



Proposed Submission Core Strategy

Assessment of Representations

September 2014

Contents

Explanatory Notes: This analysis is presented in the same order as the Proposed Submission Core Strategy (June 2014).
No representations were submitted on certain topics so these are not included in the analysis.
Representations on related topics that are not part of the Plan are covered assessed at the end of the schedule

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Proposed Submission Core Strategy – Assessment of Representations

Section 1. Context – 1.1 Introduction and Whole Plan Issues

Number of Supports: 7 Number of Objections: 5 Number of Unspecified: 4

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	Object to the Development Management Considerations (DMC) section under each policy. These do not carry the weight of policy and to avoid any confusion or misunderstanding as to the scope of the development plan in relation to the determination of planning applications when the Core Strategy is adopted, any such requirements should be either covered in policy or deleted from the supporting text.	DMC should be deleted or included in each policy	DMC section is intended to provide information that will be useful to applicants and the Council when determining applications - no change.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	Object to the DMC section under each policy. These do not carry the weight of policy and to avoid any confusion or misunderstanding as to the scope of the development plan in relation to the determination of planning applications when the Core Strategy is adopted, any such requirements should be either covered in policy or deleted from the supporting text.	DMC should be deleted or included in each policy	DMC section is intended to provide information that will be useful to applicants and the Council when determining applications - no change.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	Object to the DMC section under each policy. These do not carry the weight of policy and to avoid any confusion or misunderstanding as to the scope of the development plan in relation to the determination of planning applications when the Core Strategy is adopted, any such requirements should be either covered in policy or deleted from the supporting text.	DMC should be deleted or included in each policy	DMC section is intended to provide information that will be useful to applicants and the Council when determining applications - no change.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	Object to the DMC section under each policy. These do not carry the weight of policy and to avoid any confusion or misunderstanding as to the scope of the development plan in relation to the determination of planning applications when the Core Strategy is adopted, any such requirements should be either covered in policy or deleted from the supporting text.	DMC should be deleted or included in each policy	DMC section is intended to provide information that will be useful to applicants and the Council when determining applications - no change.
Welbeck Strategic Land	McLoughlin Planning Ltd	No	No	No	1.1.4 - concerns about terminology. 1.1.10 - does not support Proposal GLH - no objective evidence for this. 1.1.12 - there is an over-reliance on delivery of Proposal GLH	None specific to this section.	Position noted - see comments elsewhere.
Gallagher Estates Ltd	Framptons	No	No	No	Deficiencies in the sustainability assessment process and the overall provision for housing and jobs render the plan unsound.	None specific to this section.	Position noted - see comments elsewhere.
Sharba Homes	Barton Willmore llp	Not Specified	No	No	1.1.3 - Do not believe that the Council has considered or responded to the need to tackle strategic cross-boundary issues that relate to the interests of the wider area in which the District is located. The emerging Birmingham City Council Draft Development Plan and matters related to housing need in Coventry are key considerations for Stratford-on-Avon District in bringing forward its own plan. 1.1.9/10 - Support balanced dispersal of housing, but not Proposal GLH.	None specific to this section.	See comments at 1.3 regarding the cross-boundary issues. Proposal GLH - see comments elsewhere.
West Northamptonshire Joint Planning Unit		Yes	Yes	Yes	We support the plan as a whole and particularly note that Stratford-on-Avon District Council is able to meet its Objectively Assessed Housing Need.	None	Support noted.
Gladman Developments		No	No	No	Objection to overall strategy based on contention that the level of housing growth planned for is inappropriate and not objectively assessed.	None specific to this section.	Position noted - see comments elsewhere.

Warwick District Council		Yes	Yes	Yes	<p>1.1.6 and 1.1.12 - The focus on AME sector and in particular the provision of land for the potential expansion of Jaguar Land Rover is supported. Consistent with the Coventry and Warwickshire SEP and anticipated that this will bring benefits for the sub-regional economy.</p> <p>In this context the commitment to keep the provision of housing under view is also welcomed and as further information becomes available on the nature and scale of expansion at JLR and through the monitoring of housing delivery, we are pleased to see a commitment to review the Core Strategy if necessary.</p> <p>We would emphasise the importance of continued Duty to Cooperate discussions on this issue right up until (and beyond) the submission of the Core Strategy. In particular we need to ensure that the two Councils are working together in continuing to address the links between employment provision and housing requirements.</p>	None.	Position noted and accepted. See further comments at 1.3 and elsewhere.
St Modwen Developments Ltd	Barton Willmore llp	Yes	No	No	<p>The Council has failed to work effectively with neighbouring LPAs to consider and accommodate the wider housing needs within the HMA.</p> <p>1.1.3 - The Strategy takes insufficient notice of the challenge around meeting the identified housing needs of Birmingham.</p> <p>1.1.6 - Comments on economic vision are supported.</p> <p>1.1.9/10 - Support balanced dispersal of housing, but not Proposal GLH.</p>	Plan to bring forward additional housing development at Meon Vale.	See comments at 1.3 regarding the cross-boundary issues. Economic vision - position noted. Proposal GLH - see comments elsewhere.
Cotswolds Conservation Board		Yes	Yes	Yes	The Board considers the Core Strategy to be sound.	None	Position noted.
Daventry District Council		Yes	Yes	Yes	Notes the Council will meet objectively assessed housing need and therefore supports the plan.	None	Position noted.
Chesterton & Kingston Parish Meeting		No	No	No	There has been no proper consultation with the parish.	Carry out meaningful consultation.	<p>The Parish of Chesterton and Kingston does not have a Parish Council. A Parish Meeting operates.</p> <p>The specific concern relates to Proposal GLH, which was subject to consultation in 2013 and 2014. Appropriate notifications were sent to the registered Parish Meeting contact.</p> <p>Public meetings and other consultative events were held in the immediate vicinity and the Parish meeting was given the opportunity to host a meeting about the New Settlement proposal.</p>
Environment Agency		Yes	Yes	Yes	Overall we consider that the Proposed Submission Core Strategy is: a) Legally compliant b) Compliant with the Duty to Co-operate c) Sound	A number of minor policy specific changes are recommended - see individual policy summaries.	Position noted.

Earlswood & Forshaw Heath Residents Association	No	No	No	The Council has not consulted in a meaningful fashion. Any consultation documents that pre-date the NPPF and/or are predicated on the former Regional Spatial Strategy are out of date and should not be relied on. There was insufficient consultation on the 2012 Draft Core Strategy. There has been no meaningful consultation on subsequent versions of the overall Strategy.	None specified.	The Council does not rely on versions of the Core Strategy produced prior to the publication of the NPPF. However, it is relevant to refer to those documents when explaining the evolution of the plan since work on it commenced in 2007. The structure and content of the plan has properly evolved in response to the publication of the NPPF. The Council's Statement of Community Involvement is up-to-date and consultation has been undertaken in accordance with the SCI and national legislation. The evidence base is up-to-date. The scope of the consultations undertaken in 2013 and 2014 was clearly identified. These exercises provided the opportunity to comment on issues that were new to the plan or subject to material change.
Welford-on-Avon Parish Council	Yes	Yes	Yes	PC has been consulted at all stages of the process and their comments have been noted and considered. Core Strategy is compliant with NPPF and evidence based. All stakeholders have been properly consulted.	None	Position noted.
Long Compton Parish Council	Not Specified	Not Specified	Yes	PC considers that the Submission Core Strategy has been prepared against a basis of sound and carefully considered information and public comment and, as such, it has our support. It is imperative that adoption is achieved as quickly as possible.	None	Support noted.
Overall Officer Response	Whilst a range of different issues have been raised under this introductory section, it is not considered that any specific changes need to be made. The more substantive issues are picked up under the relevant policy headings. The Council has consulted appropriately, in accordance with its Statement of Community Involvement, at all stages of the plan making process.					
Overall Officer Recommendation	That no changes to this section of the plan be proposed.					

Section 1. Context – 1.2 The State of the District

No representations received

Section 1. Context – 1.3 Cross Boundary Issues

Number of Supports: 8 Number of Objections: 13 Number of Unspecified: 5

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
South Worcestershire Councils		Yes	Yes	Yes	With regard to the Duty to Co-operate the South Worcestershire Councils agree the evidence demonstrates that there is no requirement to meet any of SDC housing need within the South Worcestershire Development Plan (SWDP) area.	None	Position noted
Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	Plan fails to address the issue of accommodating housing needs arising in Birmingham.	None specified.	The current known position does not justify delaying the progress of this Core Strategy. See overall response.
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	Yes	Yes	Yes	Welcome the Council's acknowledgement of the need to take account of the needs of Redditch as part of the Core Strategy. Supports the proposals to allocate land at Winyates Green Triangle/Gorcott Hill to meet the identified employment needs of Redditch.	None	Support noted.
Hallam Land Management	Marrons Planning	Not Specified	No	Not Specified	The Council was not an active participant in the preparation of the CWJSHMA. Failure to address unmet housing need arising from Birmingham and (possibly) South Worcestershire.	None specified.	The Council has formally adopted the CWJSHMA (November 2013) as part of its evidence base. It has jointly commissioned follow-on work arising from the publication of the 2012 SNPP. Bi-lateral liaison between SDC and BCC has led to an agreed position set out in a signed Memorandum of Understanding. See response from Wychavon DC on behalf of the South Worcestershire authorities. The SWDP is currently subject to proposed revisions to ensure housing need across its area is met.
Bishops Itchington Parish Council		No	No	No	The lack of a rigorous transport and traffic assessment carried out in conjunction with Warwickshire County Council. Note: comment made in context of representation on Proposal GLH.	None specified.	The Council has published two strategic transport assessments (Options Analysis and Cumulative Assessment) that inform the selection of Gaydon/Lighthorne Heath as a preferred location for growth. Each report was prepared by Warwickshire County Council with input from Arup.
Redrow Homes South Midlands	Barton Willmore	Not Specified	No	Not Specified	By leaving the Birmingham and Coventry issues to a review process, the Council is attempting to achieve an agreement to cooperate at an undefined date in the future. In reality there is no mechanism available to developers or neighbouring authorities to force Stratford-on-Avon District to review the Core Strategy. Given this position it is wholly appropriate that the Council continue to engage fully with the other HMA authorities, both for Birmingham and Coventry, until such time as the housing needs of each area — and the ability of those areas to accommodate their own needs — is understood.	None specified.	The current known position does not justify delaying the progress of this Core Strategy. See overall response.

Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	The strategy acknowledges the influence of the Birmingham housing market area on part of the District. There are unmet needs in Birmingham and also Coventry. The Council is not meeting the full objectively assessed need identified by the JSHMA. Whilst the Joint Committee has apparently accepted this, there is no indication about where the shortfall will be accommodated. The circumstances make it essential that SDC participates in the Green Belt Review process.	None specified.	The Joint Committee has recognised that CWJSHMA identified a range of provision (3750-3800 dwellings per annum) and that, with SDC planning for 540 dwellings per annum, overall planned provision remains within that range. The Council has worked bi-laterally with Birmingham CC and there is a signed Memorandum of Understanding between the two authorities. The Council is participating in the Sub Regional Green Belt Study. This study is to be commissioned as part of the evidence base required to inform a future review of this strategy. See also the representations made by the individual authorities and the overall response.
Gladman Developments		Not Specified	Not Specified	Not Specified	There is a distinct possibility that unmet housing needs arising from surrounding authorities (most notably Birmingham and Coventry) will need to be met within Stratford-on-Avon. As the quantity of this need has yet to be finalised, the Council must include a policy that seeks to review the planned housing requirement and related policies to ensure that needs do not go unmet.	Include a review policy.	See overall response.
CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	No	Not Specified	Lack of a full and robust evidence base concerning the Duty to Co-operate. There are unmet needs in Birmingham that should be planned for, and no evidence of co-operation between SDC and BCC.	Uplift the housing requirement in CS.16	Given that the Duty to Co-operate is on-going, the published Draft Statement of Compliance can by definition only refer to the evidence available at the time of publication. Appendix B of that document refers to the bi-lateral meetings held with BCC and the signed MoU is now available. BCC supports the approach set out in the published strategy.
CALA Homes (Midlands) Ltd	Stansgate Planning	No	No	No	The Council acknowledges housing shortfalls in Coventry and Birmingham but fails to address them. There is no commitment regarding the timing of any review, or what circumstances would trigger it. A review is not flexible enough to deal with changing circumstances.	The housing requirement should be uplifted if evidence becomes available from within the housing market area or adjacent market areas that Stratford District needs to help accommodate growth from those areas.	The potential need to accommodate growth from outside the District is unknown. Birmingham and Coventry City Councils both support the review approach. More clarity around the trigger for and timing of a review would be appropriate - see overall response.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	No	No	The Council has not constructively engaged with the SHMA process or acted within its recommendations. Despite claiming to endorse the findings of the SHMA in its Duty to Cooperate Statement, the Council has identified a lower objectively assessed need figure. The Council has not made any statement of how the unmet need from Stratford not being planned for (1,400 dwellings) against the SHMA recommendation at Table 97. The Council is not following a jobs-led spatial plan as set out and justified by the CWLEP. The Council is not making provision for, nor has it demonstrably evidenced any engagement with Coventry City Council in respect of unmet need arising in the SHMA. The Council appears to be operating as a sole entity within the extents of the SHMA and CWLEP and not planning for its own need, let alone making arrangements for unmet need of others.	Plan to accommodate additional housing growth.	The Council has formally adopted the CWJSHMA (November 2013) as part of its evidence base. It has jointly commissioned follow-on work arising from the publication of the 2012 SNPP. The Sub Regional authorities and the LEP are engaged at member/board level via the Coventry and Warwickshire Joint Committee for Economic Growth and Prosperity. The Joint Committee has recognised that CWJSHMA identified a range of provision (3750-3800 dwellings per annum) and that, with SDC planning for 540 dwellings per annum, overall planned provision remains within that range. The Council has worked bi-laterally with Birmingham CC and there is a signed Memorandum of Understanding between the two authorities. See also the representations made by the individual authorities and the overall response.

