The research may indicate whether assessing the affordable housing requirement by floorspace has any bearing on the economic viability of developments that aim to address the needs of a wide range of households in accordance with Policy CS.10. At this time the District Council has seen no convincing evidence that suggests the use of floorspace as a measure for assessing the extent of affordable housing has a negative effect on viability. As regards the claim that residential floorspace assessment will lead to an imbalance of tenure mix, the likelihood of more than 50% of units being affordable through the application of this measure is slight, given that the District Council aims to promote housing development that helps to build mixed communities. As regards a lack of clarity and certainty, if this is a problem, then additional information can be provided by the District Council in a Supplementary Planning Document, as has already been provided in the Meeting Housing Needs SPD, although it can be made clear in the Core Strategy that floorspace means gross internal residential floor area.

7. A viability assessment has been commissioned by the District Council and this will take account of current economic conditions. Until the results of this study are known, it would be inappropriate to respond to the comments on the threshold and percentage share issues, apart from stating that the threshold and proportion are similar to those used by many planning authorities that cover rural areas, including some whose Core Strategies have been found to be sound.

8. The District Council has not adopted a higher affordable housing proportion when previously proposed mainly on the basis of two issues:

- a concern that developments would not provide a balanced housing mix;
- a concern that developments would not prove to be economically viable

As indicated above, the Strategic Housing Market Assessment Market Review will give new information about housing need and affordability in the district. At the same time information on development viability is also awaited. This new information will help to establish whether the circumstances have changed since the District Council last considered whether to change the affordable housing proportion. In the absence of this information, no specific recommendation is being made at this stage as regards the proportion of affordable housing to be sought on development sites.

9. Again, the viability study will provide information as to whether small sites can contribute affordable housing and still remain economically viable. As a consequence no specific recommendation is being made at this stage. A solution adopted by other authorities is to specify a sliding scale of affordable housing provision, e.g. the smallest sites (e.g. 5 or fewer dwellings) providing the lowest proportion of affordable housing with, conversely, the largest sites providing the highest proportion. In recognition of issues regarding location, site type and viability, some authorities allow scope for the smaller sites not to have to accommodate the affordable housing on-site but make a financial contribution to the provision of affordable housing off-site.

10. This is an important issue on which the viability study will shed some light. However, even without the conclusions of this study, the current financial situation in the development industry suggests that the expectation that all schemes should not require public finance is unrealistic, particularly in the case of rural 100% affordable schemes. The District Council's Meeting Housing Needs SPD does allow scope for public funding to support the provision of affordable housing on some sites, although the onus is on developers to demonstrate a robust financial case for reduced affordable housing provision or the use of public funds towards the cost of the affordable housing element in line with the standard requirements. The policy needs to be amended to reflect this degree of flexibility.

11. In line with the Meeting Housing Needs SPD it is agreed that the policy should allow scope for affordable housing provision to be varied in the light of a robust financial appraisal submitted by developers. However, the District Council may seek expert

## Analysis of Representations

verification of such an appraisal if the latter appears to contain assumptions and conclusions that have not been adequately substantiated.

12. This principle is expressed in Policy CS.24 and will apply to all development schemes.

13. This is an over-simplistic statement. The Stratford-on-Avon District LDF has to conform with the RSS which sets growth housing growth requirements that reflect strategic objectives. Excessive housing provision in this district could undermine the achievement of those objectives and is likely to be viewed as unsound. Over-allocation of housing land in this district would have a range of other drawbacks which stem from the rural character of the district, the generally small scale of its settlements and its lack of urban infrastructure, facilities, services and employment, drawbacks insufficiently outweighed by a gain in the number of affordable dwellings that would accrue.

14. This approach is supported in principle. The reference to "competing priorities" acknowledges that a requirement for affordable housing is one of a range of requirements which are sought from developments, each of which has an effect on the potential economic viability. The latter is a constraining factor that may result in planning gain requirements having to be reduced.

15. The response to point 5 above indicates that the District Council will not pursue an affordable housing requirement on schemes that fall within Use Class C2. As regards schemes that fall within Class C3, the response to other points above indicates that the District Council is willing to properly consider the issue of economic viability in the assessment of affordable housing requirements. Rather than remove the scope for affordable housing on sheltered housing and extra care sites altogether, thereby removing the opportunity for these schemes to contribute to meeting aspects of local housing need, the onus is on developers to provide robust evidence to demonstrate that the inclusion of affordable housing in their scheme would jeopardize economic viability.

### Recommended Action

1. A realistic target for the provision of affordable housing is included in the Core Strategy.
  2. The policy is re-drafted to concentrate on strategic objectives and to provide a context for more detailed guidance in separate development plan documents.
  3. The Core Strategy uses a definition of affordable housing that excludes discounted sale market homes unless new information indicates that there is scope for these dwellings to meet the affordability criteria in Annexe B of PPS3.
  4. The re-drafted policy should define the scope of the policy in relation to sheltered or "extra care" housing schemes.
  5. The re-drafted policy should refer to the affordable housing proportion being measured against gross internal residential floor area.
  6. New information is examined as to whether it provides a case for varying the specified affordable housing threshold and proportion, including consideration of whether small rural sites should accommodate an element of affordable housing.
  7. The re-drafted policy expresses an expectation that the affordable housing element of mixed tenure schemes will be funded without public subsidy unless the latter is justified by special circumstances.
  8. The re-drafted policy includes scope for the affordable housing provision on developments to be varied in the light of financial constraints established through financial appraisal that takes into account the likely range of developer-funded planning gain requirements.
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## Analysis of Representations

Topic: CS.9

Specialist housing

### Summary of Matters Raised in Representations

1. There is a requirement in this draft document for 'proportionate' provision. However that cannot reasonably operate in the market where this accommodation is substantially provided by the specialist private care operators and should be driven by market need/demand as provided through appropriate consultancy reports. Stratford District is so short of this type of accommodation that by 2026 when 25% of its population will be over 55 as much accommodation as possible is required.
2. The provision of such accommodation should be based on identified needs not just at the District-wide level as the policy states but also on needs identified at a parish level.
3. The policy should be strengthened through further reference to the Meeting Housing Needs SPD.
4. It should be made clear that the provision of specialist housing can be used to offset the requirement of affordable housing as set out in Policy CS.8
5. There is no mention in the pre-amble or in the policy of WCC or PCTs. This is a major omission and shows a lack of joined up thinking.
6. It is important to ensure that there is no duplication in meeting the housing needs of the elderly and/or vulnerable people across policies CS.8 and CS.9 as some specialist housing for the elderly and/or vulnerable would normally be provided by RSLs as part of the affordable housing element of residential developments.
7. The approach is not specific enough to ensure its delivery. The Council should undertake further detailed assessments to quantify the level of need and demand for housing for the elderly. Once the requirement has been quantified a policy must be introduced to ensure its delivery. A specific monitoring mechanism also needs to be introduced to ensure the delivery of the housing against the identified requirement.
8. There are a number of opportunities identified in the DCS around SuA to provide accommodation for elderly persons or special needs housing. It is not clear whether all proposed retirement sites will be expected to come forward.

### Officers' Response

1. The intention of "proportionate provision" is to avoid a situation where a settlement within the district receives a high level of housing of special needs housing that would place local care services under pressure. There is also a concern that the amenity and accessibility of the district, combined with an unconstrained approach to the provision of special needs housing, would lead to an excess of provision that would rely on demand from outside the district to fill the accommodation. Such a tendency would reinforce the demographic trends that are being quoted as justifying high levels of provision, and those trends would then be used in future to justify even higher levels of provision. These trends would have the effect of further skewing the age profile of the district towards the older age groups.

An excess of provision against locally based need and demand in a largely rural area would raise issues relating to sustainability. One of these would relate to the labour market in the locality: staff for these establishments may have to travel from outside the district. Another would be the extent to which visitors would be travelling long distance by to see residents.

The comment implies that the provision of special needs housing is the main means of accommodating older people. This belies the fact that a large majority of older people live in general needs housing and will continue to live in the latter for the rest of their lives. It is a strong theme of national and local social policy that the independence of older people should be supported in number of different ways. One way, referred to in Policy CS.10, is to ensure that new general needs housing is built to "Lifetime Homes" standards.

2. The comment is supported in principle and it is the District Council's policy to encourage parishes to undertake local housing needs surveys. However, the district and local data can give differing pictures of the need for specialized housing in that the former take into account longer term trends, while the latter tend to concentrate on the immediate needs of existing residents. Surveys may also be undertaken without reference to current models of provision, e.g. the "extra care" concept is not yet well known, and this tendency may underplay people's interest in alternatives to their current accommodation.

3. This comment puts "the cart before the horse" in that the Core Strategy should give the parameters for other Development Plan Documents and Supplementary Planning Documents. However, the policy can usefully refer to Local Development Documents providing detailed principles and criteria for assessing proposals for special needs housing.

4. If the provision of special needs housing were to be confined to dwellings or bedrooms priced on the basis of the open market and thus inaccessible to many local people, then the use of this housing to offset the affordable requirement would not be supported. Such development would not help the achievement of national, regional and local priorities that recognize that many people cannot access or afford market housing and that accommodation needs to be made available through a range of different tenures.

5. There was certainly no intention to ignore or underplay the importance of the County Council and Primary Care Trust in the field of special needs housing. The District Council works closely with both of these organizations.

## Analysis of Representations

6. This point is accepted. Affordable special needs housing will be counted towards the affordable housing element of any development, as long as this housing addresses identified local housing needs and meets recognized standards.

7. In developing its Care and Choice Programme, Warwickshire County Council has researched the accommodation needs of older people in some depth. The housing needs of older persons were also examined in the Joint Housing Assessment for South Warwickshire which was published in March 2007. At the more local level housing needs survey have been undertaken for a number of parishes in the district. These studies mean that there is a good information base already, although there is always a need to keep data up-to-date to enable changes in trends to be detected. The County Council has estimated a "care gap" between the current level of care provision and current/estimated needs. However, these figures do not translate easily into a target for new special needs accommodation. Much of that "care gap" can be filled by improving the support for people in their own homes and the County Council has not compiled specific targets for new accommodation within this district. The lack of a target does not represent a lack of commitment to resolve the problems. Furthermore, innovation in special needs housing is blurring the differences between types of accommodation and to have set targets for outdated categories could be an impediment to achieving the best solutions. The wording of the policy needs to reflect this trend and make clear that it addresses the whole spectrum of special needs housing including those that offer high levels of support for residents.

8. The location of these proposals has been framed to achieve a reasonably balanced distribution of provision and it would be beneficial if all of the proposals were to be implemented. However, the take-up of proposals will be largely in the hands of the RSLs and the private sector and the District Council is not able to guarantee all of the opportunities will attract private investment and/or public funding.

### Recommended Action

The policy is re-drafted to be wider in scope, more strategic in content and to include reference to Local Development Documents providing detailed principles and criteria.

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## Analysis of Representations

Topic: CS.10

Housing mix

### Summary of Matters Raised in Representations

1. The policy is not strategic. It is a development control policy and should be moved to a Development Control Policies DPD. Alternatively, it could be converted into a more strategic policy by setting out development principles rather than detailed requirements.
2. The policy is too prescriptive. The prescribed mix is not supported by evidence. Housing mix should be treated on a site by site basis, taking into account particular circumstances including changes of requirements over time and the differing character of neighbourhoods. The market should be left to determine the mix of market housing. Mix should only be required on larger sites above a certain threshold.
3. Intended bias towards smaller family housing is contradicted by the intention to encourage the provision of dwellings which are suitable for working from home.
4. Specialist housing, e.g. dwellings intended for elderly people, should be exempt from any mix requirement prescribed in the policy but should be tailored to meeting specific needs.
5. Affordable housing ought to reflect the mix specified for market housing but allow for local needs and removal of the bar on affordable single bedroom flats which help to cater for growth in single person households.
6. Requirement for even spread of tenures within a development may not be practicable. It should be left to the RSL and developer to determine.
7. "Lifetime" Homes" requirement is too onerous and exceeds the requirements of national policy. Standard is voluntary. Ignores issue of economic viability.
8. Specifying care requirements for sheltered housing is wrong because Use Classes Order states that residents of this form of development (Class C3) are not subject to care packages.

### Officers' Response

1. The comments are accepted. There is too much detail for a strategic policy and the policy needs to be amended to be made more strategic.
2. The comment that the policy is too prescriptive is accepted. The wording of the policy is derived from Key Principle MHN11 in the District Council's Meeting Housing Needs Supplementary Planning Document, but this Key Principle contains additional text that gives more scope for site by site variation in stock mix. In a more strategically worded policy, the legitimate intention to achieve a mix of housing in line with PPS3 can be expressed in more general terms. However, the view that the market should be left to determine the mix is not accepted because PPS3 advises that the profile of households requiring market housing should be reflected in proposals for market housing, not just demand. As to the application of a threshold above which a mix of housing would be sought, there is practical value in such an approach and it would reflect general practice. Such a threshold would be best detailed in a development control policy.
3. The point is being made in support of the inclusion of a higher proportion of larger dwellings in developments than CS.10 intends. The comment highlights an area of apparent conflict between objectives, but creative design of space within dwellings should be the best way of resolving the issue. This should mean that the inclusion of additional floorspace to accommodate home working should not be prevented by a policy that deals with bedroom numbers. It should not be assumed that a spare bedroom is the only part of a house that can be used for home working. For example, ground floor space can be designed to be suitable for this purpose.
4. This point is accepted. The Core Strategy gives scope for housing schemes that are tailored to meet special needs. If the principle of the scheme is accepted, then it would not be the District Council's intention to impose a mix of dwellings within the scheme that does not address the identified needs.
5. There may be circumstances which require the mix of dwellings within the market and affordable sectors to be different, particularly when demographic data and the results of local surveys suggest that the two sectors within a proposed development need to target differing profiles of household types. As to the removal of the bar on single bedroom flats, the latter is not expressed in the Draft Core Strategy but comes out of the District Council's "Meeting Housing Needs" Supplementary Planning Document. The more strategic style of policy proposed in the light of consultation responses will not specifically exclude one bedroomed flats, but concerned remains about the inflexibility of such dwellings to cater for changing needs, their unsuitability for family occupation, their unsuitability for the accommodation of carers and relatives and their very limited ability to provide space for home working.
6. The District Council's view on this issue is expressed in the Meeting Housing Needs SPD (MHN11). Taking account of the PPS3 objective of creating mixed communities, the concern to seek an even distribution of tenures across development sites is legitimate, although the SPD does allow for small clusters of affordable dwellings, not just a scatter of single dwellings. The District Council will continue to reflect this approach in its policies, although the detail is more appropriate in a Development Control Policies DPD.

## Analysis of Representations

7. The Government's aspiration is that all new dwellings will be being built to Lifetime Homes Standards by 2013. Given the lead time on development schemes, putting this aspiration into practice will require the design of residential development to incorporate this principle within the short term. For this reason it is not unreasonable for the Core Strategy to embody this principle now rather than having to be amended to take it on board very soon after its adoption. As regards economic viability, the recent Government publication "Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society" points to the relatively modest costs that will accrue through application of this standard, and this view throws doubts on claims that it will render schemes uneconomic.

8. Part (b) of CS.10 is also derived from the "Meeting Housing Needs SPD (MHN11)". Its intention is to avoid sheltered housing schemes which have not been designed to embrace the concept of "extra care". This element of policy is better placed in Policy CS.9 which relates to specialist accommodation.

### Recommended Action

1. The policy is re-drafted to concentrate on strategic objectives and to provide a context for more detailed guidance in separate development plan documents.

2. The re-drafted policy includes the following principles:

- residential development should provide a range of dwelling types and sizes, taking into account the scale of the scheme, the characteristics of the site and its setting, and whether the scheme is focused for good reason on a specialized form of accommodation;
- residential development should be designed to provide accommodation which can be easily adapted to suit changing household needs, including the use of Lifetime Homes Standards for all new dwellings and making provision for home working, unless a clear case to the contrary has been provided.

3. The re-drafted policy omits reference to sheltered housing.

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## Analysis of Representations

Topic: CS.11 Management of housing stock

### Summary of Matters Raised in Representations

1. The EA wish the authority to seriously consider flood risk when applications for the replacement or extension of a dwelling is proposed in areas where flooding is known to occur. In such cases the EA would wish to see floor levels raised and no increase in the footprint of the development in order to minimise flood risk.
2. The blanket approach of the policy is inappropriate.
3. Support the proposals but the policy should be strengthened through further reference to the Meeting Housing Needs SPD.
4. Qualify the reference to amenity in part (c) of the first part of the policy by inserting the word "reasonable".
5. Support the re-use of redundant rural buildings outlined in this policy.
6. Criterion (a) should be amended to reflect the wording of Policy COM.12 of the Local Plan Review i.e. '...unless there is a specific and over-riding justification....'
7. Concern that the second criterion (a) will result in planning applications being refused because a proposal would create too many houses of one size in a particular location. Such an interpretation would therefore be contrary to the first criterion (b) that support will be given to people wishing to extend their dwellings. The second criterion (a) should be removed from the Policy.

### Officers' Response

1. Although the issue of flood risk is specifically addressed by Policy CS.23, it is of such importance as to merit reference in the list of environmental performance measures listed in the last part of the policy. However, reference to floor levels and footprints would not be appropriate in a strategic policy and would be better placed in a development management policies development plan document.
2. The policy is strategic and deals with well established principles that have wide application. At this level of policy it would not be appropriate to attempt to list the exceptional circumstances in which these policies would not be applied. However, it is conceded that the first principle that relates to the loss of existing dwellings to other uses infers a rigid approach, whereas in reality there are situations in which the net loss of dwellings would be acceptable, e.g. the provision of community facilities or premises that would support economic development. A degree of flexibility needs to be worked into this part of the policy to reflect such possibilities.
3. This comment puts "the cart before the horse" in that the Core Strategy should give the parameters for other Development Plan Documents and Supplementary Planning Documents. However, the policy can usefully refer to Local Development Documents providing detailed principles and criteria for assessing proposals relating to the existing housing stock.
4. The policy should not imply that amenity will be an overriding factor in every case. A revised wording closer to that of the adopted Local Plan policy COM.12 would be an improvement: "avoid undue harm to the amenity of neighbouring property or to the character of the locality".
5. The reaction to criterion (d) of the first part of the policy has highlighted that it is capable of mis-interpreted. It is meant to refer to existing vacant dwellings, not non-residential buildings such as farm buildings. CS.11 is about the existing housing stock. A change of wording is needed: "facilitate and secure the re-use of empty dwellings as homes".
6. See point 2.
7. It is accepted that second criterion (a) adds an element of contradiction into the policy. There is also tension with other elements of policy in the Core Strategy that favour a bias towards family sized dwellings that include flexibility to address the changing needs of the household and which provide scope for home working (cf. Policy CS.10). The policy is not aimed at providing the basis for refusing applications for domestic extensions and replacement dwellings in response to an apparent shortage of certain house types in a locality. The reference to housing stock profile is best omitted.

### Recommended Action

The policy is amended to:

- include a reference to the loss of dwellings being acceptable in specific and overriding circumstances;
- include a reference to flood risk;
- include a reference to Local Development Documents;
- replace the reference to amenity with "avoid undue harm to the amenity of neighbouring property or to the character of the locality";
- replace the reference to empty buildings with "empty dwellings";
- omit the reference to cumulative change in the profile of the District's housing stock.

## Analysis of Representations

**Topic: CS.12 Accommodation for gypsies & travellers**

### Summary of Matters Raised in Representations

1. Any application should meet a local needs test.
2. If sites have previously been refused planning permission for housing they should not be granted as gypsy/traveller sites.
3. Highway safety should be given paramount consideration in view of the type of vehicles used.
4. Human rights should be considered for all parties and development should benefit all residents and not be to the detriment of the local community.
5. SDC is relying on travellers to purchase land and build sites therefore these would not be under the control of SDC which could cause more problems.
6. Unclear that this policy relates to providing homes for gypsies and travellers - this is misleading to the public.
7. Flood risk, adequate water supply and availability of suitable foul drainage disposal require consideration.
8. More definitive emphasis on requirements together with specific guidelines needed to ensure tighter controls.
9. Gypsy and traveller sites are not agreed with as this is a lifestyle choice.
10. If 16 pitches was deemed too large a number for one site at Darlingscott crossroads, two sites within the District will not be enough for 44 pitches.
11. GTAA indicates that Irish travellers require short stay temporary stopping places although Irish travellers are under-represented in the survey and this must cast doubt on the assessment.
12. The Core Strategy should be flexible and include for the probable need for more than 34 permanent pitches due to unauthorised camps which may arise.
13. Two sites for a minimum of 34 pitches does not meet the expressed need for smaller and privately owned sites. The Core Strategy should reflect the range of needs and it is suggested that a range of sites are identified to meet the identified needs as outlined in the GTAA.
14. Assurance needed that a 'change of circumstances' includes 'unexpected' applications as mentioned in paragraph 31 of Circular 1/2006.
15. Criterion E could be capable of being interpreted in such a way that almost any application could be refused.
16. SDC has failed to meet its responsibility in providing permanent pitches therefore sites should be promoted in the South and East of the District.
17. Part A is not clear in identifying a location.
18. Concern that relocated travellers from Friday Furlong, Bidford will set up an illegal encampment elsewhere in the District.
19. Questions whether the needs of the Darlingscott gypsies are catered for in the 34 pitches proposed to be across 1 or 2 sites.
20. Concern that 'The Paddocks', Poolhead Lane is not a suitable site.
21. Particular care in relation to the exact location should be taken, especially where these border sensitive sites for nature conservation.
22. Control of waste must be a particular criteria to be addressed.

### Officers' Response

1. Stratford District Council has a clear responsibility through the planning process to identify sites in sustainable locations to meet the needs of Gypsies and Travellers in the District. Confirmation of the identified need for the District should be founded on a clear evidence. The Council, working with its partners have carried out a Gypsy and Traveller Accommodation Assessment (GTAA) which identifies a need for 34 permanent pitches for Gypsies and 10 temporary pitches for stop over for travellers. There has been a recent appeal decision regarding a Gypsy site in Dalingscote. The Inspector has recommended that the District Council should plan for 50 permanent pitches instead of the 34 identified in the GTAA. The Council is considering the Inspector's conclusions and its implications and this will inform provision made in the Core Strategy.

The Council is fully aware of advice given in national guidance about the scale of sites and the management implications associated with that and will be mindful of that when allocating specific sites to meet the need.

## Analysis of Representations

The Draft Core Strategy identifies a number of potential development opportunity sites for housing from which specific sites would be selected to meet the needs of Gypsies and Travellers. These sites have been subjected to a public consultation exercise. A number of representations have been received and are being analysed. Any alternative sites that are suggested as a result of this process will also be taken into account in selecting preferred sites. As part of the selection process, the Council will also be talking to Gypsy and Travellers representatives to gain full understanding of their site locational requirement before finalising its decision of preferred sites.

The ultimate goal of the Council would be to identify suitable sites at sustainable locations that meet the functional requirements of Gypsies and Travellers. If circumstances were to change in the future and additional sites are required, the policy sets out clear criteria for determining the suitability of any site that would come forward for that purpose.

2. See 1 above.
3. Highway safety is one of the criteria to be taken into account in the site selection process.
4. In selecting sites to meet the needs of Gypsies and Travellers, the Council will assess the potential impacts of development of the site as it will do with all other housing development sites.
5. See 1 above.
6. See 1 above.
7. All the issues raised will be taken into account in considering any planning application that would come forward. They will also be taken into account in the site selection process for the Core Strategy.
8. The allocated sites will include specific detail requirements for their development. The schedule of Development Opportunity Sites in Appendix B of the Draft Core Strategy is an example of the form of detail that will be included in each allocation.
9. The Council has a responsibility to make provision to meet the housing needs of all sections of the local community. Gypsies and Travellers are a particular group of people whose needs should be met through the planning process. Also see 1 above.
10. See 1 above.
11. The Council do not doubt the credibility of the outcome of the GTAA but is prepared to consider any other alternative evidence to inform the Core Strategy process. Also see 1 above.
12. If circumstances were to change in the future, the Core Strategy will have an in-built scope and criteria for further sites to be considered. Also see 1 above.
13. See 1 above, in particular, the need to take into account scale and management implications when allocating sites.
14. See 1 above
15. Criterion 'e' is important in assessing the suitability of any sites that would come forward and should be retained. If a proposal meets that criterion, together with all the others, the Council will be minded to support any such application. It will be difficult for the Council to sustain a reason for refusal of any application that has met all its requirements even if it wished to do so.
16. SDC has not failed to allocate sites for Gypsies and Travellers. It is in the process of doing so as part of the Core Strategy process. Also see 1 above.
17. See 16 above
18. The Council is in the process of allocating sites to meet the needs of Gypsies and Travellers in sustainable locations. Enforcement action will be taken against any illegal emcampment.
19. See 1 above
20. See 1 above.
21. See 1 and 15 above.
22. This will be taken into account in any detailed planning application that would come forward. Also see 7 above.

### Recommended Action

1. That specific sites be identified from the list of development opportunity sites or from other alternative sites suggested during the consultation period to meet the needs of Gypsies and Travellers. The selection of preferred sites should be informed by the on-going assessments of omission sites and the targeted consultation with Gypsies and Travellers.
2. That the level of need identified in the GTAA be reviewed to take into account the recommended level of need suggested by the Inspector who determined the Dalingscote Appeal. It will be difficult to defend a level of need which is lower than what is

## Analysis of Representations

recommended by the Inspector.

3. That the allocation of any site should include a list of standards to be achieved and infrastructure requirements to support the development of the sites.

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### Topic: T2b Business - context

#### Summary of Matters Raised in Representations

1. The pattern of employment choices within Stratford-on-Avon District should accommodate local needs and reduce the reliance on tourism to create a more diverse local economy.
2. Development should take place in sustainable locations where people have easier access to jobs and services and employment sites need to accommodate different uses and offer a range of employment opportunities.

#### Officers' Response

1. It is agreed that the local economy should be diverse and not be too reliant on tourism. The approach taken in the Draft Core Strategy provides for this.
2. This is the essence of the approach taken on the location of development in the Draft Core Strategy.

#### Recommended Action

1. No change
  2. No change
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## Analysis of Representations

Topic: CS.13

Business - expansion & development

### Summary of Matters Raised in Representations

1. This aligns with WMES Strategic Objective 1.3 which encourages the creation/growth of economically sustainable and competitive new businesses particularly in high growth businesses.
2. Issues and Options paper highlighted that the Council felt the amount of employment land proposed by the current RSS document is much higher than the amount needed to meet local needs for residents. However NLP document proposes higher housing levels which therefore needs to be reflected in the employment figures to meet local needs. The DCS details 84.2 ha for the Plan period, however the higher option in the Issues and Options paper of 150 ha should be supported.
3. The availability of alternative sites to meet the need identified should also be considered.
4. Reassured that Policy CS.2 will allow business development in smaller settlements should it be needed and wanted.
5. If housing requirement is increased the employment strategy may also need further consideration to ensure a balanced approach remains.
6. Council must recognise the importance of supporting all forms of economic development in the District and not just schemes involving technology and knowledge-based businesses. It would be harmful if other businesses seeking new employment sites were unable to obtain them due to the Councils stance towards higher technology development. The policy should be amended to clarify this matter.
7. The restriction to buildings 'sufficiently close to SuA or a MRC' in criterion (g) should be widened to recognise the potential contribution of buildings in smaller rural settlements and rural areas in providing for District-wide economic growth. Refer to CS.1 which seeks employment opportunities in rural settlements.
8. Before any more industrial areas are built, existing sites should be used.
9. Look forward to seeing the specific proposals which will lay out the details of support for rural businesses and the rural economy in general. Although this document should not contain detail, indicators would be useful as to what will be covered in DPDs.
10. LDF should consider the need to encourage young start-up entrepreneurs, home workers and small rural businesses.
11. Would like further employment opportunities to the south of the river.
12. Criterion (g) should be extended to include existing rural buildings in the Green Belt.
13. Support policy but wish to see Option 2 (encouraging economic growth across the whole District) adopted.
14. An 'unacceptable impact' should be more clearly defined.
15. Restraint is required over further warehouse development in Southam and Wellesbourne due to visual impact and limited employment opportunities provided.
16. Middle Quinton should be identified in the Schedule of Development Opportunities at Appendix B.

### Officers' Response

1. It is necessary for the Core Strategy to be consistent with the Regional Economic Strategy.
- 2/5. If the housing requirement for the District is raised through the RSS Phase Two Revision process, it is likely to be necessary for the provision of employment land to be increased accordingly.
3. This is not thought to be necessary since the land identified for employment development should be available and suitable in any case.
4. The District Council wishes to ensure that the rural economy and local employment opportunities are supported.
6. The policy does not preclude any form of employment development in appropriate circumstances. However, it is evident that a greater number of higher paid jobs should be provided in the District to reflect the qualifications and skills of its residents and the level of out-commuting that takes place to such jobs.
7. It is important that the scale of employment development is appropriate to the location and its accessibility. The District Council will consider the merits of modest extensions to rural buildings in countryside locations.
8. It is necessary to ensure that a range of opportunities are provided for business development. It would be unreasonable to require existing sites to be implemented before new land is made available, particularly if it is in a different part of the District or if it is to serve a different purpose.

## Analysis of Representations

9. It is intended to provide a set of indicators for assessing the performance of policies in Development Plan Documents.
10. The policies in the LDF, including Policy CS.13, will not as a matter of principle prevent development that is intended to meet these specific business needs.
11. Further consideration is being given to a range of other potential development sites south of the river in Stratford-upon-Avon but infrastructure constraints, particularly in relation to the river crossings, will need to be resolved.
12. Criterion (g) does not rule out such development in the Green Belt but it would have to be rigorously justified in accordance with national and local Green Belt policy.
13. This is the preferred option that has been identified and taken forward in the Draft Core Strategy.
14. Such an impact can take many forms and can only be gauged on a case by case basis.
15. Such a blanket restriction would be inappropriate although the issues raised should be assessed in relation to an individual proposal.
16. The principle of Middle Quinton Eco-town is still to be decided by Government and, as things stand, the District Council is not supportive of the proposals. It would therefore be inappropriate to identify the Eco-town in the Core Strategy as things stand.

### Recommended Action

- 2/5. Consider whether and how the employment land requirement should be increased as a result of a higher housing requirement.
9. Develop a set of indicators for monitoring the effectiveness of policies in the Core Strategy.
11. Assess the suitability of land south of the river in Stratford-upon-Avon for additional employment development.

All other points - no change

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### Topic: CS.14                      Loss of employment sites

#### Summary of Matters Raised in Representations

1. It is important to acknowledge that in certain circumstances, to achieve the effective use of land, it may be desirable to allow a site to be redeveloped rather than remain vacant.

#### Officers' Response

1. This point is accepted but it is important to assess whether the site is genuinely redundant for employment purpose otherwise the stock of employment land could be reduced unnecessarily.

#### Recommended Action

1. No change
-

## Analysis of Representations

Topic: CS.15 Tourism - accommodation & attraction

### Summary of Matters Raised in Representations

1. World Class Stratford comment that a policy regarding the amount and potentially the distribution of visitor accommodation would be appropriate, and that the WCS aim to encourage higher spending, longer staying visitors is emphasised.
2. Advantage West Midlands is making major investments in Stratford-upon-Avon through the World Class Stratford programme and the RST redevelopment, and broadly supports the preferred option. It suggests that the policy is sufficiently flexible to ensure potential appropriate larger-scale development and a definition of larger-scale should be included.
3. The policy does not recognise and provide guidance for Stratford's unique tourist attractions. It is necessary to manage the growth of tourism and to maintain and improve the quality of peoples experience of visiting and staying in Stratford and the Council should ensure that these international venues are exclusively safeguarded and enhanced through its LDF policies
4. It is important that the rural, unspoilt countryside and wildlife habitats are recognised as key elements of the attraction to the District and should be valued for the benefits this brings in visitors and inward investment
5. This policy should seek to recognise and promote in some form the tourism offer of the canal network
6. Object to the lack of cultural content in the DCS regarding the protection and promotion of existing internationally valuable cultural assets in particular theatres
7. The policy is not locally distinctive and although it is acknowledged on page 4 that Shakespeare-related properties are a key tourist attraction this is underplayed in the policy
8. The preamble and the two options discussed in the Sustainability Appraisal are ambiguous and confusing. This needs revision with much greater emphasis placed on the significance of the visitor economy
9. The policy is unreasonably restrictive as it seems unrealistic to expect all of the visitor accommodation to be confined to the town centre.
10. Warwickshire Wildlife Trust would like to see reference made to the need for sustainable travel networks/opportunities between visitor attractions
11. Given that low numbers of visitors arrive in SuA by public transport, this policy should particularly support future tourist attractions in locations which make the most of multi-transport modes.
12. Spreading the tourism footfall to cover other attractions in the rural areas and Market Towns should be encouraged
13. The policy refers to supporting 'small-scale tourism based schemes' but no justification is given to the need for them to be 'small-scale' neither is there a definition of what 'small-scale' might be
14. Tourism has declined in recent times due to the economic climate. When this is reversed, tourism will recover and there is no need for further action or for any particularly insensitive and inappropriate proposals for the type advocated by so called 'World Class Stratford'
15. The policy should be amended to include business complexes as one of the types of development where ancillary visitor accommodation may be acceptable.
16. Policy should be changed to provide for proposals relating to the growth and development of major existing tourist, conference and recreation complexes such as the Heritage Motor Centre at Gaydon.