Quintessential Inns	Barton Willmore	No	No	No	There is limited evidence to suggest that the Duty to Co-operate on the strategic issue of the housing requirement has been properly met between SDC, Birmingham CC and Coventry CC. Delaying this matter to a future review is inappropriate and has been found not legally compliant in other examinations (eg Coventry, Rushcliffe).	None specified	BCC and CCC have both expressed support for the review approach proposed by SDC. It is not yet known whether the BCC housing needs can be fully met within the GBSLEP area. CCC is expected to consult shortly on the potential to accommodate the JSHMA housing requirement within the city boundary, but there remains some uncertainty around this. See also the overall response.
Taylor Wimpey UK Ltd	Barton Willmore	Not Specified	Not Specified	Not Specified	The commitment to future review is a failure under the Duty to Co-operate. The duty requires local planning authorities to meet – and therefore understand through joint working - the housing needs of authorities within the wider Housing Market Area who are unable to accommodate their own needs. What the Council are attempting to achieve is an agreement to cooperate at an undefined date in the future, when in reality there is no mechanism available to developers or neighbouring authorities to force Stratford-on-Avon District to review the Core Strategy. The Council must continue to engage fully with the other HMA authorities, both for Birmingham and Coventry, until such time as the housing needs of each area – and the ability of those areas to accommodate their own needs – is understood.	None specified	It is a core planning principle that planning should be genuinely plan-led, but also that plans should address larger than local issues (NPPF para 17). The Government is encouraging local authorities to speed up the process of getting up-to-date plans in place. Given an explicit commitment to review on the basis of fresh evidence, it would be perverse to delay this plan on the basis that an as yet unknown occurrence may come to pass. See also the overall response.
K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	No	No	No	The Council acknowledges housing shortfalls in Coventry and Birmingham but fails to address them. There is no commitment regarding the timing of any review, or what circumstances would trigger it. A review is not flexible enough to deal with changing circumstances.	The housing requirement should be uplifted if evidence becomes available from within the housing market area or adjacent market areas that Stratford District needs to help accommodate growth from those areas.	The potential need to accommodate growth from outside the District is unknown. Birmingham and Coventry City Councils both support the review approach. More clarity around the trigger for and timing of a review would be appropriate - see overall response.
Birmingham City council		Yes	Yes	Yes	Welcome and support the commitment by the District Council to ongoing technical work and discussions in relation to the housing shortfall that has been identified in the Birmingham Housing Market Area. The HMA includes part of Stratford-on-Avon District. Welcome the commitment given to review the Core Strategy should the outcome of this work lead to an increase in housing provision within Stratford-on-Avon District. This commitment is in line with the positive bi-lateral discussions between our two authorities and the recent Duty to Co-operate agreement relating to the Birmingham Development Plan.	None	Support noted.
Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	Yes	We are aware that SADC has had detailed discussions with neighbouring authorities, principally within Coventry and Warwick but also within the other housing market areas that influence the District. We are also aware that the Council continues to work with its immediate and wider neighbours and will keep under on-going review the need and scope to respond to new evidence. Given the commitment made to review the Core Strategy if there is evidence to necessitate this, we consider that the Council has adequately undertaken its Duty to Cooperate as required by the NPPF.	None	Position noted.

Warwick District Council		Yes	Yes	Yes	<p>WDC has worked with SDC actively and on an ongoing basis. This work continues and is acknowledged as important. Emphasise the importance of continued Duty to Cooperate discussions right up until (and beyond) the submission of the Core Strategy. In particular need to ensure that the two Councils are working together in continuing to address the links between employment provisions and housing requirements.</p> <p>Recognise the description of cross boundary issues set out in section 1.3 in as far as it relates to Warwick District and the Coventry and Warwickshire Housing Market Area. Welcome the strong reference to the Joint SHMA in paragraph 1.3.7 and support the inclusion of Stratford District within the C&W HMA. Emphasise the importance of continued Duty to Cooperate discussions across the HMA up until the point the Plan is submitted, particularly important given the challenges that have been made to the evidence in the Joint SHMA.</p> <p>Paragraph 1.3.8: welcome the commitment to review to address housing need arising outside the District's boundary, but would like to see a much stronger commitment within the Core Strategy to participate fully in the process agreed by the Joint Committee.</p> <p>WDC (and others within the C&W HMA) need ongoing confidence that SDC are fully committed play their part in addressing housing needs arising elsewhere (eg Coventry or Birmingham). Ask that SDC include a policy setting out the circumstances in which they would review their Plan, in line with the Joint Committee recommendation.</p>	Ask that SDC include a policy setting out the circumstances in which they would review the Plan, in line with the Joint Committee recommendation.	<p>SDC acknowledges the commitments running from the Joint Committee resolution of 20/03/14. The Council will co-operate fully in the ongoing development of a joint evidence base for the Coventry and Warwickshire Sub Region.</p> <p>The Council acknowledges the need to ensure that objectively assessed housing need for the HMA as a whole is fully met.</p> <p>See overall response.</p>
Paul Ridgeway	Stansgate Planning	No	No	No	The Council acknowledges housing shortfalls in Coventry and Birmingham but fails to address them. There is no commitment regarding the timing of any review, or what circumstances would trigger it. A review is not flexible enough to deal with changing circumstances.	The housing requirement should be uplifted if evidence becomes available from within the housing market area or adjacent market areas that Stratford District needs to help accommodate growth from those areas.	<p>The potential need to accommodate growth from outside the District is unknown. Birmingham and Coventry City Councils both support the review approach.</p> <p>More clarity around the trigger for and timing of a review would be appropriate - see overall response.</p>
Earlswood & Forshaw Heath Residents Association		No	No	No	SDC has not complied with the requirement to undertake meaningful cross-boundary consultation.	None specified.	A draft Statement of Compliance with the Duty to Cooperate was published alongside the Proposed Submission Core Strategy in June 2014. It is not evident that the information contained in this document has been referred to by the Residents' Association.
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	The commitment to a review of the Core Strategy should be set out in policy rather than supporting text. Whilst there remain uncertainties about meeting in full the OAHN for Stratford upon Avon District, neighbouring LPAs adjoining Stratford upon Avon and across the Birmingham conurbation it is impossible to determine if the Council has or has not complied with the Duty to Co-operate. The evidence is not available on which to make such a judgement.	Include a policy setting out the commitment to review.	See overall response.
Rugby Borough Council		Yes	Yes	Yes	<p>The commitment to work with immediate and wider neighbours in accordance with the duty to co-operate is welcomed. The commitment to review where evidence which identifies further housing provision being justified is also welcomed. However, this should be enshrined in policy and be triggered if it is identified that need within the HMA as a whole cannot be met.</p> <p>Similarly, a review policy is also relevant to the proposed Jaguar Land Rover extension. The uncertainty about timescales does not negate the need to consider the impact of this level of economic growth on the need for further housing within the district.</p>	The commitments to review should be stated as policy.	Overall support noted. See overall response. More clarity around the review process would be appropriate.

Midland Commercial Properties	Stansgate Planning	No	No	No	The Council acknowledges housing shortfalls in Coventry and Birmingham but fails to address them. There is no commitment regarding the timing of any review, or what circumstances would trigger it. A review is not flexible enough to deal with changing circumstances.	The Plan should acknowledge that it must meet needs arising from adjoining Districts (including Birmingham and Coventry) and be reworded to explain how those needs are going to be met and when. In reality this will mean making further housing allocations.	The potential need to accommodate growth from outside the District is unknown. Birmingham and Coventry City Councils both support the review approach. More clarity around the trigger for and timing of a review would be appropriate - see overall response.	
A C Lloyd Homes Ltd	Delta Planning	Not Specified	No	No	Approach to meeting the housing requirement does not take into consideration any shortfall of housing within the sub-regional housing market area (in particular in Coventry) or within adjoining housing market areas (in particular Birmingham). Issue is recognised at Section 1.3 of the Plan but suggested review only if evidence justifies it is premature and inadequate. The interim findings of the Greater Birmingham and Solihull LEP (GBSLEP) Strategic Housing Needs Study are due for publication shortly. It is clear that the implications from that Plan may well start to become apparent in time to be considered as part of the evidence base against which to establish the overall objectively assessed need for Stratford District.	The housing requirement should be uplifted if evidence becomes available from within the housing market area or adjacent market areas that Stratford District needs to help accommodate growth from those areas.	The potential need to accommodate growth of this nature is unknown. Birmingham and Coventry City Councils both support the review approach. Any need to meet wider housing requirements should not be confused with the objective assessment of housing need for the District.	
Redditch Borough Council - Development Plans		Yes	Yes	Yes	It is noted that SDC proposes to meet its objectively assessed needs for market and affordable housing in full and will do so within its own boundaries. This approach is supported by RBC .	None	Support noted	
Coventry City Council - Planning Policy Manager		Not Specified	Not Specified	Not Specified	May not be able to meet objectively assessed housing need within the City boundary. Therefore supports the commitment in para 1.3.8 to carry out a review should the evidence prove this to be necessary.	Would prefer the review commitment to be stated as policy.	See overall response	
Cherwell District Council - Strategic Planning & the Economy		Not Specified	Not Specified	Not Specified	CDC is satisfied that SDC has discharged the Duty to Cooperate and is supportive of Proposal GLH, the key issue having cross-boundary significance.	None	Support noted	
Solihull Metropolitan Borough Council - Policy & Spatial Planning		Not Specified	Yes	Not Specified	SMBC believes that Stratford District Council has met the Duty to Cooperate	None	Support noted	
Overall Officer Response		<p>With the sole exception of the matter raised by Bishops Itchington PC, the concerns expressed about cross-boundary issues relate wholly to the strategic challenge of objectively identifying and subsequently meeting housing needs across the different market areas that are acknowledged as having an influence on the District. The objective assessment of need is dealt with under Policy CS.16.</p> <p>As regards duty to co-operate, then in summary the representations fall into two groups. One group says that the proposal to address any needs arising from outside the District (most particularly, but not only, from Birmingham and Coventry) via a future review of the strategy is a failure under the Duty to Co-operate. The other group generally endorses the Council's approach as meeting its Duty to Co-operate, but seeks a strengthening and clarification of the approach to strategy review via the introduction of a policy commitment.</p> <p>On the first issue, there is currently no evidence to suggest that housing need arising from outside the District should be met within the District. Adjoining councils are all maintaining the position that their own plans will provide fully for the housing need arising in their areas. In contrast, Birmingham City Council has published a plan that fails to meet identified need within the city boundary. Coventry City Council is preparing to consult on plans to meet a housing need of 23,600 having to date been able to identify options to accommodate only 16,000 homes within the existing urban area. It is therefore considering further sites both within the administrative area of the city and in discussion with adjacent authorities. Likewise Birmingham, via the auspices of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP), is working with a number of its neighbours to assess the capacity to meet need within the GBSLEP area.</p> <p>Given these facts, suggestions that Stratford District will need to accommodate housing growth to meet need arising from either Birmingham or Coventry are conjecture. It is not unreasonable to take the view that the need arising from each of these cities could be met without recourse to development in Stratford District. A commitment to accommodate additional development at this point would be premature. To delay this plan further and wait to see how matters elsewhere unfurl would be inappropriate. The recommended approach of committing to an early review should that prove to be necessary is felt to be the most reasonable approach. On the second issue, there are a number of representations that promote the need for a policy commitment to plan review that provides more certainty about the triggers that would prompt this. There is evidence to show that this approach has been adopted by other authorities in similar circumstances.</p>						