### Officers' Response

1. Agree that policy should refer more directly to accommodation when discussing Stratford-upon-Avon. However we do not consider we have sufficient evidence or national/regional policy basis on which to prescribe a detailed policy.
2. We feel that the current policy wording provides scope for larger-scale visitor attractions/ accommodation within Stratford-upon-Avon through a hierarchy approach and by expressing support for the World Class Stratford initiative.
3. The World Class Stratford initiative is resulting in projects to address these issues, and the policy gives support to this initiative. The World Class Vision itself has not been adopted as Supplementary Planning Guidance because it was felt this would not add value to a document already adopted by a wide range of partners including the District Council, and the planning adoption process would be potentially confusing to residents.
4. We agree that these features of the district attract visitors and should be valued. This issue shaped the policy's requirement that "development has to be sensitive to the area" and the restriction on inappropriate development in policy CS.3.
5. We agree that the canal network contributes to the tourism offer of the canal network. Policy CS.21 refers to the value of green infrastructure which includes canals and waterways.

## Analysis of Representations

6. The theatres are specifically mentioned in the Current Situation text for Policy CS.15. The promotion and protection of cultural assets including the theatres is a central aim of the World Class Stratford initiative, with the Royal Shakespeare Company and SDC as key partners. The policy gives specific support to the World Class Stratford schemes.
7. The accompanying text could include greater reference to the special cultural attraction of the district. The policy is locally distinctive in that it refers to several key settlements and projects taking place in our district. It is unclear how a specific reference to Shakespeare-related properties in the policy itself would be helpful.
8. The text introducing the policy in the Draft Core Strategy will be revised and reduced. However we consider that the current introduction emphasises the importance of the visitor economy, with the first paragraph of the Current Situation setting out the benefits for the district.
9. The policy does not mention confining all visitor accommodation to the town centre. However it does seek to direct most visitor accommodation, especially larger -scale, to the most sustainable locations in the district, as set out in national guidance.
10. The text of the Draft Core Strategy mentions that the Preferred Option would need to be supported by good walking, cycling and public transport links, particularly between SUA and the main rural centres. We also agree that a good network of sustainable travel opportunities would reduce the negative effects of visitor attractions, and be an attraction in their own right. Policy CS.21 promotes the sustainable transport value of green infrastructure, CS.19 expects development to contribute to open spaces including directly related green infrastructure, and CS.17 promotes walking, cycling and public transport, so schemes to improve the network would be supported.
11. The low use of public transport by visitors is identified as an issue by the Draft Core Strategy and in the World Class Stratford Vision. Siting tourism development according to the settlement hierarchy should encourage development in places best served by public transport.
12. The policy aims to spread the benefits of tourism across the district, while retaining the character of the rural areas. Supporting the initiatives in market towns will also help achieve this.
13. Encouraging larger-scale tourism schemes in rural areas would be contrary to national and regional policy which directs tourism schemes to larger settlements. The reference to small-scale schemes is intended to balance this policy context against the local wish to spread the benefits of tourism across the district without harming character. It is difficult to set a definition for size due to the varying form of tourism attractions and accommodation.
14. A decline in tourist numbers had been identified well before the current economic crisis. For example, see graph on p10 of the World Class Stratford Urban Design Framework illustrating visitor numbers to Shakespeare properties from 1977-2004 and illustrating a significant decline over the past 10+ years.
15. Where a direct functional link is shown to a major business use, visitor accommodation may be appropriate.
16. It is recognized that certain sites being promoted for tourism-related uses do not relate to a settlement but may have specific locational characteristics. It would be appropriate to acknowledge this in the policy.

### Recommended Action

1. Add direct reference to accommodation when setting out policy for centre of Stratford-upon-Avon. Refer to WCS aim to encourage higher-spending, longer-staying visitors in supporting text.
2. As above.
3. Review policy to give greater recognition to Stratford-upon-Avon's tourism role and the aims of World Class Stratford initiative.
4. Mention value of countryside as well settlements in accompanying text.
5. Mention canal network in accompanying text. Clarify in Policy CS.21 that green infrastructure includes canals and other waterways.
6. Review accompanying text to include greater reference to the special cultural attraction of the district.
7. As above.
8. As above and retain references to the importance of the visitor economy in future text for tourism policy.
9. No action.
10. Make a reference to the value of sustainable travel networks for access to attractions and as an attraction themselves in Core Strategy to highlight the link between tourism and other policies. Consider whether it would be appropriate to insert a criteria relating to sustainable travel opportunities in the policy itself.
11. As above.

## Analysis of Representations

12. Look for opportunities to highlight individual communities' aspirations for tourism development, perhaps through the settlement portraits.
  13. Consider whether we have sufficient evidence to provide greater details about the definition of scale.
  14. No action.
  15. Amend policy wording to include 'business' in list of uses where directly associated accommodation may be justified.
  16. Consider whether to insert a reference to specific locational characteristics that should be taken into account when considering the merits of tourism-related development proposals. Investigate whether an exceptions policy elsewhere in the Core Strategy would be a more appropriate way to deal with these specific circumstances.
- 

### Topic: T2d Town and local centres

#### Summary of Matters Raised in Representations

1. Supports out-of-centre development if a suitable centrally-located site cannot be found.

#### Officers' Response

1. The Draft Core Strategy makes it clear that a range of 'tests' need to be satisfied when considering proposals for out-of-town centre retail development.

#### Recommended Action

1. No change
-

## Analysis of Representations

**Topic: CS.16**                      **Retail & commercial development**

### Summary of Matters Raised in Representations

1. Considers that the Core Strategy should contain a specific proposal for the enhancement and redevelopment of the Town Square as discussed in the adopted Urban Design Framework.
2. Too restrictive and limits locations, the sequential test of PPS6 should be used.
3. There is a significant deficit in the provision of food floorspace and other retail and local services on the south/east side of the River Avon to serve Bridgetown and Trinity Mead areas.
4. Napton Brickworks should be included in the exceptions listed otherwise the policy is very restrictive and could well threaten the viability of the redevelopment.
5. It is not wise to encourage the provision of supermarkets in our small market towns. These supermarkets provide unfair competition to existing outlets and in time reduce choice, generating more food miles.
6. Provision of new retail floorspace in Alcester, Shipston and Southam should not be capped at 2500 sq.m as this may fail to deliver the investment and benefits necessary to enhance the retail offer and reduce leakage to outside of the District. 2500 sq.m should be provided as an indication only.
7. The policy concentrates on the four largest retail areas within the District. This fails to provide adequate support for the other local centres.
8. Argue that Stratford cannot support any more retail space and that town centres are struggling to maintain their current retail base.
9. Draft provides no guidance within the proposed policy on the scale of development to be provided in Stratford or how this might be accommodated. This detail will need to be 'fleshed out' in the submitted version.
10. Concern regarding the effect new foodstores in Alcester, Southam and Shipston would have on existing local retailing.
11. Concern at the traffic implications of new foodstores in the three Main Rural Centres identified.
12. Parts (a) and (b) may need revision in light of current and possible future closures of major shops.
13. Does allocation SOU.1 contradict CS.16, i.e. are the foodstores to be in the town centre or on the edge?
14. The major developments proposed by World Class Stratford should be reviewed to determine whether the proposed extra retail space is viable and in the long term interests of the town.
15. Greater clarity is needed to confirm the position for the other Main Rural Centres. The policy does not state whether or not development of less than 1000 sqm within other main centres would be supported. Would suggest that the approach of Policy MRC.1 of the Local Plan Review is carried forward into CS.16.
16. Policy should refer to the desirability of maintaining and enhancing the local distinctiveness of townscapes.
17. Criteria of the policy are incomplete as they fail to include one of the 'retail tests' of PPS6 namely whether the proposed development is of an 'appropriate scale'.
18. Questions reliability of Retail Study. Any projections should not be regarded as targets but as broad and general indications of future capacity.
19. Should consider redefining the town centre boundary to include the Bridgeway and Rother Quarter areas.

### Officers' Response

1. Consideration will be given to including such a reference although it may be too small-scale to be covered by a specific proposal in the Core Strategy.
2. The approach taken reflects the role of town and city centres in the hierarchy established in the current RSS and due to be carried forward in the Revision that should be maintained by individual LDFs in the region.
3. Attempts are being made to improve the provision of shops and services south of the river but the wider impact of large-scale proposals need to be fully assessed.
4. It is intended that Proposal CTY.F in the District Local Plan should be 'saved' so that it will continue to provide the basis for considering any redevelopment proposals for the site.
- 5/10. The purpose of providing a larger foodstore in each of the specified market towns is to make them more self-contained and

## Analysis of Representations

reduce the amount of travel to larger towns. However, the policy makes it clear that a wide range of criteria need to be satisfied by any proposal, including impact on the town centres themselves.

6. The Retail Study produced for the District Council recommends that a maximum floorspace figure of 2,800 sq.m gross should be applied since larger stores would not be consistent with regional retail policy. The District Council believes that a slightly lower maximum figure should be specified in the policy although a degree of flexibility could be applied if the specific circumstances of a case merit this.

7. The policy does not preclude the provision of improved retail provision in the other Main Rural Centres and other policies in the Draft Core Strategy are supportive of shops and services in local centres.

8. Any retail proposal above 1,000 sq.m outside the town centre will have to be assessed against a wide range of criteria including impact.

9. It is acknowledged that the RSS Phase Two Draft Revision expects the LDF to show how the amount of additional comparison retail floorspace it specifies for Stratford-upon-Avon will be met.

11. The traffic impact of any such foodstore proposals will be carefully assessed.

12. The basic approach taken in the policy and the specific criteria will be applied to the circumstances that prevail at the time.

13. The approach taken in the Draft Core Strategy is that a foodstore should ideally be in the town centre but if no such site is available and an edge-of-town store satisfies all the criteria in Policy CS.16, a suitable location would be as part of Proposal SOU.1.

14. The RSS Phase Two Draft Revision indicates that 35,000 sq.m of additional comparison retail floorspace should be provided in Stratford-upon-Avon town centre by 2026 to bolster its role (see Policy PA12A). The development opportunities identified in the Urban Design Framework provide scope for contributing to this requirement.

15. It is confirmed that the principle of retail schemes comprising less than 1,000 sq.m gross would be appropriate in the other Main Rural Centres. It is agreed that the policy could be made clearer in this respect.

16. This is not an issue that is appropriate to cover in the retail policy; the principle is ingrained in other policies in the Draft Core Strategy.

17. This point is accepted and should be included in the policy.

18. The District Council has not sought to set targets but used the findings and recommendations of the Retail Study to base its preferred approach towards bolstering the role of the three largest rural market towns.

19. It may be appropriate to amend the town centre boundary to include the Bridgeway area; it should be noted that the Rother Quarter already lies within the defined town centre.

### Recommended Action

1. Make an appropriate reference to the enhancement/redevelopment of Town Square in the Core Strategy.

9. Specify how much additional comparison goods floorspace is to be provided in Stratford-upon-Avon town centre.

15. Clarify the principle of retail proposals less than 1,000 sq.m gross being appropriate in all Main Rural Centres.

17. Insert a criterion relating to the need for retail proposals to be of a scale that is appropriate to the circumstances.

19. Consider whether the town centre boundary for Stratford-upon-Avon as defined in the District Local Plan should be amended.

All other points - no change

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## Analysis of Representations

Topic: CS.17 Transport

### Summary of Matters Raised in Representations

1. Warwickshire County Council accepts that basing a strategy around Option 5 would be flawed; however suggest a compromise bringing together previously referred to Options 1, 3 and 5 by focussing development within SuA and on 3 key public transport corridors within the District
2. Emphasis should be given to maintaining present levels of transport particularly in rural communities
3. Should seek to re-open the Long Marston- SuA railway
4. Policy should be expanded to explain how the delivery of public transport and new roads in certain circumstances will be achieved
5. SuA needs a north-south bypass to take traffic out of the town centre
6. Should consult Network Rail re interest in re-opening all or part of Stratford to Cheltenham railway line
7. Consideration should be given to the creation of new assets to link with river corridors, waterways, woodlands, nature reserves, urban green space, historic sites and other existing assets.
8. Lack of protection/safeguarding for former Sua - Honeybourne - Cheltenham railway route
9. Existing park and ride should be safeguarded and is essential for the future success of the town centre
10. Policy lacks commitment and does not include reference to improving road safety.
11. Reference to long stay car parking in Stratford main town is ambiguous. Additional car parking may be envisaged to assert the towns role which would be inconsistent with the preferred option which seeks to focus on public transport, walking and cycling
12. Apart from reference to Park and Ride, this policy is extremely vague in that no examples of where public transport, cycling facilities or roads need improvement or how it might be achieved. Useless as a means of brining about specific change.
13. Concerns that wording of policy i.e. 'improvements will be made to the existing road network including the management of road space so that it functions more effectively' as it contradicts guidance set out in Circular 2/07.
14. Role of Leamington Railway Station should somehow be addressed in the planning framework for Stratford. The geography of the District requires that transport links use Leamington as a hub yet this is not strategically addressed. This is particularly relevant for the east of the District which is not practically served by Warwick Parkway or the Stratford branch line.
15. Improvements to public car parking in rural centres should be amended to make it clear that they will only be supported once all other options, better transport and improved conditions for walking and cycling have been considered
16. Policy does not reflect the likely increased development requirements or represent a sound and deliverable infrastructure plan
17. Reference should be made the the Local Transport Plan
18. Given the strategic nature and benefits associated with the development of the SWRR it should be listed within the policy
19. 'Priority' should replace 'emphasis'
20. Amend fourth paragraph as follows: delete 'additional' parking and replace with 'a southern', change 'facilities' to 'facility', remove 'will be' and replace with 'is', insert 'necessary' after 'considered'

### Officers' Response

1. One of the significant means of achieving sustainable development is striking a good balance between transport, service provision and spatial distribution of development. The Core Strategy seeks to achieve this aim by assessing its spatial development options through a thorough sustainability appraisal process. Options considered by the District Council included a Transport Corridor Option which assessed the potential implications for concentrating development along the key public transport corridors in the District. The Draft Core Strategy process also included an assesment of the transport challenges facing the District and the possible options for addressing them. Again, these mitigation options have been tested through a thorough sustainability appraisal process. The outcome of the appraisal processes provides us with useful evidence to suggest that the most sustainable locations for significant development in the District are Stratford-upon-Avon and the Main Rural Centres and the best performed transport strategy option to address the challenges facing the District would be to place much priority on the provision of public transport services and better conditions for walking and cycling. New road building is supported only where it is demonstrated that improvements in public transport, walking and cycling are not appropriate or sufficiently effective to deal with a specific situation.

The Council accepts that the Draft Policy will need to be recast to emphasise that there are locally specific transport proposal in

## Analysis of Representations

the various settlements of the District, in particular, those that have been committed by the County Council in the Warwickshire Local Transport Plan (LTP). Similarly, it is suggested that a Policy be included in an appropriate DPD and a Proposals Map to show safeguarded land for specific transport routes, in particular, safeguarded land for transport schemes of strategic and local significance. Response to Policy CS.20 addresses the matter of safeguarded routes.

Outside the Core Strategy process, the District and County Councils are working together in developing/reviewing strategies for parking, public transport infrastructure and service improvements in rural areas, provision/improvement of cycle and pedestrian infrastructure etc. It is suggested that policies in the Core Strategy should be cross referenced to these strategies to gain full understanding of transport provision in the District.

2. It is the objective of both the District and County Councils to enhance existing levels of transport provision in rural areas of the District rather than just maintaining the existing levels.

3. See 1 above. This is a matter that is addressed under Policy CS.20.

4. An Infrastructure Development Plan and an Implementation Plan will be included in the final version of the Core Strategy. This will set out precisely how proposals in the Core Strategy will be implemented. It will include details of when, who, where and how these proposals will be implemented.

5. A north-south bypass has been considered and debated at various public inquiries in the past. In all instances, the idea had been rejected for a number of reasons, not least its significant adverse environmental implications. The transport implications of the development opportunities in the Draft Core Strategy have been assessed by both the County Council and the Highways Authority. At this stage a case to support a north-south bypass as an effective means of addressing the traffic impacts of the proposed developments opportunities has not been recommended by the two transport authorities. This position will continue to be reviewed as we progress the Core Strategy to its adoption.

6. See 1 above. The saved policies of the Local Plan Review safeguard land for transport purposes, including the provision of rail infrastructure. How these are addressed in the Core Strategy is dealt with under Policy CS.20.

7. It is the intention of the District Council to make key environmental assets and alternative transport corridors in the District accessible for the benefit of the general public. Apart from the recreational and transport benefits, these assets are good sources of local information and knowledge. The role of the Core Strategy in achieving this aim will be explored, but it is clear that the Council will need to work in partnership with other organisations and the voluntary sector to achieve this objective.

8. See 1 and 6 above.

9. The Park and ride is operational and there is no reason to suggest that its future is threatened.

10. See 1 and 4 above.

11. The policy makes specific reference to additional provision of public parking in Stratford and the rural centres. As parking provision are made in sustainable locations, it is essential and reasonable that the amount of long stay parking at the town centre of Stratford is reassessed. The management and supply of parking will continue to compliment the other aspects of the transport strategy rather than conflict with them.

12. See 1 and 4 above.

13. No perceived contradiction exist between Policy CS.17 and Circular 02/07. Circular 02/07 which is about Planning and the Strategic Road Network does not absolutely rule out improvements to the road network.

14. A case for the strategic role of a Parkway Station to be linked to the existing Park and Ride facility in Stratford-upon-Avon has been made by the County Council. A programme for its implementation have already began with various consultation processes in progress. Details of the scheme will be included in the final version of the Core Strategy. The decision to promote a parkway station in Stratford has been made after careful consideration of the role of other stations in the main towns of the County such as Leamington Spa.

Stratford-upon-Avon is a key destination for visitors. It is the aim of the Council to promote sustainable tourism by encouraging tourists to use public transport where relevant. The management of other journeys to and from the town for work and recreational related activities are also significant. The role of Stratford as a public transport hub in its own right is an undeniable fact and should be promoted. The existing station in Stratford is also earmarked for significant improvements including a proposed bus/rail interchange and an effective pedestrian links from the station to the town centre. Other improvement schemes are proposed for the other stations within the District.

Whereas improvements to Leamington Station are supported and welcome, that should not be allowed to undermine the strategic importance of proposals to improve rail transport in Stratford-on-Avon District.

15. The saved policies of the Local Plan Review and the adopted Parking Strategy for the District include some robust set of criteria to consider parking provision in the Main Rural Centres of the District.

16. The transport implications of each of the proposed developments in the Draft Core Strategy has been assessed. The policy

## Analysis of Representations

takes into account the overall impact of the development requirements of the Draft Core Strategy. Specific mitigation measures have been introduced as part of a package of measures to support the development of the allocated sites. Furthermore, an Implementation and Infrastructure Development Plan is being prepared to clearly set out how each proposal and policy in the Core Strategy will be delivered.

17. See 1 above. The Council accepts that proposals in the LTP should be acknowledged.

18. See 1 above. It is intended to list all significant transport schemes in an appropriate DPD. Policy CS.20 deals with safeguarded land for key transport proposals in the District. It addresses how this matter will be dealt with. It needs to be emphasised that the case for the SWRR is linked to the delivery of the Shottery allocation (Proposal SUA.4).

19. The suggested wording change to replace 'emphasis' with 'priority' is reasonable.

20. Various studies to inform the provision of park and ride in Stratford has recommended that a three site park and ride strategy will be the most effective parking solution to the town and should be the goal to be achieved. There is also the potential to expand the existing park and ride facility with the introduction of the parkway station. There is therefore potential additional parking provision in Stratford beyond a Southern park and ride. The Core Strategy set the development framework for the period until 2026. The transport strategy should allow scope for all these potential schemes to come forward. The wording in the Draft Core Strategy seeks to ensure that these options for additional parking are not closed.

### Recommended Action

1. Core Strategy or other appropriate DPD to include specific key transport infrastructure proposals to deal with the transport challenges of the District. Further consideration be given to this recommendation and its implications before an appropriate document is identified.
  2. Proposals Map/Key Diagram to include transport proposals and safeguarded land for transport related purposes in accordance with recommendation 1 above.
  3. Consideration should be giving to grouping the key transport proposals by settlement where relevant to make them locally distinctive.
  4. Policy to acknowledge other transport strategies that are developed outside the Core Strategy process.
- 

### Topic: CS.18 Provision of services

#### Summary of Matters Raised in Representations

1. Would have preferred Option 2 to be adopted. Do not see how the policy can be implemented even when required as part of a development appraisal.
2. Some community facilities could be provided in housing schemes for the elderly benefiting the local catchment area where appropriate to the circumstances of the proposals being brought forward
3. A set time frame is necessary otherwise individual interpretation will occur
4. Insert '6 months' after 'actively marketed' in bullet point B

#### Officers' Response

1. Option 3 was considered to be the most sustainable option. The Sustainability Appraisal of the Options can be found on the Councils website. The policy provides a useful framework for protecting existing facilities and opportunities for creating new one. Where relevant, developer contribution will be secured to improve and/or provide new services in the District as part of new development. The Council will also work with its partners such as the County Council to support services such as public transport in rural areas of the District.
2. See 1 above.
3. The case for putting a time frame for marketing existing services before they can be used for alternative uses is worth exploring. Revisions to the policy should take this into account.
4. See 3 above.

#### Recommended Action

No modification required as a result of the representations received. However, policy will continue to be reviewed in the light of any new evidence that will emerge.

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## Analysis of Representations

**Topic: CS.19 Recreation facilities**

### Summary of Matters Raised in Representations

1. The policy appears to be a strategic approach to the allocation of recreation facilities. It makes no reference to existing Local Plan commitments for public open space and refers only to targets to be set in a SPD. No guidance is given as to what level or target this policy is seeking to achieve and why it is appropriate for it to differ from national standards applied to all new housing development. The policy needs to be explicit for it to be applied.
2. The policy should conform with Circular 05/2005 so that it is clear that any on site provision or off site contributions should be directly related in scale to the proposed development and should not be used to resolve existing deficiencies in infrastructure provision or to achieve wider planning objectives that are not necessary to allow consent to be given to a particular development.
3. It is onerous to expect all new housing developments to provide increased or improved facilities either on site or make an off site contribution. This is especially the case where affordable housing is being provided. Contributions should be made on a scheme-by-scheme basis with consideration given to the nature of the development being provided
4. This policy shows the consequences of confining development to larger settlements. Without housing developments it is unlikely that improvements in provision will be made.
5. Why is only new housing development expected to provide green infrastructure?
6. There should be a mix of community-led provision along with a hierarchical approach to the provision of larger facilities. All communities need to have access to open spaces and play provision and local communities should lead the siting of such provision
7. More allotments should be provided
8. The 'current situation' section demonstrates that there is no clear evidence base as yet regarding access to green space although an audit is envisaged. Open space audits only give part of the picture as it needs to include the wider green infrastructure network. Natural England believes that the lack of comprehensive information in terms of existing green space/green infrastructure assets and future requirements is a constraint with respect to developing preferred options for recreation.
9. British Waterways would welcome the expansion of this policy to include support for the use of canals as recreational resources including improvements to access
10. New public rights of way should be included in the policy
11. Recreation and open space provision should where needed include 'space for water'. The EA would be happy to comment on any SPD but advise that where sustainable drainage techniques are used on new development, balancing ponds and swales can make a positive contribution to designated 'open space'.
12. Concerned that the policy includes wording in the fourth paragraph that could encourage alternative uses such as housing or food store to replace a recreation facility if a 'proven lack of need can be demonstrated'
13. More specific consideration should be given to the extension of the recreation ground to the south of the river to provide for the increased population in this vicinity
14. The leisure centre should remain where it is as the site is easily accessible. The narrative does not indicate the potential to disaggregate the range of leisure facilities currently collected together at the Stratford leisure centre. A smaller site area would be necessary if the replacement is spread across two or more sites.
15. The provision of a new leisure centre should be a commercial enterprise which should not be undertaken by the Council. Public demand should dictate the size and location of this provision.

### Officers' Response

1. A PPG17 Audit and Investment Strategy would provide more extensive evidence on which to base standards for provision and agree priorities for new open space/ facilities. The priorities may replace or confirm the current Local Plan commitments. PPG17 does not give national standards to be applied in terms of sport, recreation and open space provision, instead it states that Local Authorities should develop standards based on local circumstances.
2. It is intended to use the PPG17 methodology to agree local standards of provision per person in the district. On and off-site contributions would therefore be related to the number of people/ size of development.
3. The preferred approach follows national policy guidance. Setting local standards will provide greater clarity and certainty for developers. There may be exceptional circumstances which justify a different level of provision.
4. As commented above, contributions should not be used to resolve existing deficiencies but to meet the increased demand resulting from a development. Other sources of funding need to be found to improve facilities further, for example rural community-led projects for children's play and sport have often received funding through the District Council's Community

## Analysis of Representations

Grants Scheme.

5. We recognise that other forms of development can also increase demand for open space and recreation facilities.
6. We agree with this approach and hope that the draft Policy CS.19 will encourage it.
7. It is intended to include allotments within the categories of open space considered through the Audit and contributions mechanisms.
8. As part of the recreation and open space audit we are looking at green infrastructure within and around larger settlements, although mainly in terms of recreational value rather than biodiversity etc. A project by the West Midlands Biodiversity Partnership seeks to deliver habitat network improvements on a regional scale. Studies are underway producing valuable information on habitat networks but the project is not yet at a sufficiently advanced stage to use specific findings, or to set out with certainty how it could impact on this district.
9. Draft Core Strategy Policy CS.27 gives green infrastructure connections as a criteria for good design, and this could include links to local canals for on a site-specific basis.
10. Draft Core Strategy Policy CS.27 gives green infrastructure connections as a criteria for good design, and this could include improved links to local footpaths on a site-specific basis.
11. We consider that this point can be picked up to some extent by Draft Core Strategy policy CS.21. Other than that this level of detail would be more appropriate for the SPD to accompany Policy CS.28 Sustainable Construction.
12. This wording was intended to protect recreational facilities, while allowing some flexibility to adapt their use to another recreation use if this has been shown to better meet the priorities of the local community. PPG17 says that open space, sport and recreational building and land should be preserved unless assessment shows that it is clearly surplus to requirements.
13. This comment is about a level of detail which will not be included in the Core Strategy
14. If the leisure centre is to be relocated, accessibility will be a major factor in deciding its location. Disaggregating the uses, and the implications for management and perception, is a possibility that is still being considered. A further study into the future of the leisure centre is being carried out over the next few months.
15. It is not for Core Strategy to decide the basis on which the Leisure Centre would operate. Public opinion will influence the nature of any replacement leisure centre.

### Recommended Action

1. No change to policy. However, further work is needed to agree the timetable for preparation of Audit and Investment Strategy.
  - 2/3/4. No action
  5. Amend policy to include all development, not just housing.
  - 6/7. No action
  8. Strengthen reference to green infrastructure in policy.
  9. Make sure reference to green infrastructure connections is retained in the revised CS.27 design policy. Consider whether any site allocations provide opportunities to improve access to canals.
  10. Consider whether any site allocations provide opportunities to improve rights of way. Discuss further whether it may be appropriate to request contributions towards local rights of way
  11. No action on CS.19. Refer to sustainable drainage in Policy CS.21.
  12. Review policy wording to ensure it cannot be misinterpreted, or consider removing as it replicates national planning guidance.
  13. No action
  14. Review approach to leisure centre once current study has been concluded.
  15. No action
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## Analysis of Representations

Topic: CS.20                                      Effective use of land

### Summary of Matters Raised in Representations

1. Object to the failure of the DCS to make reference to the continuing need to safeguard the former Stratford-Oxford/Cheltenham rail corridor.
2. Should ensure that the maximum density of development is achieved in a way that is compatible with the character of the site including its environmental character and the adjacent area.
3. All new development greater than 1 ha, in utilising above ground sustainable drainage methods, should make 'space for water'. This may have an effect on the maximum density potential of a development.
4. Object as such an approach is not justified by the scale of development proposed and the concerns expressed regarding the impact of high density on the character of the area.
5. The emphasis on achieving the 'maximum density' and 'maximising' the use of the 'previously developed land' should be removed from the policy and increasing emphasis should be placed on a flexible approach to housing densities in line with PPS3.
6. Vital that WCC as Minerals Authority is consulted on any proposals or applications to ensure that non-minerals development of a large-scale does not affect mineral deposits.
7. High densities should allow for greater use of green space, perhaps through planning gain.
8. In (a) replace 'maximum' with 'a reasonable' and insert at the end 'and the comfort of occupiers and those adjacent to the site'.
9. The planning system needs to take account of its sphere of influence on the architecture and style of previous new housing i.e. blocks of flats. Traditional family housing on two levels with an appropriate amount of curtilage amenity space should be promoted in the future.
10. As set out in the 'Vision for Alcester 2020' the protection of a route within the District for the reinstatement of the railway south of Redditch to Studley and Alcester should be considered.
11. Disused farm yards and buildings should be treated and classified as brownfield sites because they are the same as industrial sites and indeed are sites of the past and should be available for future development.

### Officers' Response

1. The District Council has sought to 'save' those parts of the District Local Plan which safeguard this route (Policy PR.10.6 and PR.10.8). Consideration will be given to the most appropriate means of covering this matter in the LDF should safeguarding still be justified.
2. It is not necessary to make specific reference to environmental impact as it is an integral part of character.
3. This is too prescriptive for inclusion in this policy; appropriate means of providing space for water should be considered as part of all development proposals.
4. Establishing the appropriate density of development can only be determined on a case by case basis depending on the character of the local area and other site specific issues.
5. These two principles are entirely valid to ensure that land is used effectively; it is accepted that some flexibility is required in terms of density to reflect individual circumstances and in relation to the use of previously developed sites because not all such land is in sustainable locations.
6. This is done as a matter of course.
7. This principle is acknowledged and specific cases could offer such opportunities.
8. It is important in achieving the efficient use of land to strive for a maximum density appropriate to the circumstances. The suggested additional wording deals with specific considerations that are part of the prevailing character and is unnecessary.
9. The District Council now places much greater emphasis on the provision of homes that are more suitable for families.
10. There appears to be no reasonable prospect of reinstating this railway line; hence it would be inappropriate to safeguard that part of the route that has not already been affected by development.
11. It is current national policy to categorise farm buildings and, by inference, farmyards as greenfield.

### Recommended Action

1. Decide the most appropriate means of covering the issue of safeguarded schemes in the LDF.

## Analysis of Representations

**Topic: CS.21**                      **Open spaces & green infrastructure**

### Summary of Matters Raised in Representations

1. British Waterways objects to the exclusion of waterway corridors including rivers and canals in this policy.
2. The EA would wish to see the inclusion of the word 'created' when discussing open space and green infrastructure. The creation of such areas can assist with water quality improvement.
3. It would be useful if the Landscapes for Living approach can be referenced in this section regarding climate change adaption
4. Open Spaces and Green Infrastructure should be translated through into other policies and strategies to be realised.
5. Natural England suggests specific wording to strengthen the policy by requiring development to contribute to green infrastructure, give priority to biodiversity gains, and specifically stating that development will be refused if it compromises the function of the Green Infrastructure network.
6. Suggest additional words 'and managed to meet conservation objectives, including Local BAP targets'
7. WCC Countryside Recreation suggest additional wording "and where appropriate a better access network is provided"
8. The land between the by-pass and Bishopton Lane as identified in the Local Plan Review is still required for public open space. Land between the Holiday Inn and The Bancroft Gardens and around Manor Rd/Loxley Rd should be allocated as public open space.
9. The policy should be reworded to recognise that the protection and enhancement of open spaces is also likely to be beneficial to the maintenance of the Historic Landscape and environment.

### Officers' Response

1. We agree that waterway corridors should be considered as a valuable form of green infrastructure. They are included in the definition given in the West Midlands Green Infrastructure Prospectus.
2. We agree that such features should be created where possible. The creation and enhancement of such features may be implemented through CS.19 which mentions requirements on new development, and through schemes such as the World Class Stratford Initiative.
3. This project by the West Midlands Biodiversity Partnership seeks to deliver habitat network improvements on a regional scale. Studies are underway to produce useful information on habitat networks but the project is not yet at a sufficiently advanced stage to use specific findings, or to set out with certainty how it could impact on, and implemented in, this district.
4. We agree that the importance of green infrastructure means its enhancement requires effective implementation. Protection of such features will be implemented through grant and refusal of planning permission in accordance with CS.21. Their creation and enhancement may be implemented through CS.19 which mentions requirements on new development, CS.27 which gives green infrastructure connections as a criteria for good design, and through schemes such as the World Class Stratford Initiative.
5. As explained above, policies CS.19 and 27 meet certain aspects of the suggested wording. CS.24 gives strong guidance on biodiversity improvement including reference to strengthening networks of habitats. The actual wording suggested would be extremely difficult to apply and implement without a comprehensive Green Infrastructure study for the district/ sub-region including an Action Plan for specific projects agreed with all partners and identification of other opportunities/ linkages which would be affected by planning sites. We therefore feel that the current approach will deliver benefits as far as is currently practical, but recognise that this is an important area to develop further.
6. The policy already highlights the potential for biodiversity value, while policy CS.24 references the importance of Local Biodiversity Action Plans when managing green networks.
7. We consider that the wording of the policy already covers this issue by encouraging the improvement of access to natural areas through rights of way.
8. This comment is about a level of detail which will not be included in the Core Strategy.
9. We agree that open spaces can enhance the historic landscape but consider this issue is adequately covered in policies CS.24 and 26 in the Draft Core Strategy.

### Recommended Action

1. Add "waterways" to opening sentence of the policy. Reference West Midlands Prospectus in supporting text.
2. Add "created" to opening sentence of policy.
3. Consider how the Landscapes for Living work can be supported through the Core Strategy/ LDF and include reference in accompanying text if the project's future is secure.

## Analysis of Representations

4. Bring together implementation methods for this policy and consider whether more needs to be done to successfully implement it in practice. Strengthen reference to green infrastructure in CS.19, and make sure reference is retained in the revised CS.21 design policy.
  5. As 3 and 4 above. Consider strengthening reference to networks and green infrastructure in CS.24. Discuss possibility of future Green Infrastructure study and resulting action plan. Discuss whether policy should be strengthened to allow adoption of any resulting decisions from this or the Landscapes for Living work.
  6. Take use of LBAPs for informing management of open spaces into account when reviewing the implementation of this policy alongside CS.24, and CS.19.
  7. No action.
  8. No action.
  9. No action.
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## Analysis of Representations

Topic: CS.22 Renewable energy

### Summary of Matters Raised in Representations

1. The Council should be more proactive and should adopt a more positive attitude towards renewable energy.
2. The cumulative impacts on the environment, including ancillary development/power lines' should be added as an additional factor to be taken into consideration
3. The need for renewable energy should have precedence over the Conservation Area or AONB restrictions. Each proposal should be judged on its merits and there should not be a blanket ban on such energy sources in these areas
4. The policy highlights the need for consideration of the impacts of renewable energy on some aspects of the historic environment but not on historic parks and gardens or scheduled ancient monuments. The special interests which are recognised through these designations have the potential to be harmed by insensitive renewable energy developments and a consistent approach in line with that taken for listed buildings and conservation areas should be applied.
5. An EIA should be required to support proposals located in the AONB
6. In-shore wind farms are ineffective but have a negative impact on people and the countryside. The negative impacts of small-scale on-shore wind farms far outweighs the modest reduction of CO2 emissions and the relatively small amount of electricity produced.
7. The Wildlife Trust has a policy on windfarms and would need to assess any proposals for sites against this to ensure the overall benefit in energy generation was clear and there was no significant loss of biodiversity.
8. Energy Conservation is the priority and design standards and other Council policies must reflect this. Local communities should be involved in the provision of any small-scale decentralised, renewable schemes and that such schemes must ensure that the community shares the benefits
9. Concerned by the reference to the extent of community involvement in determining the suitability of any such proposals. The process for community involvement is set out within the adopted SCI therefore reference to this within the policy is considered unnecessary repetition
10. The policy makes no reference of the need to consider the economic viability of introducing renewable energy sources within developments in particular against the need to deliver sufficient housing development to meet the expected supply. This is contrary to guidance contained in paragraph 33 of PPS1. Suggests re-wording.
11. Welcome the flexible approach as not all developments will be suitable for the incorporation of renewable energy technologies
12. BWEA suggest that Core Strategy should include overarching policy on climate change, renewable energy, energy efficiency etc, followed by detailed proactive policies with the Development Control DPD, as generic policies are more difficult to implement effectively.
13. Important that LDF includes a robust, criteria-based policy to assess applications for renewable energy, following guidance in PPS22 and PPS1.

### Officers' Response

1. We are in the process of commissioning a study to investigate the renewable energy resource in the district. We will need to consider whether the findings and recommendations of this study provide scope for a more proactive approach to renewable energy through the LDF
2. The study mentioned above may inform a more strategic approach to the potential for cumulative impacts. Otherwise we will need to consider whether it is necessary to incorporate this principle into the policy.
3. Policy CS.22 follows national guidance in stating that the objective of such designations should not be compromised by renewable energy development. However we acknowledge that there may still be scope for some renewable energy schemes within these areas which is why the policy gives criteria rather a blanket ban. The indication that large scale wind and biomass are unlikely to be appropriate in the AONB is based on guidance produced by the Cotswolds AONB resulting from a detailed landscape study.
4. National guidance states that all national designations should not be compromised. The policy also lists the impact on historic features as an important consideration.
5. This comment is about a level of detail which will not be included in the Core Strategy
6. National guidance (PPS22) accepts on-shore wind farms as a valid form of renewable energy. Planning policies cannot rule out or place constraints on specific types of renewable energy without sufficient reasoned justification. The criteria in the policy are

## Analysis of Representations

designed to take into account any negative impacts of proposed schemes when reaching planning decisions on a case-by-case basis.

7. We acknowledge this comment.

8. We have sought to incorporate climate change and sustainability considerations throughout the Core Strategy. We agree that community-led schemes should be encouraged. It is intended that criteria of the policy will encourage such schemes.

9. The current situation describes circumstances that mean there may be particular scope for renewable schemes involving the community as a partner in our district. This reference therefore reflects local circumstances.

10. I suggest this comment shows a misinterpretation of the intended purpose of this policy. Policy CS.22 is intended to apply for all renewable energy schemes, from large-scale commercial schemes to micro-generation on houses, many of which will be put forward as independent applications. The reference in Policy CS.28 indicates that these criteria will also be used to check that renewable energy schemes proposed to meet the 10% requirement are appropriate to their location. The detailed implementation of CS.28 will be set out in an SPD.

11. As above. We consider that these criteria will allow schemes to be considered on a case-by-case basis.

12. This is an interesting point which requires further discussion.

13. We are aware that this is important.

### Recommended Action

1. Review policy once renewable energy resource study is completed.

2. As above

3. No action

4. Consider if necessary to add "and other nationally designated sites".

5/6/7/8/9. No action

10. Consider whether the reference to Policy CS.22 in Policy CS.28 is misleading and needs revising (Policy CS.28 will also be revised following further studies into resources and viability).

11. No action

12. Discuss further with team the level of detail which should be given in Core Strategy policies and how far this should be left to Development Control Policies.

13. No action

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## Analysis of Representations

**Topic: CS.23 Flood risk & water management**

### Summary of Matters Raised in Representations

1. Suggest strengthening the policy with the inclusion of 'the protection of naturally functioning floodplains and natural coastal defences' and 'the Council will refuse development that relies on the use of inappropriate culverting'.
2. Development within Stratford District should not exacerbate the flood risks experienced outside the plan area.
3. The Policy allows for some deferral of assessments of flooding impacts to the development control stage.
4. Recent experience has shown that fluvial flooding is only one aspect and that attention should be given to the effects of pluvial impacts and run off from existing developments. Section needs expanding particularly having regard to sewer and surface water flooding.
5. It is essential to ensure sufficient off site network capacity exists to serve any proposed development and that it will not cause flooding to any existing customers. When reviewing development and flood risk it is important to recognise that sewerage infrastructure may be required to be developed in flood risk areas.
6. The Environment Agency would expect a much more specific policy that deals with the issue of flood risk in the District.
7. Concerned that there are areas identified for development that lie within Flood Zone 3. Proposals SUA.3, ALC.2 and ALC.3 must reflect the policy and PPS25 and need reconsideration. These allocations must raise questions over the suitability of the sites and the deliverability of the housing requirement.
8. There is no policy to remove caravans from the floodplain.
9. Object to criterion (f) because SUDS are not always the best solution to deal with surface water and are dependent on the ground conditions. With regard to SUDS, suggest that the reliability, management and maintenance schemes will need to be demonstrated to assess their effectiveness.
10. Developer contributions should only be sought where the development has a negative impact on the floodplain.
11. Rivers and brooks should retain their natural floodplain unimpeded by development. There are several engineering solutions that work with natural processes to address flooding. These should be investigated.
12. Flood risk is likely to worsen with the effects of climate change and should be mitigated by changes in land management, including habitat restoration and creation and the adoption of sustainable construction methods.
13. Inconsistency between criterion (a) and (b). Developers proposing to build in Flood Zones 2 and 3 are unlikely to be put off by having to submit a FRA so there could be a large number of such applications that would make a nonsense of requirement (a)
14. Should improve and provide a means of managing floods when they happen, i.e. water meadows.

### Officers' Response

1. This comment relates to an aspect of the policy which is likely to be amended as a result of Environment Agency comments.
2. The District Council would not wish to see the flood risk exacerbated either within or outside the District boundary by new development.
3. It is not possible for the policy in the Core Strategy to assess the flood risk impact of all development across the District. Therefore it is inevitable that this issue should be fully assessed, utilising this policy, at the planning application stage. The siting, scale and nature of the development will affect the level of detail to be submitted by the applicant and this policy should be used to guide the information provided and the decision-making process.
4. This is acknowledged and agreed with. The District Council has established Flood Drainage Forums to bring together key stakeholders to identify actions that can be taken to reduce future flood risk and identify where flooding occurs and the reason for this flooding. This information will help identify appropriate locations for future development.
5. The District Council is working with Severn Trent Water to ensure that there is sufficient capacity within the existing network. Where there may not be capacity, advice is being sought from STW on how new development can be accommodated without causing further flood risk in the vicinity.
6. The District Council agrees that the policy needs rephrasing to make it more specific to Stratford District. This will be achieved through consultation with the EA and through feedback from the Flood Drainage Forums.
7. It is acknowledged that there are parts of certain proposed allocations that are situated within Flood Zone 3. However the site boundaries shown in the Draft Core Strategy are indicative only and are not final. As not all of the site falls within Flood Zone 3 it is anticipated that the higher flood risk areas will be left as open areas within the developments and this will be a specific development criteria or worked into a Masterplan/Development Brief for the site.

## Analysis of Representations

8. The District Council is not aware that there are any unauthorised caravan sites in the District but there are three sites which have planning permission and are sited within the flood plain. These are established sites. The District Council will not be seeking to relocate them but will work with the EA to educate the park owners/managers to mitigate for on-site flooding and reduce the potential impacts on human health and safety and on static park equipment.

9. It is agreed that this may be too prescriptive and the management of waste water should be determined on a site by site basis. However new developments will be expected to incorporate sustainable drainage systems or techniques to limit or preferably reduce surface water run-off.

10. Contributions can only be sought in relation to a development where this adds extra stress to existing services or facilities which may need upgrading as a direct result of the development occurring. The District Council is in the process of producing an Infrastructure Requirement Report to support the allocations in the Core Strategy and this will provide developers with some certainty with regard to what contributions will be sought. It may be that contributions are not sought unless it is inappropriate for development to occur until existing flooding issues have been addressed, eg. the sewer system has been ungraded.

11. It is not intended that any development proposals should interfere with the natural flow of any streams or brooks. The EA will advise on the distance buffers which will be required around these watercourses and this should be taken into account in the design of the development.

12. Policy CS.28 addresses sustainable construction methods. Policy CS.21 deals with habitat management, flood mitigation and other climate change impacts through open spaces and green infrastructure management. These policies are inherently linked to Policy CS.23 and there is no need to repeat their content in this policy.

13. It is acknowledged that not all development will occur in Flood Zone 1 due to the lack of suitable sites etc. This criterion is not aimed at deterring developers but is required to make them aware of the requirements of the policy in line with PPS25. In light of the EA's comments which wish for the policy to be more specific to Stratford District, it is probable that the wording and requirements of the policy will alter and the lack of clarity between (a) and (b) will be reassessed as part of this process..

14. The EA have requested that water space is created in developments and this could include balancing ponds to allow surface water run-off to drain to or water meadows adjacent to development. The Council will request that water space is designed into any masterplans/development briefs and that the developer will need to allocate space for this.

### Recommended Action

1. No change
2. Amend wording in the pre-amble to the policy to explicitly state that development in Stratford District should not exacerbate flooding issues outside the plan area.
3. Amend the policy to explicitly state that sufficient assessment of the flood risk situation will be required to accompany an application.
4. Continue to use Flood Drainage Forums to collate further information on the location of flooding in order to inform decisions on development locations.
5. Continue to liaise with Severn Trent Water to ensure that flood risk is not exacerbated and where possible is reduced through appropriate mitigation and improvements.
6. Prepare a more specific policy on flood risk in consultation with the EA and through feedback from the Flood Drainage Forums.
7. Ensure that the higher flood zone areas are identified and suitable uses of these areas are fully explained in the production of development briefs/masterplans for development sites.
8. Work with the EA to educate the park owners/managers to mitigate for on-site flooding and reduce the potential impacts on human health and safety and park equipment.
9. Amend the policy to allow more scope for different types of sustainable drainage systems and techniques.
10. Refer to the Infrastructure Requirement Report which will provide developers with information as to what contributions will be sought.
- 11/12. No change
13. Amend the wording of the policy to provide further clarity on the level of information required for development proposals in each Flood Zone.
14. Add 'water space' into the pre-amble to the policy.

## Analysis of Representations

**Topic: CS.24**                      **Natural features & landscape**

### Summary of Matters Raised in Representations

1. Natural England suggests additional text to be added to the policy based on Section 40 of the Natural Environment and Rural Communities Act 2006 and general re-wording to emphasis key points. This may be amended as part of the policy review.
2. The section about the context needs to be expanded to include geodiversity features.
3. Natural England support the decision to no longer define Special Landscape Areas in the LDF. This accords with PPS7 and Natural England's own landscape policy which is rooted in the European Landscape Convention.
4. There is reference in this policy to the landscape of the District and its ... 'valued' local distinctiveness. There does not appear to be any supporting text or plans for this policy. The important landscape areas should be identified on appropriate plans in the Core Strategy so that the public are clear which parts of the District are protective and which parts are distinctive.
5. Sub-clause 1 (c) it is too broad, if land has no formal designation how can it be safeguarded?
6. The District Council has not re-assessed the landscape qualities of the SLAs because such a selective and limited study would have been at odds with the current approach to landscape assessment which seeks to recognise the intrinsic value and locally distinctive character of all landscape. RASE object to this as the text in the DCS is misleading as it ignores the landscape character assessments done in relation to the setting of Stratford and other areas in the District and implies that up to date assessments may not have been done since the 1970s.
7. Although Structure Plan Policy ER.4 has not been saved there is existing and emerging RSS basis for local landscape protection policies such as Policy QE1B(iv) and QE5A and B of the adopted RSS.
8. The reasons why the Council has not re-assessed the SLA designations are unsound. A full landscape character assessment should be undertaken in relation to the District's landscape for Core Strategy purposes or a key part of the plan-making process is being put to one side.
9. Policy CS.24 does not refer to the 'protection' of any landscape feature rather just that it is valued for certain characteristics and that developments should 'strengthen .... Distinctive features'. The policy does not accord with RSS policy if it does not reflect the need for explicit protection of landscape features from development.
10. The policy should not blur the distinction between landscape protection with landscape and biodiversity enhancement, as it currently the case. There should be a separate policy for each.
11. Specific reference to Biodiversity Enhancement Areas or their equivalent as designated by the 'Landscapes for Living' project should be shown on any map accompanying the Core Strategy.
12. The data from the Habitat Biodiversity Audit and the Wildlife Sites Project is not up to date for Stratford and there are 700 potential Local Wildlife Sites/SINCs to be surveyed in the District.
13. The Warwickshire Wildlife Trust welcomes the statement that resources are required to track trends in biodiversity including a sufficient programme to identify local sites of nature conservation interest. However, this will require a financial contribution three times greater to support the team to carry out this work.
14. The Warwickshire Wildlife Trust suggest re-wording of the policy to emphasise and strengthen its role. Reference should be made to natural features and to the provision of equivalent rather than alternative habitat. However, Warwickshire Museum want the whole of the caveat attached to 1(b) to be deleted in that it may encourage destructive works with only token mitigation measures.
15. There is scope for the protection of natural habitats to be tied to the provision of leisure facilities and better fitness for residents by the provision of safe cycle tracks and routes and walks.
16. There should be greater encouragement for proposals that provide for significant enhancements to existing natural features
17. The whole of Stratford District should be considered a special area. Areas which are allocated Green Belt, Special Landscape Areas and AONB are discriminating against the rest of the District.
18. Developing biodiversity networks that radiate out from our existing core biodiversity areas, together with policies for their protection, reconnection and restoration will be essential to allow the movement of species and maintenance of diversity as global warming continues.
19. The policy should not imply that development can be other than destructive towards biodiversity and always involves the removal of habitat and species.

### Officers' Response

## Analysis of Representations

1. The comment is accepted. S.40 of the NERC Act places a duty on local authorities to have regard to the purpose of conserving biodiversity. It is an important part of the legal framework for District Council decision making.
2. This point is accepted. In PPS9 geological conservation is given the same weight as biodiversity. The prominence of geodiversity is being raised through the process of preparing the Warwickshire Local Geodiversity Action Plan, a consultation draft of which has been recently published by the Warwickshire Geological Conservation Group and the Warwickshire Museum.
3. Noted.
4. The essence of landscape character assessment (LCA) is that landscape as a whole is valued for its local distinctiveness and that certain areas should not be singled out and be made subject to local designations that aim to apply a strong degree of protection. Government guidance (PPS7) sees such designations as negative and tending to prevent sustainable development and economic activity. The alternative sought by Government is criteria-based policies and Policy CS.24 aims to fulfil this role.
5. New survey work can show that a site has value for biodiversity. The need to conserve biodiversity is enshrined in legislation and is embedded in planning policy at all levels. Even if a site of value for biodiversity is not subject to a formal designation, it can still be protected because of that biodiversity. It is unsurprising that many sites of biodiversity value in Stratford-on-Avon District are not subject to designations in that survey work in the form of the Warwickshire Wildlife Site Project has only been proceeding at a very limited level in recent years due to lack of resources.
6. It is true that the Urban Edge Study for Stratford-upon-Avon did provide additional analysis of landscape character for one part of the district, but its geographical scope was very limited. Much the greater part of the district has not been subject to recent landscape character assessment in accordance with national guidance published in 2002.
7. On the contrary, the policies of the adopted RSS do not express support for local landscape designations that have not been substantiated by landscape character assessment and/or historic landscape assessment. The Special Landscape Areas within Stratford-on-Avon District fall within this category. Policy CS.24 provides an alternative criteria-based approach to managing change in the landscape which places emphasis on strengthening landscape character. It is positively worded, rather than advocating a negative and protectionist stance.
8. While it would be desirable to update the landscape character assessment that underpins the Warwickshire Landscape Guidelines, normally such work would be initiated at the county level. However, the County Council has not pursued such a project due to lack of resources. Although the county's landscape has not been subject to comprehensive re-assessment, the Guidelines do provide a body of information on landscape character that is still relevant, even if it lacks certain elements that would be gained through a new study, e.g. sensitivity assessment. There is also information from the Stratford Town Urban Edge Study and from the landscape assessment undertaken as part of the 2008 Strategic Housing Land Availability Assessment. Furthermore, information from the Warwickshire Historic Landscape Characterization project has been made available to the District Council in its consideration of proposed development opportunities. The requirements of Policy CS.24 mean that those submitting planning applications for development that will have an impact on landscape character will need to provide evidence as to how their proposals will affect landscape character. Because of the availability of this information the lack of a recent comprehensive landscape character assessment is not considered to undermine the soundness of the Core Strategy.
9. PPS7 states that a criteria-based policy can provide sufficient protection for areas of landscape outside nationally designated areas. The second part of the Policy CS.24 makes clear that proposals which do not strengthen distinctive features are unlikely to receive support. The principle is intended to encourage sensitivity in the planning and design of development proposals. It also gives scope for the authority to prevent development that would have a detrimental impact on distinctive features. A policy that is framed on this basis accords with adopted RSS policy. It will protect and enhance the distinctive character of different parts of the region.
10. The point of combining landscape and biodiversity in one policy is to reflect the part biodiversity plays in helping to form the character of the landscape. Much emphasis is now being placed in Government and regional guidance on the need to consider biodiversity at the landscape scale, for example in the Landscapes for Living Prospectus published by the West Midlands Biodiversity Partnership. The need for planning for biodiversity at the landscape scale is growing in the face of the need to mitigate the impact of climate change. The need for the policy to be strategic also supports the case for it to have a wide scope, and the policy does not lose strength because of the inclusion of landscape and biodiversity.
11. None of the Biodiversity Enhancement Areas in the adopted RSS fall within Stratford-on-Avon District, hence the absence of a reference to this designation. The District Council is participating in the compilation of Biodiversity Opportunity Maps for use at the district level, but these have not yet been published. However, should maps of this type become available prior to publication of the Core Strategy, then they will be given due recognition in the document.
12. It is true that much of the HBA data is out-of-date and it will take a number of years for this deficiency to be corrected, too long a timescale for use in the LDF Core Strategy process. However, the District Council has commissioned an update of HBA (Phase 1) data for land on the edge of the larger settlements of the District, those areas that are under most pressure to be used for development. This update will also indicate whether certain sites need to be subject to more detailed (Phase 2) survey. Some of these urban fringe sites have already been subject to more detailed surveys commissioned by landowners and developers. In general, therefore, there should be sufficient information about biodiversity to enable the Core Strategy to progress according to the LDS programme.
13. Noted.

## Analysis of Representations

14. It is agreed that reference to natural features will clarify the scope of the policy. It is also agreed that a reference to equivalent habitat would strengthen the policy to make clear that replacement habitat should aim to replicate what would be lost through development, although this may be impossible as regards a habitat that has taken many years to evolve. Ancient meadows and woodlands are examples of the latter and in those situations the District Council would not be prepared to grant planning permission for destructive works. This point needs to be made clear in the policy.

To omit the caveat altogether would fall foul of the guidance in PPS9 in that there would be no distinction between the treatment of locally designated sites and those subject to nationally designated sites.

Other comments on strengthening the policy relate to details that are best left to a Development Control Policies DPD.

15. It is agreed that the creation of leisure facilities often provides an opportunity for enhancing biodiversity and geodiversity. However, there is no need to make specific reference to this issue in that the policy relates to all forms of development including leisure facilities.

16. The policy aims to encourage those proposing development schemes to incorporate measures that enhance natural features. However, it should not go as far as inferring that this benefit would justify development that would be contrary to other policies in the Core Strategy.

17. The Core Strategy cannot remove national designations. As regards local designations, the Core Strategy has not sought to retain Special Landscape Areas and advocates an approach that recognizes the intrinsic value and locally distinctive character of all landscape. This approach is in line with the submitted comment.

18. Noted. The policy encourages the creation of these networks.

19. This is an unduly pessimistic view. Even the environmental lobby groups accept that development can be opportunity to enhance biodiversity and there examples of best practice where this has happened.

### Recommended Action

1. Reference to S.40 of the NERC Act is included in the context information.
  2. References to geodiversity are strengthened.
  3. Reference is made to the need to take into account the outcome of biodiversity opportunity & enhancement mapping when this becomes available.
  4. Reference is made to natural features in the policy.
  5. The policy makes clear that irreplaceable habitat within a local site will be safeguarded.
  6. The policy states that the creation and maintenance of equivalent habitat will be secured where there is good reason to permit development affecting a local site that contains habitat that capable of re-creation elsewhere.
  7. Reference is made to more detailed requirements being specified in a separate Development Plan Document.
  8. The preamble includes reference to the European Landscape Convention (in response to representation on Policy CS.26).
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## Analysis of Representations

Topic: CS.25

Cotswolds AONB

### Summary of Matters Raised in Representations

1. Concern that the strictures of the Cotswold AONB could affect the viability of the community in view of the fact that it is enforced inflexibly
2. The AONB is a cornerstone to Policy CS.15.
3. The specific needs of agriculture should be taken into account by AONB policy.

### Officers' Response

1. The policy makes clear that the impact of development proposals on the economic and social well-being of the area is taken into account. The AONB designation is about securing development that is sensitive to the special qualities of the area. It should not be assumed that this approach will have a negative effect on the viability of the community. The designation has been in place nearly twenty years in south Warwickshire and there is little evidence that it has been used to stifle development that would be beneficial to the local community.
2. Noted.
3. The specific needs of agriculture are referred to in the policy.

### Recommended Action

No change.

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## Analysis of Representations

**Topic: CS.26**                      **Historic environment**

### Summary of Matters Raised in Representations

1. British Waterways object to the policy as the key requirement for quality of design is maintainability and management which should be incorporated into this policy
2. The DCS fails to clearly demonstrate that the appropriate response to the historic context has been chosen due to the apparent lack of clear evidence. Proposals need to demonstrate how they have responded and acknowledged the evolution of change in the District, associated built form, historic street pattern etc. Without such information it is difficult to establish whether the proposals are the most appropriate.
3. The policy should provide more information on the process of archaeological evaluation.
4. Appendix B highlights an expectation that an associated planning application should be accompanied by an archaeological assessment. Surely this should be undertaken before the principle of the designation is decided.
5. The approach that has been adopted for the historic characterisation project should be adopted for the habitat biodiversity audit work
6. The policy is very vague and could do with some examples of what might constitute a 'detrimental effect' on what kind of feature. Without this it is difficult to see how the policy as worded can effectively guide decision-making.
7. The pre-amble needs addressing in light of the omission of the Bill, suggest that paragraph one is removed and paragraph two is re-worded.
8. There should be a reference to the European Landscape Convention.

### Officers' Response

1. The policy refers to "sound conservation principles". One of the main sources of guidance on such principles is the English Heritage publication "Conservation Principles - Policies and Guidance for the Sustainable Management of the Historic Environment". The issues of maintenance and management are given good coverage in this advice. There is therefore no need to single out these issues as they are already embedded in the policy through the reference to "sound conservation principles".
2. This is a comment that is directed to all of the development proposals in the DCS, rather than Policy CS.26. Warwickshire Museum Field Services have compiled a report entitled "Stratford-on-Avon District Local Development Framework Core Strategy - Historic Environment Assessment Proposed Strategic Sites" which provides much of the evidence sought by the respondent. The volume includes information from the Warwickshire Historic Landscape Characterisation project which is nearing completion. More documentation regarding the basis for the selection of the development opportunities is being compiled.
3. This requirement would be too detailed for a Core Strategy. However, it could be addressed in the proposed Development Management Policies Development Plan Document.
4. The District Council cannot undertake archaeological fieldwork before determining whether to allocate a site for development in the Core Strategy. There is insufficient time and finance for what would be a major programme of research. Instead, the District Council commissioned an Historic Environment Assessment of all of the sites that relies on examination of existing records to determine whether there is any potential for archaeological remains within the site. It is then the responsibility of those promoting the development to undertake detailed archaeological investigations before any planning application is submitted.
5. The District Council has commissioned an ecological & geological evidence base update for the development opportunities and other parts of the fringes of the larger settlements of the district. It will involve an update of the HBA data and will be similar in format to the Historic Environment Assessment.
6. This requirement would be too detailed for a Core Strategy. However, it could be addressed in the proposed Development Management Policies Development Plan Document.
7. This point is agreed.
8. The point is accepted but reference would be better placed in the preamble to Policy CS.24. The Convention is binding and its articles include one (5d) which states, in summary, that landscape will be integrated into a range of different policies including those relating to town planning and the environment, and into any other policy with a possible impact on the landscape.

### Recommended Action

1. Reference is made to more detailed requirements being specified in a separate Development Plan Document.
  2. The pre-amble is updated in the light of the Government's decision not to progress new heritage legislation.
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## Analysis of Representations

**Topic: CS.27**                      **Design - high quality & locally distinctive**

### Summary of Matters Raised in Representations

1. Should include targets for reduction for Councils' own carbon emissions in line with the Climate Change Bill and other Government defined policies.
2. Suggest adding reference to Parish Plans and Village Design Statements to benefit smaller communities.
3. A simplistic approach to what a sustainable building should be, more sensible to offer a choice to developers to build the homes to a known standard i.e. Code for Sustainable Homes.
4. Needs to be a trade off between designing and building homes to lifetime homes standards and the needs of the planning system to increase density.
5. Accessibility can be difficult to achieve in certain rural locations and where planning restrictions are imposed.
6. Welcomes reference to green infrastructure but should also include 'conserve' to secure a more active approach.
7. Design and materials should harmonise with the local vernacular style and should respect what it has replaced in some cases which would enhance rural communities and tidy up eyesores within the District.
8. Add that the layout should create and enhance networks of green infrastructure for public and biodiversity benefit across the site and wider area, protect existing public rights of way and connect with off site pedestrian, equestrian and cycle routes in the wider countryside.
9. Generally developments do not reflect the identity of the locality.
10. Assumes policy covers wildlife protection. This must not override other planning policies and result in acceptable schemes being refused.
11. Wish to see 'by all practical modes of transport' replaced with 'by sustainable modes of transport'.
12. Appears as list making without any self-consistency. Requirements of some criterion clash.
13. Development should be both sustainable and well designed.
14. Policy should be elaborated.
15. Caution needed about what measure of time period and what example are used to determine traditional local building styles.
16. Cannot have both innovation and continuity. Innovative building design can lead to buildings that are out-of-keeping and character with its surroundings.
17. Should be strengthened to include that each dwelling provided will be within 300 metres of an accessible green space and this is secured through developer contributions where appropriate.

### Officers' Response

1. The Core Strategy sets out general strategic policies and standards to guide development in the District. It is not about setting targets for specific individual organisations such as the District Council to follow. However, there is a strong case to suggest that the Council should lead by example in applying the requirements of the Core Strategy.
2. Reference to Village Design Statements/Parish Plans (in addition of the District Design Guide) is a reasonable suggestion for the Core Strategy to take on board.
3. The Council will ensure that the Core Strategy include standards for good design that are robust, has a clear objective, are within the framework of strategic guidance and are achievable. Furthermore, it will ensure that locally distinctive standards are defensible.
4. The Council will continue to seek to strike a good balance between the two factors, both at the policy formulation stage and the application of the policy at development control stage.
5. Development will need to be accessible to be functional and that principle is a reasonable one to retain. Furthermore, they will need to be accessible to meet national standards such as standards for disable access.
6. Adding the word 'conserve' is a reasonable suggestion to include in any modification to the policy.
7. The District Design Guide and other sources of information such as Village Design Statements/Parish Plans include detailed guidance on choice of materials, character assessments etc. Such documents are the appropriate documents to deal with detailed requirements of design principle set out in the Core Strategy. In this regard, it is proper that the Core Strategy concentrates on

## Analysis of Representations

the strategic principles to guide development in the District.

8. The suggested wording is reasonable to incorporate in any modifications to the policy.
9. The Council strongly believes that development should be sensitive to the character of their localities.
10. Wildlife protection is a significant material consideration in planning decisions. There are some species of national and international significance that are protected by legislation and development should take account of that. This same principle would apply to species of local significance. Overall, the Council has a responsibility through the planning system to protect its biodiversity.
11. The term sustainable modes of transport is often associated with walking, cycling and public transport. The Council promotes sustainable transport modes as the core of its transport policy (see Policy CS.17 of the Draft Core Strategy). However, it accepts that the District is predominantly rural and not all areas are easily accessible by sustainable modes of transport. In such circumstances and in a number of other ways, the car has a fundamental role to play. It also has a key role in rural economic growth and rural travel that should be recognised. Access to development by car in many circumstances is unavoidable, not least the manner in which development are serviced such as deliveries, waste collection etc.
12. The intention of the Policy is to set out a list of principles from which detailed guidance will be prepared. The Council will look to minimise any inconsistencies and where they arise, will seek to rationalise them in their application.
13. Good design is also about sustainability and the policy is clear to emphasise that as one of its key principles.
14. Suggestion should be considered where it is relevant to do so. The aim would be to improve its user friendliness.
15. See 7 above
16. Innovative designs should not necessarily be out of character in its wider context. The Council believes that a good balance could be struck between the two factors and there are a number of good examples where this has been achieved.
17. This is too detailed and prescriptive and can best be considered in other documents such as Design Guides or detailed Development Control Policies DPD.