Overall Officer Recommendation	<p>That the Inspector be requested to recommend that:</p> <p>At the end of paragraph 1.3.8, insert "(see Policy CS.xx)". At the end of paragraph 1.3.9, insert "(see Policy CS.16)".</p> <p>Insert new Policy CS.xx to follow Policy CS.16 in Section 5 (Development Strategy) of the plan as follows:-</p> <p>“Policy CS.xx - Accommodating Housing Need Arising from Outside Stratford-on-Avon District</p> <p>The existence of unmet housing need arising outside Stratford-on-Avon District will not render this Plan out of date. However, the Plan will be reviewed if evidence demonstrates that significant housing needs arising outside the District should be met within the District and cannot be adequately addressed without a review. To establish this, the Council will work with other local authorities in the Coventry and Warwickshire Housing Market Area to:</p> <p>a. prepare and maintain a joint evidence base including housing need and housing land availability;</p> <p>b. take part in a process to agree the strategic approach to address any shortfall of land availability to deliver in full the Housing Market Area’s Objectively Assessed Housing Need or other evidenced housing need arising outside the District; and</p> <p>c. where the evidence and the duty to co-operate process clearly indicates that there is a housing need that cannot be met within the administrative boundaries of the authority in which the need arises and part or all of the need could most appropriately be met within Stratford-on-Avon District, the Council will seek to identify the most appropriate sites to meet this need and will review the Local Plan to do this, should it be required.</p> <p>Explanation</p> <p>The six local planning authorities within the Coventry and Warwickshire Housing Market Area (HMA) have agreed to cooperate together to ensure the HMA’s housing need of 3,750-3,800 dwellings per annum is met in full. It is recognised that this is important in supporting the growth ambitions of Coventry and Warwickshire as well as ensuring local plans and core strategies within the sub-region comply with national policy and guidance. However, it is recognised that there may be physical or policy constraints which make it difficult for one or more of the local planning authorities within the sub-region to meet their local objectively assessed housing need in full.</p> <p>In these circumstances it will be necessary for the six authorities to work closely together to address this potential shortfall and to ensure the HMA’s overall housing need is met in full. The process for doing this has been set out and agreed by the Coventry and Warwickshire Shadow Joint Committee. The starting point of this process is a shared evidence base relating to strategic issues. It is recognised that the following assessments/ studies are likely to be the key elements of this shared evidence base:</p> <ul style="list-style-type: none"> • A Joint Strategic Housing Market Assessment: it is important to ensure that the objectively assessed housing need of the HMA and each of the Councils within the HMA is understood and that the evidence to support this is kept up to date. • A Joint Approach to Strategic Housing Land Availability Assessments: it is important that housing land availability is assessed consistently across the HMA so that the overall and local supply of potential housing sites is understood. • Joint Employment Land Assessment: it is important to ensure that employment land requirements and supply are understood, and planned for, alongside housing. A shared evidence base will help to understand the sub-regional and local employment land requirements as well as the availability of sub-regional and local sites to meet these requirements. • A Green Belt Study: the West Midlands Green Belt covers significant parts of the Coventry and Warwickshire HMA. The Green Belt study needs to be up to date to inform a sub-regional approach. <p>In the event that there is a shortfall arising from one or more District within the HMA, and in the context of a shared evidence base, the six local planning authorities have agreed to work together to develop and maintain a strategy to meet the HMA’s housing requirement. This process will seek to identify the most suitable available sites to meet any shortfall. Stratford-on-Avon District Council will participate actively in the process on an on-going basis. Should this strategy identify that sites within Stratford-on-Avon District are required to meet some or all of a housing need arising from outside the District, the Council will undertake work to establish the most appropriate sites to do this and if this indicates that significant modifications are required to the Local Plan, the Council is committed to undertaking an early review of the Plan to address this.</p> <p>A further issue that may need to be addressed through this process is the potential for a shortfall in housing land arising from outside the Coventry and Warwickshire HMA, in particular from the Greater Birmingham area. In the event that such a shortfall may need to be partially addressed within the Coventry and Warwickshire HMA, the six local planning authorities have agreed to work together using the process described above”.</p> <p>Insert the following paragraph at the end of Part D (Phasing and Delivery) of Policy CS.16:</p> <p>“If evidence demonstrates that significant housing needs are arising from accelerated economic development in the District, the Council will first seek to re-phase the delivery of housing sites and/or identify additional sites, but will also bring forward a review if it is evident that the housing needs cannot be adequately addressed without such a review”.</p> <p>Insert new paragraph 5.2.14:</p> <p>“As identified at paragraph 1.3.9, the planned long term expansion by Jaguar Land Rover at Gaydon involves a development that is likely to be of more than local significance. The precise nature and timing of this development is currently unknown. In the event that development creating a substantial number of new jobs is brought forward in the earlier part of the plan period, this could have implications for the scale of housing growth that should be planned for beyond 2021. The Council will keep this matter under active review, in co-operation with other authorities in the housing market area”.</p>
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Section 1. Context – 1.4 Vision and Strategic Objectives

Number of Supports: 0 Number of Objections: 7 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Hallam Land Management	Marrons Planning	Not Specified	Not Specified	No	<p>Generally support the dispersal approach. Consider greater scope for allocation of strategic sites within Stratford and the MRCs particularly if the proper OAN is to be met.</p> <p>The level of facilities and services to properly support GLH given its scale may act as a “brake” on development for reasons of cost. Thus, the anticipated delivery of new homes is likely to fall below the expectation of 2,500 dwellings expected within the plan period. If, as the vision notes, the further substantial expansion of Stratford-upon-Avon is not appropriate, then the shortfall from GLH should be met at one or more of the MRCs.</p>	The Council should reconsider its vision and strategic objectives, and reassess its expectations in terms of rate of delivery of development and infrastructure at GLH, before considering whether any shortfall can be addressed by the MRCs.	See separate comments in respect of CS.15 and Proposal GLH.
Hallam Land Management	Marrons Planning	Not Specified	Not Specified	Not Specified	<p>Do not consider that the Vision and Strategic Objectives for the Plan are appropriate. Whilst the MRCs are unobjectionable, the reliance on 44 LSVs to deliver 1,950 new homes, many of who have very limited local services seriously undermines the principles of sustainable development.</p> <p>The significant role and function of Stratford-upon-Avon as the main town and as the pre-eminent settlement in the District is not properly reflected or recognised. The vision for Stratford-upon-Avon does not refer to its contribution as a sustainable location for new housing.</p> <p>The Strategic Objectives do not properly balance the need to accommodate development in sustainable locations and the desire to protect the character of the District. Again there exist opportunities to accommodate additional development at Stratford-upon-Avon that do not cause harm to the character of the town yet could contribute a sustainable pattern of development.</p>	<p>Vision should be modified to recognise the role that Stratford-upon-Avon should play in accommodating future housing development.</p> <p>The Strategic Objectives should similarly be amended to explain how development is to be distributed in a sustainable manner; naturally this will maintain a focus on Stratford-upon-Avon.</p>	See separate comments in respect of: - CS.15 Distribution of Development; CS.16 Housing Development - Appendix 2 LSV Methodology.
K P Brooks and the Stearn Children’s Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	No	Housing requirement should be higher to meet the OAN of the District and to meet the needs arising from adjoining Districts as necessary.	Housing figure should be increased	See separate comments in respect of: - Section 1.3 Duty to Co-operate; CS.16 Housing Development - Proposal GLH
CPRE Warwickshire Branch		Not Specified	Not Specified	No	OAN should be amended to 6,000 and reference to new settlement at GLH not justified or needed.	Strategic objective 14 should be amended to state that an additional 6,000 dwellings will be provided by 2031.	See separate comments in respect of: - Section 1.3 Duty to Co-operate; CS.16 Housing Development - Proposal GLH
Sharba Homes	Barton Willmore llp	Yes	No	No	Do not support the inclusion of GLH.	Council must meet the OAN.	See separate comments in respect of: - Section 1.3 Duty to Co-operate; CS.16 Housing Development - Proposal GLH

St Modwen Developments Ltd	Barton Willmore llp	Not Specified	Not Specified	No	<p>The Council's Vision, to maintain and enhance Stratford-on-Avon's built and natural character and heritage, as well as its settlements and landscape, is welcomed. It is our view that Meon Vale (i.e. the former Engineer Resources Depot, Long Marston) will greatly contribute to this vision.</p> <p>The second paragraph of the Vision and Strategic Objective (14) purports to establish a need for 10,800 additional homes in the District by 2031. We consider that the Local Plan should seek to deliver a minimum of 18,200 dwellings, meeting the employment growth ambitions of the Council. On this basis, the Council's Vision is not considered to be informed by objectively assessed housing needs and positively prepared, nor justified.</p> <p>There is no clear evidence which indicates that the site at GLH will be deliverable during the Plan Period given significant infrastructure works required to be carried out prior to the delivery of anything more than a modest number of new homes. It is therefore our view that the Council's Vision is neither justified nor effective.</p> <p>In terms of tourism, Meon Vale will contribute to Strategic Objective (10) of the Council's Vision, providing self-catering holiday lodges and holiday homes, will encourage longer stays in the area, providing a type of facility that is not currently available. As such Meon Vale will assist the town in meeting the Council's objective of re-establishing its position in the top 20 UK towns and cities for international visitors.</p> <p>The Council's desire to improve the affordability of housing across the District, underlined by Strategic Objective (15) of the Vision, is also welcomed. 35% of the 550 dwellings proposed at Meon Vale will be affordable tenure.</p>	<p>The housing requirement should be increased from 10,800 to 18,200.</p> <p>Serious deliverability issues regarding GLH and risk of relying on a single site.</p> <p>To meet the housing target, Meon Vale should be specifically identified as a location to accommodate housing; a location which has a track record for delivering housing.</p>	<p>See separate comments in respect of: -</p> <p>Section 1.3 Duty to Co-operate; CS.16 Housing Development - Proposal GLH</p>
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	<p>Support the general thrust of the vision and the strategic objectives. However, explicit reference must be made to the need to recycle brownfield land. It is not sufficient to simply identify and allocate additional employment land: proper economic growth scenarios to capitalise on the opportunities for the District should be provided.</p>		<p>See overall response below. See separate comments in respect of CS.21 Economic Development.</p>
Midland Commercial Properties	Stansgate Planning	Yes	Not Specified	No	<p>The vision for Southam indicates that about 350 additional homes will be provided by 2031. For reasons given elsewhere we find that the overall amount of housing to be provided during the Plan period is too low, meaning the plan is not positively prepared and not consistent with national policy.</p> <p>In order to overcome these concerns additional housing should be directed towards the Main Rural Centres, including Southam, which is consistent with the dispersal strategy of the Plan whilst still ensuring development is sustainable. In the light of this the figure stated is too low and should be increased. We conclude that the revised figure should be approximately 600 dwellings, taking into account land which we identify in separate representations as being suitable for allocation and development at the current time.</p>	<p>The housing figure for Southam should be increased to about 600 dwellings.</p>	<p>The reference to 350 homes at Southam is in respect of the two allocated sites. It is not the maximum number of homes that will be provided: indeed, the Housing Trajectory (Figure 1) shows that 440 homes will be delivered in Southam across the plan period.</p> <p>See also separate comments in respect of CS.15 and CS.16.</p>
Cal Gavin Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	Not Specified	<p>Support the general thrust of the vision and strategic objectives, although SDC should look beyond the land-use element and link with important major businesses and their requirements for growth.</p>	<p>None specified.</p>	<p>See separate comments in respect of CS.21 Economic Development</p>
Overall Officer Response		See overall response in respect of Section 1.4 Vision and Section 1.4 Objectives.					
Overall Officer Recommendation							

Section 1. Context – 1.4 Vision and Strategic Objectives - Vision

Number of Supports: 3 Number of Objections: 11 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
South Worcestershire Councils		Yes	Yes	Yes	Support the vision	N/A	N/A
Paul Ridgeway	Stansgate Planning	Yes	Not Specified	No	Paragraph 2 of the Vision indicates the Council will provide an additional 10,800 dwellings across the District by 2031. Objections made elsewhere conclude that this figure should be higher, to meet the objectively assessed housing needs arising from the District itself, and to meet the needs arising from adjoining districts as necessary. Failure to address objectively assessed need means the Plan is not positively prepared and not consistent with national policy.	Increase the housing numbers.	See separate comments in respect of: - Section 1.3 Duty to Co-operate and CS.16 Housing Development
Stagecoach Midlands		Not Specified	Not Specified	Not Specified	Generally support Vision, and dispersal-based strategy, despite the fact that this approach is both relatively unusual, and counter-intuitive to most transport planning orthodoxy in particular. Clarity of vision and strategy is essential in setting the basis on which sustainable development can be realised. So too is a strong evidence base. Stagecoach recognises that the early adoption of a sound plan is also essential if development is to be optimally directed to take advantage of the opportunities for sustainable transport. However, Stagecoach has great reservations about the way the dispersal approach has been taken into the plan at CS.15 and CS.16 in particular.	None specified.	See separate comments in respect of:- CS.15 Distribution of Development and CS.16 Housing Development
Wellesbourne Matters	SLR Consulting	Yes	Yes	No	Vision fails to recognise the presence and economic and social significance of Wellesbourne Airfield, and the important role in local and regional aviation activity. Whilst there are no detailed proposals to expand operations, inclusion in the vision would enable the potential for the airfield to be realised (e.g. increase hanger space, enlarged maintenance operation, improve visitor facilities, increase amount of hardstanding for larger aircraft and taxiway, offices and education centre for flying school, combined visitor centre and museum).	It is proposed that the following text should be inserted into the Wellesbourne sub section of the Vision set out at paragraph 1.4 of the Core Strategy:- "The Wellesbourne Airfield will continue to have a significant role in supporting general aviation and is an asset to the District and beyond. Proposals for enhanced aviation, and aviation related facilities at Wellesbourne Airfield for the delivery of economic and social benefits will be encouraged." The modification would make the Core Strategy sound by ensuring that a significant facility immediately adjacent to the Main Rural Centre of Wellesbourne is recognised within the Vision and will be encouraged to make a further economic and social contribution to the District.	See overall response below. See separate comments in respect of AS.9 Wellesbourne.
Warwickshire and West Mercia Police		Yes	Yes	No	Whilst generally supportive of the Vision, it should directly reference the need to ensure that the District's communities are safe, secure and enjoy low crime rates in conformity with the NPPF. Amending the Vision help achieve safer communities objective in the District Sustainable Community Strategy' and support the objectives contained within the 'South Warwickshire Community Safety Partnership Plan. It should also be noted that whilst the District has relatively low crime rates compared to other areas of the West Midlands, numerous surveys have shown that residents consider that maintaining low crime levels is the most important factor in making somewhere a good place to live. More generally, the Vision contains other aspirations such as ensuring a high quality of life for residents throughout the District, but these and other aspirations will not be achieved if those communities are not safe, secure and enjoy low crime rates.	We propose that the Vision should incorporate the following amendment: - "...Overall, the strategy will have strengthened town and village communities whilst maintaining their characteristics, ensured that they are safe, secure and enjoy low crime levels, protected the countryside from inappropriate development and activities and ensured a high quality of life for residents throughout the District."	See overall response below.

Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	<p>Object to the Plan's 10,800 new homes target. It is considered that whilst this figure is an objectively assessed need, in isolation it does not take into account previous shortfalls in delivery of housing, nor the Duty to Cooperate.</p> <p>Raise concern with "Sensitively developed in ways that protect and enhance the setting, character and identity of each settlement" as this is very subjective.</p> <p>Concerns raised about the apparent prominence given to the statistical increase in the size of settlements between 1981 and 2011. It is considered that this test, as part of the vision could be used to effectively "block" new housing development, which is seen by the Council as compromising the identity of the settlement, by virtue of a percentage increase in size.</p> <p>Vision also fails to recognise continued growth of settlements in meeting their role and function.</p>	The vision should be amended to reflect the fact that the settlement will continue to expand over the plan period.	<p>The concerns are noted but considered unfounded. The statistics cited in the Area Strategies are to provide context. The key point is how development is accommodated. Growth that continues to maintain the important built characteristics of a settlement is not contrary to the Core Strategy.</p> <p>See also separate comments in respect of: - CS.16 Housing Development - Section 1.3 Cross Boundary Issues</p>
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	Yes	Yes	Yes	Welcome the Council's recognition, as part of their vision, for the need to have provided 19ha of land to meet the employment needs of Redditch during the plan period.	N/A	N/A
Alcester Estates Ltd	Stansgate Planning	Yes	Not Specified	Yes	Alcester is an important town in the District, providing much needed employment to many people both living locally and in the surrounding area. The allocation of additional land for employment development north of Arden Road is therefore essential and is strongly supported. Notwithstanding this support, the area of land should be slightly enlarged to ensure a secondary vehicular access into the site can be achieved.	None specified.	See separate comments in respect of :- CS.21 Economic Development and AS.2 Alcester
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	No	Paragraph 2 of the Vision indicates the Council will provide an additional 10,800 dwellings across the District by 2031. Objections made elsewhere conclude that this figure should be higher, to meet the objectively assessed housing needs arising from the District itself, and to meet the needs arising from adjoining districts as necessary. Failure to address objectively assessed need means the Plan is not positively prepared and not consistent with national policy.	The housing figure should be increased.	See separate comments in respect of CS.16 Housing Development.
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	No	<p>The vision for Shipston-on-Stour does not make reference to the development of any additional housing. This means any new housing can only be developed on land within the settlement. This is extremely limiting and does not allow the proper development of what is one of the most sustainable settlements in the District. It is therefore essential that additional housing is directed towards the settlement through allocations.</p> <p>Overall amount of housing to be provided during the Plan period is too low, meaning the plan is not positively prepared and not consistent with national policy. Additional development should be directed to the MRCs consistent with the existing dispersal strategy of the Plan.</p>	The vision for Shipston-on-Stour should be amended to state that 'Development to the west of Shipston-on-Stour will have provided about 70 new homes'.	See separate comments in respect of CS.16 Housing Development.
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	No	<p>The Council's vision is broadly appropriate and we particularly agree with the intention to meet future development needs. In addition we agree with the aspiration to support growth in the economy and note that providing the right type of housing in the right locations is critical to the Council in achieving this.</p> <p>In particular we welcome the acknowledgement that Southam 'will continue to prosper as a centre and focal point for shops, services and jobs for a sizeable rural catchment.' This recognises the sustainability of Southam now, and the potential for continued growth and preservation as a sustainable settlement over the Plan period.</p> <p>Furthermore, we agree in principle that the built environment and setting of Southam should be treated sensitively by preserving the Stowe Valley. However, we consider that this can be done, and indeed the valley can be enhanced, whilst allowing development to come forward that is of an appropriate scale and sensitively designed within this area.</p>	<p>The final sentence is unjustifiably restrictive in its current form. We therefore suggest the following amendments to the final sentence:-</p> <p>"The built environment and setting of Southam will have been enhanced, including by only allowing development in the Stowe Valley to the west of the town which is of an appropriate scale and sensitively designed".</p>	See separate comments in respect of AS.7 Southam Area Strategy.

Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	<p>The amount of homes quoted in the vision is inconsistent with the OAN for the District.</p> <p>The settlement hierarchy should reflect that of the Draft 2010 Core Strategy where the sustainability credentials of Southam, Alcester and Shipston-on-Stour are recognised, thereby elevating their status to three Principle Rural Centres (based on evidence).</p> <p>Object to proposals at GLH on the basis that the existing MRCs and Startford are more sustainable locations.</p>	None specified.	See separate comments in respect of:- CS.15 Distribution of Development and CS.16 Housing Development
K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	No	<p>The vision for Southam indicates that about 350 additional homes will be provided by 2031. For reasons given elsewhere we find that the overall amount of housing to be provided during the Plan period is too low, meaning the plan is not positively prepared and not consistent with national policy.</p> <p>In order to overcome these concerns additional housing should be directed towards the Main Rural Centres, including Southam, which is consistent with the dispersal strategy of the Plan whilst still ensuring development is sustainable. In light of this the figure stated is too low and should be increased. We conclude that the revised figure should be approximately 600 dwellings, taking into account land which we identify in separate representations as being suitable for allocation and development at the current time.</p>	The housing figure for Southam should be increased to 'about 600 dwellings'.	See separate comments in respect of – CS.16 Housing Development and AS.7 Southam
Paul Ridgeway	Stansgate Planning	Yes	Not Specified	No	<p>The vision for Studley indicates that any new housing will be delivered on small sites within the settlement boundary. Given that the Green Belt boundary is drawn very tightly around the settlement this is extremely limiting and does not allow the proper development of what is one of the most sustainable settlements in the District. Essential that additional housing is directed towards the settlement through allocations.</p> <p>Overall amount of housing to be provided is too low, meaning the plan is not positively prepared and not consistent with national policy. Additional housing should be directed towards the Main Rural Centres, including Studley, which is consistent with the dispersal strategy of the Plan.</p>	<p>The vision for Studley should be amended to read either:-</p> <p>“Development on the edges of the settlement will have provided about ??? new homes.”</p> <p>Or:</p> <p>“Previously developed sites within the Green Belt close to the edges of the settlement shall have been developed with new housing to help meet housing needs arising from the settlement.”</p>	<p>The vision for Studley is not incompatible with the overall distribution of development and there are considered to be sites available within the settlement boundary to meet additional development needs in Studley.</p> <p>See separate comments in respect of:- CS.16 Housing Development and AS.8 Studley</p>
Midland Commercial Properties	Stansgate Planning	Yes	Not Specified	No	<p>Objections made elsewhere conclude the housing requirement of 10,800 should be higher to meet the OAN of the District and to meet the needs from adjoining Districts.</p>	Housing figure should be increased.	See separate comments in respect of: - Section 1.3 Duty to Co-operate; CS.16 Housing Development; Proposal GLH
P Henson & Bird Group of Companies	Andrew Granger & Co	Not Specified	Not Specified	No	<p>Shortfall of 600 against the OAN of 11,400 as identified in the SHMA.</p> <p>Vision fails to recognise Stratford town as the key settlement for new housing in line with the NPPF and SHMA.</p>	Core Strategy needs to be rebalanced to give a greater focus for new homes and jobs in Stratford thereby recognising the importance of the town and presenting a more sustainable growth solution.	See separate comments in respect of: - Section 1.3 Duty to Co-operate; CS.16 Housing Development; Proposal GLH
Overall Officer Response					<p>Agreed that the vision should refer to maintaining safe communities.</p> <p>Agreed that the vision for Wellesbourne should be amended in respect of the airfield.</p>		
Overall Officer Recommendation					<p>Insert "safe" between "a" and "high" in paragraph 6 of the vision which begins "Overall".</p> <p>Insert the following text in the Wellesbourne vision: "The aviation related functions at Wellesbourne Airfield will have been retained and enhanced" as the penultimate sentence between the words "wildlife" and "There".</p>		

Section 1. Context – 1.4 Vision and Strategic Objectives - Objectives

Number of Supports: 1 Number of Objections: 15 Number of Unspecified: 3

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Environment Agency		Yes	Yes	Yes	<p>We support the strategic objectives within this document, however we recommend that strategic objective 6 is reworded. We recommend the change in wording because the current text suggests that the existing status quo of flood risk is acceptable.</p> <p>We feel that the policies within the supporting document reflect the need to reduce flood risk within the District using sustainable methods, as outlined in policy CS.4 Water Environment and Flood Risk. The change in wording would also highlight compliance with paragraph 100 within the National Planning Policy Framework.</p>	<p>Reword Strategic Objective (6) as follows:-</p> <p>“The floodplain will be maintained and, where opportunities arise, restored. The risk of flooding will be managed effectively by taking a whole catchment approach to implement sustainable flood management schemes. Water bodies will have reached a good status or potential in line with the Water Framework Directive”.</p>	The recommended change should be accepted.
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	<p>Support the need for energy efficient homes, but Objective 4 needs to be updated to reflect the fact that the Code for Sustainable Homes is going to be abolished, once Building Regulations have been updated in 2016.</p> <p>Notwithstanding concerns about the District's housing target, Strategic objective 14 does not provide the necessary detail in terms of the distribution of housing across the District. It is silent on the need to provide homes in a variety of locations in the settlement hierarchy and on both greenfield and brownfield sites. This objective should be revised to include reference to development at sites adjacent to Main Rural Centres.</p>	None specified.	See overall response below.
Paul Ridgeway	Stansgate Planning	Yes	Not Specified	No	In order to be sound the Plan should contain a comprehensive set of strategic objectives. These should ensure that all the development needs of the District, and those arising from adjoining areas which it is agreed will be accommodated within Stratford on Avon District, are fully met. There is no objective which indicates that the needs arising from neighbouring authorities will be met. As such the plan is not positively prepared, it is not effective and it is not consistent with national policy.	A new objective should be included which states ‘Some of the development needs of adjoining Districts which cannot be met within their own authority areas will be met within Stratford on Avon District, as agreed with the relevant authorities’.	<p>See overall response below.</p> <p>See separate comments in respect of Section 1.3 Cross Boundary Issues.</p>
K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	No	In order to be sound the Plan should contain a comprehensive set of strategic objectives. These should ensure that all the development needs of the District, and those arising from adjoining areas which it is agreed will be accommodated within Stratford on Avon District, are fully met. There is no objective which indicates that the needs arising from neighbouring authorities will be met. As such the plan is not positively prepared, it is not effective and it is not consistent with national policy.	A new objective should be included which states ‘Some of the development needs of adjoining Districts which cannot be met within their own authority areas will be met within Stratford on Avon District, as agreed with the relevant authorities’.	<p>See overall response below.</p> <p>See separate comments in respect of Section 1.3 Cross Boundary Issues.</p>

Warwickshire and West Mercia Police		Not Specified	Not Specified	No	<p>Whilst we are generally supportive of the Vision, it should directly reference the need to ensure that the District's communities are safe, secure and enjoy low crime rates in conformity with the NPPF.</p> <p>Amending the Vision to help achieve safer communities objective in the District Sustainable Community Strategy' and support the objectives contained within the 'South Warwickshire Community Safety Partnership Plan. It should also be noted that whilst the District has relatively low crime rates compared to other areas of the West Midlands, numerous surveys have shown that residents consider that maintaining low crime levels is the most important factor in making somewhere a good place to live.</p> <p>More generally, the Vision contains other aspirations such as ensuring a high quality of life for residents throughout the District, but these and other aspirations will not be achieved if those communities are not safe, secure and enjoy low crime rates.</p>	<p>To resolve all of our concerns and significantly improve the Strategic Objectives effectiveness and consistency with the NPPF, we request that the following amendments are made:-</p> <p>'(8) Community facilities and open space will have been improved across the District. Through collaborative working between District, Town and Parish Councils and key partners in education, public health, emergency services and other services, opportunities to improve the safety, security, health and wellbeing of the Districts communities will have been realised as a result of the development process.'</p>	See overall response below.
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	No	<p>We generally agree with the Council's set objectives and the aspiration to deliver high quality development across the District. However, we draw attention to Strategic Objective 4. As the Council will be aware, the Government are in the process of phasing out the Code for Sustainable Homes and moving forwards Building Regulations will be relied upon in order to deliver improvements in the sustainability of the built form. The Council's desire to improve housing affordability is welcomed and the delivery of additional land west of Holywell Road, Southam could assist the Council in meeting this objective.</p>	<p>Given that the Core Strategy is intended to cover the period up to 2031 and there may be significant amendments to Building Regulations over this time, we recommend that Strategic Objective 4 is amended to the following:-</p> <p>'To help mitigate and adapt to climate change, all development will comply with building regulations at the time of delivery'.</p>	See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	<p>Strategic Objective 4 referring to water and energy efficiency to Code for Sustainable Homes Level 4 is unsound. It is not consistent with national policy and will be rendered out of date by the Government's Standards Review proposals on these matters. On 13 March 2014, the Government announced the outcome of its Housing Standards Review and a Ministerial Statement on Building Regulations was issued together with a Supporting Note. The Statement made clear that in the future, energy and water efficiency standards will be set through national building regulations.</p> <p>The findings of the Housing Standards Review has led to the proposal that all building standards requirements will be set out within the Building Regulations and that it is not the remit of planning policy to require standards that are contained within other legislative processes. All sustainability building standards that are part of the Building Regulations and its proposed review should therefore be removed from policies in the Core Strategy.</p>	<p>Strategic Objective 4 is not required in light of the housing standards review and should be deleted.</p>	See overall response below.
Paul Ridgeway	Stansgate Planning	Yes	Not Specified	No	<p>The proposed housing figure of 10,800 does not meet the District's OAN or the needs arising from neighbouring authorities.</p>	<p>Increase the housing figure</p>	See separate comments in respect of CS.16 Housing Development.
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	No	<p>The proposed housing figure of 10,800 does not meet the District's OAN or the needs arising from neighbouring authorities.</p>	<p>Increase the housing figure</p>	See separate comments in respect of CS.16 Housing Development.
The Bird Group of Companies	Framptons	Not Specified	Not Specified	Not Specified	<p>It is submitted that in terms of dealing with the overall provision for housing and jobs, the plan has not been positively prepared, it is not justified or effective and it is not consistent with national policy. It is therefore unsound.</p>	<p>None specified.</p>	See separate comments in respect of: - CS.15 Distribution of Development; CS.16 Housing Development; CS.21 Economic Development