### Recommended Action

1. Policy should be cross reference to the District Design Guide, Village Design Statements/Parish Plans.
  2. 'Conserve' should be included in the wording of the Policy where relevant to emphasise the proactive nature of the policy.
  3. Add 'equestrian' to the list of routes in point 'h' ( of the principles set out in the policy).
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## Analysis of Representations

Topic: CS.28

Design - sustainability

### Summary of Matters Raised in Representations

1. The reference to the Corporate Strategy aim to reduce the District Council's carbon footprint is weak as it does not include targets or concrete actions.
2. The requirements for renewable energy and a level of the Code for Sustainable Homes will add to the cost of house building (see Cost Analysis of Code) which is likely to restrict housing delivery, especially in current economic climate. The viability of all requirements must be tested.
3. The core strategy should be consistent with government guidelines and the RSS, but should not exceed these guidelines.
4. The draft RSS policy is untested. GOWM have objected to it so it should be considered unsound. The Core Strategy policy based on it will therefore also be unsound.
5. The policy has no clear mechanisms for implementation and monitoring.
6. An SPD is needed to provide further guidance. Another respondent commented that leaving detailed matters to an SPD will lead to excessive prescription without independent assessment.
7. The policy lacks an adequate evidence base.
8. The policy is currently too complicated and should be simplified by requiring phased increases in the required level of the Code for Sustainable Homes only.
9. The following aspects of sustainable design should be included:
  - a. adaptation to climate change e.g. attenuating heat and extreme weather
  - b. highlighting the wildlife benefits of green roofs and sustainable drainage
  - c. durability, aiming for a 200 year life span for buildings
  - d. adequate infrastructure for recycling and composting and contributions to waste infrastructure elsewhere
  - e. recycling and reusing on-site construction waste
  - f. personalised energy assessments for each application.
10. Local development in areas with good public transport is more important than details of design.
11. Core Strategy should encourage innovative eco-housing schemes such as Bedzed. All new development should be built to the same standard as promoted for the Eco-town.
12. Several respondents support the policy. The Homes and Communities Agency will work with the District Council through the "single conversation" to raise the standard of market and affordable homes.
13. There are some discrepancies between the Checklist and other standards, so the checklist may need to be applied flexibly.
14. The policy should be strengthened to require best practice in all cases against the Checklist unless a good reason other than financial is given.
15. The Checklist has no formal planning status. The policy should not cross-reference to an outside document and should include the necessary detail within itself.
16. The Code requirements duplicate and accelerate the Building Regulations timetable, contrary to PPS1 paragraph 30. The requirement should be removed, or should focus on site-specific and development area opportunities.
17. Evidence of special local circumstances is needed to support the requirement for higher levels ahead of the Building Regulations timetable.
18. As there is no local evidence to support this requirement, the policy should be worded to encourage rather than require higher levels of the Code.
19. The study for the South-West RSS cannot be cited as evidence for Stratford district.
20. The draft West Midlands RSS follows the national timetable in its requirements for higher levels of the Code, and there are no local circumstances which suggest Stratford should be different to the rest of the region.
21. Developers should be encouraged to meet levels 5 and 6 of the Code well before the national timetable.
22. There is no provision in the emerging RSS for development to incorporate on-site renewable energy. Instead design of new development should aim to maximise potential to connect to decentralised energy systems.
23. The Policy should clarify that renewable energy will only be required where it is suitable and viable. It should explain how

## Analysis of Representations

this will be applied flexibly for difficult cases such as apartments.

24. A carbon emission reduction target would be more flexible so should be applied instead of a renewable energy target.
25. The way the requirement is applied should reward schemes that have already been designed to minimise energy consumption.
26. The requirement for water efficiency duplicates the requirement for a level of the Code for Sustainable Homes, as the Code includes water efficiency as a mandatory element.
27. There are no special local circumstances given to justify a higher level of water efficiency.
28. Water efficiency standards are supported by Thames Water.

### Officers' Response

1. The content of the Corporate Strategy is separate to the Core Strategy, but we agree that the Council should lead by example whenever possible.
2. We have commissioned a study to assess the viability of development in the district taking into account all the requirements of the Core Strategy including sustainable construction.
3. Government and emerging RSS policy encourage Local Authorities to set requirements appropriate to local circumstances. We are in the process of commissioning a study to investigate appropriate requirements based on factors including available resources for decentralised energy, financial and technical viability and policy context.
4. We consider that it would be helpful to applicants if policies across the West Midlands are reasonably consistent and therefore it is useful to use the draft RSS policy as a guide. However local evidence should also be used to support the policy.
5. The policy will be implemented through the determination of planning permissions. Detailed guidance on this will be set out in an SPD. A monitoring framework is being prepared for all the policies in the Core Strategy.
6. We intend to prepare an SPD to provide additional guidance. The targets and requirements have been set out within the draft Core Strategy policy to allow them to be properly examined.
7. We are in the process of commissioning a study to investigate appropriate requirements based on factors including available resources for decentralised energy, financial and technical viability and policy context. Other sources of valid evidence include experience of the operation of current policies, local characteristics of the district and development, and national studies. The Code Level 3/ 25% water efficiency requirements are supported by the 'RSS Technical Work: The Impact of Housing Growth on Public Water Supplies (Environment' Agency, June 2007) which identifies Stratford District as falling within a high risk resource zone.
8. The Code only covers dwellings and their individual qualities so does not cover non-domestic development nor pick up on wider aspects of sustainable design and construction.
9. Comment as follows:
  - a. Agreed, this is an important aspect of ensuring sustainable development.
  - b. This level of detail may be appropriate as part of the detailed guidance in the SPD.
  - c. We currently do not have sufficient supporting information for this requirement
  - d. The Code for Sustainable Homes will require adequate waste storage and encourage good recycling storage. If there are particular circumstances which justify a contribution to waste infrastructure beyond a site, Policy CS.30 in the Draft Core Strategy could apply.
  - e. Since April 2008, national regulations required construction projects over £300,000 to prepare a Site Waste Management Plan and use it to monitor consumption and recycling. Local Authorities and Environment Agency currently have joint powers to enforce this. The Code for Sustainable Homes will also encourage developers to use a SWMP.
  - f. We will consider how schemes will be required to demonstrate compliance with the requirements when producing detailed guidance in the SPD. This level of detail is not required for a Core Strategy policy.
10. The Core Strategy seeks to address both aspects of sustainable development.
11. Policy CS.27 in the draft Core Strategy promotes sustainability and innovation as two key features of good design. We consider that the policies will therefore encourage innovative eco schemes in appropriate circumstances.
12. The support of partners including the HCA is welcomed.
13. Agreed. Further research has suggested that the Checklist is intended to be used as an information source for both applicants and planners rather than as a target in itself. Using the Checklist to ensure all issues are fully considered will allow explanation and discussion of which sustainable methods are most appropriate in each case.
14. As above

## Analysis of Representations

15. It would be useful to provide more information about the Checklist and where it can be obtained to help applicants. However the Core Strategy is not intended to be self-contained, and the new spatial planning system in fact encourages referencing rather than repetition of national and regional policy.

16. The government currently intends to use Building Regulations to require increasing energy efficiency/ carbon emission standards equivalent to higher levels of the Code. The full Code covers many other aspects of sustainability including water, materials, ecology which have also been identified as important through the RSS Technical Work, consultation on the Issues and Options, and the Sustainability Appraisal process. In particular the 'RSS Technical Work: The Impact of Housing Growth on Public Water Supplies (Environment' Agency, June 2007) demonstrates the need for all new dwellings to achieve water efficiency equivalent to Levels 3 & 4 of the Code, especially in high risk resource zones which include Stratford District.

17. As above, special local circumstances have been demonstrated to justify the need to achieve Level 3 or 4 of the Code in terms of water efficiency. We are in the process of commissioning a study to investigate appropriate requirements based on factors including available resources for decentralised energy, financial and technical viability and policy context. Other sources of valid evidence include experience of the operation of current policies, local characteristics of the district and development, national studies and the forthcoming Viability Study.

18. It is unlikely that this would result in effective implementation of the policy. Local evidence will be used to agree and support an appropriate level which can be required.

19. Agreed. However certain parts of the study contain factual information (rather than conclusions) which is not location dependant.

20. The RSS Phase 2 Preferred Options Policy SR3 requires all new homes to meet at least Level 3, and encourages Local Planning Authorities to consider the potential for securing higher standards for new homes ahead of the Building Regulations timetable.

21. As described above, further research will be undertaken to determine the appropriate levels for this district.

22. RSS Phase 2 Preferred Options Policy SR3 d) sets out this requirement

23. Details of the implementation of the policy will be set out in an SPD.

24. Current national and regional policy allows for a requirement in terms of renewable energy rather than overall carbon emissions reduction.

25. Details of the implementation of the policy will be set out in an SPD.

26. This requirement is intended to apply to all development, whereas the Code only applies to dwellings. The current policy wording attempts to highlight this cross-over.

27. The 'RSS Technical Work: The Impact of Housing Growth on Public Water Supplies (Environment' Agency, June 2007) demonstrates the need for all new dwellings to achieve water efficiency equivalent to Levels 3 & 4 of the Code, especially in high risk resource zones which include Stratford District.

28. Support is welcomed.

### Recommended Action

1. Seek to include examples of Council's efforts in justification.

2. Use the findings of the Viability Study to inform the requirements of the policy.

3. Use the findings of the Energy Resource Assessment to inform the requirements of the policy.

4. As above.

5. Prepare monitoring framework for Core Strategy.

6. No action.

7. Use the findings of the Viability Study, the Energy Resource Assessment, and a review of the operation of the current policies, to inform the requirements of the policy.

8. No action.

9. Recommend following actions:

a. Refer to the importance of climate proofing development as well as minimising energy consumption.

b. No action

c. No action

d. No change to policy. Consider if any site allocations have special circumstances requiring a contribution to waste infrastructure

## Analysis of Representations

beyond the site.

e. It would be useful to refer to this national requirement in the supporting text to the policy. However we will need to consider corporately whether planning should be responsible for the enforcement of this requirement.

f. No action

10. No action

11. No action

12. No action

13. Review the wording and implementation of this requirement. Consider replacing with a wording such as “all applications for larger developments must submit a completed version of the checklist. Where good or best practice is not followed an adequate justification must be given.”

14. As above

15. Provide information on the Checklist and how to access it in the explanation accompanying the policy.

16. Seek to retain the requirement for Level 3 as justified by RSS Technical Work on water supplies, making a clearer reference to this document in the explanation. Emphasise in explanation as well as policy that the Code for Sustainable Homes covers many aspects in addition to energy efficiency. Use the findings of the Viability Study, the Energy Resource Assessment, and local information to further inform the requirements of the policy, particularly for higher levels of the Code.

17. Action as above.

18. Action as above

19. Action as above

20. Action as above

21. Action as above.

22. No action

23. No action.

24. Give further consideration to applying a carbon emissions reduction target rather than a renewable energy target once recommendations of the Energy Resource Assessment have been received.

25. No action

26. Consider how to further clarify the link between the water and Code for Sustainable Homes requirements.

27. No action.

28. No action.

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## Analysis of Representations

### Topic: CS.29 Control of pollution

#### Summary of Matters Raised in Representations

1. A consultation document has been recently distributed about the poor air quality and pollution levels around Barley Mow, Studley; policy should be strictly adhered to in this area
2. "Tranquillity" should be inserted after human health.
3. Should read planning permission 'will not be' granted and at the end of the policy amenity of 'all' properties.
4. 'Vibration' should be added to the list of pollutants and the historic environment should be added to the list of vulnerable receptors.

#### Officers' Response

1. Air quality is a specific aspect of pollution that Government legislation requires to be taken into account.
2. It would be reasonable to add this term to the policy and apply it in appropriate circumstances.
3. On the first point, policies have been phrased in the present tense throughout the Draft Core Strategy to reflect the fact that they are applied on a day-to-day basis. The second point is accepted.
4. Both points are accepted.

#### Recommended Action

1. No change
  2. Insert the word 'tranquillity' in the first paragraph of the policy.
  3. Amend the fourth paragraph to read 'all properties'.
  4. In the first paragraph, insert the word 'vibration' to the list of pollutants and 'historic heritage' to the list of receptors.
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### Topic: T5a Implementation process

#### Summary of Matters Raised in Representations

1. When outlining those responsible for the implementation of Core Strategy policies, reference should also be made to the private sector.
2. No clear policy and refers only in brief to monitoring.
3. Annual Monitoring Report has fulfilled the role, but critical of approach which isolates monitoring from managing and identifies a need for an implementation strategy to be added to allow for effective monitoring and the recourse to address issues arising through a contingency plan.
4. Infrastructure improvements should occur before developments are implemented.
5. To deliver aims it is essential that Countryside be involved before pre-application discussions and requirements incorporated in the S106 discussions to avoid becoming embroiled in avoidable complexities at a later stage.

#### Officers' Response

1. An Implementation Plan will be added to the Section. It will include who, when, what and how the policies of the Core Strategy will be delivered. Furthermore, an Infrastructure Development Plan is being prepared to demonstrate how the infrastructure requirements to support the proposed developments in the Core Strategy will be met.
2. See 1 above
3. See 1 above
4. See 1 above.
5. This is a matter for development control. The practicality of implementing the suggestion will be fully explored with colleagues in the Planning Development Section.

#### Recommended Action

1. An Implementation Plan and an Infrastructure Development Plan will be included as part of this Section.
-

## Analysis of Representations

**Topic: T5b Planning obligation**

### Summary of Matters Raised in Representations

1. Strengths and potential of planning obligations and CIL must be explored in order to provide infrastructure for existing communities as well as new development.

### Officers' Response

1. Planning obligations cannot be used to rectify existing deficiencies in services or facilities. Circular 05/2005 states that monies collected from new development should be reasonably connected with that development. Developer contributions shall be sought where appropriate however this will not be to improve existing circumstances. CIL will be explored to assess whether this should replace the existing method of collecting contributions via Section 106 agreements.

### Recommended Action

1. Continue to monitor the emergence of CIL and assess this against the Councils needs.

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## Analysis of Representations

**Topic: CS.30 Planning gain**

### Summary of Matters Raised in Representations

1. Complex nature of collecting contributions means there is no point of responsibility and monies can go uncollected and unspent.
2. Should not rely on developers to provide for infrastructure outside of their remit.
3. Wording is vague and does not provide any certainty to developers in respect of the levels of contributions to be sought.
4. HCA wishes to work with the District Council to deliver the objectives of the Core Strategy and other LDF documents.
5. Affordable housing provision should be exempt from any form of planning gain. The actual act of providing appropriate affordable housing should be seen as the 'contribution'.
6. Green infrastructure should be included to recognise the importance of developer contributions to creating and maintaining these valuable assets.
7. One of the Core Output Indicators specified by CLG in 'Regional Spatial Strategy and Local Development Framework: Core Output Indicators - Update 2/2008' statement on Pg 55 says it is important to provide resources to track trends in biodiversity. Reporting on this indicator will be inadequate if the baseline/trends are unknown.
8. Canal infrastructure should be a recognised beneficiary as recognised by the Food and Rural Affairs Committee in its report into British Waterways.

### Officers' Response

1. There are two basic approaches that the Council uses to secure developer contributions - the tariff based approach and through negotiations. Both approaches are secured by Section 106 Agreements. A key principle that the Council seeks to achieve is transparency in the planning obligation process and the tariff based approach to a great degree ensures that this is the case. Many of the items for which developer contributions are secured for are straight forward because there are standard methodologies for calculating the amount to be paid. Beyond the planning process, a monitoring system has been set up to monitor amount collected and how they have been used. In some cases, the Council will be required to refund contributions if they are not used and a reason is not given about why they have not been used. The monitoring database is designed to ensure that contributions are paid when they are supposed to be paid. This process is managed by the legal section of the Council. It is acknowledged that there are instances where monies have not been spent within the time range when they are supposed to be spent. There could be a number of reasons why this can be the case. However, if the Council could not provide a justifiable reason why contributions have not been spent, then it will be required to pay the contributions back with interest.
2. Developers will not be required to provide infrastructure which is not associated with their development in accordance with Circular 05/2005.
3. The Development Opportunity Sites include a package of development requirements to support the development of the sites. Furthermore, an Infrastructure Requirements Report is being produced to provide developers with more certainty on what contributions will be required and for what type of infrastructure and how they will be delivered. An Implementation Plan is also being prepared to clarify what, who, when, how each policy will be delivered.
4. HCA will be notified of progress on Local Development Framework to ensure involvement.
5. The principle of planning gain would apply to every development where it is relevant and can be justified. However, the Council has and will continue to be pragmatic about the way it delivers its affordable housing requirements to ensure the viability of such schemes.
6. It is acknowledged that the provision of green infrastructure such as footpaths and bridleways should be secured through developer contributions where this is relevant and meet the test of Circular 05/2005. These will provide for more sustainable communities by giving people the option to walk and cycle rather than use the car.

### Recommended Action

1. Council to continue to develop its monitoring database to set out amount of money collected and for what purpose and a tracking mechanism to check whether or not they have been used.
2. Infrastructure Development Plan to be included in Core Strategy to provide clarity to developers prior to the submission of a planning application.
3. Provision of green infrastructure to be included in the infrastructure Development Plan and the prospect of securing developer contributions towards that be fully investigated.

## Analysis of Representations

### Topic: T5c Community Infrastructure Levy

#### Summary of Matters Raised in Representations

1. The problem with matching infrastructure to small scale, incremental development may be partially resolved by CIL and lower thresholds for providing affordable housing.

#### Officers' Response

The regulations to guide the introduction of CIL is being prepared. When published, the District Council will consider its effectiveness in addressing the infrastructure requirements of the District. It will be presumptuous at this stage to predict the details of the regulations and how relevant they will be in addressing the infrastructure needs of the District.

#### Recommended Action

Council to consider the implications of CIL Regulations when it is published to see its effectiveness towards infrastructure provision in the District.

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### Topic: T5d Phasing

#### Summary of Matters Raised in Representations

No representations received.

#### Officers' Response

No response required.

#### Recommended Action

None

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### Topic: T5e Monitoring

#### Summary of Matters Raised in Representations

1. An implementation strategy should be incorporated in accordance with advice in PPS3.

2. A housing trajectory should be accommodated.

3. Not sufficient to simply monitor the implementation of policies.

#### Officers' Response

1. An implementation Plan is being prepared and will be incorporated into the final version of the Core Strategy.

2. The Council has published its housing trajectory as part of its annual housing monitoring report. This will continue to be a technical background report to the Core Strategy. It is reasonable to include this in the Core Strategy, but this will be best addressed under the Housing Policy (Policy CS.7). How the trajectory is being met should be an essential indicator for monitoring the delivery of housing in the District.

3. The monitoring process is mainly about monitoring how the policies of the Core Strategy are delivering their objectives.

#### Recommended Action

An Implementation Plan to be included in the Core Strategy.

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## Analysis of Representations

### Topic: Htab Housing supply components table

#### Summary of Matters Raised in Representations

1. The housing target does not reflect the likely increased numbers to emerge through the RSS. As no flexibility is applied to allow for an increase in housing through the emerging RSS it should be acknowledged in the table that this is the minimum residual requirement.
2. The 'dwellings permitted row' (row 4) will need to be discussed properly with the development industry and agents to investigate whether they are indeed likely to be implemented by 2026. Without this analysis the process is not robust.
3. The windfall allowance cannot be justified in current government policy and the 750 figure is not adequately explained. The allowance is excessive and should be reduced to 250 dwellings increasing the residual requirement by 500 dwellings.
4. The 15% discount applied to SHLAA sites is not enough given the uncertainties in bringing the sites forward
5. The figure of 2550 Proposed Development Locations is not considered deliverable due to sites where flood risk issues have not been resolved or the number of dwellings is not confirmed. As a result 425 dwellings may need to be found elsewhere.
6. The 20 dwellings allocated for Alcester could restrict development opportunities for Meadow View and the current hospital site for which plans are already being formulated. This entry should be deleted.
7. The former Henley in Arden cattle market site seems to be exclusively identified for housing (40 dwellings). In the current Local Plan Review the allocation is for 25 dwellings and industrial use. Clarification on the use and number is required.

#### Officers' Response

1. This would make an assumption that the RSS Phase Two Revision will increase the housing growth figure for Stratford-on-Avon District. At this stage there is no definite indication that this will happen. It is also unclear whether that figure will be a minimum or a maximum level of growth. However, the RSS EIP Panel recommendations regarding the district's housing growth should be available prior to the publication of the Core Strategy and they will need to be taken fully into account in the publication document.
2. The current SHLAA review includes a review of planning permissions.
3. The windfall figure is derived from average annual windfall rates shown in the 2008 SHLAA, subject to a measure of discounting reflecting the possibility that the supply of windfalls may decline marginally in the long-term. However, the issue of windfall rates is being examined in the 2009 SHLAA Review and the outcome will be available for use in revised housing land supply figures.
4. The 15% discount is considered appropriate given that the SHLAA assessed the availability and achievability of sites and set aside those sites which did not meet these tests.
5. The current Land Parcels Assessment should pick up constraints of this sort not already identified, so too additional studies that are being undertaken such as the SHLAA Review and also discussions with developers. If such constraints are found, then it will be necessary to make changes to the proposed land supply.
6. The status of this site is being examined in the SHLAA Review. If it is found that the residential development of the site is no longer appropriate, then it will be discounted.
7. The capacity figure does take into account the proposal for mixed use (SHLAA site: UCS/SITE/HEN011).

#### Recommended Action

The table is amended in response to further outcomes from the RSS Phase Two Revision, the SHLAA Review and other sources of updated evidence.

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## Analysis of Representations

**Topic: SUSAPP Sustainability Appraisal**

### Summary of Matters Raised in Representations

1. Sustainability Appraisal fails to consider the specific sites directly and instead adopts a much broader approach.
2. Sustainability Appraisal only considers the merits of settlements therefore allocation of specific sites is not truly supported and justified by the evidence base.
3. Incorrectly records the impact of the various options having regard to consistency with national policy.
4. Taking into account PPS1, Option 1 should score more positively than other options and the other options should score more negatively.
5. Seems to be envisaged that no sustainability appraisal is to be undertaken comparing the relative merits or disbenefits of sites assessed in the SHLAA process.
6. Sustainability appraisal scoping report erroneously continues to refer to PPg3 (not PPS3) and PPG25 (not PPS25) despite being finalised after the publication of the new RSSs.
7. Interpretation of results could lead to more than one alternative being appropriate depending on the weight to be accorded to different factors.
8. Water as a resource should be identified as one of the elements of the SA Framework.
9. Rivers that lie with the District should be identified as a resource, along with their natural floodplain which should be protected from inappropriate development.
10. SA makes no reference to the Strategic Flood Risk Assessment which has been carried out by the District Council and its partners. A Water Cycle Study is also recommended to provide a useful baseline information.
11. Interim Monitoring Framework should include a measure of the number of dwellings built contrary to Environmental Agency Advice.
12. Suggest a measure against Policy CS.21 as improvement in local water quality in accordance with the Water Framework Directive.
13. Impact of tourism on floodplain should be recognised, in particular, reducing the number of locations used to site caravans in areas at risk of flooding.

### Officers' Response

1. Options for the overall strategy for the spatial distribution of development in the District has been appraised as an integral part of the Core Strategy process. Appendix A of the Draft Core Strategy include details of this Appraisal. Representations received in relation to this particular appraisal are being analysed to see if any revisions are necessary. A comparative appraisal of specific sites, the criteria used and the rationale behind the preferred choice of sites is a separate exercise that has been carried out as part of the evidence base to inform the Core Strategy. This assessment will be published as part of the final version of the Core Strategy.
2. See 1 above.
3. This will be reassessed to see if that is the case and where relevant revisions will be made. However, in reappraising the options, it is important to emphasise that the outcome of the appraisal to some extent is influenced by the assumptions used to underpin the analysis and in this regard, it is possible that different people using different assumptions could come to different conclusions. The objectives that each element of the appraisal framework seeks to achieve are clearly set out in the Sustainability Appraisal Framework (Figure 5 of the Draft Core Strategy Sustainability Appraisal).
4. See 1 above. The factors used for the appraisal and the objectives that they seek to achieve are clearly defined in the Sustainability Appraisal Framework. This will be reviewed to check the validity of this suggestion.
5. See 1 above.
6. It is accepted that data used to inform the Core Strategy should be constantly updated. The Scoping Report was no different. It was informed by up to date information at the time of its preparation. A number of new planning documents have been published since its publication and this is not unique to the Scoping Report. The Council has been concerned to ensure that new and updated information are used to inform its new documents when they are being prepared. For example, the SAs that draws information from the Scoping Report have been informed by up to date information. The Council will also continue to update the information in the Scoping Report from time to time.
7. That could potentially be the case. However, the options identified for the appraisal are clearly defined and the preferred option is backed by the outcome of the appraisal process.

## Analysis of Representations

8. This is reasonable and should be accommodated.

9. Rivers are valuable natural resource and an asset that should be recognised. In this regard, the suggestion is a reasonable one for the Core Strategy to consider. In doing so, it needs to be emphasised that rivers are not the only important natural resource in the District and care should be taken not to give the impression of some form of prioritisation if that cannot be justified by evidence. Rivers as natural assets of the District is covered under natural assets (environmental assets). The SA Framework will be redefined to take this into account.

10. The Council is working in partnership with other neighbouring authorities to commission consultants to undertake a Water Cycle Study. The outcome of the Study will be used to inform the Core Strategy. The Council and its partners have already carried out a Strategic Flood Risk Assessment. This has been acknowledged in the Draft Core Strategy (Research and Evidence on page 6) as an evidence based to inform the Core Strategy. Flood risk is already identified as one of the elements of the Sustainability Appraisal Framework. Specific recognition of the Strategic Flood Risk Assessment in the SA Report is reasonable.

11. Council will work with the Environment Agency to monitor this indicator.

12. The impact of development on water quality will be fully assessed at the planning application stage and the advice of the Environment Agency will be crucial in this regard.

13. The objective of extending the benefits of tourism across the District has been assessed against the elements of the Sustainability Appraisal Framework, which includes flood risk and the natural assets of the District.

### Recommended Action

1. Sustainability Appraisal (SA) should be updated where relevant to take account of any changes to the Draft Core Strategy and other new information.

2. The SA Framework be updated to include the need to manage water resources.

3. Appraisal of spatial development options should be reviewed to rationalise any inconsistencies if there are any.

4. The SA Framework should be reviewed to give specific recognition to the Strategic Flood Risk Assessment and rivers as natural resource of the District.

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## Analysis of Representations

Topic: AppA

Appendix A - Assessment of locational options

### Summary of Matters Raised in Representations

1. Consider it inappropriate to say that the Strategic Flood Risk Assessment does not rule out any of the options on these grounds. This implies that your Authority has carried out full FRAs for all the sites being promoted and that these are risk free
2. Should be more information regarding biodiversity value of the options before The Wildlife Trust wishes to comment further. Each proposed area needs more consideration and more detailed biodiversity information. Any landscaping must meet Arden design guidelines if within the Arden area
3. Under the biodiversity factor, the comment should be more strongly worded i.e. must not or will not harm...
4. The use of the term 'neutral' against these factors is potentially misleading
5. The assessment acknowledges that concentration of development at the edge of SuA (Option 1) would have an adverse impact by placing additional pressure on the towns historic features; an equally strong case could be made for recognising the potential impact upon other settlements in the five other options
6. The scoring table may be dismissed as being too simplistic however it does reflect the relatively long list of positive compared with negative factors for Option 1. Factors such as consistency with regional policy and the sustainability of the locations are ones that ought to have greater weight than those such as the results of the initial consultation exercise

### Officers' Response

1. It is accurate and reasonable to state that the Stage One SFRA undertaken for the Council does not rule out any of the options in their entirety, even though individual locations falling within any of the options could be unsuitable on flood risk grounds.
2. A more detailed assessment of potential development locations will be undertaken in deciding which ones should be allocated at the next stage of the document.
3. It would be unreasonable to require any development option or site to avoid harm to biodiversity entirely.
4. The term 'neutral' represents minimal or no harm or where a relationship between factors is not relevant.
5. The distinction is that for Option 1 the scale of development involved in relation to Stratford-upon-Avon would be far greater than by dispersing development around a wider range of settlements. It is accepted that impact on historic features is an important consideration throughout the District.
6. The assessment covers a wide range of factors, of which very few are absolute when comparing the options; they are mostly a matter of degree when considered at the macro-level.

### Recommended Action

1. Refer to Stage One SFRA under the 'Flood Risk' factor.
- 2-6. No change
-

## Analysis of Representations

Topic: APPb

Appendix B - Development opportunities

### Summary of Matters Raised in Representations

1. There should be stronger references to the proposed masterplan for Proposal SUA.3 as currently there is limited information set out in Appendix B.
2. Natural England suggest requirements to be included in the 'main features of development' with regard to; habitat corridors, habitat enhancement, access to green space and a Green Infrastructure Plan
3. It is suggested that the following implementation agencies are included; WCC Ecology Unit, Warwickshire Wildlife Trust, Natural England and the Forestry Commission
4. The needs of existing and additional public rights of way should be considered in concert with requirements for public open space and green corridors within development proposals
5. Where areas shown in the DCS are of greater extent than the equivalent sites appraised in the Strategic Sites Assessment (SSA) the advice has been reviewed; ALC.1 extends into an area of known cropmarks, ALC.3 extends further into an area already identified as sensitive. These underline the need for pre-determinative archaeological evaluation
6. There are no allocated housing sites within Studley and the development of the land at Studley garage would serve to meet the need for open market housing in the settlement and support existing services
7. Various site specific comments which should be dealt with under the relevant sites section/topic

### Officers' Response

1. It is accepted that reference should be made to a masterplan to be prepared for the Bridgeway/Bridgefoot area.
2. It is unnecessary to include such a reference in each proposal. National, regional and local planning policies cover these principles and can be applied to individual cases as appropriate.
3. It is unnecessary to refer to these agencies in each proposal. A specific reference is appropriate where an agency is likely to have a specific implementation role, as distinct from solely a consultative one.
4. This point is accepted and will be applied in individual cases where opportunities arise.
- 5/7. All the information shown in the Appendix will be reviewed and updated as necessary in preparing the next stage of the document.

### Recommended Action

1. Insert reference to a masterplan being prepared for Proposal SUA.3.
  2. No change
  3. Amend implementation agencies for each proposal as appropriate.
  4. Insert a reference to such opportunities in specific proposals where appropriate.
  - 5/7. Update provisions set out in Appendix B as appropriate.
  6. No change
-

## Analysis of Representations

Topic: AppBg

Appendix B - Development opportunities - generic requirements

### Summary of Matters Raised in Representations

1. The inclusion of a brief summary of the key policies is supported however in accordance with objections made specifically to some of the policies, some of the criteria are objected to.
2. Natural England request that 'network of habitat corridors throughout the site' and 'enhancement of habitat in line with Local BAP objectives' is added to the 'main features of development' column and 'every home should be within 300 metres of an accessible natural green space of at least 2 ha' in line with RSS policy QE4
3. Warwickshire County Council Ecology unit, The Warwickshire Wildlife Trust, Natural England and the Forestry Commission should be included as implementation agencies
4. Natural England request that 'green infrastructure plan for the site and any adjoining areas' is added to the 'specific infrastructure requirements' column
5. The EA welcome being identified as an implementation agency
6. The needs for existing and additional public rights of way should be considered in concert with requirements for public open space and green corridors within development proposals
7. There are no allocated sites within Studley and representation 2052/E proposes a site
8. With reference to SUA.3, there should be stronger references to the proposed masterplan in the CS as currently there is limited information set out in Appendix B.

### Officers' Response

1. The summary of key policies on p.82 itself is not policy and will be revised to reflect the content of the finalised policies in the final Core Strategy. Comments about specific policies have been dealt with under the relevant topic.
2. These issues are covered by Policies CS.19 (open space), CS.21 Green Infrastructure), CS.24 (natural features), CS.27 (layout and design). The summary on p. 82 is intended to pick up requirements that will be applied to all allocations (and other developments). The summary states that "the layout should create and enhance networks of green infrastructure for public and biodiversity benefit". Detailed standards for provision of open space will not be included in the Core Strategy, although we consider that national standards may be used before an SPD is adopted.
3. It is agreed that these agencies will be important consultees of any development, however we do not consider that these agencies will be involved in the actual implementation of the projects unless there are site specific circumstances. .
4. General requirements to be applied to all allocations (and other developments) are given in policies in the Core Strategy and only summarised here for ease of use. This particular requirement concerns a level of detail which will not be included in the Core Strategy.
5. Support is noted.
6. This comment has been considered under Policy CS.19
7. The site put forward is Studley Garage, east of Birmingham Road. This site has planning permission for a foodstore which has been implemented.
8. Comment has been dealt with under SUA.3

### Recommended Action

1. Revise summary to reflect content of policies once Core Strategy finalised.
2. As above.
3. Check when revising schedule following further work on site allocations whether any involve site-specific requirements which will involve these agencies in their implementation.
4. No action
5. No action
6. No action
7. No action

## Analysis of Representations

### 8. No action

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#### Topic: PROPMAPS                      Proposals Maps - general

##### Summary of Matters Raised in Representations

1. There is a lack of clarity in the proposals maps as to changes from the previous Local Plan Proposals Map.

##### Officers' Response

1. The Proposals Maps at the Draft Core Strategy stage were not designed to provide this information. A Proposals Map will be produced as a separate Development Plan Document which will show changes from the version in the current District Local Plan that relate to the contents of the Core Strategy. This will be published concurrently with the formal publication stage of the Core Strategy.

##### Recommended Action

1. Prepare a Proposals Map DPD that shows the relevant changes to the version in the District Local Plan.
- 

#### Topic: SUAgen                      Stratford-upon-Avon - general

##### Summary of Matters Raised in Representations

1. The pedestrianised area of the town centre should be extended. Transport initiatives should be reviewed including the issue of car parking at RST.
2. The recreation ground should not be extended on to the land known as 'Orion Fields' which extends south to Severn Meadows Road. There is no demand for an extension, extra policing would be required which is unlikely to be available
3. Concern that any new development in SuA will have negative traffic implications. A new ring road system and new traffic river bridge is needed
4. Priority should be given to the future use of Clopton Bridge
5. Traffic lights should be installed at both ends of the High Street, outside the NatWest Bank and at the bottom of Bridge Street

##### Officers' Response

1. These matters are being considered as a matter of course; while it would be inappropriate to include detailed schemes in the Core Strategy, reference to the principle of extending pedestrianisation in Stratford town centre could usefully be made.
- 2/4/5. These matters are too detailed to cover in the Core Strategy.
3. Impact on the road system in the town will be assessed in deciding the amount and location of future development in the town and necessary improvements to transport infrastructure will be required as part of such development.

##### Recommended Action

1. Consider making a reference to support for the principle of further pedestrianisation in Stratford town centre.
  - 2/4/5. No change
  3. Assess the transport implications of further development in Stratford-upon-Avon.
-

## Analysis of Representations

**Topic: SUA.1 Canal Quarter, Stratford-upon-Avon**

### Summary of Matters Raised in Representations

1. Concern that the proposals will be incapable of delivery due to the plethora of other land ownership, commercial and business interests. No mechanisms have been brought forward to demonstrate how the proposals can be implemented in the Core Strategy period.
2. Is a development brief to supplement the guidance in the Urban Design Framework proposed?
3. The words 'watercourse restoration' should be applied to the Racecourse Brook.
4. Greater emphasis should be given to the need for a comprehensive approach and the preparation of a more detailed development brief.
5. Understood that the proposed bus link using the former rail trackbed north of the railway station had been formally abandoned by WCC. Would like clarification of the route and would object to any proposals to use any part of the former rail trackbed. Requests clarification that Draft Core Strategy will not inhibit the proposed development for the Railway Centre and Museum Facility. The proposal should give priority to a railway visitor centre.
6. Concern at further traffic congestion along Birmingham Road.
7. Housing is already an over-provision in this part of Stratford.
8. The Birmingham Railway Museum Trust should be added to the list of implementation agencies.

### Officers' Response

1. There is no reason to suspect that significant progress cannot be made towards implementing this proposal in the period to 2026.
- 2/4. It is intended that a Masterplan be prepared for the entire area that is consistent with the principles established in the UDF and provides more detailed guidance; reference to this should be included in the wording of the proposal.
3. This adjustment to the wording is appropriate.
5. It is confirmed that the proposed bus link will no longer utilise the former trackbed. Development of the land should not prevent the provision and operation of the Railway Centre and Museum. This point should be made in the wording of the proposal.
6. This matter will have to be addressed in detail when a specific scheme is being considered.
7. There is no evidence that this is the case.
8. This is not necessary as the Trust has no direct role in delivering the proposal.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

**Topic: SUA.2 Rother Quarter, Stratford-upon-Avon**

### Summary of Matters Raised in Representations

1. Concern that a comprehensive redevelopment may not come forward in the foreseeable future due to changes in circumstances. LPA need to ensure that individual proposals do not prejudice a comprehensive approach but should not refuse such proposals due solely to the absence of a scheme for the comprehensive redevelopment of the area.
2. There is no mention of the listed buildings within the site or its location within a conservation area. There is no advice on the subsequent need to respond to the areas context with buildings of an appropriate scale and design sensitivity. Archaeology will obviously be an important consideration. A masterplan should be required.
3. Greater emphasis should be given to the need for a comprehensive approach and the preparation of a more detailed development brief.
4. Concern at the relocation of the police station.
5. Size of the new development should into account the proximity of the listed buildings.
6. Rother Market should be pedestrianised.
7. At least the frontages of the Rother Quarter buildings should be retained.
8. The addition of out of town shopping and parking has affected the viability of the town centre. Questions the need for more retail space.
9. A large number of Stratfordians are of a mature age and this should have some influence on the future shopping trends and requirements.
10. The phrase 'improve relationship with railway station' is inappropriate. Should this have been one of the main features of development for SUA.1?
11. Concern about impact on existing neighbouring properties.

### Officers' Response

1. The District Council believes that a comprehensive approach is necessary but it will not necessarily expect the whole area to be redeveloped in its entirety through the promotion of single scheme.
- 2/5. These matters are covered in a range of other national and local planning policies and will have to be taken into account as a matter of course.
3. It is intended that a Masterplan be prepared for the entire area that is consistent with the principles established in the UDF and provides more detailed guidance; reference to this should be included in the wording of the proposal.
4. The Police Authority will come to a decision on its future requirements; it should not be assumed that the police station will be relocated.
6. Consideration will be given to the enhancement of Rother Street which should cover the issue of traffic management, although full pedestrianisation may not be feasible.
- 7/11. These are detailed matters that will be taken into account when a specific scheme is being considered.
8. The Regional Spatial Strategy expects a considerable increase in retail floorspace to be provided in Stratford town centre; this area provides one of the few opportunities for doing so.
9. This factor will no doubt be taken into account by any retailer that is thinking of opening a store in the town.
10. This is an appropriate issue to address because the current relationship between the town centre and the station is relatively poor; but it is accepted that the same point is valid in relation to Proposal SUA.1 and should be added.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.



## Analysis of Representations

13. The County Highway Authority continues to address the issue of traffic flows on Clopton Bridge.
15. These uses would be acceptable in principle; there is no apparent opportunity for relocating the coach park nearer the station.
16. All of these uses are referred to apart from Class C2 residential institutions which are unlikely to be suitable for this location. It would be appropriate to add a reference to 'tourism-related uses'. Reference to the visitor gateway and visitor attractions would also be appropriate .

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

**Topic: SUA.4 West of Shottery, Stratford-upon-Avon**

### Summary of Matters Raised in Representations

1. Shakespeare Birthplace Trust wish to be satisfied that there are no other suitable sites.
2. The integrity and setting of Anne Hathaways Cottage should be preserved. The setting of the Cottage would be destroyed by the proposal.
3. Residents Against Shottery Expansion contend that it is unreasonable to assume that little has changed since the Local Plan Inquiry to undermine continuing support for site. Case needs to be re-examined in order for Core Strategy to be sound. A clear explanation should be given to justify the inclusion of the site. Many circumstances are materially different from the time of the Local Plan Review, making it necessary to:
  - undertake a fresh and thorough comparison with all other sites in Stratford-upon-Avon and main rural settlements
  - reassess case for a western relief road in relation to the transport situation in Stratford-upon-Avon
  - assess impact of western relief road in accordance with current data and standards
  - assess current situation regarding drainage, flood risk and water quality.
4. The Environment Agency request detailed modelling to clarify the flood plain extent along the south east site boundary. A Level 2 SFRA is necessary. Also a buffer strip in the Shottery Brook corridor must be provided.
5. Flood risk should be a key consideration and the development should not lead to flooding elsewhere. The flood risk relating to the site will be exacerbated.
6. There is a need for full ecological surveys to be completed. Concern that a local wildlife hotspot will be lost.
7. The existing infrastructure in the locality is inadequate to support such a large residential extension
8. The proposal would extend the urban area into attractive countryside and there will be a loss of historical landscape.
9. The proposed Western Relief Road would not solve the traffic congestion issues in this part of the town. The congestion will simply be moved to another part of the town. Will cause congestion on Bordon Hill.
10. The proposal will ruin the setting and character of the village of Shottery.
11. Brownfield sites should be developed before greenfield land is released for development .
12. Housing should be dispersed around all settlements in the District and not just around Stratford town. Villages would benefit from development and this would allow local services to be supported.
13. The proposal will have a detrimental impact on the attractiveness of Stratford as a tourism hotspot and on the World Class Stratford initiative.
14. The allocation of this site is not needed if windfalls are taken into consideration.
15. The phasing constraint should be removed.
16. Employment opportunities should be identified to meet needs of additional residents.
17. Large amount of empty housing in district should be used to meet the identified need.
18. The proposal will cause a loss of amenity to the residents of Shottery and will increase noise, air and light pollution.
19. The proposal is not in accordance with the Core Objectives and the Regional Spatial Strategy Phase 2 Revision.
20. The role of the eco town should play an important role when allocating housing developments.

### Officers' Response

1. Further assessment is being undertaken to compare the relative merits and impact of development on all land on the edges of Stratford-upon-Avon and the Main Rural Centres in order to help decide the development locations to be identified at the next stage of the Core Strategy.
  2. This matter is acknowledged as being critical and English Heritage and Shakespeare Birthplace Trust will need to be satisfied that the development, including the road, would not cause unacceptable harm to the cottage and its setting.
  3. The case for West of Shottery is being re-examined; this assessment will cover all the issues specified by RASE that are critical in deciding whether the proposal should remain in the Core Strategy.
- 4/5. It is agreed that these matters need to be addressed to the satisfaction of the EA.

## Analysis of Representations

6. All sites are being assessed in more detail for their ecological value.
7. The capacity of key infrastructure and services to cater for further development will be taken into account.
8. A landscape assessment has been carried out which concludes that the two areas proposed for development are not particularly sensitive.
9. The impact of the proposed road continues to be assessed, including its effect on the existing network.
10. This issue is critical and will be addressed carefully, taking into account the benefits of the proposal as well as the impacts.
11. While the development of brownfield sites is preferable, the release of greenfield land will be necessary in order to meet the regional housing requirement in a manner that is consistent with the overall strategy.
12. An assessment of a wide range of options for locating future development was made in preparing the Draft Core Strategy (see Appendix A). This concluded that a dispersal approach was the preferred option. However, this needs to be tempered by the fact that the larger settlements in the District, especially Stratford-upon-Avon, are the most sustainable locations for development. Consideration is being given to whether a specific allowance should be made for some development in villages but this would not negate the need for a significant amount to take place in Stratford-upon-Avon, unless it can be proven that there are overriding constraints which would make this inappropriate and unacceptable.
13. While this is an important issue, there is no evidence that such harm would be caused unless it is proven that the infrastructure of the town cannot cater for the proposed scale of development.
14. Further consideration is being given to the basis for making a windfall allowance; however, this will need to be based on Government guidance on the issue otherwise the approach would be unsound. It is unlikely that the windfall allowance will be of a scale that would equate to the West of Shutterly proposal.
15. This matter will be considered further, taking into account the need to maintain a five year housing land supply and the lead in time for commencing development on a site of this nature.
16. It would be appropriate to seek the inclusion of some small-scale opportunities for businesses; however, land south of Alcester Road has been identified in the Draft Core Strategy for larger scale employment opportunities (see Proposal SUA.5).
17. The District Council is taking measures to bring empty homes back into use but the requirement for new housing in the District far exceeds the number of empty dwellings and does not make an allowance for such an outcome in any case.
18. There is no evidence that undue harm would be caused to the amenity of existing residents.
19. It would be nigh on impossible for development not to impinge on certain objectives while seeking to achieve others; the challenge is to strike the appropriate balance and minimise impact as far as possible. It is not apparent that the proposal does not accord with the RSS Phase Two Revision.
20. The role and suitability of the Eco-town proposal is being considered through the RSS Phase Two Revision process. This may be an appropriate means of meeting an increased housing requirement but a new settlement was found to be the least suitable option for meeting the requirement as it stands (see Appendix A in Draft Core Strategy).

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

**Topic: SUA.5**                      **South of Alcester Road, Stratford-upon-Avon**

### Summary of Matters Raised in Representations

1. The proposal is clearly dependent on the construction of the Western Relief Road and therefore SUA.4.
2. Is an intrusion into the open countryside outside of the built-up area of Stratford without justification and would provide an unattractive gateway into the town.
3. The proposed type of development is business use but it seems largely unrelated in any strategic way to policies and proposals elsewhere in the Draft Core Strategy.
4. The development of site SUA.5 is likely to have a significant impact on strategic road network (SRN). This is of particular concern given the cumulative impact that development of this site and the proposed SUA.4 would have on the A46. To ensure that development of SUA.5 and all employment development has minimal impact on the SRN the Highways Agency would wish to see that policy wording is in place to ensure that schemes are delivered in accordance with PPG13 and Circular 2/07.
5. Without a site comparison sustainability appraisal and a full District-wide employment site identification and needs appraisal for the whole of the plan period (not just to 2021) this site cannot be soundly justified.
6. Ponds and watercourses will need surveying and suitable buffering, protection and management put in place.
7. Flooding of the site will need addressing prior to development.
8. Unlike SUA.4 the boundary of SUA.5 appears to be indicative only making it unclear how the two sites would relate to each other. There would appear to be scope for the two sites to expand into each other possibly involving a considerable extension of the total area to be developed.
9. There does not appear to be any demand for business units given the number of vacant premises in the town i.e. Timothys Bridge estate.
10. The proposal is not in compliance with the RSS Revision which seeks to locate further office development in town and city centres rather than on business parks or other locations.
11. The allocation of this site contradicts the core objectives.
12. Loss of agricultural and ecological land should be resisted.
13. Such development should occur on brownfield land and not greenfield land.

### Officers' Response

1. This is likely to be the case.
2. The provision of a further employment area during the plan period is justified to meet the economic needs of the town; the design and layout will need to ensure that visual impact is minimised although it is acknowledged that the approach to the town will be affected.
3. The strategy seeks to provide a wide range of employment opportunities across the District and there is also a need to provide a continuous supply of employment land. The emerging RSS Phase Two Revision expects this to be provided in a sustainable manner and such a development on the edge of Stratford-upon-Avon as the main town in the District would achieve this.
4. It will be necessary for the Highways Agency to be satisfied that there is a reasonable prospect of securing an acceptable access to the site in order for the proposal to remain in the Core Strategy.
5. The alternative means of providing a sufficient and continuous supply of employment land will be assessed further but the location of such provision should be consistent with the overall preferred strategy.
6. This is a detailed matter that will be taken into account when a specific scheme is being considered.
7. This issue will need to be thoroughly addressed and the Environment Agency will have to be satisfied that the form of any proposed development meets the requirements of PPS25.
8. The area of land covered by the proposal is not defined precisely on the Proposals Map at this stage; consideration is being given to defining specific boundaries.
9. The Core Strategy covers the period to 2026 and it is expected to make provision for the longer-term economic and employment needs of the District.
10. The proposal does not refer to office uses being appropriate on the site; any such scheme would have to be assessed against national and regional policies on the matter.

## Analysis of Representations

11. It would be nigh on impossible for development not to impinge on certain objectives while seeking to achieve others; the challenge is to strike the appropriate balance and minimise impact as far as possible.

12/13. While it is important to maximise the use of brownfield land, the reality is that the scale of additional employment land to be provided will require some greenfield land to be lost.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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### Topic: SUA.6 Egg Packing Station, Bishopton Lane, Stratford-upon-Avon

#### Summary of Matters Raised in Representations

1. Developer contributions should be sought to create a new public footpath along Bishopton Lane and Birmingham Road.
2. This area should be attractively landscaped and the pond on the recently completed development adjacent should be turned into wildlife area with seating.
3. The proposed 75 dwellings is too dense.

#### Officers' Response

- 1/2. These matters will be given further consideration.
3. The density is reasonable given the nature and location of the site and satisfies the minimum density of 30 dwellings per hectare specified in national guidance.

#### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

**Topic: SUA.7**                      **South of Kipling Road, Stratford-upon-Avon**

### Summary of Matters Raised in Representations

1. Further loss of greenfield land currently designated as community woodland.
2. Concern at extra traffic generated from the proposal and the impact this will have on congestion to the south of the river
3. Air quality will worsen due to the extra fumes from the additional cars and this will be detrimental in making Stratford a World Heritage Site.
4. Natural England suggest that 'sufficient measures to prevent deterioration of water quality and quantity in Rush Brook' is unambitious. The aim should be to enhance quality and quantity.
5. The Environment Agency wish to set minimum floor levels for this location.
6. The proposal to transfer land to District Council for community woodland and meadowland raises the issue of how this will be managed. The Warwickshire Wildlife Trust would be interested in discussing this with the Council as there are resource implications of involvement in developing a management plan and land management, and there would need to be commitment for the long term if this is pursued.
7. The proposed development is on grade II agricultural land outside of the present building line. Development should only be granted if it is on brownfield land until such a time when these have been fully taken up.
8. The site has been the subject of previous appeals which have been dismissed and circumstances do not appear to have changed to justify this proposal
9. The local infrastructure including schools is not adequate to cope with more residents.
10. There is a lack of employment opportunities in Stratford to support further residents.
11. There is a sufficient number of empty homes in the District which should be utilised before new development is allowed.
12. Public footpaths will be affected by the development and this will greatly diminish their amenity value. The significantly increased population in this area has access to exceptionally poor public rights of way network. Developer contributions should be sought to rectify this.
13. The site is a Strategic Reserve Site. Since calculations in the DCS ignore windfall sites until 2021 the current target of 5600 could be met without releasing this land. If the housing figures increase by 4500, the eco town or Long Marston alternative proposal would absorb a large number of this requirement. This site should therefore be deleted from the DCS.
14. The dispersal option states that housing should be dispersed around the District and not in already highly concentrated areas south of the river.
15. There is a severe lack of facilities south of the river to support residents.
16. The site is ecologically important and should be preserved to encourage biodiversity.
17. There are already considerable foul and storm drainage issues which have arisen since the increased numbers of housing at Trinity Mead. These existing problems need addressing before any further development occurs.
18. The site is Green Belt and should not be developed. There is a lack of open space to the south of the river due to the increase in built development in recent years.
19. Concerns regarding the access to the site.
20. It is not clear how this development would create an attractive edge to development along the southern boundary.
21. Any further development should be of traditional design and of good quality to ensure it is in keeping with the character of the established area otherwise what is good about Stratford is changed.

### Officers' Response

1. The land involved does not form part of the existing Community Woodland & Meadowland area; in fact the proposal provides an opportunity to extend this designation.
- 2/3/9/17/19. These issues will have to be resolved to the satisfaction of the responsible authorities before development can take place.
4. While enhancement would be welcomed, it would be unreasonable to expect development of the land to achieve such an outcome.

## Analysis of Representations

5/12/20/21. These are detailed matters that will be taken into account when a specific scheme is being considered.

6. It is anticipated that the extended area will be managed in the same way as the existing feature, although it would be appropriate to discuss the situation with WWT.

7. While a large part of the land involved has historically been categorised as Grade 2, its isolation from the wider agricultural landscape is likely to mean that this value has been reduced. No objection has been received from Natural England about the site. It would not be reasonable to expect all brownfield land to be taken up before greenfield land is developed.

8. This site has not been the subject of any appeals in the past.

10. The Core Strategy will seek to provide additional employment opportunities in the town.

11. The District Council is taking measures to bring empty homes back into use but the requirement for new housing in the District far exceeds the number of empty dwellings and does not make an allowance for such an outcome in any case.

13. Further assessment will be carried out as to the amount of land that needs to be identified for future development.

14. While the approach taken in the Draft Core Strategy supports small-scale housing development in villages, it is appropriate that most development should take place in the larger settlements of the District because they are more sustainable locations.

15. This point is accepted but the scale of development proposed is not so excessive that it will exacerbate the situation significantly.

16. Further assessment of the ecological value of the site is being carried out.

18. The site does not lie within the Green Belt. There is in fact a considerable amount of open space south of the river.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

**Topic: SUA.8 North of Banbury Road, Stratford-upon-Avon**

### Summary of Matters Raised in Representations

1. Proposal should be clarified to confirm that this falls within the definition of a dwellinghouse within the Use Classes Order to allow it to be included in the land supply.
2. The area is already too developed and will cause further traffic congestion on the Alveston roundabout and River Bridge. The proposed access through an existing residential estate. needs careful consideration.
3. Concern that the safe use of a landing strip at Arden Heath Farm would be compromised by the development.
4. Loss of agricultural land should only be in exceptional circumstances - is this development exceptional?
5. There is a lack of local infrastructure to support the development - the nearest existing bus route will not be sufficient for those residents in need of extra care.
6. The proposed landscaping along the north east boundary will not be acceptable, this should be altered and should be along the north west and south west boundaries.
7. Noise and light pollution should be taken into account, especially the impact on existing nearby residents, as well as loss of privacy.
8. Questions the need for further care home facilities.
9. Site is too far away from the town centre.
10. Flood risk concerns due to lack of drainage infrastructure in the locality.
11. Concern that scheme will be developer led and may lead to further residential development on the remaining field.
12. Preference should be given to development on brownfield land.

### Officers' Response

1. This principle will be set down in the appropriate policy in the Core Strategy.
- 2/10. These issues will have to be resolved to the satisfaction of the responsible authorities.
3. This matter needs to be addressed in detail to determine whether the use of the landing strip would be affected to such an extent.
4. This is not a test set down in national planning policy regarding the loss of agricultural land to development.
- 5/9. It is accepted that there are limited facilities south of the river and that the site is some distance from those in the town centre but this is not an overriding constraint on the suitability of the site for accommodation for the elderly.
- 6/7. The relationship of development to existing properties is a matter that will need to be dealt with appropriately when a specific scheme is being considered.
8. The planning system is required to meet the needs of an ageing population and Stratford District is a very popular location for people to retire to. The promoters clearly believe there is such a need otherwise they would not have proposed the site for this form of development.
11. A much larger area of land is being promoted for development but this is not supported by the District Council at this stage. However, its suitability for development will have to be assessed further.
12. The District Council does seek to ensure that suitable brownfield land is redeveloped but the scale of development that needs to be provided means that greenfield land will also be required.

### Recommended Action

1. Clarify the definition of dwellinghouses for the purposes of meeting the housing requirement to include self-contained units that form part of accommodation for the elderly.

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

### Topic: SUAMap Stratford-upon-Avon Proposals Map

#### Summary of Matters Raised in Representations

1. SuA proposals map identifies land to the east of Shipston Road as a possible location for a new leisure centre. This could be strengthened by reference in the text to the opportunity offered at Shipston Road in conjunction with the proposed development of a retail store and other local facilities
2. The symbols showing possible locations for a replacement leisure centre should be shown within an Area of Development Opportunity as shown on the map.

#### Officers' Response

1. This will be dependent on the outcome of assessing whether the site is appropriate for such a form of development.
2. Further assessment of the Leisure Centre situation is required before a decision can be made on how to treat this issue in the Core Strategy.

#### Recommended Action

1. Carry out a thorough assessment of the land being promoted.
  2. Reflect the District Council's position regarding the Leisure Centre in the Core Strategy.
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### Topic: OMSITE001 West of Birmingham Road, Bishopton, Stratford-upon-Avon

#### Summary of Matters Raised in Representations

1. Land to the west of Birmingham Road, Bishopton should be identified for development in the Core Strategy.

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: OMSITE002 East of Birmingham Road, Bishopton, Stratford-upon-Avon

#### Summary of Matters Raised in Representations

1. Land to the east of Birmingham Road, Bishopton should be identified in the Core Strategy for residential development.
2. Site is constrained by strong field boundaries and would represent a logical extension to development in this area of Stratford.
3. Site would be highly sustainable given its close proximity to the Maybird Retail Park and Stratford Town Centre and also benefits from excellent bus links.

#### Officers' Response

- 1-3. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: OMSITE003 North and South of Loxley Road, Stratford-upon-Avon

#### Summary of Matters Raised in Representations

1. Land to the north and south of Loxley Road, Stratford should be identified for development in the Core Strategy.

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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## Analysis of Representations

**Topic: OMSITE015**                      **South of Trinity Way and east of Shipston Road, Stratford-upon-Avon**

### Summary of Matters Raised in Representations

1. A new proposal should be included in the Core Strategy for the development of a 30,000 sq.ft food store and other local facilities. Land could also be set aside for a park and ride facility which will enable delivery of part of CS.17.
2. This would make up for the shortfall in local facilities in the Bridgetown area and will eliminate the imbalance in availability of food stores as all major food retailers are present in the north side of the river.
3. Footpaths and cycleways could be improved providing greater accessibility.

### Officers' Response

1-3. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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**Topic: OMSITE016**                      **Land adjoining Wildmoor Spa and Leisure Centre, Alcester Road, Stratford-upon-Avon**

### Summary of Matters Raised in Representations

1. A new proposal should be included in the Core Strategy for the development of land adjoining Wildmoor Spa and Leisure Centre as a luxury resort hotel with outdoor recreation facilities.
2. This would allow Stratford town to have a greater number and broader range of visitor accommodation facilities that already exist if it is to continue to compete as a visitor attraction of international significance.
3. The proposal would not conflict with the purposes of the Green Belt.

### Officers' Response

1-3. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. This will need to take into account the policy context regarding the scale, nature and location of visitor accommodation. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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**Topic: OMSITE038**                      **North of Bishopton Lane, Stratford-upon-Avon**

### Summary of Matters Raised in Representations

1. Land to the north of Bishopton Lane, Stratford-upon-Avon should be identified in the Core Strategy for residential development, public open space and relocated Leisure Centre.
2. Site is in a sustainable location, well related to existing services and facilities.
3. Site is not within the Green Belt and Special Landscape Area and is appropriate in landscape terms.
4. Site can be satisfactorily accessed by all modes of transport and a comprehensive package of measures will be developed to mitigate traffic impact.
5. There are no constraints to the development of the site for housing, and is a logical extension to the urban area.

### Officers' Response

1-5. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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## Analysis of Representations

Topic: ALCgen Alcester - general

### Summary of Matters Raised in Representations

1. Alcester Town Council notes that the DCS indicates a more flexible approach towards proposals for small-scale development within the built up area of the town where it achieves a net benefit to the local community. The Town Council would therefore like to see further consideration being given to the following items; recreation land/facilities, allotment land, regeneration of current retail areas, cemetery facilities, long stay car parking, community buildings/youth club
2. Alcester Pavilions could have provided community facilities. A youth centre should be built on the Moorfield Rd old school site. Alcester needs more small independent shops - small retail units should be built next to Somerfields.
3. The three proposed allocations should not be considered individually because if all three are implemented, this could have a significant impact on the infrastructure of Alcester. Support the phasing constraint but ALC.2 and ALC.3 should not be implemented at the same time
4. Alcester has experienced several serious floods in recent years. The town has also had many more localised flooding incidents caused by the inadequate drainage infrastructure of the town. The management of surface water from rainfall should be considered an essential element of reducing future flood risk. The DCS has a responsibility to ensure new development does not exacerbate existing conditions. If development is given planning permission then improvements to the local infrastructure beyond the site itself must be provided.
5. Almost all units on the industrial estate are occupied and there is a shortage of housing to meet local needs. The western side of the town requires local community facilities and there is a shortage of care facilities for the elderly.
6. 3 parcels of land are removed from the Green Belt in the current Local Plan to accommodate the future development needs of Alcester. It is accepted that these are the parcels of land which should be considered for development at the current time. However each site must be assessed on its merits and the most appropriate sites allocated for development. Where there are specific reasons, consideration should be given to allocating different land not currently removed from the Green Belt instead.
7. There is a danger that the character of the market town will be lost if additional development is allowed. The DCs focuses on avoiding development which might impact on Stratford's cultural heritage and natural environment. The actual proposals will have a significant impact on Alcester's cultural heritage and natural environment.
8. Building should not be allowed in the Alcester floodplain regardless of the measures taken to alleviate flooding.
9. The small plot of land opposite no. 8 Ropewalk and adjacent to 42 School Rd should be allocated as urban greenspace.
10. Further housing in Alcester must be matched by provision of facilities including school places and health care capacity.
11. The town has seen a considerable growth in development without sufficient attention being paid to the essential infrastructure of the town and the provision of affordable housing for a local need.
12. Questions need for new houses in the district, particularly on Greenfield sites around Alcester.

### Officers' Response

1. We will work with the Town Council to reflect community needs and aspirations in the Core Strategy as far as possible. It will be useful to meet the Town Council to discuss where the facilities listed could be located, and what informs each requirement.
2. As above
3. All infrastructure requirements are being considered on a district and settlement wide basis. The draft Core Strategy sets out our concern that ALC.2 and ALC.3 should not be implemented at the same time, but methods for managing this still need to be investigated.
4. We are very aware that Alcester has experienced serious flooding and this is reflected in the flood risk policy CS.23. Flood Risk Assessments must take account of all sources of flooding including surface water, and the potential to impact on other sites. We will work closely with flood authorities such as the Environment Agency when developing site allocations, and at a planning application stage.
5. The Draft Core Strategy currently suggests delivery of all these elements. However other respondents for ALC.3 have suggested there is less demand for community facilities on the western side of town.
6. We are in the process of considering all sites adjacent to Alcester for their suitability, whether or not they are in the Green Belt.
7. We are working to identify the constraints on development (both in terms of character and infrastructure provision) for all settlements. The current strategic approach directs significant proportion of development to Stratford-upon-Avon, as well as locating development in Alcester and other main rural centres.

## Analysis of Representations

8. The Draft Core Strategy does not put forward any sites for development within the flood plain. We are currently undertaking a full review of all sites adjacent to Alcester, and risk of flooding will be a key factor when considering suitability for development.
9. This comment is about a level of detail that will not be included within the Core Strategy
10. An infrastructure plan is being prepared alongside the Core Strategy to address the provision of facilities to meet the needs of users/ residents of new development.
11. As above. 35% off housing will be affordable.
12. The need for new houses is discussed under responses to Policy CS.7. The housing requirement for the district is set by the Regional Spatial Strategy.