Cal Gavin Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	Not Specified	Support objective 12 and provision of 11ha of employment land at Alcester (Arden Forest). However, it is important that SDC provide alternative appropriate employment land to satisfy choice of land and location.	None specified.	See separate comments in respect of CS.21 Economic Development
B and M Glanfield	Framptons	No	No	No	It is submitted that in terms of dealing with the overall provision for housing and jobs, the plan has not been positively prepared, it is not justified or effective and it is not consistent with national policy. It is therefore unsound.	None specified.	See separate comments in respect of:- CS.15 Distribution of Development; CS.16 Housing Development
Taylor Wimpey UK Ltd	Barton Willmore	Not Specified	Not Specified	Not Specified	Generally agree with the objectives and aspirations to deliver high quality development but as the Council will be aware, the Government are in the process of phasing out the Code for Sustainable Homes and moving forwards Building Regulations will be relied upon in order to deliver improvements in the sustainability of the built form. Given that the Core Strategy is intended to cover the period up to 2031 and there may be significant changes to Building Regulations over this time. The Council's desire to improve the affordability of housing across the District, underlined by Strategic Objective (15) of the Vision, is welcomed. The delivery of additional residential development, including on land south of Alcester Road, Stratford-upon Avon, could assist the Council in meeting this objective.	We recommend that Strategic Objective 4 is amended to the following:- "To help mitigate and adapt to climate change, all residential development will comply with building regulations at the time of delivery".	See overall response below.
Gladman Developments		Not Specified	Not Specified	No	Gladman do not consider the content of the vision and strategic objectives of the plan to be sound and in compliance with the context set by the Framework. The plan does not adequately seek to address significant issues in the framework such as economic growth and affordability. The vision and objectives instead seem to regurgitate the policies and strategy of the Core Strategy rather than setting goals for the plan to achieve. For example, rather than seeking meet housing needs, the objective simply states that 10,800 dwellings (the target for the Core Strategy) will have been provided across the district. The lack of ambition provided by the plans vision and objectives mean that the plan is self-fulfilling. The plan only seeks to deliver exactly that planned by the policies, rather than setting aspirational objectives. In addition to these concerns Gladman consider the presentation of the objectives to be negative. The objectives of meeting housing need and affordability, as well as employment growth come bottom of the list. Although this maybe incidental, the treatment given to these objectives implies that this crucial part of the plan has been treated as an afterthought and is not a true priority. The Framework is clear that economic growth and boosting housing supply are critical objectives for the national government; something that is not translated by the plan.	None specified.	Whilst being aspirational, the objectives are also realistic setting goals that are achievable and measurable. The objectives do not regurgitate the policies, quite the opposite. The objectives set the goals whilst the policies (read together) set out how these goals will be achieved. To do this, it is necessary for there to be some repetition of the objectives in actual policies. The objectives would reflect whatever number meets the District needs. The Council contends that this is 10,800. The order of the objectives is not a reflection of priority as such, although it was felt appropriate to start with the objective that reflected the strongest community aspiration.
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	No	In order to be sound the Plan should contain a comprehensive set of strategic objectives. These should ensure that all the development needs of the District, and those arising from adjoining areas which it is agreed will be accommodated within Stratford on Avon District, are fully met. There is no objective which indicates that the needs arising from neighbouring authorities will be met. As such the plan is not positively prepared, it is not effective and it is not consistent with national policy.	A new objective should be included which states: 'Some of the development needs of adjoining Districts which cannot be met within their own authority areas will be met within Stratford on Avon District, as agreed with the relevant authorities'.	See separate comments in respect of Section 1.3 Cross Boundary Issues.

K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	No	The proposed housing figure of 10,800 does not meet the District's OAN or the needs arising from neighbouring authorities.	Increase the housing figure	See separate comments in respect of:- CS.15 Distribution of Development; CS.16 Housing Development
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	Objective 12 relates to the provision of new jobs and is negatively written. It simply allocates an additional 35 hectares of land for business uses within the District. This is not sufficient in encompassing the requirements of the NPPF and government advice on economic growth since there is no appreciation of the types and styles of economic growth that should be promoted and, more particularly, where that growth should take place. A substantial element of this "growth" is the additional 35 hectares to support Redditch Town in its future growth; thus employment growth in Stratford District is therefore way below the actual needs. No reference whatsoever in the Strategic Objectives to the proper and reasonable recycling of "brownfield" land. This policy initiative should have been at the forefront of the Stratford District Plan and would, if Stratford District had properly set out its policies, been championed by them to reduce the need for additional "greenfield" land releases.	None specified.	See overall response below. See separate comments in respect of CS.21 Economic Development
Midland Commercial Properties	Stansgate Planning	Yes	Not Specified	No	In order to be sound the Plan should contain a comprehensive set of strategic objectives. These should ensure that all the development needs of the District, and those arising from adjoining areas which it is agreed will be accommodated within Stratford on Avon District, are fully met. There is no objective which indicates that the needs arising from neighbouring authorities will be met. As such the plan is not positively prepared, it is not effective and it is not consistent with national policy.	A new objective should be included which states: 'Some of the development needs of adjoining Districts which cannot be met within their own authority areas will be met within Stratford on Avon District, as agreed with the relevant authorities'.	See separate comments in respect of Section 1.3 Cross Boundary Issues. See overall response below.
Midland Commercial Properties	Stansgate Planning	Yes	Not Specified	No	The proposed housing figure of 10,800 does not meet the District's OAN or the needs arising from neighbouring authorities.	Increase the housing figure	See separate comments in respect of:- CS.16 Housing Development; Section 1.3 Cross Boundary Issues.
Overall Officer Response		Agreed that Strategic Objective 4 needs rewording to reflect changes to national policy. Agreed that objectives should refer to brownfield land, safe communities and the mix and location of development. For clarification, objective 14 should be amended to reflect the results of the Gypsy and Traveller Accommodation Assessment 2014 Update. In light of modifications in respect of the Duty to Co-operate (see comments in respect of Section 1.3) and the inclusion of an additional policy in this regard, agreed that objectives should include reference to this.					
Overall Officer Recommendation		The Inspector is requested to make the following modifications:- Reword Strategic Objective 4 as follows: 'To help mitigate and adapt to climate change, all residential development will have achieved as a minimum the national standards set out in Building Regulations. From 2019, all non-residential development will have achieved water and energy efficiency BREEAM 'Good' standard.' Reword Strategic Objective 6 as follows: 'The floodplain will be maintained and, where opportunities arise, restored. The risk of flooding will be managed effectively by taking a whole catchment approach to implement sustainable flood management schemes. Water bodies will have reached a good status or potential in line with the Water Framework Directive. In respect of Strategic Objective 8, insert "safety," between "the" and "health". In respect of Strategic Objective 14, reword as follows: "An additional 10,800 homes (an average of 540 per annum) will have been granted planning permission and built across the District on brownfield and greenfield sites, reflecting the dispersed settlement pattern of the District. Where justified by the available evidence, the District Council will also have worked with neighbouring councils to help meet any unmet housing needs arising outside the District. In addition, the needs of Gypsies and Travellers will have been met through the provision of 41 pitches by 2019 and an additional 30 pitches thereafter, a total of 71 pitches by 2031." In respect of Strategic Objective 15, reword as follows: "A mix of sizes, types and tenures of housing will have been built by a range of developers, housing associations and other providers. To improve the affordability of housing across the District, 35% of homes on eligible sites will have been provided as affordable homes."					

Section 1. Context – 1.4 Vision and Strategic Objectives – Key Diagram

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	Not Specified	Not Specified	Not Specified	The key Diagram should be amended to identify the boundaries of the Forest of Arden.	As described.	The Forest of Arden does not have a designated boundary. Covered under CS.5 Landscape. No change.
P Henson & Bird Group of Companies	Andrew Granger & Co	Not Specified	Not Specified	No	The Green belt to the north of Stratford and the A46 should be removed either in whole or in part to allow for the positive planning for additional housing and employment requirements to meet the town's needs through the plan period.	As described.	Consultee submitted this representation under this topic. Covered under CS.10 Green Belt. No change.
Overall Officer Response		Refer both representations to their respective policies where both have been covered.					
Overall Officer Recommendation		No change.					

Section 2. Sustainability Framework – 2.1 Sustainability Appraisal

No representations received for this section.

See Sustainability Appraisal of the Core Strategy at end of document.

Section 2. Sustainability Framework – 2.2 Sustainable Development – Policy CS.1

Number of Supports: 2 Number of Objections: 3 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Urban Renaissance Villages (URV) and Helical Bar	Barton Willmore	Yes	Yes	Yes	N/A	N/A	N/A
Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	Adds little to the overall Core Strategy as it repeats parts of the NPPF.	No changes sought explicitly	Disagree. See overall response below.
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	The first paragraph indicates a wish to adopt a policy of managed economic growth. This would restrict and control economic growth and does not accord with the NPPF. The Policy is incomplete and unsound as it does not refer to the recycling of brownfield land in the District	No changes sought explicitly	Disagree. See overall response below.
Gladman Developments		Not Specified	Not Specified	Not Specified	Query the need for the additional elements to this policy which has been used	no changes sought	N/A
St Modwen Developments Ltd	Barton Willmore llp	Not Specified	No	No	Policy is good in principle but could be improved	Bullet point 3 of Paragraph 2.2.2 in the supporting text should be amended to be consistent with the NPPF. The following text should be added after the word 'prudently': "including the effective use of land by reusing land that has been previously developed, promote mixed use developments..."	Agree.
Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	Yes	N/A	N/A	N/A
Overall Officer Response	<p>A representation received requested that the policy is omitted as it adds little to the overall Core Strategy and repeats parts of the NPPF. Policy CS.01 has been included in the Core Strategy following advice from PINS.</p> <p>One of the representations received has expressed concern that the policy seeks to 'manage' economic growth, claiming that it would restrict and control economic growth and is therefore inconsistent with NPPF. It is considered that the use of the word 'managed' is appropriate in the context of the Core Strategy which seeks to balance the need to provide employment and housing, so that the role and function of the District's towns and rural centres are retained and strengthened.</p> <p>The representations also consider that the policy should be amended to include the re-use of brownfield land in the explanatory text bullet point 3 (Planning for Places) under paragraph 2.2.2. This complies with the NPPF (Paras 17, Bullet Point 9 and Para 111) in requiring that the planning system should both protect and ensure our natural environment, and to use natural resources prudently.</p>						
Overall Officer Recommendation	<p>That the Inspector be requested to recommend that Policy CS.1 is modified as follows:</p> <p>After the word "prudently" in line 2 of the paragraph 'Planning for Places (an environmental role)' insert the following: ", ensuring the effective use of land through reusing previously developed land and promoting mixed use developments,"</p>						

Section 3. District Resources – 3.1 Climate Change and Sustainable Construction – Policy CS.2

Number of Supports: 2 Number of Objections: 7 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Environment Agency		Yes	Yes	Yes	We are supportive of this policy and welcome the clear reference to the importance of green infrastructure and biodiversity within new developments to mitigate against climate change.	N/A	Support noted.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	The policy is unsound. Most of it simply refers to other policies set out in the Core Strategy, for example under Part A, paragraphs (a) and (c) refer to other policies and are superfluous. Much of the rest of Section A is not precise and would not enable a decision maker to effectively evaluate the extent to which any development proposal was compliant with this part of Policy CS.2.	None specified.	Disagree. See overall comments below.
Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	Supportive of the principle to mitigate for climate change and designing development to reduce carbon emissions, the policy would benefit from some 'tweaks'. Part A item (c) Green Infrastructure and Biodiversity should be amended to bring it into conformity with NPPF. Object to the reference to Code for Sustainable Homes (CSH) - no substantial evidence has been produced by the Council to depart from national policy.	item (c) the final sentence should be amend to read “proposals which result in significant adverse impact...” given that the NPPF requires a clear balancing exercise of benefit vs harm to be undertaken and the key thrust contained therein is one of the significance of the harm. Delete reference to CSH.	Agree to amendment of wording of Part A item (c) Agree to deletion of reference to CSH.
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	No	Generally agree with the Council's objectives and aspirations in seeking high quality development. It is considered that the strategic objective 4 should be amended to delete reference to Code for Sustainable Homes and BREAM Standards to reflect the phasing out of the CSH.	Amend Strategic Objective 4 to read “To help mitigate and adapt to climate change, all residential development will comply with building regulations at the time of delivery”	Agree to the deletion of reference to CSH. However the government has not yet signalled its intention to phase out the BREEAM Standards.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	It is not consistent with the national policy and will be superseded by the Housing Standards Review. The Core Strategy should not refer to Code for Sustainable Homes in its energy policies. The principle was established by the Inspector at the examination of the Bath & N. Somerset Core Strategy on page 262 of his report	Delete reference to Code for Sustainable Homes	Agree. See overall comments below.
St Modwen Developments Ltd	Barton Willmore llp	Not Specified	Not Specified	No	The inclusion of separate criteria to cover ' Extensions and Major Refurbishments' is welcomed. However a definition of major refurbishment is required, either in the policy or supporting text as it may discourage the reuse of existing commercial buildings as it is unclear whether the criteria for non- residential development or extensions and major refurbishment should be applied. It is therefore recommended that the criteria relevant to 'Extensions and Major Refurbishments', is amended to 'Extensions and-the Reuse of Existing Buildings' to provide clarity on the matter. Object to reference to CSH 4 - The policy should be amended to reflect the requirement for CSH 3 in the 'Meeting the Need' SDC SPD'. The Policy needs to be clear about the requirement to provide 10% renewable on site, set out in the Council SPD' Sustainable Low Carbon Buildings will still be applied, given the overlap between the SPD and CSH.	Provide a definition of major refurbishment, either in the policy or supporting text. The policy should be amended to reflect the requirement for CSH 3 in the 'Meeting the Need SDC SPD'. It is recommended that the criteria relevant to 'Extensions and Major Refurbishments', is amended to 'Extensions and-the Reuse of Existing Buildings' to provide clarity on the matter. The Policy needs to be clear that the requirement to provide 10% renewable on site, set out in the Council SPD' Sustainable Low Carbon Buildings' will still be applied, given the overlap between the SPD and CSH.	Agree to provide definition of major development. Disagree that policy should be amended - CSH is to be phased for all dwellings Agree to amend to provide explanation in the supporting text
Natural England - South Mercia Area		Yes	Yes	Yes	N/A	N/A	N/A

Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	No longer any justification to reference the Code for Sustainable Homes in the Council policies.	The policy should be amended to 'future proof' it.	Agree. See overall comments below.
William Davis Ltd		Not Specified	Not Specified	No	The policy is not consistent with the national policy and will be superseded by the Housing Standards Review. The Core Strategy should not refer to Code for Sustainable Homes in its energy policies. This principle was established by the Inspector at the examination of the Bath & N. Somerset Core Strategy on page 262 of his report.	Delete reference to Code for Sustainable Homes.	Agree. See overall comments below.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Yes	Yes	No	<p>Most of the Policy CS.2 refers to other policies set out in the Core Strategy and considered superfluous.</p> <p>Most of Section A is not precise and would not enable a decision maker to evaluate to extent of a proposal compliance with the policy.</p> <p>Section B should be deleted as it is the province of Building Regulations in determining energy efficiency compliance. Allowable Solutions are also to be dealt with by Building Regulations.</p>	Delete the reference to CSH in section B.	<p>Disagree that Policy CS.2 is superfluous.</p> <p>Agree that reference to CSH should be deleted.</p>
Overall Officer Response		<p>A number of representations consider that Section A of Policy CS.2 is superfluous, imprecise and would not enable a decision maker to evaluate the extent of a proposal compliance with the policy. Section A provides a strategic context to mitigating and adapting climate change, and recognises that it is an issue which affects, and needs to be addressed, by a number of different strategic policies within the Core Strategy. It is therefore appropriate to reference the relevant policies within the climate change policy. It is important that Policy CS.2 provides an integrated and holistic approach to mitigate and adapt climate change in the district.</p> <p>There are a number of representations which request that Section B is deleted to omit the reference to the Code for Sustainable Homes. Following the Government's Housing Standards Review consultation, which sought views on simplifying and rationalising various sustainable buildings standards into a national set of standards, the Government announced on 13 March 2014 that CSH is to be phased out and the sustainability standards in buildings will be dealt with by Building Regulations. There is no need for LPAs to set a sustainability buildings standard in planning policy. It has also been announced that Allowable Solutions, the delivery mechanism to offset carbon emissions requirements, will be applied on a national basis, rather than being left to LPAs to establish their own Allowable Solutions scheme. The LPA will be encouraged to work with developers to bring forward suitable projects.</p> <p>A comment was received that the reference to BREEAM should be omitted along with the CSH. However, the Government's proposed national standards to replace Code for Sustainable Homes standards apply to new homes. The Government has not signalled its intention to phase out BREEAM standards.</p> <p>A representation has suggested that the policy requirement for CSH 4 is amended to CSH 3, which currently applies to the provision of affordable homes. As the Government intends to phase out CSH, as set out above, it is not considered appropriate to amend the policy as such. A few representations have welcomed the inclusion of separate criteria to cover 'Extensions and Major Refurbishments'. However a definition of major refurbishment is required, either in the policy or supporting text as it may discourage the reuse of existing commercial buildings as it is unclear whether the criteria for non-residential development or extensions and major refurbishment should be applied. It is therefore recommended that the criteria relevant to 'Extensions and Major Refurbishments', is amended to 'Extensions and the Reuse of Existing Buildings' to provide clarity on the matter.</p> <p>A further representation has stated that the BREEAM standards in the policy should be deleted. This is not considered appropriate as Government have not signalled any intention to phase out BREEAM standards.</p> <p>Further clarification is sought in the explanatory text about the requirement for 10% energy from renewables on site within the Council's SPD Sustainable Low Carbon Buildings and whether it should be applied. The Council's 10% on site renewable energy requirement as set out in the Council's SPD Sustainable Low Carbon Buildings has led to a greater deployment of renewable technologies in Stratford-on-Avon District than would have been the case in absence of the policy driver. However, it is now recognised that a percentage requirement for on-site renewable energy generation has been superseded by progressive tightening of Building Regulations and the 'fabric first' energy efficiency approach, which embeds carbon savings into the lifetime design of the dwellings. Furthermore, as the Building Regulations are tightened to the Government's Zero Carbon Homes target, greater energy efficiency and renewable energy resources will be required to comply with the statutory carbon emission savings.</p>					

Overall Officer Recommendation	<p>It is recommended that the Inspector is requested to modify the policy as follows:</p> <p>Section B – Sustainability Standards in Buildings</p> <p>Delete the paragraph entitled 'Residential Development'.</p> <p>Delete the reference to Code for Sustainable Homes from the second paragraph under 'Non-residential Development'.</p> <p>Amend the heading 'Extensions and Major Refurbishments' to read ' Extensions and the Re-Use of Buildings' and delete the second sentence in this section.</p> <p>It is recommended that the Inspector is requested to modify the associated explanatory text as follows:</p> <p>At the end of paragraph 3.1.4 add as follows: “Subject to the introduction via the Building Regulations of higher energy targets aimed at achieving the Government’s Zero Carbon Homes Policy, new homes will have to incorporate renewable and low carbon energy technologies and the Council’s SPD requirement for 10% renewable energy onsite will no longer be applied”.</p> <p>Delete the final sentence in paragraph 3.1.7.</p> <p>In paragraph 3.1.8, remove the second sentence and insert “The Government has indicated the Code for Sustainable Homes standards will be phased out and will be replaced by national standards for energy and water within Building Regulations for new homes. For non-residential development, the Council will use the alternatives standards provided by BREEAM to demonstrate the energy and water performance”.</p> <p>Paragraph 3.1.11; delete last sentence.</p> <p>Paragraph 3.1.12; delete first sentence and last sentence.</p> <p>Under the section 'Implementation and Monitoring'; delete the first bullet point.</p>
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Section 3. District Resources – 3.1 Climate Change and Sustainable Construction – Policy CS.2 B. Sustainability Standards in Buildings

Number of Supports: 0 Number of Objections: 5 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Taylor Wimpey UK Ltd	Barton Willmore	Yes	Yes	No	<p>The inclusion of separate criteria to cover ' Extensions and Major Refurbishments' is welcomed. However a definition of major refurbishment is required, either in the policy or supporting text as it may discourage the reuse of existing commercial buildings as it is unclear whether the criteria for non- residential development or extensions and major refurbishment should be applied.</p> <p>Object to reference to Code for Sustainable Homes (CSH) 4 - The policy should be amended to reflect the requirement for CSH 3 in the 'Meeting the Need' SDC SPD'.</p> <p>The Policy needs to be clear about the requirement to provide 10% renewable on site, set out in the Council SPD' Sustainable Low Carbon Buildings will still be applied, given the overlap between the SPD and CSH.</p>	<p>Provide a definition of major refurbishment, either in the policy or supporting text.</p> <p>The policy should be amended to reflect the requirement for CSH 3 in the 'Meeting the Need' SDC SPD'.</p> <p>The Policy needs to be clear about the requirement to provide 10% renewable on site, set out in the Council SPD' Sustainable Low Carbon Buildings will still be applied, given the overlap between the SPD and CSH.</p>	<p>Agree to provide revised definition -see officer response to CS.02.</p> <p>Disagree that policy should be amended - CSH is to be phased for all dwellings. See officer response to CS.02</p> <p>Agree to amend to provide explanation in the supporting text. See officer response to CS.02.</p>
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	No	<p>Generally agree with the Council's objectives and aspirations in seeking high quality development, it is considered that the strategic objective 4 should be amended to delete reference to Code for Sustainable Homes and BREEM Standards to reflect the phasing out of the CSH.</p>	<p>Delete reference to BREEAM and CSH</p>	<p>Agree to the deletion of reference to CSH. However the government has not yet signalled its intention to phase out the BREEAM Standards.</p>
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Most of the Policy CS.2 refers to other policies set out in the Core Strategy and considered superfluous. Section B should be deleted as it is the province of Building Regulations in determining energy efficiency compliance. Allowable Solutions are also to be dealt with by Building Regulations.</p>	<p>Delete reference to CSH in section B.</p>	<p>Disagree. See officer response to CS.02.</p>
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Most of the Policy CS.2 refers to other policies set out in the Core Strategy and considered superfluous. Section B should be deleted as it is the province of Building Regulations in determining energy efficiency compliance. Allowable Solutions are also to be dealt with by Building Regulations.</p>	<p>Delete reference to CSH in section B</p>	<p>Disagree. See officer response to CS.02.</p>
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Most of the Policy CS.2 refers to other policies set out in the Core Strategy and considered superfluous. Section B should be deleted as it is the province of Building Regulations in determining energy efficiency compliance. Allowable Solutions are also to be dealt with by Building Regulations.</p>	<p>Delete reference to CSH in section B</p>	<p>Disagree. See officer response to CS.02.</p>
Overall Officer Response		See response to CS.02					
Overall Officer Recommendation		See recommendation at CS.02					

Section 3. District Resources – 3.2 Sustainable Energy – Policy CS.3 A. Renewable and Low Carbon Energy Generation

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	Support for the use of renewables, however further clarification is required for the needs of large development to provide for further connection to or provision of decentralised energy schemes. It is considered that the Bidford-on-Avon site of 150 homes is not practical for a decentralised system to be installed as there will not be the demand of energy use throughout the day which makes CHP systems practical. The need to provide further connection is an unnecessary expense on developers	Further clarification sought.	Government provides strong support for the promotion and deployment of decentralised energy, to tackle climate change, to help reduce increasing energy bills, combat fuel poverty and to establish a security of energy supply. The wording should be amended to make clear the scale of development that should assess the potential for decentralised energy provision.
Overall Officer Response		See officer comment above.					
Overall Officer Recommendation		It is recommended that the Inspector is requested to modify the policy as follows:- In Part A paragraph 2, delete the second sentence and insert "All proposals involving commercial development providing 1,000 square metres or more floorspace or residential development providing 100 or more dwellings shall assess the feasibility of incorporating decentralised energy provision."					

Section 3. District Resources – 3.3 Water Environment and Flood Risk – Policy CS.4

Number of Supports: 2 Number of Objections: 3 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
West Midlands HARP Planning Consortium	Tetlow King Planning	Not Specified	Not Specified	No	Concern about the policy's approach to Flood Zone 2 land - PPG has requirements for Sequential and Exception Test in relation to various Flood Zones - no evidence to justify a different approach. Sustainable Urban Drainage Systems (SUDS) will be covered by national legislation. This should be indicated in the text, whilst removing unnecessary detail.	Amend Section A. We would encourage the Council to direct persons to other guidance on SUDS.	Agree - this request is covered as part of the EA recommendations submitted in response to this consultation. Disagree
Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	It is considered that the policy is completely unnecessary as it cuts across other legislation and replicates items which are controlled by alternative guidance. Suggest deletion of policy.	Delete Policy CS.4	Disagree
Natural England - South Mercia Area		Yes	Yes	Yes	Recommend the explicit reference to the use of 'soft engineered' SUDs in section B. Recommend a stronger emphasis on the protection and enhancement of the natural environment, so that the value of watercourses as linear wildlife corridor should be recognised. We welcome the inclusion of policy which makes this requirement.	Include reference to soft engineered SUDs in section B of policy. Include a statement to place greater emphasis on the protection and enhancement of the natural environment, so that the value of watercourses as linear wildlife corridor should be recognised. Where there is the opportunity to do so, development proposals should be required to deliver biodiversity enhancement along watercourses.	Agree - this request is covered as part of the EA recommendations submitted in response to this consultation.
Warwickshire County Council		Yes	Yes	Yes	The inclusion of the word 'may' in the second line of the paragraph 3 in the DMC suggests that managing exceedance flows on green field applications is optional. It is LLFA's opinion that exceedance flows should always be considered for green field sites. Recommend amendment to policy to change 'may' to 'needs'	Amendment to policy to change 'may' to 'needs'.	Agree
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	Object to the reference to Code for Sustainable Homes (CSH) as the Government has indicated that it will be phased out and the energy efficiency standards will be dealt with under Building Regulations.	Delete reference to CSH	Agree
Overall Officer Response					<p>The reference to the deletion of CSH is dealt with the response to representations on Policy CS.02.</p> <p>A request was received to strengthen the reference in Paragraph 3 in the DMC and change the wording 'may' to 'needs'. This is in line with the Environment Agency (EA) recommendations. See recommended changes to Policy set out in representations to CS.04A.</p> <p>Natural England's request for an explicit reference to the use of 'soft engineered' SUDs in section B and a stronger emphasis on the protection and enhancement of the natural environment is consistent with recommendations made by the Environment Agency and Warwickshire Wildlife - see representations to CS.02A and C.</p> <p>The policy is necessary in the context of national guidance. Paragraph 17 of the NPPF sets out a set of overarching principles to underpin both plan-making and decision-making. These include a requirement that planning supports the transition to a low carbon future in a changing climate, taking full account of flood risk and encouraging the re-use of resources, including water. It is therefore appropriate that the Core Strategy includes a strategic approach to reducing flooding and protecting and enhancing the water environment and natural resources.</p>		