### Recommended Action

1. Meet again with Town Council to discuss requirements in more detail. Incorporate information on community aspirations into Settlement profile for Alcester.
  2. As above
  3. Give further consideration to how to phase development to of ALC.2 and ALC.3.
  4. Review of Draft Core Strategy Policy on flood risk will ensure flooding issues including surface water are adequately dealt with. Continue to work closely with flood authorities such as the Environment Agency.
  5. Continue to review allocation and mix of uses on sites in Alcester taking needs of the settlement into account.
  6. No action
  7. Finalise strategic approach to development, and allocation of sites taking into character of all settlements into account.
  8. Continue to take flood risk into account when assessing sites for development.
  9. No action
  10. Continue to prepare Infrastructure Plan.
  11. As above
  12. No action.
-

## Analysis of Representations

**Topic: ALC.1 North of Arden Forest Industrial Estate, Alcester**

### Summary of Matters Raised in Representations

1. Half of the allocation is in the Green Belt - inappropriate and would set precedent for further development in the Green Belt.
2. Green Belt value of adjacent field will be lost due to access road and should be removed from the Green Belt.
3. The field adjacent to ALC.1 should be included to form an employment allocation of c.12 ha. This would have no greater impact than the current allocation, would help balance higher levels of housing expected through RSS process, and would allow for public open space by the river, a footpath link to the north of the site, and more effective screening and flood mitigation. The access road may not be viable without this extension.
4. Impact of the development on landscape character and openness of the Green Belt must be minimised. A design code should be agreed with local parties and enforced for the site. Features should include: suitable planting to northern boundary in keeping with local Arden character, minimise impact of lighting, restrict development height to 2 storey equivalent, appropriate colours/finishing of buildings, effective management and enforcement of site. Good and sustainable design should be required.
5. Provision of additional employment sites in Alcester is supported by several respondents, and by the Alcester Town Plan business survey which found several local businesses felt hampered by the lack of opportunities to expand in Alcester. However other respondents comment that there are currently many empty units on the Arden Forest Industrial Estate which should be filled first and which indicate a lack of demand.
6. A technology park is supported because this is lacking in Alcester at the moment.
7. Limiting site to technology park style units may be too restrictive, and should be reviewed in light of current economy. Promoters of site agree that high tech units should be provided, but that B1, B2, and B8 should all be allowed to avoid restricting employment opportunities in Alcester.
8. The development must not increase the future risk of flooding in Alcester or downstream, and adequate measures must be in place before development takes place. The development must have a stand-alone drainage system.
9. Consideration needs to be given to potential impacts on nearby Beauchamp Court.
10. Object due to impact on Coughton Court and its setting until an appraisal shows that there will be no significant harmful impacts.
11. Impact on biodiversity must be minimised. Corridor along watercourse must be at least 10m wide (plus any footpath width) to allow for otters. A Habitat Survey submitted by the promoters concludes that development on ALC.1 or the adjacent field is unlikely to harm biodiversity provided certain guidance is followed especially relating to water corridors, and that a reptile survey is carried out if hedgerows and field verges will be lost.
12. Existing road is inadequate as access to the development.
13. Impacts on traffic generation must be minimised locally and further afield including HGV movements in the Vale of Evesham.
14. Development will reduce amenity of footpath to the east, and should compensate by creating footpath link along north of site to river footpath.
15. Archaeology constraints on site already identified in draft Core Strategy. An enlargement of the site westwards would extend into an area of known cropmarks.
16. The landowner of the site is supportive of the allocation and provides detailed information in representation 657/N

### Officers' Response

1. Further work is required to assess the suitability for development of the field within the Green Belt to the west of ALC.1. This assessment will include archaeological constraints, landscape impacts, and potential benefits among other issues. Green Belt designation cannot be treated as an absolute barrier to allocation for development adjacent to Alcester.
2. As above
3. As above
4. Issues raised are too detailed to be addressed in a Core Strategy. They are matters that can be dealt with in a Development Brief for the site if it is considered relevant. It is important to note that the detailed development control policies contained in the Local Plan Review are robust enough to enable these matters to be addressed at a planning application stage.
5. The Core Strategy aims to provide suitable land for employment growth up to 2026 and must therefore take a long-term view of need and supply.

## Analysis of Representations

6. These matters will be given further consideration.
7. As above.
8. This issue will need to be thoroughly addressed at an early stage. The Environment Agency, Severn Trent Water and SDC will need to be satisfied that development would not cause greater flood risk and that the drainage system has capacity for any proposed connections.
9. Consideration will be given to the possible impacts on Beauchamp Court (private Grade II Listed Building) and adjacent SAM. Due to the location of the proposed allocation and heavily wooded site it is possible that landscaping and other design issues agreed at the planning application stage would be able to mitigate any impacts.
10. Consideration will be given to the possible impacts of views from Coughton Court. As this National Trust property is a mile from the proposed allocation it is possible that landscaping and other design issues agreed at the planning application stage would be able to mitigate any impacts.
11. All sites are being assessed in more detail for their ecological value. The detail of these matters will be taken into account when a specific scheme is being considered.
12. WCC highways are being consulted on this matter. The existing road was intended as a suitable access for any future development, and is the same width as Arden Road.
13. WCC highways are being consulted on this matter. It is worth noting that the Vale of Evesham control zone was established to keep HGV traffic off non-trunk roads, whereas this site can be accessed off A roads.
14. The promoters of the site have suggested this as an option if the site is extended west to cover all land to the river. This matter requires further consideration and discussion with promoters.
15. The Draft Core Strategy highlights this issue and the need for careful archaeological fieldwork prior to any application, and we intend to carry this requirement through in the final Core Strategy.
16. Support and detailed information are noted.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

**Topic: ALC.2 East of Kinwarton Farm Road, Alcester**

### Summary of Matters Raised in Representations

1. Industrial development should not take place on this site because it is too close to residential properties, will increase commuter and commercial traffic on nearby roads, and because ALC.1 is available for employment development.
2. Site should be used for employment to reduce commuting from Alcester, and alternative land allocated in Bidford to meet the housing requirement.
3. Housing is supported on the site provided it is high quality and sustainable design, and aimed at keeping young people in Alcester through affordable housing. Local councillor comments that residents report a lack of affordable housing for single people and for couples with more than 3 children in Alcester.
4. Alcester Town Council would like to see a reduction in dwellings on the site to allow for extra-care housing and community facilities as well as open space.
5. Concern that there may be over-provision of extra-care if schemes are also built at Great Alne, Moorfield School and the hospital site.
6. There have already been flooding problems in Kinwarton parish due to run-off from this site which will be worsened by development, and the site is naturally fairly wet. Storm and foul sewage drainage need to be upgraded. The development must not increase the future risk of flooding in Alcester or downstream, and adequate measures must be in place before development takes place. Environment Agency comment that 2 pumping stations are proposed which should alleviate flooding problems at this location.
7. Eastern boundary must have good landscaping but this will improve currently harsh edge to town. Another respondent comments that the new development will be visible over the crest of the adjacent hill whereas the current boundary is strong and attractive.
8. Height and size of development should be limited as land rises.
9. The site has several informal footpaths across it providing access to other footpaths and a hill-top trig point. Concerns that development here would result in a loss of public open space for the town, and loss of access to the countryside.
10. Footpath adjacent to E. boundary (Monarchs Way) will be adversely affected and may need diversion and improvement, and provision of additional links should be integrated with the proposed open space. Green wedge is supported and will need appropriate wildlife management.
11. Ponds with Great Crested Newts should be protected with a buffer zone. There may also be kestrels, buzzards and woodpeckers on the site.
12. Phasing constraint should be worded to ensure ALC.2 and ALC.3 cannot be implemented at the same time.
13. Kinwarton Farm Road is a natural boundary to the town. A previous public inquiry (resulting in land to west being built on 1978 - 83) stated that land to the east (i.e. ALC.2) should not be built upon.
14. Residents will use facilities in Alcester Town Centre so contributions should go to Alcester not Kinwarton Parish. An extra play area is needed on this side of town.
15. Concerns that development will put too much pressure on over-subscribed doctors and dentists, inadequate youth facilities and schools near capacity in Alcester. An extra play area is needed on this side of town.
16. Concerns that development will put too much pressure on car parking in Alcester and outside Hopkins Precinct, congestion on Kinwarton Farm Road outside schools and shops, and will increase in traffic on A435 and rural road to Great Alne.
17. It is not sensible to develop on the side of town furthest from the town centre. Schools and facilities are too far away and there is a lack of public transport. Children are likely to go to Great Alne primary school but the pavement is unsuitable for young children to walk.

### Officers' Response

1. Supported by the Town Council and Town Plan, we wish to provide additional employment opportunities to support the role of Alcester. The Draft Core Strategy sees ALC.1 as the preferred site for employment, but sets out that employment will need to be provided if ALC.1 is not achievable. Further work is ongoing to assess the deliverability of ALC.1 uses. If it is considered important to allocate some of this site to employment, consideration will be given to which types of employment use are suitable in the location.
2. As above
3. A percentage of affordable housing (currently 35%) will be required from the site. The nature of this provision should reflect

## Analysis of Representations

evidence of local needs. The Core Strategy will also include policies ensuring high quality design and sustainable construction.

4. Further discussions and information are needed to confirm what kind of community facilities are required. The developers have been made aware of the need for open space provision on site, and are investigating the possibility for extra-care housing.

5. This matter requires further discussion.

6. The developer has been advised that this issue will need to be thoroughly addressed at an early stage. The Environment Agency, Severn Trent Water and SDC will need to be satisfied that development would not cause greater flood risk and that the drainage system has capacity for any proposed connections.

7. The appropriate form of landscaping is a detailed matter that would be addressed at the planning application stage. However it may be useful to indicate in the Core Strategy that impacts of the scheme from the countryside to the east will need to be taken into account.

8. This is a detailed matter that will be taken into account when a specific scheme is being considered.

9. The site schedule within the Draft Core Strategy highlights the need to extend open space to allow green wedge into Alcester, and that the layout should include footpath access across the site to connect to existing.

10. As above

11. All sites are being assessed in more detail for their ecological value

12. Agreed. Further work will be done to agree a Phasing scheme for the Core Strategy allocations.

13. Decisions on the Core Strategy should be taken in relation to the current situation, requirements and policies. It should also be noted that public inquiries into Local Plans in 1995 and 2005 concluded that the site could be suitable for development.

14. Further work is being done to determine the infrastructure requirements resulting from the scheme.

15. The capacity of key infrastructure and services to cater for further development will be taken into account.

16. The capacity of key infrastructure and services to cater for further development will be taken into account. The site is within 600m of health facilities, secondary school and the Hopkins Precinct, while the town centre and primary school are around 1km away. The Core Strategy seeks improved pedestrian and cycle links to local services

17. As above.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

Topic: ALC.3

West of Alcester

### Summary of Matters Raised in Representations

1. Alcester is relatively close to the border with Wychavon. Additional development will potentially impact on Wychavon with respect to car-based trip generation, HGV movements and flooding.
2. The EA note the proposals to include 'dry retention ponds' however the EA have a preference for permanently wet balancing ponds sited within public open space areas. These will maximise the biodiversity aspects that can be achieved.
3. It is not clear whether the alternative proposed forms of development outlined are a menu or opportunities or a specific alternative.
4. There appears to be potential for a food store of up to 2500 sq metres gross as part of the proposals. Such provision would meet the requirements identified in CS.16 of the DCs and it is noted that specific sites for food stores are identified for Shipston and Southam but not Alcester. This should be addressed and included as a specific provision of ALC.3.
5. Promoters of site generally support the proposals and confirm that they intend to cooperate with all the relevant landowners to bring these forward as soon as possible. Comment that areas south of Allimore Lane and south of Stratford Road are available for allotments and open space. Question whether Masterplan is necessary or whether development control activities could achieve the same benefits, and consider a phasing constraint is not sensible.
6. The proposal raises issues over the deliverability of the site due to unresolved flooding issues in the town. This should be resolved before the site can be included as a proposal.
7. The Town Council supports a limited amount of new housing in the area subject to a detailed Masterplan being developed which would include for new infrastructure works to the site and to the wider area. Matters such as drainage, flooding, schools, doctors, highway improvements should be addressed
8. The Warwickshire Wildlife Trust would like the ecological value of the proposed open space to be assessed and for there to be enhancements for biodiversity as well as recreation facilities. Long term management needs to be planned and implemented. The ecological interest for the site should be reflected in the proposed form of development section. The ponds with great crested newts must be protected, together with appropriate buffer areas. Part of the area is awaiting designation as a SINC
9. The amenity value of public footpath AL50b will be greatly diminished by the proposal and therefore developer funding is sought for additional public rights of way, in mitigation and to support the recreational demand of the increased population.
10. The development will restrict access of existing residents to the open countryside and the development will encroach into the open countryside.
11. Question whether west of Alcester needs further leisure facilities.
12. The site has previously been refused and dismissed at appeal for residential development. Alcester does not need a large amount of new houses as the infrastructure will be inadequate. This is not a sustainable location, it is further from the historic town centre than the map suggests. What has changed to warrant the inspector's decision being revisited?
13. ALC.3 should be extended to include land to the south of Allimore Lane instead of ALC.2. This would allow provision of further housing, footpath connections, open space and community facilities. If it is not allocated it should remain outside the Green Belt.
14. To introduce additional homes will destroy the character of Alcester.
15. The proposed access will create highway safety concerns.
16. The proposal is not sustainable as there are insufficient jobs to support additional residents.
17. The loss of green belt should be avoided.
18. The document vision for Alcester 2020 proposes the reopening of the railway between Redditch, Studley and Alcester however proposal ALC.3 appears to block the route of such a railway and also the site of a possible railway station for the town
19. The document is not user friendly and from past experience of SDC, this has probably been done on purpose.
20. Archaeology constraints on site identified in draft Core Strategy. An enlargement of the site southwards would extend further into an area already identified as sensitive.
21. Substantial previous archaeological investigations, including trial trenching, have taken place in 1995 and 2000 showing southeast sector has most archaeological potential. County archaeologist and Secretary of State accepted on appeal that archaeological consideration could be protected by use of planning conditions.

### Officers' Response

## Analysis of Representations

1. There would be very limited impact on Wychavon although issues of flooding and traffic will be considered further.
2. This matter will be given further consideration.
3. Further consideration needs to be given to the alternative proposed forms. The presentation of this information will be clarified.
4. The draft Core Strategy supports a foodstore within the centre of Alcester, whereas this site lies outside the town centre. In line with draft Policy CS.16, as well as being satisfied that there was not a suitable site within the town centre, a comprehensive assessment would be required to ensure that this proposal would not have a detrimental impact on the town centre. It would therefore be currently inappropriate to allocate this site for a foodstore.
5. Support is noted. Matters raised will need to be considered and discussed further.
6. This issue will need to be thoroughly addressed at an early stage. The Environment Agency, Severn Trent Water and SDC will need to be satisfied that development would not cause greater flood risk and that the drainage system has capacity for any proposed connections.
7. As set out in the Draft Core Strategy, we expect a masterplan to be prepared setting out key principles of land use, layout, design and infrastructure, together with the arrangements for implementation. This will require input from many stakeholders.
8. All sites are being assessed in more detail for their ecological value. Ecological information must be taken into account when determining the masterplan for the site.
9. We expect any scheme for the site to retain all existing rights of way. When preparing the masterplan, opportunities will be sought to retain as much amenity value for the site and its rights of way as possible. Scope for further improvements to the rights of way network could be investigated through this process.  
The site allocation includes extensive areas of open space providing recreation facilities, promoting areas of ecological value and preserving a green wedge into the town.
10. As above
11. The need for community and recreation facilities for Alcester and on this site will be investigated further.
12. Decisions on the Core Strategy should be taken in relation to the current situation, requirements and policies. The site was allocated in a previous local plan. In the current Local Plan the inspector found that the site was generally suitable for development but was not required for housing at the time and was contrary to the current strategy to focus development in Stratford-upon-Avon. The appeal decision referred to did not refer to site specific matters but was about the overall strategy for development at the time.
13. The suitability of this additional land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.
14. The capacity of Alcester to take further development will be taken into account.
15. WCC Highways will be consulted further on the proposals.
16. The Core Strategy seeks to provide employment as well as residential development in Alcester.
17. This site is not within the Green Belt.
18. This matter will need to be investigated.
19. We have tried to make the document as suitable as possible for a range of users including residents, developers, external agencies etc. We also produced summary sheets showing the proposed development opportunities for Alcester and summarising the key points from the rest of the draft Core Strategy, as we hoped this would help residents to focus on the aspects they were most interested in. These sheets were available from Alcester library, town council and on our website.
20. The Draft Core Strategy highlights this issue and the need for careful archaeological fieldwork prior to any outline or detailed scheme being prepared, and we intend to carry this requirement through in the final Core Strategy.
21. As above.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

## Analysis of Representations

**Topic: ALCMap** **Alcester Proposals Map**

### Summary of Matters Raised in Representations

No representations submitted.

### Officers' Response

No response required.

### Recommended Action

None

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**Topic: BIDgen** **Bidford - general**

### Summary of Matters Raised in Representations

1. The facilities and sustainability credentials of Bidford have not kept pace with this disproportionate expansion.
2. Alcester, Shipston and Southam are the three largest market towns with supporting facilities and therefore should take a greater level of development than Bidford.
3. Concern that with extra pupils for the proposed developments and Friday Furlong will push Bidford school over its capacity.
4. Comments made by Parish Council regarding the 3 proposals include; current road system is under stress, lack of parking is reducing the number of residents using the local shops, drains/sewerage system is under considerable strain, flooding issues will be exacerbated, unsustainable education system - no High School and the primary school is at capacity, developments are against the B50 Parish Plan, no more large scale development should take place until Friday Furlong site has been developed and its impacts assessed.

### Officers' Response

1. Bidford supports a reasonable range of shops, services and jobs and its status as a Main Rural Centre is appropriate in the context of the nature and role of settlements in Stratford District.
2. This point is generally accepted. The scale of additional land identified for development in Bidford in the Draft Core Strategy is considerably lower than that in the three largest market towns.
3. The capacity of the primary school will be taken into account in deciding the eventual scale of development identified in the Core Strategy.
4. All these matters will be considered further and in the context of the situation with Friday Furlong.

### Recommended Action

1-4. Continue to assess the suitability of Bidford to take further development, taking into account its character, the situation regarding services, infrastructure and traffic and the status of the Friday Furlong site.

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## Analysis of Representations

### Topic: BID.1 North of Bramley Way, Bidford-on-Avon

#### Summary of Matters Raised in Representations

1. Bidford is relatively close to the border with Wychavon District Council. Development will potentially impact on Wychavon with respect to car based trip generation, HGV movements and flooding.
2. Bidford is not capable of accommodating a further 130 dwellings. The settlement lacks facilities in terms of a secondary school, medical centre and has a limited village centre. Further development will be unsustainable and will increase car dependence.
3. Land involved has not been included as a site submitted for consideration in the SHLAA and there is therefore a question over the availability and deliverability of the site.
4. Area identified should be expanded to include additional housing.
5. There is no justification for phasing the development of the site.
6. Bidford has the second highest expansion in the District and the current plans for Friday Furlong will place it first. The number of houses on the market illustrates that there is no demand for additional housing.
7. The development of the land would curtail any sizeable increase in the local school, which would be necessary because of the increased population.
8. Proposal is at odds with Policy CS.20 as the site is of high quality arable land.
9. Concern about unsuitability of Bramley Way as an access.
10. Fire and ambulance services will require expansions to cope with extra residents.
11. Proposal is contrary to landscape character in the Warwickshire Landscape Guidelines.
12. Lack of local employment to support local residents will increase commuting and road congestion.
13. There are bats in the trees which are a protected species so development should not go ahead.
14. Affects Green Belt land and surrounding properties.

#### Officers' Response

1. There would be very limited impact on Wychavon although issues of flooding and traffic will be considered further.
2. Bidford is one of the largest rural settlements in the District and has a comparatively good range of services; the capacity of key services to cater for further development will be taken into account.
3. The owners of the land involved have expressed support for its identification for development at the Draft Core Strategy consultation stage; this will be reflected in the SHLAA update.
4. The suitability of this additional land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.
5. It is legitimate to seek the implementation of a site that is allocated in the adopted District Local Plan in advance of further sites. Should this be in doubt or delayed significantly, the situation will be reviewed.
6. The Regional Spatial Strategy Revision will set a requirement for additional housing to be provided in the District for the period to 2026. Bidford is an appropriate location for further growth given the range of services and jobs it supports and level of accessibility.
7. The capacity of the primary school to cater for further development will be taken into account and contributions to improvements to the school will be required from developers as appropriate.
8. This is acknowledged but the area of land involved is relatively small and Natural England has not objected to its proposed development at the Draft Core Strategy consultation stage.
9. The issue of access will have to be resolved for development to take place.
10. It is for service providers to decide on any improvements that are necessary as a result of additional development and seek contributions from developers towards them.
11. There is no significant landscape harm that would be caused by the land being developed.

## Analysis of Representations

12. Bidford supports a wide range of jobs and Proposal BID.C promotes an extension to the industrial estate.
13. The ecological features of the area will be considered further.
14. The land involved is not within the Green Belt; any development would be expected not to have an unreasonable impact on existing properties.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

**Topic: BID.2 North of Salford Road, Bidford-on-Avon**

### Summary of Matters Raised in Representations

1. Would be sensible to have an alternative access off Salford Road.
2. Bidford is relatively close to the border with Wychavon District Council. This will potentially impact on Wychavon with respect to car-based trip generation, HGV movements and flooding.
3. Bidford is not capable of accommodating a further 130 dwellings. The settlement lacks facilities in terms of a secondary school, medical centre and has a limited village centre. Further development will be unsustainable and will increase car dependence.
4. BID.2 is poorly related to the existing pattern of development and would constitute an unacceptable encroachment into the open countryside to the west of the village.
5. There is no sound planning justification for the release of BID.2 particularly when there are more appropriate and available sites elsewhere in the village.
6. Proposal is only acceptable if landscaping is used to create a screen between the town and the rural landscape.
7. Site is ecologically valuable, specifically for moths; sites should be fully assessed prior to their inclusion in the submission Core Strategy.
8. Bidford has the second highest expansion in the District and the current plans for Friday Furlong will place it first. The number of houses on the market illustrates that there is no demand for additional housing.
9. Valuable agricultural land will be lost.
10. Local services are already stretched.
11. The current drainage system is inadequate and recent flooding events will become more frequent if more development is allowed.
12. Development can only be implemented by demolishing a perfectly sound house to create a 'backland' development.
13. Do not agree that proposal would 'create an attractive edge between development and countryside'. This already exists.
14. Concern that proposal will lead to a 'new town' between Bidford and Salford due to sprawl of the settlement.
15. The settlement should be infilled not stretched into open countryside.
16. Site is of ecological importance, particularly for moths.
17. Property to be demolished in an attractive arts and crafts style property built circa 1900 and should be retained as it forms a pair.

### Officers' Response

1. Access arrangements will have to satisfy the requirements of the County Highway Authority.
  2. There would be very limited impact on Wychavon although issues of flooding and traffic will be considered further.
  3. Bidford is one of the largest rural settlements in the District and has a comparatively good range of services; the capacity of key services to cater for further development will be taken into account.
  4. The site is reasonably well related to the physical form of the village with existing development on two sides.
  5. Further assessment is being undertaken to compare the relative merits and impact of development on all land on the edge of the village.
  6. The appropriate form of landscaping is a detailed matter that would be addressed at the planning application stage.
- 7/16. All sites are being assessed in more detail for their ecological value.
8. The Regional Spatial Strategy Revision will set a requirement for additional housing to be provided in the District for the period to 2026. Bidford is an appropriate location for further growth given the range of services and jobs it supports and level of accessibility.
  9. This is acknowledged but the area of land involved is relatively small and Natural England has not objected to its proposed development at the Draft Core Strategy consultation stage.

## Analysis of Representations

10. The capacity of key services to cater for further development will be taken into account.
11. The Environment Agency and Severn Trent Water will need to be satisfied that development would not cause greater flood risk and that the drainage system has capacity.
- 12/16. The loss of one existing house, which is not protected in any way, is not in itself a reason for resisting development of the site; neither is such a form of development accurately described as 'backland'.
13. There is no reason why a new attractive edge to the village cannot be achieved.
14. The scale of development is modest and would not result in such an outcome.
15. The housing requirement for the District could not be met solely through windfall development; it is unavoidable that greenfield land will be needed.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Topic: BID.3 West of Grafton Lane, Bidford-on-Avon

### Summary of Matters Raised in Representations

1. Bidford is relatively close to the border with Wychavon District Council. Development will potentially impact on Wychavon with respect to car based trip generation, HGV movements and flooding.
2. The disused railway will need assessing for ecological value with recommendations for buffering and management for the area
3. The estate has a number of empty units which should be filled before an expansion is considered. The site is removed from any suitable access roads and because of weight restrictions north of Bidford it is effectively an industrial estate at the end of a cul de sac.
4. Further development is incompatible with Core Objective 5 as the proposal will make matters worse for the local community.
5. A more suitable site would be Marriage Hill Nurseries which was previously allocated for employment use.
6. Concern that local infrastructure, i.e. road system, fire and ambulance, will not be able to cope with further development in Bidford.

### Officers' Response

1. There would be very limited impact on Wychavon although issues of flooding and traffic will be considered further.
2. The ecological features of the area will be considered further.
3. It is necessary to make additional employment land available to meet the future needs of the District; the County Highway Authority will need to be satisfied that additional traffic can be accommodated.
4. The harmful effects of development will need to be mitigated although in certain circumstances it may not be possible to avoid some degree of impact.
5. The merits of this site will be considered further but a large proportion of it lies within a flood risk area.
6. The capacity of key services to cater for further development will be taken into account.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

### Topic: BIDMap Bidford-on-Avon Proposals Map

#### Summary of Matters Raised in Representations

No representations submitted.

#### Officers' Response

No response required.

#### Recommended Action

None

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### Topic: OMSITE026 North of Bidford-on-Avon

#### Summary of Matters Raised in Representations

1. Land to the north of Bidford-on-Avon should be identified in the Core Strategy for residential development.
2. Site is well contained by existing development and in the wider landscape by low hills, small settlements and woodland.
3. Development would provide the opportunity for improved pedestrian and cycle links.

#### Officers' Response

1-3. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: OMSITE037 Land to the East of Waterloo House, Waterloo Road, Bidford-on-Avon

#### Summary of Matters Raised in Representations

1. Land east of Waterloo Road, Bidford-on-Avon should be considered for residential development (NB. This site has been suggested by a member of the public not by a landowner/developer)
2. Site is surrounded on three sides by development and is well placed in relation to employment opportunities and services.

#### Officers' Response

1/2. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land suggested.

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### Topic: HENgen Henley-in-Arden - general

#### Summary of Matters Raised in Representations

1. Henley market should not be abolished; it should be retained albeit on smaller section of the site to allow for some redevelopment. The market is of local importance and value and may become more economic in future years than it is currently. Attempts to move the market to Green Belt land in the 80's and 90's were unsuccessful. This asset is locally unique to Henley and should be preserved.
2. Car parking is required for residents of Warwick Road who are adjacent to the site. This is supported by Warwickshire County Council and needs incorporating into the LDF.

#### Officers' Response

1. The cattle market is subject to an allocation in the Local Plan, and is not currently picked up through the Core Strategy. If the Local Plan allocation is not progressed soon we will need to consider reallocating the site within the Core Strategy. This will be an opportunity to review the appropriate allocation for the site with all stakeholders.

2. As above. This is a site specific matter which would be picked up at Planning Application stage.

#### Recommended Action

1. Review allocation of Cattle Market site through next stage of Core Strategy.
  2. No action.
-

## Analysis of Representations

### Topic: HENMap Henley in Arden

#### Summary of Matters Raised in Representations

1. There may be flooding implications concerning the development of the Cattle Market site. Environment Agency will have a revised hydraulic model of the River Alne which flows through Henley in Arden by Spring 2009.
2. It has been demonstrated in the FRA which was submitted in support of the October 2007 application that the 1 in 100 year flood envelope remains outside the boundary of the site and therefore lies in Flood Zone 1.

#### Officers' Response

- 1/2. The flood risk issue relating to any scheme for the redevelopment of the Cattle Market will have to be resolved to the satisfaction of the Environment Agency.

#### Recommended Action

- 1/2. Take flood risk fully into account when considering all development proposals for the Henley Cattle Market site.
- 

### Topic: OMSITE011 West of Henley-in-Arden

#### Summary of Matters Raised in Representations

1. Land to the west of Henley accessed via Bear Lane should be allocated for residential development. The site has been promoted through the SHLAA however Henley remains without a housing allocation in the DCS. Part of the site lies within the development boundary. There is some built development on site so the area could be classed as brownfield land.

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

- Carry out a thorough assessment of the land being promoted.
- 

### Topic: KINgen Kineton - general

#### Summary of Matters Raised in Representations

1. Kineton needs a relief road to ease traffic congestion exacerbated by new development.

#### Officers' Response

The Core Strategy should only safeguard land for transport infrastructure such as a relief road for Kineton where there is a reasonable prospect of its implementation. This scheme is not included in any current programme of transport infrastructure provision of the County Council who are the Highway Authority for the area. The cost of the bypass will be significant and cannot be funded entirely at the back of the proposed development in the Draft Core Strategy. Furthermore, the case for the effectiveness of a bypass and its environmental implications are yet to be proven. It would therefore be premature for the Core Strategy to commit to the scheme. It is important to emphasise that one of the soundness test for the Core Strategy would be to demonstrate how and when infrastructure proposals in the Core Strategy will be delivered and who will be funding them.

#### Recommended Action

- No change be made to the Core Strategy as a result of this representation.
- 

### Topic: OMSITE033 Land to the North of Banbury Road, Kineton

#### Summary of Matters Raised in Representations

1. Land to the north of Banbury Road, Kineton should be identified in the Core Strategy for residential development.
2. Site is not constrained from being developed.
3. Development of the site is not reliant on the relocation of the High School.

#### Officers' Response

- 1-3. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

- Carry out a thorough assessment of the land being promoted.
-

## Analysis of Representations

**Topic: KIN.1**                      **Kineton High School, Banbury Road, Kineton**

### Summary of Matters Raised in Representations

1. New school beneficial to Kineton and surrounding villages.
2. Concern at exacerbated traffic congestion, relief road to the north of site suggested.
3. Development would place a strain on the village and its facilities and would be unsustainable.
4. Infrequent bus service will result in a reliance on the private car.
5. Lack of employment opportunities in the village will result in extra commuters.
6. Map suggests bigger urban extension than the text. The new housing needs to be strictly confined to the southern end of the site.
7. Developer contributions should be sought to create a new public footpath east of the site from Banbury Road running north and north-west to Southam Road.
8. A development of 75 dwellings will not produce capital receipts to finance the re-construction of the secondary school. More dwellings are required to fund the gap between income and expenditure required by a developer to provide a new school.
9. Housing allocation should not be reliant upon the replacement of the school as the County Council are not able to make a firm commitment as to the replacement of the school or the timing.
10. More development should be located in Kineton and KIN.1 land allocation should be expanded.
11. General queries regarding the detail of the proposal; siting of school, siting of dwellings, access, replacement childrens playground.
12. Systematic battlefield survey is required to determine whether any archaeological evidence of parliamentarian flight exists.
13. Loss of village character due to overdevelopment.
14. Light and sound pollution to neighbouring properties.
15. Provision for new services in village required to accommodate new residents.

### Officers' Response

1. A great deal more work still has to be done before we can decide which development locations to support at the next stage. However, the following specific response is given to the points raised.

The case for a new school has been made by the County Council who are responsible for education provision in the District. This case includes the benefits of the proposed new school to the school environment and the prosperity of its pupils. The Core Strategy seeks to provide a useful framework for this to be achieved.

2. The allocation of the site includes a number of transport measures to mitigate the traffic impacts of the development. The traffic implications of any scheme that comes forward will be fully assessed and appropriate mitigations introduced with the framework of the requirements.

The suggestion for a relief road has already been dealt with under topic 'KINGEN'.

3. The proposal would provide useful facilities for pupils in the catchment area as well as general community facilities such as sporting facilities and affordable housing for residents in Kineton. The Council accepts that there could be a potential for the development to put additional strain on existing services and facilities, but generally speaking, it is expected that the development can also enhance the viability of a number of services if any adverse impacts are appropriately mitigated. Overall, the benefits of the scheme could be significant.

4. The Council will continue to work with the County Council and other partners to improve public transport services in the area.

5. Policy CS.13 identifies a variety of means to meet the employment land requirement for the District. The policy will allow scope for further employment opportunities to be promoted if a specific need is proven. Kineton has a relatively decent level of facilities and jobs and is therefore a sustainable location for development. However, the Council will be concerned to ensure that development in the village does not leave a legacy of adverse impacts that could not be mitigated.

6. The boundaries of the development opportunity sites will be refined before the Core Strategy is formally published.

7. Details of any Section 106 Agreement will be resolved at the planning application stage. Improvements to pedestrian links has been identified as one of the broad areas on infrastructure provision which development of the site will seek to achieve. This

## Analysis of Representations

particular suggestion together with other requirements will be examined to see if they meet the test of Circular 05/2005 which sets out the guidelines for securing developer contributions.

8. It is not expected that a development of 75 dwellings will be funding the redevelopment of the school. Funding for the school will mainly be secured from public sector sources and/or other funding regimes for education provision. In any case, the level of residential development that will be viable enough to entirely fund the school would be too large to be sustainable in Kineton.

9. There is a realistic prospect that a scheme for the redevelopment of the school will come forward during the life of the Core Strategy.

10. The Council has sought to distribute its housing requirement amongst the Main Rural Centres and Stratford-upon-Avon based on a logical set of criteria. Kineton's share of the requirement is the 75 dwellings. It is expected that this development will occupy the footprint of the existing school. At this stage it is anticipated that the development opportunity sites identified in the Draft Core Strategy are adequate enough to meet the District's housing requirement. The final version of the Core Strategy will include how the Council will deal with any potential increase in its requirement.

11. Issues raised are too detailed to be addressed in a Core Strategy. They are matters that can be dealt with in a Development Brief for the site if it is considered relevant. It is important to note that the detailed development control policies contained in the Local Plan Review are robust enough to enable these matters to be addressed at a planning application stage.