Overall Officer Recommendation	<p>That the Inspector be requested to recommend that:</p> <p>Part A - Flood Risk Areas: Delete the second sentence.</p> <p>In the third sentence, delete “2, 3a and 3b” and insert “2 and 3a” and add at end “Land use in High Probability Flood Zone 3b should be restricted to water compatible or, with the exception test, essential infrastructure.”</p> <p>In the fourth sentence insert “, ecological” after “landscape”</p> <p>Add at end: “Rural and urban land use practices to restore more sustainable natural floodplains and to reduce runoff will be encouraged. Developers will be encouraged to reduce the reliance on hard engineered solutions through their site by contributing to upstream flood storage, giving consideration to a whole catchment approach.”</p> <p>Part B - Surface Water Runoff and SUDS: In the first paragraph, delete “on” and insert “to”</p> <p>In paragraph 9, line 2, insert after “site”: “during the 1 in 100 year plus climate change rainfall event”. Add at end of paragraph “There is a presumption against the underground storage of water.”</p> <p>Part C - Protection of the Water Environment: Amend the title of Part C to read “Enhancing and Protecting the Water Environment”</p> <p>Delete the first paragraph and insert: “Development proposals that lie adjacent to a canal, river or tributary should ensure that the natural features and functions of the watercourses and its wider corridor are retained, or where possible reinstated and that appropriate habitats buffers are established.”</p> <p>Delete the fourth paragraph and insert: “Physical and visual access to watercourses will be promoted where it respects the natural function of the watercourse and sensitive nature of the river corridor as a whole.”</p> <p>Add the following at the end of paragraph 5: “Where a development site contains areas identified as flood plain, the development layout design should ensure that no surface water attenuation features are located in Flood Zone 1. There should be an 8 metre easement to allow maintenance & access to all main rivers and to ensure that the river corridor is sensitively managed to support environmental infrastructure (including wildlife corridors) and to protect/improve habitat for BAP species and/or ecological networks.”</p> <p>Delete the second sentence of paragraph 6.</p> <p>Add a new paragraph at the end of Part C: “Development proposals will take full account of the biodiversity value of watercourses and river corridors and their role in supporting local ecological networks. Impacts from lighting, noise and visual disturbances should be avoided or mitigated and opportunities to create, enhance and restore adjacent habitats for biodiversity will be encouraged.”</p> <p>Part D - Water Quality: Add a new second paragraph as follows: “In respect of the proposal for land at Gaydon/Lighthorne Heath (Policy GLH) and the growth of existing employment at Gaydon (Policy AS.11), Severn Trent Water has identified the need for improvements to be made to the local wastewater infrastructure, including temporary works to ensure that adequate capacity is secured prior to occupation of early phases of development. Such improvements are necessary to support the delivery of the overall strategy for the District and will be supported accordingly.”</p> <p>Explanation: Add at the end of paragraph 3.3.11: “The greatest benefits are gained when sustainable urban drainage systems are designed as a multifunctional resource, capable of delivering a wide range of environmental and quality of life benefits (ecosystems) for future occupants. Flood storage areas, wetland habitats and above ground SUDs can form a functioning ecosystem in their own right for many species, and can increase biodiversity by increasing habitat area, increasing populations of some protected species and increasing species movement.’</p> <p>Development Management Considerations (DMCs): In DMC (3), line 2, delete “may need” and insert “needs”.</p> <p>Add at the end of DMC (7): “The Environment Agency promotes flood risk measures that include wetland habitat creation, including through the use of woody debris upstream, to ensure that flood management solutions are consistent with biodiversity needs.”</p>
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Section 3. District Resources – 3.3 Water Environment and Flood Risk – Policy CS.4 A. Water Environment and Flood Risk

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Environment Agency		Not Specified	Not Specified	Not Specified	<p>Strongly recommended that the Flood Risks Areas section in reworded to be consistent with the NPPF.</p> <p>We recommend the following sentence on the flood plain is amended to include the following phrase 'ecological'.</p> <p>Insertion of 3 additional paragraphs on flood plain issues.</p> <p>Section B - Surface Water Runoff and SUDs - amendment of sentence to include the word 'to' and insertion of text to clarify the relevant return period to formulate surface water discharge rates.</p> <p>Additional text to be added to the explanatory text about the role of SUDs</p> <p>C. Protection of the Water Environment Recommendation for the policy with some amendment and additional wordings</p>	<p>All development proposals should be located in Flood Risk Zone 1 (Low).</p> <p>Development within the Environment Agency's Flood Risk Zones 2 and 3a will only be acceptable when the sequential test and where applicable, the exception test have been satisfied, as set out in the NPPF.</p> <p>Land use in High Probability Flood Zone 3b should be restricted to 'water compatible' or with the exception test, essential floodplain.</p> <p>Amend floodplain sentence to read: The flood plain will be maintained, and where opportunities arise, restored in order to maximise natural storage of flood water, reduce flooding problems and increase landscape, 'ecological' and conservation value.</p> <p>Insertion of following paragraphs: 'Rural and urban land use practices to restore more sustainable natural floodplains and to reduce runoff will be encouraged'.</p> <p>'Developers are encouraged to reduce the reliance on hard engineered solutions through the site by contributing to upstream flood storage, giving consideration to a whole catchment approach.'</p> <p>'The Environment Agency promotes flood risk measures that include wetland habitat creation including through the use of woody debris upstream so as to ensure that flood management solutions are consistent with biodiversity needs.' (to be added to DMC section)</p> <p>Section B Amend sentence to read : 'In all development, there should be no flooding, from all sources to properties up to the 100 year flood event, including an allowance for climate change.</p> <p>'All developments should seek to control and discharge 100% of surface water runoff generated on site <i>during the 1 in 100 year plus climate change rainfall event</i> using above ground sustainable urban systems, such as swales, ponds and other water based ecological features. There is a presumption against underground storage of water.'</p> <p>Include additional text to explanation: The greatest benefits are gained when sustainable urban drainage systems are designed as a multifunctional resource, capable of delivering a wide range of environmental and quality of life benefits (ecosystems) for future occupants. Flood storage areas/ wetland habitats/ above ground SUDs can form a functioning ecosystem in their own right for many species, and can increase biodiversity by; increasing habitat area increasing populations of some protected species increasing species movement</p> <p>C. Protection of the Water Environment All development proposed adjacent to a river corridor should be designed to take advantage of its proximity to the river through layout and orientation of buildings and space. 'Where a development site contains areas identified as flood plain, the development layout design should ensure that no surface water attenuation features are located in flood zone 1.</p> <p>There should be an 8 metre easement to allow maintenance & access to all watercourses, and to ensure that the river corridor is sensitivity managed to support environmental infrastructure including wildlife corridors, protect and protect and improve habitat for BAP species and /or ecological networks. (To include in DMC)</p>	<p>Agree that the policy should be revised to ensure it accords with the NPPF and reflects the issues raised by the EA.</p>

Overall Officer Response	The District Council has worked closely with the Environment Agency throughout the preparation of the Core Strategy, and in particular Policy CS.04. The Policy should be amended to strengthen it further and ensure it is compliant with the NPPF in terms of Flood Risk Areas, surface water runoff and use of SUDs, providing opportunities to reduce the causes and impacts of flooding and the protection of the water environment. The recommendations proposed seek to ensure that Policy CS.04 will contribute fully to the protection and enhancement of the natural environment (including the water environment) and help to improve biodiversity in line with the NPPF.
Overall Officer Recommendation	See recommendations at CS.04

Section 3. District Resources – 3.3 Water Environment and Flood Risk – Policy CS.4 B. Water Runoff and SUDS

Number of Supports: 1 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
George H Jackson OBE		Not Specified	Not Specified	Yes	<p>The LPA should be rigorous in ensuring that drives of all properties, where appropriate are constructed from porous materials to reduce runoff.</p> <p>In relation to runoff from agricultural land, LPA should work with DEFRA to encourage EU environmental support programmes to farmers and landowners to recognise the use of grassed field margins buffers strips to slow down the rate of surface run off form arable fields, given increase in heavy rainstorms as a result of climate change.</p>	Not specified	See overall officer response
Overall Officer Response		<p>Representation requesting that LPA ensure that driveways should constructed on semi-permeable materials, to mitigate any surface water flooding: It is considered that this issue is not a strategic matter. Residential driveways may be constructed without the need for planning permission providing the use of porous materials is used, or surface water drains natural to a border or lawn in the garden. If more than 5 metres is covered with non-porous materials, planning permission is sought. The requirement for SUDs would then be required under the SUDs regulations. However, it might be possible to give further considerations to this issue during the preparation of the Council's Site Allocations Plan, where non-strategic matters may be considered.</p> <p>Representation noted on working with DEFRA to encourage EU environmental support programmes to farmers and landowners to reduce surface water run off form arable fields, given increase in heavy rainstorms as a result of climate change. However, this is an area of work which would be carried out by the County Council as a Local Flood Lead Authority. It is an issue which might possibly be addressed by the Local Flood Risk Management Strategy in the future. It is therefore not appropriate to include it in this policy.</p>					
Overall Officer Recommendation		No changes proposed to the policy.					

Section 3. District Resources – 3.3 Water Environment and Flood Risk – Policy CS.4 C. Protection of the Water Environment

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire Wildlife Trust		Not Specified	Not Specified	No	The wording of some of the statements in Section C would not be effective protection for the water environment, including the water bodies. Warwickshire Wildlife Trust would be happy to work the LPA to strengthen the policy in accordance with the recommendations in the submitted representations.	<p>Seek changes to strengthening the wording to clause C as follows:</p> <p>Amend title to Enhancing and Protecting the Water Environment</p> <p>Amend first sentence to add reference to water course buffers and to reference the protection of the 'natural character and functions of the watercourse' rather than solely protecting the channel.'</p> <p>Suggested wording as follows: 'Development proposals that lie adjacent to a canal, river or tributary should ensure that the natural features and functions of the watercourses and its wider corridor are retained, or where possible reinstated and that appropriate habitats buffers are established.</p> <p>Amend statement 4 to rebalance the current emphasis on promoting access for people over the protection the water environment.</p> <p>Recommend the following wording: 'Physical and visual access to watercourses will be promoted where it respects the natural function of the watercourse and sensitive nature of the river corridor as a whole.</p> <p>Include an additional statement to account for the value of watercourses to biodiversity and local ecological networks. It will safeguard important features such as wetlands habitat and ensure that new development makes a positive contribution towards the enhancing the ecological functioning of watercourses such as important wildlife corridors: 'Development proposals will take full account of the biodiversity value of watercourses and river corridors and their role in supporting local ecological networks. Impacts from lighting, noise and visual disturbances should be avoided or mitigated and opportunities to create, enhance and restore adjacent habitats for biodiversity will be encouraged.'</p>	Agree - see officer overall response
Overall Officer Response		The representation seeks amendments to the policy to strengthen its role in protecting and enhancing the water environment and biodiversity. The amendment of the title to include 'enhancing' would be consistent with para 7 of NPPF which requires that planning should be contributing to protecting and enhancing our natural environment. The representation also seeks to strengthen the policy by providing greater degree of protection to the water environment and its habitats. This is line with the NPPF 114, planning positively for the creation, protection, enhancement and management of the biodiversity and green infrastructure. It further requests that statement 4 is amended to rebalance the current emphasis on promoting access for people over the protection the water environment.					
Overall Officer Recommendation		See recommendation at CS.04					

Section 3. District Resources – 3.3 Water Environment and Flood Risk – Policy CS.4 D. Water Quality

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Jaguar Land Rover Ltd	Gerald Eve LLP	Not Specified	Not Specified	Not Specified	<p>Not effective or positively prepared in light of the strategic nature of JLR to expand operations on 100ha land to the East of B4100 allocated in the draft Policy GLH.</p> <p>It is considered that explicit reference should be made in draft Policy CS.4 to the need for Severn Trent Water to upgrade the sewerage networks and Sewage Treatment Works in connection to JLR's expansion and the proposed new settlement at Gaydon/Lighthorne Heath.</p> <p>Formal identification of improvements needing to be made to the local sewerage network to support JLR and GLH settlement would clearly identify the need for 'objectively assessed infrastructure needs' and so would help to ensure that the policy is positively prepared.</p>	<p>IPart D of Policy CS.4 is amended by the following additional text In respect of the proposal for land at Gaydon/Lighthorne Heath (Policy GLH) and the growth of existing employment at Gaydon (Policy AS.11),</p> <p>“Severn Trent Water has identified the need for improvements to be made to the local wastewater infrastructure, including temporary works to ensure that adequate capacity is secured prior to occupation of early phases of development. Such improvements are necessary to support the delivery of the overall strategy for the District and will be supported accordingly.”</p>	<p>Accept the recommended additional wording. It will provide policy support for the necessary local waste water infrastructure in advance of the proposed development at GLH and employment growth at Gaydon.</p> <p>It will also provide greater certainty for Severn Trent Water to plan and budget for the proposed works in their Asset Management Plan.</p>
Overall Officer Response		Accept proposed additional wording.					
Overall Officer Recommendation		It is recommended that the Inspector is requested to modify Section D of Policy CS.04 - see overall recommendation at CS.04					