12. One of the pre-requisites for the development of the identified sites, where applicable is an archaeological survey of the sites prior to development.

13. The Council will be concerned to ensure that the development of the site does not adversely impact on the character of the village.

14. See 11 above.

15. See 3 above.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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### Topic: KINMap

### Kineton Proposals Map

#### Summary of Matters Raised in Representations

No representations submitted.

#### Officers' Response

No response required.

#### Recommended Action

None

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## Analysis of Representations

Topic: SHIPgen Shipston - general

### Summary of Matters Raised in Representations

1. Affordable local transport is needed between the medical centre and the hospital and other areas of the town and the proposed food store
2. There may be conflict between the businesses in the town centre and the possible food store
3. It is disappointing that there are no proposals for employment in the town that will satisfy the stated needs for skills development
4. The potential to pedestrianise the market square in Shipston should be considered and its positive impact on the environment, health and safety and enhancement of the town's character.

### Officers' Response

1. The provision of public transport links between the town and the proposed SHIP.1 development at Campden Road will be given due consideration if this proposal is retained in the Core Strategy.
2. In line with Policy CS.16 of the Draft Core Strategy, the promoters of the food store scheme have been asked by the District Council to commission an assessment of whether the proposed development will have a detrimental impact on the vitality and viability of Shipston town centre. The District Council will commission its own consultants to verify this assessment.
3. Proposal SHIP.1 includes 2 hectares of land intended for business and commercial uses which will provide scope for additional employment at Shipston. However, at this stage it is not possible to say what types of business will occupy the site and whether they will require skilled labour and if so, what types of skill would be needed.
4. For such a scheme to be included in the Core Strategy there needs to be evidence that it can be delivered in the period up to 2026. At present no resources have been set aside for such a scheme and no feasibility study has been undertaken to assess the impact of pedestrianization of High Street on businesses, traffic movement, the environment etc. For such a feasibility study to be undertaken, there would have to be evidence of strong local support for the idea. The Shipston Town Plan includes a medium-term proposal to undertake an assessment of traffic, parking and congestion in the High Street and surrounding areas, to review the broader need for parking facilities, including the safety aspects for pedestrians. However, there is no specific proposal for pedestrianization. The same applies to the Stour Vision Action Plan, but it does contain a reference to environmental improvements in the town centre. Furthermore, consultation with the Town Council has not highlighted local pressure for pedestrianization.

### Recommended Action

No change be made to the Core Strategy but consultation be undertaken with the Highway Authority (WCC) and the Town Council regarding potential funding for a Shipston town centre traffic/parking/pedestrian assessment study.

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## Analysis of Representations

Topic: SHIP.1

North & South of Campden Road, Shipston-on-Stour

### Summary of Matters Raised in Representations

1. The site should only be used for industrial purposes.
2. There is no proven need for more housing in the Shipston area. Housing on this site would put an unacceptable strain on local resources.
3. Siting the medical centre so far out of the town centre would mean difficult access for those without cars. It would also mean that virtually all patients would have to travel by car. This will conflict with Policy CS.17.
4. Any retail development would have a negative impact on the town itself which is an important and valued shopping centre for the area. The foodstore is contrary to 'Our Vision of 2026'. Retail development should be aimed at a level that services the existing community and does not rely on in-commuters. Any additional retail space should be based in the town centre. The supermarket proposal should be subject to the requirements of PPS6 using a sequential approach.
5. The site rises and would be visually intrusive in the AONB. The site constitutes a significant intrusion into the countryside increased by the gradient of the site. This will cause additional light pollution.
6. Housing development should be on small sites around the edges of Shipston so that growth appears more organic and fits in better with the landscape.
7. Any housing should be to meet an identified local need.
8. The promoters of the site confirm that it complies with PPS3 and it deliverable in the first five years of the plan period.
9. Concern that development of the land will exacerbate existing flooding problems faced by the town. The land proposed for development lies uphill of the town and thus any water which runs off the site will undoubtedly run through the town and into the river. The development will increase surface run-off which should be avoided at all costs.
10. A permanent gypsy pitch should be considered at the Norgren site. This could meet the requirements for access. Health services and schools would be within easy reach.
11. The connectivity of this area of Campden Road is poor with poor roads and limited prospects of a viable bus service. Further development will bring increased traffic and negative implications including further congestion.
12. There is a conflict in the DCS which argues for more retail space in Shipston Town Centre and new retail space on the out of town site (page 93).
13. Shipston has grown in a linear manner from north to south and this site is not part of the historic growth of the town.
14. There is no evidence to support housing on this scale in a rural hub, particularly now that two substantial employers no longer contribute to the economy of the area.
15. There are no public rights of way within the site. The north western quadrant of Shipston is devoid of any public rights of way to meet the recreational demand from new housing. Developer contributions should be sought to create a new public footpath from Campden Road north and north eastwards to Darlingscote Road.
16. The major health issues suffered by a large percentage of Shipston residents (respiratory) will be exacerbated by the provision of additional dwellings on the prospective area.
17. The term 'food store' is misleading as these shops increasingly sell other white goods and services which will impact further on existing businesses in Shipston.
18. Shipston has seen significant growth in the overall number of dwellings, 95% since 1981. This growth in dwellings has not been supported by the improvement in infrastructure resulting in a situation which requires re-dress before any further development can take place.
19. Retail expansion on the edge of the town could be detrimental to the tourist aspect which you wish to encourage in this area.
20. The residential element should include a range of housing including affordable flats. This would keep young people in the area which would help the demographics of the community.
21. Prime arable land should be retained and not built on.
22. The natural ground at the site is lower lias clay which contains a substantial amount of sulphates. Sulphates attack the concrete foundations of houses and changes the composition of water tables.

### Officers' Response

## Analysis of Representations

1. This is a reference to the Norgren site. The proposal does not prescribe retention of the site for industry on the basis of a pragmatic approach. Allocation for industry will not guarantee that it will be used for such a purpose. There is no evidence that there is a demand for re-use from businesses that are able to offer the current owners a fair return on the asset. Some of the current buildings are becoming obsolete and would not be easily adapted or sub-divided for alternative uses. In terms of landscape impact, the aim would be to use redevelopment of the site to provide a softer edge to the town than that presented by a large industrial premises.
2. The proposed locational strategy includes Shipston-on-Stour as one of the settlements scheduled for housing growth because it is one of the more sustainable settlements in the district in terms of existing services and facilities. It also generates its own housing needs and the strategy aims to meet housing needs where they arise. If it is clear that the development will give rise to additional pressure on the town's resources, then finance to improve the latter can be secured as part of the development process.
3. Ways to secure public transport access to this development will be investigated.
4. In line with Policy CS.16 of the Draft Core Strategy, the promoters of the food store scheme have been asked by the District Council to commission an assessment of whether the proposed development will have a detrimental impact on the vitality and viability of Shipston town centre. This assessment will also include a sequential test. The District Council will commission its own consultants to verify this assessment. The July 2008 Stratford-on-Avon District Retail Study sees the foodstore as a means of retaining more retail expenditure in the town, many people currently undertaking their main food shopping in places such as Stratford-upon-Avon and Banbury. If the store can perform this role and avoid a negative impact on the town centre, then it should be something positive for the town, in line with the Vision's intention that a greater percentage of retail spend will directly support the local economy.
5. The impact of the proposal on the AONB and the adjoining landscape is being carefully considered. The site promoters have prepared a Landscape & Visual Impact Assessment of the proposal. This study indicates that a development can be undertaken on this site without substantial negative effects on the landscape. Preparation of a masterplan for the site will take into account the findings of the Assessment and the need to minimize the scheme's impact.
6. Such an approach would not provide sufficient housing to meet strategic requirements in line with the proposed locational strategy. Also, reliance on small site development would give rise to cumulative impact on infrastructure while providing less scope for securing funding to address those effects.
7. The RSS Phase Two Revision aims to limit housing growth within Stratford-on-Avon District to that which is required to meet local needs. The proposed locational strategy within the Core Strategy aims to direct this housing growth to the most sustainable locations within the district, one of which is Shipston-on-Stour, so the new housing intended to be located at Shipston will be meeting the needs of an area wider than the town itself, reflecting the town's role as a service centre for a rural catchment. However, if the RSS Phase Two Revision housing figures for the district are increased significantly, then Shipston may need to accommodate households moving into the district from elsewhere. Even so, there will be scope for housing sites to include an element of affordable housing that is aimed at accommodating local people whose needs have been identified through local surveys.
8. Noted.
9. The effects of the proposed development on drainage form an important consideration. Appropriate sustainable drainage measures are highlighted as one of the specific infrastructure requirements in Proposal SHIP.1. In essence these measures would aim to ensure that surface water run-off derived from this site would not over-burden the existing drainage system.
10. Consistent with Policy CS.12 of the Draft Core Strategy, SHIP.1 is being considered as one of the possible locations for a Gypsy and Traveller site to help to address the identified need for this type of accommodation in the district.
11. The need to create good links between the site and the rest of the town is highlighted in the proposal in line with the requirements of the Highway Authority. The latter does not consider that potential traffic congestion is an issue with this proposal.
12. In Policy CS.16 exceptions to town centre provision will only be acceptable where there is no suitable site available in the town centre and also where the proposal meets the specified criteria. Because of this, the District Council has asked the promoters to undertake an assessment of whether the proposed development will have a detrimental impact on the vitality and viability of Shipston town centre. This assessment will also include a sequential test.
13. The C19 & earlier core of the town does in fact show a strong east-west orientation. West Street, Sheep Street and Telegraph Street are all orientated in this way. North-south linearity was largely the result of more recent ribbon development, and that pattern has been much compromised by post-war development.
14. The need for employment growth in the town has not been overlooked. Proposal SHIP.1 includes elements that would support increased employment in the town.
15. This proposal will be taken into account in the detailed planning of the development.
16. There is no evidence to substantiate this claim.

## Analysis of Representations

17. This issue will be examined in the retail impact assessment referred to above.
18. Infrastructure capacity is being examined in connection with the selection of sites for development. An Infrastructure Requirements Report is being compiled.
19. By examining the potential effects of the proposed foodstore on the vitality of the town centre, the retail impact assessment should be a good guide as to whether tourism in the town will be affected by the proposal.
20. The District Council will be looking for a mix of housing that will address the requirements of the different types of households that are likely to require housing over the plan period. There may be a case for an element of affordable flats.
21. On the Provisional Agricultural Land Classification (ALC) map the land is classed as Grade 3. No recent detailed survey of ALC has been undertaken to determine whether any part of the site falls within Grades 1, 2 or 3a, the best and most versatile farmland according to PPS7. However, this is unlikely in view of the lack of any Grade 2 land on the west side Shipston.
22. The District Council's Building Control Team indicate that there are technical solutions to this problem that would not affect the economic viability of the development.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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### Topic: SHIPMap Shipston-on-Stour Proposals Map

#### Summary of Matters Raised in Representations

No representations submitted.

#### Officers' Response

No response required.

#### Recommended Action

None

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### Topic: OMSITE009 East of Stratford Road, Shipston-on-Stour

#### Summary of Matters Raised in Representations

1. Object to SHIP.1 but an alternative would be this site located to the north of the town for mixed uses. The land is less visible from the wider area and would therefore be less visually intrusive. The site lies downstream of the town and there would be no likelihood of exacerbating the existing flooding problems within the town. The land lies equally close to the services and facilities available within the town and is closer to the primary school, doctors surgery and hospital. Development would provide the opportunity to enhance community facilities particularly sporting facilities to the north of the town.

2. Broad areas for development were considered by the SHLAA in 2007/8. This report concluded that land to the north of the existing built up area provides the best opportunities for development without significant landscape impact. This report supports the development of this land.

#### Officers' Response

1-2. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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## Analysis of Representations

**Topic: OMSITE012**                      **West of Furze Hill Road & North-west of Shoulderway Lane, Shipston-on-Stour**

### Summary of Matters Raised in Representations

1. SHIP.1 should be extended from its south easterly extremity to form a 'ribbon' development abutting the existing residential area. The advantages of this would be fewer tall buildings as they could be located on lower ground, easier access for elderly and nearly infirm residents and more housing will allow for a better mix of ages within the community.
2. It is doubtful that allocating one site will provide an adequate supply of land for comprehensive development land for the next 20 years. The provision of about 250 dwellings on site SHIP.1 over the next 20 years is the equivalent of an annual build rate of less than 13 dwellings. Such a low build rate will not bring forward the numbers of affordable housing units that are required to satisfy local housing needs.
3. This site should be allocated for residential development and the SHIP.1 site for industrial/business use. There are advantages of separating the uses, i.e. less traffic, more environmentally sustainable, better access.

### Officers' Response

1-3. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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**Topic: OMSITE025**                      **Land north of Shipston-on-Stour between Darlingscote Road & Stratford Road**

### Summary of Matters Raised in Representations

1. This land should be allocated in addition to SHIP.1 as it is less obtrusive, above the flood plain and in close proximity to the main access routes to the town. Mixed use development including residential development could be accommodated in this area.
2. This site should be reviewed in the SHLAA.

### Officers' Response

1-2. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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## Analysis of Representations

Topic: SOUgen Southam - general

### Summary of Matters Raised in Representations

1. Care facilities should be located on the eastern side of Banbury Road and not within SOU.1.
2. Any additional housing land other than that already proposed for allocation should be on land to the south east of the town.
3. Detailed issues regarding design and access.
4. There should be a clear and sustainable 'green belt' between any development at the southerly end of Southam and the village/parish boundary of Ladbroke.
5. Edge of town development is not needed and any that does take place will be detrimental to the existing town centres.
6. Development of a new sports facility may give the opportunity for improved facilities but stresses the importance of having sports facilities within walking distance of the town and with a safe pedestrian access.
7. Any more development will ruin the local atmosphere of the area.
8. Concern at infrastructure provision i.e. schools, GP services as these are currently at capacity.
9. Southam needs housing for local people but not housing for people from other areas.
10. The Co-op site should be redeveloped as a priority.

### Officers' Response

1. There is no inherent reason why land to east of Banbury Road is preferable for this use.
2. As things stand, the areas of land identified in the Draft Core Strategy are thought to be preferable although further assessment is being carried out.
3. Access arrangements will have to satisfy the requirements of the County Highway Authority.
4. The proposed extent of development retains an extensive gap between the two settlements.
5. The RSS Revision requires additional land to be identified for future housing development in the District. It is not apparent that this would be harmful to the town centre; a foodstore use would have to satisfy a range of criteria including impact on the town centre.
6. Improved sports facilities on the southern edge will be reasonably accessible from all parts of the town; improved pedestrian facilities are specified in the proposal.
7. The scale of development proposed is not so excessive that such harm would be caused to the existing nature of the town.
8. The capacity of key services to cater for further development will be taken into account.
9. The emphasis of future housing development is to meet local needs although occupancy cannot be controlled except in relation to social housing.
10. It is hoped that this area will come forward for redevelopment but this is dependent on other parties.

### Recommended Action

- 1-10. Continue to assess the suitability of Southam to take further development, taking into account its character and the situation regarding services, infrastructure and traffic.
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## Analysis of Representations

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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

#### Summary of Matters Raised in Representations

1. The National Monument Record (NMR) suggests archaeological activity of note may occur on this site. Should be subject to a systematic archaeological survey before any development decisions are made.
2. Only the part nearest the A423 (western part) should be included.
3. The proposed allocations are similar to land south of Daventry Road which has not been allocated. It is difficult to see what the advantages of these two sites are.
4. Detailed comments regarding the proposed access; would create a 'rat run', would cause safety issues, parking along the access route results in the road being single lane, access should be from the A423 roundabout, a new access road should be included to allow emergency services to get into the site quickly and easily.
5. Public footpath passes through the site, developer funding should be sought to create a link south-westwards.
6. Lack of infrastructure to support an additional 75 dwellings.
7. Detailed comments regarding loss of amenity for existing residents.
8. Strong objections to the proposed inclusion of a BMX track; noise, anti social behaviour, crime increase.
9. Public open space should be provided to compensate for the loss of an open area.
10. Houses should be predominantly social housing to address a known need for rented accommodation.
11. The development could raise the levels in the River Itchen and this could cause on-site flooding or flooding elsewhere.
12. Brownfield sites in the village should take precedence before greenfield edge of settlement sites.

#### Officers' Response

1. County Archaeologist has assessed the land involved and such sensitivity has not been identified; however, a programme of archaeological fieldwork would be required.
2. Further consideration is being given to the extent of the land that should be included in the proposal.
3. Further assessment of the relative merits of all land on the edge of the town for development is being carried out.
4. Detailed arrangements regarding access are being assessed by the County Highway Authority, in particular the scope to achieve the main access off Coventry Road.
5. It would be appropriate to make reference to this issue in the proposal, although extending the footpath over land owned by other parties is likely to be problematic.
6. The capacity of key services to cater for further development will be taken into account.
7. Impact on neighbouring properties is a detailed matter that would be dealt with at the planning application stage.
8. A BMX track already exists on the site and it is appropriate to seek to retain such a facility in some way if the need exists.
9. Provision of an appropriate amount of open space will be considered at the planning application stage.
10. A proportion of social dwellings would be provided as part of the development.
11. A detailed assessment of flood risk and drainage will be required as part of any planning application for the land.
12. While the development of brownfield sites is preferable, the release of greenfield land will be necessary in order to meet the regional housing requirement in a manner that is consistent with the overall strategy.

#### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

### Topic: SOUMap Southam Proposals Map

#### Summary of Matters Raised in Representations

1. The proposals map shows a small site to the north of the river that has planning permission for 50 houses; Environment Agency wishes to know whether it was consulted on this application.
2. The area identified as SOU.1, although perhaps an approximate, is likely to be insufficient to accommodate the extent of development anticipated. Southam Cricket Club have not indicated any willingness to relocate. Therefore the Council should contemplate redrafting the proposals map to exclude the cricket club land.

#### Officers' Response

1. This represents the redevelopment of the Southam Sewage Works site on Wattons Lane on which the Environment Agency was fully involved.
2. Further detailed assessment of the land involved will be carried out in preparing the next stage of the document.

#### Recommended Action

1. None required.
  2. Clarify situation regarding the aspirations of all the owners and occupiers of the land affected.
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### Topic: OMSITE004 South of Daventry Road, Southam

#### Summary of Matters Raised in Representations

1. Can see no major difference between SOU.1 and SOU.2 and this omission site. All are of a similar distance from the town centre and would extend the built-up part of the town into the open countryside.

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: OMSITE005 North of Welsh Road East, Southam

#### Summary of Matters Raised in Representations

1. Land meets the requirements of PPS3 and is available, suitable and deliverable for future development.
2. Brownfield site which satisfies sequential test unlike SOU.1 and SOU.2.

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.
2. See 1 above

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: OMSITE006 North of Warwick Road, Southam

#### Summary of Matters Raised in Representations

1. Development of SOU.2 is likely to have a greater visual impact on the form and character of the settlement and encroachment into the open countryside compared with this omission site.
2. Omission site would be seen as infilling land flanked between existing existing development.

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.
2. See 1 above

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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## Analysis of Representations

**Topic: OMSITE013** Former Garden Centre, Welsh Road East, Southam

### Summary of Matters Raised in Representations

1. Can see no major difference between SOU.1 and SOU.2 and this omission site. All are of a similar distance from the town centre and would extend the built-up part of the town into the open countryside.

### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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**Topic: OMSITE014** Hill Farm & Wincotts, South of Leamington Road, Southam

### Summary of Matters Raised in Representations

1. Both SOU.1 and SOU.2 will extend Southam into the open countryside therefore the SHLAA comments are irrelevant as all 3 are greenfield sites.

2. Once the extension to the employment site is completed, the land at Hill Farm and Wincotts will be immediately adjacent to the built up area of Southam.

### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

2. See 1 above

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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**Topic: OMSITE019** East of Banbury Road, Southam

### Summary of Matters Raised in Representations

1. Arable field should be used for infill development as it is in-between existing development and the land at both ends of the field has already been compromised by building work. Such development could be carried out without any detriment to the green recreational land currently used by local residents.

2. Site should be allocated for care provisions. SOU.1 and SOU.2 are not capable of accommodating this and a care village could be provided to meet the needs of local people.

### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

2. See 1 above

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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**Topic: OMSITE021** North of Wattons Lane, Southam

### Summary of Matters Raised in Representations

1. Land is sustainably located within Southam but was dismissed by the SHLAA because it lies within the flood plain. Other sites which have recently been developed lie within the flood plain, suggests possible mitigation.

### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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## Analysis of Representations

**Topic: OMSITE024 Glebe Farm, Southam**

### Summary of Matters Raised in Representations

1. Land is closely related geographically to the town centre and development of the site would present an opportunity to create a sustainable community with good links to the existing settlement within easy walking and cycling distance of extensive services and facilities.
2. Omission site has a better relationship with the town centre than the two proposed allocations.
3. Landscape mitigation measures are available to minimise any adverse effects of the development.
4. Site satisfies PPS3 as it is available, suitable and achievable.

### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.
2. See 1 above.
2. See 1 above.
4. See 1 above

### Recommended Action

Carry out a thorough assessment of the land being promoted

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**Topic: OMSITE028 Codemasters Campus, Leamington Road, Southam**

### Summary of Matters Raised in Representations

1. Core Strategy needs to recognise that there are existing businesses located on sites within the open countryside.
2. Requested that CS identifies Codemasters site and adjacent land as one of the Districts' development opportunities. Proposal should allow potential for new facilities that could support and grow the business in its current location.

### Officers' Response

1. The District Council is fully aware that there are many local businesses that are situated in the countryside and the Draft Core Strategy takes a positive approach towards their growth, but in a sustainable manner. Because of their sensitive locations, their expansion often has to be balanced with the need to protect the rural environment of their localities. Indeed, the Council has granted a number of planning permissions in the past for further development at the Codemaster's site, which is a clear demonstration of its commitment to support rural businesses in the countryside. The Draft Core Strategy takes this on board in the form of Policy CS.13 which allow scope for rural businesses to grow and expand at their existing locations. Consequently, Policy CS.13 would allow scope for the stated aspirations of Codemasters to be realised at its existing location if it can be demonstrated that any such aspirations would not cause unacceptable impacts on the character of the local area without having to identify the site in the Core Strategy for a specific employment use.

Generally speaking, the Draft Core Strategy seeks to allocate sites for employment development in the Main Rural Centres and Stratford-upon-Avon. The Codemasters site is in close proximity to Southam, which is one of the Main Rural Centres of the District. The inter-relationship between the site and the town of Southam and the benefits that they can derive from each other should be fully explored as part of any further development of the site. The District Council, the Town Council, the owners of the business may wish to work together to see how best this can be achieved.

2. See 2 above.

### Recommended Action

1. No modification is necessary as a result of this particular representation.
-

## Analysis of Representations

**Topic: SOUTesco Southam - anticipated Tesco application**

### Summary of Matters Raised in Representations

1. Concern that a foodstore on the edge of Southam town centre will result in the existing shops in the town centre losing custom. This will lead to a loss in custom, the closing of town centre shops and further unemployment.
2. The proposed site is an industrial estate and not a retail park. Such a use is therefore not appropriate.
3. There has been little publicity regarding this proposal and it all seems very underhand.
4. The town centre site earmarked for redevelopment should be utilised by prospective foodstores.
5. There would be an increase in traffic around this area of the town and the store would not be as accessible as it would be if it was centrally located.
6. The existing shops in Southam fulfil the food shopping requirements and there are larger supermarkets in the surrounding towns such as Rugby, Banbury and Coventry - is there a need for this store?
7. The market town character of Southam would be lost if large brands are introduced.
8. Concern that granting a change of use for Tescos will set a precedent and allow for other units on the Holywell Industrial Estate to change use and this will eventually lead to two town centres

### Officers' Response

- 1-8. These matters are being addressed through the consideration of a planning application that has been submitted for the site.

### Recommended Action

- 1-8. Consider further the issue of providing a large foodstore in the each of the three rural market towns.
- 

**Topic: STUDgen Studley - general**

### Summary of Matters Raised in Representations

1. Retaining the industrial estates in Studley will help to reduce the number of vehicle movements in and out of the Village
2. The County Council are trying to close the library in Studley but this is a key public provision and should be included in the LDF.
3. House building in Studley is not within the vision of the DCS. The STUD.1 proposal is about enhancing existing business provision and there is no mention of creating retail opportunities. Provision for retail should be included in the final document.

### Officers' Response

1. This comment is noted.
2. Policy CS.18 in the Draft Core Strategy seeks to retain existing local services and community facilities.
3. Studley is considered an appropriate place to locate some new housing development but no suitable sites were identified when preparing the Draft Core Strategy. The approach to retail set out in draft Core Strategy policy CS.16 does not consider Studley to be appropriate for a major retail development although small scale schemes could be encouraged.

### Recommended Action

1. No action.
  2. No action.
  3. Assess whether any suitable sites have come forward in Studley through the revised SHLAA or responses to Draft Core Strategy.
-

## Analysis of Representations

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

### Summary of Matters Raised in Representations

1. Studley Parish Plan expresses the desire to encourage enterprise therefore it is essential to retain this site for employment purposes
2. The Warwickshire Wildlife Trust advise that mature trees need to be assessed and any requirements re bats and foraging areas allowed for in development.
3. The sustainable drainage must be fulfilled to protect the watercourse value and species.
4. The existing infrastructure is not adequate for the associated increases in traffic. The road systems will need to be improved especially if further development takes place on the business and industrial sites along The Slough.
5. The front façade of the former needle factory should be retained
6. There are no recorded PRoW within the site therefore the development might usefully incorporate a public footpath or cycleway within the northern boundary of the site to link Redditch Road to Birmingham Road and to public footpath AL139 at Washford Bridge.

### Officers' Response

1. We agree that employment uses should be retained on the site. However further consideration is also been given to other types of development which may be of use to Studley.
2. All sites are being assessed in more detail for their ecological value
3. The Environment Agency and Severn Trent Water will need to be satisfied with any proposed drainage scheme.
4. The Highways Agency and WCC Highways are being consulted on the sites within the Core Strategy.
5. This matter will require further consideration.
6. We agree that this would be a useful connection to footpath network in Studley and should be discussed further with promoters of the site.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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**Topic: STUDMap**                      **Studley Proposals Map**

### Summary of Matters Raised in Representations

1. Proposals map fails to identify a suitable site; land at Studley garage should be allocated for housing as it is underused brownfield land that would contribute to the District's housing requirement.

### Officers' Response

1. Given the preferred approach towards the location of future development in the District as set out in the Draft Core Strategy, it would be appropriate to identify land in Studley for residential development. The specific site suggested now has planning permission for a foodstore and it has been implemented.

### Recommended Action

1. Undertake a further assessment of the suitability of land in Studley for identification in the Core Strategy for residential development.
-

## Analysis of Representations

### Topic: OMSITE017 Green Farm & Poplars Engineering, Studley

#### Summary of Matters Raised in Representations

1. There is an opportunity for further development of the site particularly bearing in mind that there is a need for small industrial estates for small businesses, start up businesses and relocated small businesses due to other development proposals. There is no need for this area to link up with the existing Studley boundary but we consider the location is good for small businesses where more economical facilities can be provided.

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: OMSITE034 Namco Tooling, New Road, Studley

#### Summary of Matters Raised in Representations

1. The Namco factory site at Studley should be allocated for a mixed use scheme comprising residential and employment. It is previously developed land, in a sustainable location, under-used and redevelopment was proposed in the 2008 SHLAA..

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: WELLgen Wellesbourne - general

#### Summary of Matters Raised in Representations

1. The Walton Estate owns substantial areas of land in and around Wellesbourne and the smaller village of Walton most of which is farmed. Some of that land could be utilised to substantially improve Wellesbourne both now and in the future. See Omission sites 29 and 30.

2. Do not agree with the site proposed for allocation but agree that the town should receive extra allocations which provide additional housing, extra care facilities and community facilities.

3. Insufficient attention has been paid to the inevitable consequence of further development within the River Dene catchment and there will be an increased risk of flooding in Wellesbourne. The EA is currently assessing options to alleviate flooding in the village but no allowance appears to be being made for future changes in land use. This is clearly in conflict with the DCS that envisages several such developments within the catchment.

#### Officers' Response

1. The site specific proposals are considered elsewhere in this report.

2. Noted. The Land Parcels Assessment is examining the merits and de-merits of potential development sites at Wellesbourne.

3. The District Council is in close consultation with the EA concerning development proposals in the district. The Council also has the benefit of a Level 1 Strategic Flood Risk Assessment which maps all forms of flood risk, while it is proposed the Core Strategy will contain a policy specifically relating to flood risk (see Policy CS.23). Amendments to the latter are proposed in this document. Furthermore, decisions relating to development proposals need to take into account Government guidance on development and flood risk in the form of PPS25. One consequence of this guidance is that developers of larger sites are normally required to submit site-specific flood risk assessments when making planning applications. All this means that the identification and planning of sites for development at Wellesbourne and elsewhere in the River Dene will take full account of potential flood risk.

#### Recommended Action

None.

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## Analysis of Representations

Topic: WELL.1 East of Ettington Road, Wellesbourne

### Summary of Matters Raised in Representations

1. WELL.1 has been prime agricultural land for many years and is not included within the village envelope. Any developments proposed for this area relating to a medical centre and additional housing would require a major examination of services, communication and transport facilities between all parts of the present community.
2. The land presents an ideal opportunity to provide a mixed-use development incorporating residential development, a medical centre and extra-care housing for the elderly and people with special needs. Landscape mitigation is available to minimise any adverse effects of development. The site meets the tests of PPS3 and is achievable, suitable and available.
3. The site is flat and is surrounded by flat land which means that it will be highly visible and will have an unacceptable visual impact on the wider landscape. This view was shared by the SHLAA. The report stated that the land could be developed if there is a need to find further land for residential development provided there is substantial structural planting. There is alternative land which would be more suitable for meeting the needs of the town and the SHLAA also identified other land as being appropriate for development.
4. The land is remote from the majority of village services and facilities. The land is separated from the village by the A429 which forms a natural boundary for the settlement.
5. Whilst the village is served by public transport, this does not extend along Ettington Road.
6. Access to the site will be difficult and potentially dangerous. The proposal states that there shall be no vehicular access from Walton Road. The A429 Ettington Road is a national speed limit road and taking an access from this road would be difficult. There appears to be no access from the Dovehouse estate which has become isolated from the main village, provision should be made to ensure that this does not occur with this site. Traffic congestion in Wellesbourne is already an issue and will be exacerbated by further traffic from new development. Traffic management for the centre of the village is also desirable.
7. The land was not promoted through the SHLAA and therefore it is unclear whether the land is available for development and what the timeframe is.
8. Concern that the site will encroach into open countryside with no boundaries. Development should be low rise to reduce the visual impact i.e. bungalows
9. The out of town supermarket (Coop) should be re-developed for housing rather than this large greenfield expansion.
10. The risk of flooding has increased in Wellesbourne in recent years and should be a consideration when allocating development. Surface water run-off and its provision needs to be a priority. The site is lower lying than the surrounding land and therefore is saturated with water after a heavy rainfall. Existing residents concerned at the flood risk of developing on this land.
11. No public rights of way are included within the site. Nearby bridleway SD81a does offer a rather lengthy walk/cycle/ride southwards but the return circuit is along a narrow road. Developer contributions should be sought to create a public footpath link along the southern boundary of the site. This will provide a connection to the village centre and to the River Dene.
12. The local GP surgery does not wish to move onto the proposed site but wishes to be kept informed of progress with the CS due to the implications population growth may have on their services.
13. Wellesbourne should not be developed much further as it is limited in toilet facilities and the general shops are sufficient for the present needs.

### Officers' Response

1. The greater part of the site comprises higher grade agricultural land (Grades 2 & 3a). While this is an important factor to take into account, it does not represent an absolute constraint on development. According to PPS7 it is one among a range of sustainability considerations and it is for local authorities to decide whether best and most versatile agricultural land can be developed, having carefully weighed the options in the light of competent advice. However, PPS7 does say that authorities should seek to use areas of poorer quality land in preference to that of a higher quality, except where this would be inconsistent with other sustainability considerations. Weighing up these considerations is part of the District Council's assessment of the suitability of different sites for development, so too the examination of services, communications and transport sought by the respondent. The process of assessment is continuing.
2. The points made in support of the proposal are noted. It should be stated that representations from the Hastings House Medical Practice indicate that there is no need for a medical centre on this site.
3. The landscape impact issue is being given due consideration. The SHLAA Landscape Study states that the former nurseries site could accommodate a modest scale of well designed development as long as it delivers a well defined and appropriate edge. As regards the land further south and east of the Ettington Road, the Landscape Study states that development here would be particularly prominent, but it goes on to suggest that substantial structural planting could create a suitable framework for a modest level of development in the two fields adjoining the existing settlement edge which is currently well defined by vegetation along Ettington Road. Alternative sites are being subject to assessment.

## Analysis of Representations

4. The relative accessibility of different potential development sites on the edge of the village is being assessed. As regards the separation/boundary issue, the SHLAA Landscape Study did not see this as an absolute bar to development, subject to mitigation measures.
5. The Draft Core Strategy specified that measures to provide access to local bus services would have to be provided. As with other development sites, these measures may include the provision of finance for changes to bus routes to bring buses to this location.
6. Road safety and traffic congestion are important issues and the District Council is taking advice from the Highway Authority on these matters. Also, the scheme promoter has provided a Transport Statement that seeks to address these issues.
7. The owners are promoting the site through the SHLAA Update and through the Core Strategy. They have confirmed that it is available.
8. The landscape impact issue has been addressed in previous points.
9. The Co-op site is not available for redevelopment. Its removal would result in the loss of a facility which is valued by local people.
10. The promoters have provided a site assessment report on drainage which concludes that the development could take place without flooding or capacity overload to adjacent land.
11. The comment is noted.
12. This point will be taken into account when re-drafting the Core Strategy.
13. If this proposal is included within the adopted version of the Core Strategy, then Policy CS.30 provides scope for the District Council to seek provision of, or contribution to the provision of facilities, infrastructure and services, and other forms of environmental and social requirements that are necessary to make this scheme acceptable in planning terms. Furthermore, the expectation is that all forms of development will achieve a net benefit to the local community taking into account its needs and aspirations.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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## Analysis of Representations

Topic: WELL.2

Horticultural Research Institute, Warwick Road, Wellesbourne

### Summary of Matters Raised in Representations

1. Wellesbourne Village Society wishes to be kept informed of any developments around the village and especially those relating to areas WELL.2.
2. The National Monument Record suggests that archaeological activity of note may occur on this site.
3. The EA advise that a detailed Flood Risk Assessment will be required in order to assess the flooding implications of this site. Existing development is shown to lie within the flood plain of the watercourse which crosses the site, flood plain restoration will be appropriate as part of the development if the existing is to be demolished.
4. The National Trust is concerned at the potential for 'remodelling and redevelopment of much of the site' will lead to substantial intensification of employment in a location which has relatively easy car access to the motorway network but which has no close relationship to a sizeable town. Suggest a more cautious approach is necessary, 'requiring' rather than 'preferring' a close relationship between new and existing uses.
5. Reference should be made to Charlecote Park as well as Charlecote Village as the park extends beyond the village boundaries to the north west and east. Avoidance of adverse impacts on Charlecote should be a main feature of the development.
6. Green infrastructure should not be the sole form by which impacts are mitigated. Good design could also be significant by preventing unnecessary light pollution or visual intrusion.
7. It should be noted that an unsurfaced, unclassified county road E6981 Research Station Road runs westwards through the centre of the site and is managed by Countryside Recreation. This route needs to be protected and incorporated within the site design. The route is used by off-road vehicles, walkers, riders and cyclists.
8. The Council did not discuss the proposal with the University of Warwick (landowner) prior to the publication of the DCS and therefore it does not fully reflect the University's aspirations for the site.
9. The preference for technology and research-based employment businesses is acknowledged however there are other locations in the sub-region with a technology focus and there needs to be flexibility for other employment uses to be considered albeit that B8 uses would not be appropriate.
10. Other uses such as hotel and conferencing facilities, outdoor tourism and recreation uses may be appropriate.
11. It is stated that 'if existing dwellings on the site become surplus to requirements, acquisition for use as affordable housing for local people should be pursued'. The University wishes for this reference to be removed as these properties are occupied by staff and there is no basis for the inclusion of this within the DCS.
12. Traffic congestion around the village is an existing problem and will be exacerbated by further development. Traffic management for the centre of the village is also highly desirable.
13. No housing should be allocated for this site. It should be used for business/commercial uses only.

### Officers' Response

1. The comment is noted.
2. The Historic Environment Assessment of the Proposed Strategic Sites undertaken by Warwickshire Museum recommends that further archaeological assessment, in the form of a desk-based assessment and walkover survey, should be undertaken for this site. A report detailing the results of this assessment should be submitted with any application to redevelop the site. Further evaluative fieldwork is likely to be required across those areas of the site which have not been subject to extensive past disturbance. This further fieldwork may need to be secured by a condition upon planning consent, assuming such is granted.
3. This point is accepted in accordance with the requirements of PPS25.
4. The DCS gives a degree of flexibility in order to give scope for an alternative employment use if retention of a research-based use were no longer feasible. A worst-case scenario would be if planning policies were so narrow in scope that they contributed to a prolonged vacancy and deterioration in the condition of the site. At the same time the proposal does specify that a B8 (warehousing/distribution) use would not be supported. The latter requirement reflects the sensitivity of this open countryside location and its proximity to Charlecote Park.
5. This suggestion relating to the inclusion of a reference to Charlecote Park is accepted. Charlecote Park is included in the Register of Parks and Gardens of Special Historic Interest and the designated area extends east of the village of Charlecote. Any proposals for development at the HRI need to be assessed for impact on the registered park (para 2.24 of PPG15). As regards the avoidance of impact on the village of Charlecote, the proposal already makes reference to this issue (see next point).
6. This point is accepted. Impact can be mitigated by means other than the provision of green infrastructure.

## Analysis of Representations

7. Noted. This matter needs to be specified in the list of specific infrastructure requirements.
8. The proposal does not have to coincide with the University of Warwick's aspirations for the site. The Core Strategy is framed through consideration of a wide range of issues and views.
9. The proposal already includes a degree of flexibility in that it states that the preferred option is employment uses related to existing research establishment for technology and research-based business. It does not rule out other employment uses except B8.

### Recommended Action

Carry out a further assessment of the proposal to decide whether or not it should be retained in the Core Strategy and, if it is to be retained, identify the specific provisions that should be set out in relation to the proposal.

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### Topic: WELLMap Wellesbourne Proposals Map

#### Summary of Matters Raised in Representations

No representations submitted.

#### Officers' Response

No response required.

#### Recommended Action

None

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### Topic: OMSITE007 North of Stratford Road, Wellesbourne

#### Summary of Matters Raised in Representations

1. The proposal WELL.1 would have a significantly greater harmful impact on the character and setting of the settlement and involve encroachment into open countryside compared to this omission site. The development of this site would be closely contained by existing well established features including the bypass. Containment by these features results in less obvious intrusion into the countryside and more logical growth. These merits cannot be applied to WELL.1.

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: OMSITE020 Land south-west of Kineton Road, Wellesbourne

#### Summary of Matters Raised in Representations

1. The site was promoted through the SHLAA and it was concluded that this site should be within the identified Broad Location for Development. No justification has been given by the Council for the allocation of WELL.1 rather than this site, as both were identified in the SHLAA as Broad Locations for Development. The site is suitable for development, is sited within 200 metres of the village and its services, and is a logical extension of the village. There are adequate public transport links and a suitable access to the site could be easily created. The site has no topographical interest and is not prominent in the landscape. The area prone to flooding would be kept free from development.

2. The representations are supported by a Habitat Survey and a Transport & Access Appraisal. The Habitat Survey concluded that the site had little ecological interest except for the margins of the River Dene. This will be retained as an open space and wildlife corridor. The Transport & Access Appraisal indicates that there is spare capacity in the local highway network to absorb traffic from this development and that there are no highway safety issues. Potential access points would accord with national guidelines.

3. The site is available immediately for development. The site could accommodate a doctor's surgery although it is understood that this is not required.

4. It is recognised that this site cannot accommodate all of the housing proposed on WELL.1, but additional land on the other side of Kineton Road would provide for the remainder.

#### Officers' Response

1-4. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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## Analysis of Representations

### Topic: OMSITE029 Dog Close, Wellesbourne

#### Summary of Matters Raised in Representations

1. The DCS recognises that there is a shortage of facilities to meet the needs of an aging population across the District. Proposed allocation WELL.1 is not the most suitable to meet this aim.
2. This site is 1.7 hectares and is generally flat. There is no public access to the land. The site is located close to the main centre village and is therefore easily accessible by foot and cycle. A small part of the site lies in the 1 to 100 flood zone but this does not affect the majority of the land. Wellesbourne has no official care home offering full time care. It is proposed that 1 hectare of this site be utilised for care facilities for the elderly, with parking to be used by the care home and some public car parking to alleviate the existing parking problems along Bridge Street. The site would be accessed via Bridge Street.
3. The owners of the site also own the Conservative Club on Church Street. This currently has a small outside amenity area. An informal recreation area attached to the Club would be of benefit to all. The remainder of the land would then be made available to the residents of Wellesbourne as public open space with associated enhancements to the wildlife corridor along the River Dene.

#### Officers' Response

- 1-3. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: OMSITE030 Precinct, Wellesbourne

#### Summary of Matters Raised in Representations

1. The Walton Estate owns the precinct which has no parking facilities. The existing leases expire in 2010 and the Estate wishes to redevelop the site to include a main retail unit, two small shops, offices, three dwellings and car parking. This form of development would regenerate the village centre, providing a new focus for the settlement. In association with this development, the Estate are proposing to better utilise land around the village hall to the rear of the precinct. It is proposed that the existing village hall be retained, the youth club building removed, allowing the area to be tarmaced and formally marked out with parking spaces. This redevelopment should overcome the parking problems in the village centre making it a far more attractive venue for local shopping. The Core Strategy should actively support the redevelopment of Wellesbourne village centre as outlined.

#### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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### Topic: OMSITE031 North-East of Mountford Close, Wellesbourne

#### Summary of Matters Raised in Representations

1. The school has become more successful and has grown in popularity. This has resulted in conflict between residents of Mountford Close and the school.
2. The Estate is willing to release land off Mountford Close for school related purposes if land off Kineton Road is allocated for development. This will allow the school to expand and increase the capacity for future pupils. An alternative access could be created away from Mountford Close which would alleviate traffic congestion issues in the vicinity.
3. The site is 2.5 hectares and is currently used for agricultural purposes. It is generally flat with mature hedgerows around all boundaries. Access is via Mountford Close but the land also abuts Newbold Road to the north west and access could be created here. Much of the site is currently identified in the flood plain by the EA. The flooding is due to surface water. It is understood that a scheme of improvements is due to improve the flow to the watercourse.

#### Officers' Response

- 1-3. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

#### Recommended Action

Carry out a thorough assessment of the land being promoted.

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## Analysis of Representations

**Topic: OMSITE032 Land north-east of Kineton Road, Wellesbourne**

### Summary of Matters Raised in Representations

1. The site has been promoted through the SHLAA but has not been allocated and objection is raised to its omission from the DCS.
2. The land has been deemed unsuitable for development due to the the current use as allotments which are well used. This should not prevent the principle of redevelopment if the land is deemed the most appropriate provided alternative allotment facilities are made available.
3. The site is within walking distance of the heart of Wellesbourne and the main facilities including the school. There are good transport links to the site and settlement including a public bus service. There is spare capacity in the local highway network to accommodate the additional traffic that would arise from development of both Kineton Road sites.
4. The land is actively cultivated so there is little of ecological interest or importance. The site does not flood. The site has no major topographical features. It is generally flat and abuts the built up boundary on two sides. Developmetn would provide strong and enhanced boundaries to the edge of the village at this point.
5. Other land in the vicinity is available for allotments.

### Officers' Response

1-4. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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**Topic: OMSITE035 Land North & South of Charlecote Road & West of Bypass, Wellesbourne**

### Summary of Matters Raised in Representations

1. The land is surplus to the requirements of the HRI.
2. The land should be considered for allocation for housing if the RSS Phase 2 Revision requires higher levels of housing growth in the district.
3. The land has the potential for good links with the facilities and services in the village.
4. Development could maximize the amenity potential of the River Dene corridor.
5. Flood risk mitigation measures will be required.

### Officers' Response

1-5. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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## Analysis of Representations

**Topic: OMSITE036** Land North of Stratford Road & West of Bypass, Wellesbourne

### Summary of Matters Raised in Representations

1. The land is surplus to the requirements of the HRI.
2. The land should be considered for allocation for mixed use development including housing & employment if the RSS Phase 2 Revision requires higher levels of housing growth in the district.
3. The land has the potential for good links with the facilities and services in the village.
4. Development could maximize the amenity potential of the River Dene corridor.
5. The site excludes the flood plain, water treatment works, the Cursus Scheduled Ancient Monument and the non-scheduled remains of a Roman villa.

### Officers' Response

1-5. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time.

### Recommended Action

Carry out a thorough assessment of the land being promoted.

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**Topic: OMSITE008** Church Road, Snitterfield

### Summary of Matters Raised in Representations

1. Land at Appleton House, Church Road, Snitterfield should be identified in the Core Strategy for residential development.
2. The site is completely surrounded by established residential development and should therefore not be considered as Green Belt.
3. There are limited views of the site due to extensive planting and development on adjoining land has set a precedent.

### Officers' Response

1-3. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time. However, it should be noted that the location of this site is inconsistent with the current preferred approach towards identifying development sites in the Core Strategy.

### Recommended Action

Consider this site in the context of the preferred approach to providing future residential development in the District.

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**Topic: OMSITE010** West & North-West of Lighthorne Heath

### Summary of Matters Raised in Representations

1. Lighthorne Heath should be identified as a settlement suitable for major expansion. Settlement is adjacent to Gaydon where there are significant employment opportunities. Development at Lighthorne Heath would reduce unsustainable travel patterns as there has been little local housing development in recent years to support the employment expansion.
2. Amendments should be included in CS.1 and CS.7.

### Officers' Response

1-2. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time. However, it should be noted that the location of this site is inconsistent with the current preferred approach towards identifying development sites in the Core Strategy.

### Recommended Action

Consider this site in the context of the preferred approach to providing future residential development in the District.

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## Analysis of Representations

**Topic: OMSITE018 King's Lane, Snitterfield**

### Summary of Matters Raised in Representations

1. Land at King's Lane, Snitterfield should be identified in the Core Strategy for residential development.
2. This would support a small scale community led scheme.

### Officers' Response

1/2. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time. However, it should be noted that the location of this site is inconsistent with the current preferred approach towards identifying development sites in the Core Strategy.

### Recommended Action

Consider this site in the context of the preferred approach to providing future residential development in the District.

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**Topic: OMSITE022 South & West of Stockton**

### Summary of Matters Raised in Representations

1. Site could accommodate additional housing growth and development would provide sustainable extensions to the village supported by existing facilities and infrastructure.

### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time. However, it should be noted that the location of this site is inconsistent with the current preferred approach towards identifying development sites in the Core Strategy.

### Recommended Action

Consider this site in the context of the preferred approach to providing future residential development in the District.

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**Topic: OMSITE023 West of Long Itchington**

### Summary of Matters Raised in Representations

1. Site could accommodate additional housing growth and development would provide sustainable extensions to the village supported by existing facilities and infrastructure.

### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time. However, it should be noted that the location of this site is inconsistent with the current preferred approach towards identifying development sites in the Core Strategy.

### Recommended Action

Consider this site in the context of the preferred approach to providing future residential development in the District.

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**Topic: OMSITE027 Copes Scrap Yard, Juggins Lane, Earlswood**

### Summary of Matters Raised in Representations

1. The change of use from a scrap metal processing plant to residential use will benefit the rural setting. The road network cannot support commercial traffic which would arise from business expansion. A recent planning application had community support for a change of use to residential purposes. There is a need for housing in the area, as demonstrated by the parish councils waiting list. The planning application was refused due to the loss of employment land in Alcester but no-one is employed at the site from this area.

### Officers' Response

1. The suitability of this land for development will be assessed in preparing the next stage of the Core Strategy. It is not appropriate or possible to pre-judge the outcome of this process at the present time. However, it should be noted that the location of this site is inconsistent with the current preferred approach towards identifying development sites in the Core Strategy.

### Recommended Action

Consider this site in the context of the preferred approach to providing future residential development in the District.

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## Analysis of Representations

**Topic: OMPOL001**                      **Vale of Evesham**

### Summary of Matters Raised in Representations

1. The Vale of Evesham has been identified as an area experiencing pressures resulting from HGV freight movements. The SPG document 'Lorries in the Vale of Evesham' was intended to provide interim planning guidance relating to this issue; the document anticipated that future planning policy would address the issue further. Gloucestershire County Council have concerns that this issue has not been addressed explicitly in any detail within the Draft Core Strategy.

### Officers' Response

1. Policy COM.11A in the District Local Plan is intended to be 'saved' so that it will continue to operate until the subject is dealt with in the Local Development Framework. As things stand, it is thought not to be appropriate for inclusion in the Draft Core Strategy.

### Recommended Action

1. Reconsider whether the subject should be covered in the Core Strategy.

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**Topic: OMPOL002**                      **Re-use of rural buildings**

### Summary of Matters Raised in Representations

1. There are a number of references in the proposed policies to the reuse of existing buildings but no specific policy which comprehensively sets out the Council's approach. The Council should confirm that the reuse of existing buildings for residential purposes within the confines of all towns and villages will be acceptable. At present there are many buildings which are left vacant often to the detriment of the visual amenity of an area. These could be put to good use to provide residential accommodation. This would improve the appearance of such areas preventing the loss of attractive premises, and provide essential accommodation to meet the housing need in the District.

2. The policy of not allowing the conversion of redundant agricultural to residential properties should be eased. Although these conversions are often sold to the more affluent they do create on-going employment for local rural residents, such as farm workers and their families. It also puts back to use otherwise wasted buildings.

### Officers' Response

1-2. The level of detail that such a policy would require to give the issue adequate coverage and clarity would not be appropriate for a Core Strategy policy that needs to be strategic in scope. It would be best handled in a Development Control Development Plan Document and if even more details needed to be provided, then they could be set out in a Supplementary Planning Document. In the schedule of "Saved Policies" submitted to the Secretary of State in January 2009, the District Council indicated that policies CTY.2 and CTY.2A of the Local Plan relating to building conversions would be replaced by a policy in the Development Control DPD, supplemented by an SPD.

### Recommended Action

No change.

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## Analysis of Representations

Topic: OMPOL003

Gaydon Proving Ground

### Summary of Matters Raised in Representations

1. LPA should take action to create the right climate for further investment and business activity to ensure that there is adequate suitable unrestricted land for existing and new businesses.
2. Welcomes continued identification of Gaydon Proving Ground but requests that District Council reconsiders its position with regard to the type of uses permitted and the extent of the identified area for future buildings. Planning system should help businesses in difficult economic climate by providing a positive and supportive regime.

### Officers' Response

1. The Council have sought to provide a portfolio of employment land in sustainable locations to meet its employment land requirement and the varying employment needs of the District. The overall spatial development strategy of the Core Strategy provides a positive framework for businesses to grow at their existing location but at the same time provides the necessary locational restrictions for various types of development. Development which will undermine the overall strategy would be resisted.
2. There are a number of large brownfield sites in the District. These include the Gaydon Proving Ground, Engineer Resources Depot at Long Marston, Southam Cement Works and the Harbury Cement Works at Bishops Itchington. All these sites are located in the countryside, away from Stratford-upon-Avon and the Main Rural Centres where most new development is encouraged. The overall spatial strategy of the development plan for the area seeks to concentrate large scale development in the main settlements where there is an established level of services and infrastructure to support development. This policy approach is supported by national and regional policy. The key issue is how to maximise the efficient use of these large brownfield sites without undermining the overall development strategy of the area and also protect the essential rurality of the District. It is also important to note that many of these sites include significant areas of high ecological and geological value of either local, regional or national significance that are worth protecting. The balance of considerations in determining the appropriate use and scale of development of these sites and the need to achieve sustainable development will continue to be a challenge.

Policy GD.7 of the Warwickshire Structure Plan is a 'saved policy' and provides the strategic policy guidance for the redevelopment of large brownfield sites in the countryside. The policy clearly emphasises that the redevelopment of these sites for a strategically significant purpose will only be accepted where a number of criteria are met. In particular, development will only be accepted where it provides for needs not accommodated elsewhere in the Plan. The need to ensure that the redevelopment of brownfield sites in rural areas does not undermine the general locational strategy of the development plan for the area is therefore paramount. It is within these general strategic principles that policies guiding the redevelopment of these sites are formulated.

The site is presently being occupied by Jaguar Land Rover (JLR) and Aston Martin Lagonda. The issues raised relate to both companies.

The Local Plan Review includes a specific enabling policy for the Gaydon Proving Ground (Policy CTY.16). The intention is that this policy will be rolled forward into the Core Strategy in its entirety. There is a considerable scale of motor vehicle activity established on the site. The policy restrict acceptable uses on the site to the research, design and testing of motor vehicles and ancillary activities. In recent times, the Council has responded to the needs of businesses on the site by allowing the manufacture and assembly of motor vehicles which are of a scale and nature which reasonable relates to the established uses on the site. The Council has been positive about development on the site but has done so within the policy context set out above and the need to protect the rural environment and amenity of residents of nearby settlements. The Council is fully aware of the national economic downturn and the particular effect it has had on the motor industry. However, a key challenge of the Core Strategy is to provide a long term positive framework to facilitate growth at sustainable locations when the upturn in the economy happens. The current economic situation is temporary, and whereas the Council is acutely aware of its significance, the long term growth of economic activity in the District should not be compromised. Unrestricted development on the District's large brownfield sites including the Gaydon site will significantly undermine the overall employment strategy of the Core Strategy. It is on this basis that development of this site should continue to be restricted to uses that are currently promoted on the site and/or within the context of the policy framework guiding development of large brownfield sites in the countryside. Having said that, it would be reasonable to extend the range of uses on the Gaydon Site to cover other forms of engineering technologies which would be complementary to motor vehicle-related activities.

A request has also been made to extend the identified area within which future development should occur. The Council believes that development involving buildings should not cover the whole of the site area. This is necessary to minimise the environmental impacts of development at this countryside location. The request to extend some parts of the site beyond the current boundary and whether or not the policies of the Plan should be used to control development rather than site boundaries has been extensively debated at a previous Local Plan Inquiry. For example, the area north of the site, currently being occupied by car parking was particularly considered at the inquiry. The adverse environmental impacts that such a proposal could have on residents of Lighthorne Heath was clearly emphasised by the Inspector and was considered significant enough to lead him to reject such a request. However, the definition of such a boundary could constrain Jaguar Land Rover and Aston Martin from providing additional buildings in locations that operationally are the most efficient. Given the importance of ensuring that the companies are competitive and have more certainty in their investment plans, it is now thought to be reasonable to dispense with the boundary. All proposals for additional buildings and activities on the site as a whole can be assessed against a range of criteria that will be set out in the proposal in the Core Strategy and other policy considerations.

### Recommended Action

## Analysis of Representations

1. Acceptable uses on the site should be extended from those specified in Policy CTY.18 in the District Local Plan to include other forms of advanced engineering technologies and products.
  2. The boundary within which development should occur as defined in the current Local Plan should be discarded in the Core Strategy.
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### Topic: OMPOL004 Policy to detail the proposed strategic sites within the main DCS

#### Summary of Matters Raised in Representations

1. The Draft Core Strategy proposes too much development in the Main Rural Centres. Consider that a number of the proposed development locations to be inappropriate and unsustainable. A separate policy should be included within the Core Strategy for the site specific locations of proposed future development. Currently the proposals are included within CS.1 and are neither individually identified within the plan nor considered in enough detail.

#### Officers' Response

1. A further assessment of all the proposed development locations identified in the Draft Core Strategy will be undertaken in preparing the next stage of the document. It is intended to set out each development proposal in the manner suggested.

#### Recommended Action

1. Present each development location as proposals in the main body of the Core Strategy and set out the specific components and requirements of each one.
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## Analysis of Representations

Topic: OMPOL005 Harbury Estate

### Summary of Matters Raised in Representations

1. Should have a site specific policy for the Harbury Estate.
2. Should consider Estate for major strategic development in excess of 2500 dwellings, employment, associated infrastructure and related facilities including a new railway station.
3. Consider collection of brownfield sites in the vicinity as major development option.
4. Commit to exploring potential for a railway station to serve new development and the hinterland.

### Officers' Response

1. The Local Plan Review includes a site specific enabling policy for the redevelopment of the site (Policy CTY.20). It is intended to roll forward the policy into the Core Strategy. A Masterplan setting out the detailed requirements for the redevelopment of the site has been adopted by the Council and has the status of Supplementary Planning Document. This is a significant material consideration for making planning decisions relating to the site.

There are a number of large brownfield sites in the District. This include the Gaydon Proving Ground, Engineer Resources Depot at Long Marston, Southam Cement Works and the Harbury Cement Works at Bishops Itchington. All these sites are located in the countryside whereas the overall spatial strategy of the development plan for the area seeks to concentrate development in the larger settlements of the District where there is greater scope for services and infrastructure to support development. This policy approach is supported by national policy. The key issue has always be how to maximise the efficient use of these large brownfield sites without undermining the overall development strategy of the area and also protect the essential rurality of the District. It is also important to note that many of these sites include significant areas of high ecological and geological value that are worth protecting. The ecological significance of this site is particularly well documented. The balance of considerations in determining the appropriate use and scale of development on these sites will continue to be a challenge and the Core Strategy seeks to strike this delicate balance by ensuring the appropriate scale and use of these sites, facilitate growth of local businesses, whilst at the same time protecting the impacts of such development on the environment and nearby settlements.

Policy GD.7 of the Warwickshire Structure Plan is a 'saved policy' and provides the strategic policy guidance for the redevelopment of large brownfield sites in the countryside. The policy clearly emphasises that the redevelopment of these sites for a strategically significant purpose will only be accepted where a number of criteria are met. In particular, development will only be accepted where it provides for needs not accommodated elsewhere in the Plan. The need to ensure that the redevelopment of brownfield sites in rural areas does not undermine the general locational strategy of the development plan for the area is therefore paramount. It is within this general strategic principles that the policy guiding the redevelopment of this site is formulated.

2. There is a specific policy for the redevelopment of the site. A masterplan has been adopted to set out the detailed requirements for the redevelopment of the site. The level of residential development that could potentially be allowed on the site has already been determined as part of the Masterplanning process. It is intended that the Policy for the site will be repeated in the Core Strategy. The proposed 2500 dwellings would be contrary to Policy GD.7 of the Warwickshire Structure Plan and Policy CTY.20 of the Local Plan and will significantly undermine the overall strategy of the Core Strategy.

The Council accepts that the strategic housing requirement for the District could change. This will become clearer after the Examination in Public (EiP) of the RSS when the Secretary of State issues his/her recommendations. If that were to happen, the Council will have to review its overall strategy and this proposal together with all others could be considered as one of the options. The Core Strategy will include how various options for further growth will be addressed.

3. See 1 and 2 above.
4. The Core Strategy will include a strategy to address various growth options. If this proposal were to be considered as one of the options, its impacts will be fully assessed and appropriate infrastructure identified to support the development. Whereas a railway station might be necessary, it might not be the only component of transport infrastructure that would be necessary. A comprehensive package of infrastructure support for such a scale of development will have to be assessed.

### Recommended Action

1. Policy CTY.20 be incorporated into the Core Strategy.
2. Consider this site in the context of an assessment of options for meeting potential increase in the strategic housing requirement for the District.

## Analysis of Representations

**Topic: OMPOL006**                      **Waste and recycling inc recycled construction materials**

### Summary of Matters Raised in Representations

1. Although the District is not the Council that is responsible for the Minerals Plan a note that the LDF supports the use of recycled materials in construction would reduce the need for virgin materials such as sands and gravel to be excavated.

### Officers' Response

1. The issue is considered under Policy CS.28.

### Recommended Action

Refer to Policy CS.28.

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**Topic: OMPOL007**                      **River Avon Navigation between Stratford-upon-Avon and Warwick**

### Summary of Matters Raised in Representations

1. The Core Strategy should recognise the Stratford and Warwick Waterways Trust's plans to reopen the Avon to navigation between Stratford and Warwick, and protect the line of the waterway. The proposal would boost the economy of the area through increased tourism and other benefits.

### Officers' Response

1. Concerns have previously been raised over the high cost and environmental impacts of this proposal. In order to promote this proposal in the Core Strategy we would need to be clear of the feasibility/deliverability of the project, and also have evidence that an acceptable scheme is possible in ecological and environmental terms.

### Recommended Action

1. Supporters of the scheme need to provide the necessary evidence. If sufficient evidence is not available then do not include policy in the Core Strategy.

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## Analysis of Representations

Topic: OMPOL008

Regulation and monitoring of housing supply and provision

### Summary of Matters Raised in Representations

1. The proposed policy aims to phase the release of previously developed land for housing development ahead of greenfield land. The latter would only be released for development when no more suitable site is available and where housing completion rates have fallen below that set out in the housing trajectory. The policy would list Strategic Reserve Greenfield Sites that would be released in the aforementioned circumstances. The policy would also refer to the annual monitoring process and to the maintenance of a five year land supply. Monitoring would take into account windfall sites which have been granted planning permission. The policy would also require the District Council to take an active part in enabling development to come forward on previously developed land.

### Officers' Response

1. The Draft Core Strategy did not include a policy relating to the phasing of housing development sites, although the Schedule of Proposed Development Opportunities did give details of phasing constraints for some of the sites. PPS3 states that Local Development Documents should set out the arrangements for managing the release of land, while Policy CF6 of the adopted RSS states that development plans should incorporate policies which allow for the managed release of new housing land, so as to secure the development of previously developed land and conversions taking account of the need for any new infrastructure and ground preparation.

Policy CF4 of the RSS Phase Two Revision lists several criteria to govern the allocation and phasing of land release at the local level:

- the need to maintain and accelerate progress of urban renaissance;
- in sustainable locations, sites which are on previously developed land should be phased early in the plan period and, in most circumstances, prior to the phasing of greenfield sites;
- sites, where development would support regeneration through opening up further opportunities for mixed use sustainable development within cities and towns, should be phased early in the plan period.

Policy CF5 of the RSS Phase Two Revision states that priority should be given to the development of brownfield land and the re-use of existing buildings, in sustainable locations, before allocations of greenfield land are released for development.

These policies are certainly encouraging planning authorities to consider including phasing policies in their LDFs. If Policies CF4 & CF5 the RSS Phase Two Revision are approved as drafted in the Preferred Option, then there would be a strong steer as to how those policies should be framed, with particular emphasis placed on the early release of brownfield land, a point echoed in the representation set out above. Indeed, the policy suggested in the representation is close to phasing policies that have been included in Core Strategies adopted by other planning authorities. On the other hand, most of the Proposed Development Opportunities in the DCS that are identified on previously developed land are unlikely to come forward for short-term development for a range of reasons including fragmented land ownership and the existence of currently viable commercial uses. If the re-development of these sites were to be used as a pre-requisite to the release of greenfield land, then there would be a prospect of house building activity shrinking to a rate below that specified in the RSS, taking into account the improbability of the District Council adopting an active delivery role in the process of urban regeneration in Stratford-upon-Avon or elsewhere in the district. Placing all the PDL sites in the first phase will not mean that they will all be developed in the short-term, however laudable that objective may be. In other words, a phasing policy has to be tempered by realism and an acceptance that some greenfield development will be needed in the short-term. The extent of that need will be determined through a revised housing trajectory.

Phasing policies are not just included in LDFs to promote PDL redevelopment ahead of greenfield development. They also perform the function of regulating the flow of new dwellings in the district so that it ties in with the building rates specified in the RSS and also addresses needs across the district if the locational strategy is one which seeks to answer need where it arises. Phasing should also be related to infrastructure provision, particularly where the latter is not within the control of the developers.

It is accepted that monitoring housing delivery is very important, including the need to properly account for all elements of the housing land supply, and for decisions relating to the release of sites to take into account the results of that monitoring, not least of which will be the situation relating to the five year land supply.

In some districts and boroughs, phasing policy resides in an Allocations DPD, but in this case there is no intention to prepare such a document, so such an approach to phasing would not be appropriate.

All this points to the need for a phasing policy, one that is geared to the local circumstances.

### Recommended Action

A phasing policy be included in the Core Strategy incorporating the following principles:

- sufficient allocated sites be released to ensure maintenance of a five year land supply in line with the housing trajectory, taking into account dwellings arising from planning permissions on additional windfall sites;
- sufficient allocated sites be released to ensure provision of housing in a range of locations to address local housing issues;
- the need to avoid a supply of new dwellings well in excess of strategic requirements;
- the need to avoid excessive numbers of dwellings being completed in one location at any one time;
- the need to avoid the completion of new dwellings ahead of infrastructure intended to service those dwellings.