Section 3. District Resources – 3.4 Landscape – Policy CS.5

Number of Supports: 0 Number of Objections: 5 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	No	Not Specified	No	<p>Part C. Trees Woodland and Hedges Wording is too onerous in comparison to the Para 118 of the NPPF as it omits reference to the need for, and benefit of, development that can outweigh the potential loss of such features. There is potential for this element of the policy to result in conflict or inconsistency with other policies in the Core Strategy. Every effort is made by developers to retain existing hedgerows and trees of value through efficient design and layout. Where it is not possible, mitigate and planting should be proposed.</p> <p>Key Diagram does not show the boundaries of the Forest of Arden so it is difficult to determine where proposals are located in the area.</p>	<p>Amend Policy to reflect the wording of the NPPF as follows: Due to the quality of ancient and semi-natural woodland and aged/veteran trees, particularly in the Forest of Arden, and their scarcity elsewhere in the District, no development will be permitted that would lead to their loss or damage unless the need for, and benefits of, the development in that location clearly outweigh the loss suitable compensatory planting is proposed.</p> <p>Clarity should be provided as to whether the area of the Forest of Arden refers to the same area proposed by Policy CS.12 as SLA Arden.</p>	<p>The justification for Policy CS.5 C. making provision for protecting Trees, Woodland and Hedges above that required by the NPPF can be found in para 3.4.9 and para 3.4.11 of the Explanation to the Policy:</p> <p>3.4.9 explains the importance of conserving and protecting ancient woodland in Stratford District, and</p> <p>3.4.11 "The District Council wishes to encourage developers and others to take a proactive stance on conserving these features rather than merely describe how it might react to proposals..." No change required.</p> <p>Agree this is confusing.</p> <p>The Arden SLA is a proposed landscape designation and has a boundary as shown on the Proposals Map.</p> <p>The part of the ancient Forest of Arden in the District covers the area above the River Avon and does not have a designated boundary. Its area is described in CS.5 Explanation para 3.4.4.</p>
West Midlands HARP Planning Consortium	Tetlow King Planning	Not Specified	Not Specified	Not Specified	There is no basis to require a full Landscape and Visual Assessment for every major application. It should be proportionate.	The Council should indicate that for major applications with a significant landscape and visual impact that a LVIA may be required and encourage applicants to determine this potential requirement at pre-application stage.	Agree. The Council is currently revising its Validation Checklist. Change final sentence of the first para B. Visual Impacts to - "Applications for major developments may require a full Landscape and Visual Impact Assessment."
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	The opening paragraph of the policy is not sufficient positive. The policy should seek also to more positively and properly enhance the landscape, rather than solely maintain the landscape character and quality. Where redeveloping a brownfield site any existing woodland/tree planting as existing should be maintained and enhanced where appropriate to assist in the upgrading and recycling of these types of sites. There was nothing positive in this policy along these lines. It is not sufficient simply to maintain the existing landscape setting.	Include the need to 'enhance' in the policy.	<p>The opening paragraph also states: "...where possible, incorporates measures to enhance the landscape." There are references to enhance and restore throughout the policy.</p> <p>No change required.</p>

St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	No	<p>Object to the criterion C within Policy CS.4 C. Trees, Woodland and Hedges</p> <p>Para 1 - Due to the quality of ancient semi- natural woodland and aged/veteran trees, particularly in the Forest of Arden, and their relative scarcity elsewhere in the District, no development will be permitted that would lead to their loss or damage.</p> <p>This is wholly inconsistent with para. 118 of the NPPF, which for ease of ref states at its bullet five: "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, <i>unless the need for, and benefits of, the development in that location clearly outweigh the loss</i>"</p> <p>Para 2 - Proposals that will have an impact on woodlands, hedges and trees should incorporate measures to protect their contribution to landscape character, public amenity and biodiversity. The loss of those trees which are of high public amenity value will be resisted and such trees will be protected by the use of Tree Preservation Orders. Inherent within this is a presumption against development-related loss of woody vegetation.</p> <p>Para 4 Development schemes and other opportunities will be used to enable the expansion of native woodlands and to buffer, extend and connect fragmented ancient woodlands, for their intrinsic value and to help climate change adaptation. NPPF para 109 bullet three states: "minimising impacts on biodiversity and providing net gains in biodiversity <i>where possible.</i>" The insertion of <i>where possible</i> clearly recognises that in some cases this (i.e. providing net gains in biodiversity) is not always possible and thus the absolutist i.e. 'will be used' - (within para 4 of the Policy) lacks the critical element of doubt expressed in the NPPF.</p>	<p>Para 1 - text should be amended accordingly to reflect para 118 of the NPPF.</p> <p>Para 2 - There is no support within the NPPF for this approach. The text should be deleted.</p> <p>Substitute the text in Para 4 that reads 'will be used' with 'where possible, will'</p>	<p>The justification for Policy CS.5 C. making provision for protecting Trees, Woodland and Hedges above that required by the NPPF can be found in para 3.4.9 and para 3.4.11 of the Explanation to the Policy.</p> <p>3.4.9 explains the importance of conserving and protecting ancient woodland in Stratford District, and</p> <p>3.4.11 "The District Council wishes to encourage developers and others to take a proactive stance on conserving these features rather than merely describe how it might react to proposals..."</p> <p>No change required.</p>
Gladman Developments		No	Not Specified	No	<p>The NPPF (para 113) requires that LPAs should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity or landscape areas will be judged.</p> <p>Gladman is concerned the policy is too ambiguous and may result in the policy being applied inconsistently. It is unclear what is meant by 'signifianct contribution to the character, history and setting' and how it will be judged. Part C - the use of TPO should be clarified so that it would only be used where warranted and not as a barrier to prevent development.</p>	<p>Amend policy to provide criteria based policies.</p> <p>Clarify the meaning of 'significant contribution to the character, history and setting' and how it will be judged.'</p> <p>Clarify the use of TPO in the policy</p>	<p>Covered separately under Section 4. District Designations - AONB and Special Landscape Areas.</p> <p>SLA's are cross referenced.</p> <p>Do not consider the policy is ambiguous.</p> <p>Use of TPO - See Policy CS.5 C. justification below.</p>
Ed Macalister-Smith		Not Specified	Not Specified	No	<p>Concern that there is no reference to AONB in the policy. Main concern is provisions in Policy CS.5 C. over and above the provisions of para 118 (5) of the NPPF.</p>	<p>Omission to be remedied.</p>	<p>Policy CS.5 is applicable to the whole District including the Cotswolds AONB.</p>
Overall Officer Response		Main concern is provisions in Policy CS.5 C. over and above the provisions of para 118 (5) of the NPPF.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that:</p> <p>Change final sentence of the first para B. Visual Impacts to - "Applications for major developments may require a full Landscape and Visual Impact Assessment."</p> <p>Add Map to Core Strategy showing landscape designations and character areas eg. Forest of Arden</p>					

Section 3. District Resources – 3.4 Landscape – Policy CS.5 C. Trees, Woodland and Hedges

Number of Supports: 2 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Environment Agency		Yes	Yes	Yes	Include further Water Cycle Study Update 2014 recommendation into text to highlight the multifunctional ecosystem services that trees, woodland and hedges provide The amendment of this policy to reference the ecosystem service of green infrastructure, including trees and planting highlights the wider social, economic and environmental benefits of developing newly planted areas. The net effect of these works is to delay and reduce the size of flood peak.	Include additional text as follows: 'Development schemes and other opportunities will be used to develop flood risk reduction measures through the planting of woodlands, trees and undergrowth.'	The change would strengthen policy support for the wider social, economic and environmental benefits of developing newly planted areas.
Woodland Trust		Not Specified	Not Specified	Yes	Pleased to see the absolute protection given to the irreplaceable habitat of ancient woodland and ancient trees in sub-paragraph C. Trees, Woodland and Hedges.	n/a	Comments noted
Overall Officer Response		Nothing to add to individual comments.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that: Policy CS.05 C. Trees, Woodland and Hedges be modified as follows;</p> <p>In the fourth paragraph, after the word "woodlands", insert ", to develop flood risk reduction measures through the planting of woodlands, trees and undergrowth"</p>					

Section 3. District Resources – 3.4 Landscape – Policy CS.5 Explanation

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Natural England - South Mercia Area		Yes	Yes	No	<p>The reference in Para 3.4.5 of the explanation to National Character Areas is out of date. Natural England has revised the National Character Areas and they are available at http://www.naturalengland.org/publications/nca</p> <p>The reference to NE's standing advice on Ancient Woodland for South East in DMC Para 4 is out of date.</p> <p>Fourth development point in DMC should include a 15m buffer point from ancient woodlands, which is taken NE guidance and based on recent case law (Appeal refs. APP/D3830/a/05/1195897-98 & APP/D3830/A/06/1198282-83).</p> <p>However, the text should recognise the necessary width of buffer will depend upon local circumstances and the type of development and a larger buffer may be required. As a starting principle, development must be kept as far away as possible from ancient woodland. Buffer zones should be retained in perpetuity and allowed to develop into semi-natural habitats. Section 6 of the revised Standing Advice includes guidance on mitigation measures, including buffers.</p>	<p>Amend to include up to date information as recommended.</p> <p>Amend to include up to date information as recommended.</p> <p>Amend to include further information provided.</p>	<p>The comments are sound and the policy explanation and DMCs should be revised accordingly.</p>
Overall Officer Response		See individual comment.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that:</p> <p>In paragraph 3.4.5, the words "set out in 'Countryside Character Volume 5: West Midlands, published by the former Countryside Agency, and a" are deleted and replaced by "described in the"</p> <p>DMC (4) is deleted and replaced with the following:</p> <p>'All development proposals in the proximity of ancient woodland shall have regard to the 'Standing Advice for Ancient Woodland and Veteran Trees' published by Natural England. As a starting principle, development must be kept as far away as possible from ancient woodland. The necessary width of any buffer zone will depend upon local circumstances and the type of development. Buffer zones should be retained in perpetuity and allowed to develop into semi-natural habitats. Section 6 of the Standing Advice includes guidance on mitigation measures, including buffers.'</p>					

Section 3. District Resources – 3.5 Natural Environment – Policy CS.6

Number of Supports: 1 Number of Objections: 7 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire Wildlife Trust		Not Specified	Not Specified	No	<p>Warwickshire Wildlife Trust is in principle supportive of Policy CS6. Welcomes the clear intention of safeguarding statutory, non-statutory and other important biodiversity assets in the policy as well as the promotion of biodiversity enhancements that focus on local biodiversity priorities and opportunities. Moreover, the overarching aim of the policy to ‘contribute towards a resilient ecological network throughout the district’ provides a strong context for the proceeding clauses and ensures that the policy is in line with the principles of para 109 of the NPPF.</p> <p>Believe that there is a shortfall in the policy within protection given to Local Sites - both Local Wildlife Sites (LWS) and Local Nature Reserves, in A. Biodiversity 1. (c). Local Sites are core areas for nature conservation which underpin ecological networks and make a significant contribution to national and local biodiversity targets. They are considered to be of county importance for nature conservation and should afford a commensurate level of protection in the local plan in accordance with para 113 of the NPPF.</p> <p>Local sites are included as an asset to be safeguarded, as with other valued biodiversity assets, in clause 1 of policy CS6. However unlike other biodiversity assets the policy states that local sites will be safeguarded unless: ‘it can be demonstrated that the benefits of the development clearly outweigh the impacts on the site, or where there is good reason to permit development and it is possible to secure the creation and long-term maintenance of equivalent habitat elsewhere’</p> <p>This statement implies that applications affecting Local Sites will determined in two ways: 1) The status and value of the local site will be upheld and balanced against the benefits of a scheme. Appears to be robust as it provides clear criteria in which sufficient weight can be given to the value of local sites in the decision making process, or 2) Development will be permitted where there is a good reason and compensation can be provided. This alternative however undermines this approach by suggesting that development can be permitted where there is a ‘good reason’ to permit development. This is a highly subjective statement with no interpretation of what a ‘good reason’ is. Clearly, a good reason could be argued by any developer wishing to promote a scheme. Creates conflict with the principles of para 113 and, Given the importance of Local Wildlife Sites in underpinning the local ecological network, would undermine the main aim of policy CS.6.</p> <p>Furthermore, the second statement makes compensation, i.e. the creation and management of equivalent habitat elsewhere, an acceptable approach for dealing with impacts on Local Sites. This trivialises the nature conservation status and value of Local Sites and bypasses the need for developments to avoid and mitigate impacts in the first instance. This approach is therefore contrary to the mitigation hierarchy in para 118 of the NPPF, which requires compensation to be used solely as a ‘last resort’ option. We subsequently believe that the current wording in 1 (c) of Policy CS.6 provides ineffective protection for Local Sites and so seek amendments to bring it in line with paras 113 and 118 of the NPPF.</p>	<p>Remove the second statement of A. Biodiversity 1. (c) so that it reads: Those subject to local designations such as Local Wildlife Sites and Local Nature Reserves. Development adversely affecting a Local Site will only be permitted Where it can be demonstrated that the benefits of the development clearly outweigh the impacts on the site.</p> <p>Add at the end of A. Biodiversity 1. after (e) the policy wording is consolidated to state: Where development is assessed and justified against the above criteria, and mitigation cannot be provided on site in an effective manner, developers will be required to offset any residual impact on biodiversity in order to ensure that a net gain can be achieved overall.</p>	<p>Remove the second statement of A. Biodiversity 1. (c) so that it reads: Those subject to local designations such as Local Wildlife Sites and Local Nature Reserves. Development adversely affecting a Local Site will only be permitted where it can be demonstrated that the benefits of the development clearly outweigh the impacts on the site.</p> <p>Add at the end of A. Biodiversity 1. (after (e) Use Natural England wording for final paragraph of Policy CS.6</p>

West Midlands HARP Planning Consortium	Tetlow King Planning	Not Specified	Not Specified	Not Specified	It is not clear if the policy reflects proportionate protection relative to the designation and value of any asset, this should be made clearer.	None specified.	Noted.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	Concerned that Policy CS.6 is unsound as presently drafted in that it is not justified or consistent with National Policy. There is no requirement in the Framework for proposals to secure a net gain in biodiversity.	None specified.	Noted. Para 109 NPPF ...providing net gains in biodiversity where possible... See alteration to Explanation paragraph 3.5.11
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	Concerned that Policy CS.6 is unsound as presently drafted in that it is not justified or consistent with National Policy. There is no requirement in the Framework for proposals to secure a net gain in biodiversity.	None specified.	Noted. Para 109 NPPF ...providing net gains in biodiversity where possible... See alteration to Explanation paragraph 3.5.11
Gladman Developments		Not Specified	Not Specified	Not Specified	<p>CS 6 sets out how "Proposals will be expected to secure a net gain in biodiversity by:</p> <p>1) Safeguarding existing habitats including...</p> <p>2) Making provision, where appropriate, for measures that will secure the creation and management of additional habitats, to strengthen networks of habitats, to foster landscape scale conservation in line with identified opportunities and priorities..."</p> <p>Gladman refer the Council to paragraph 109 of the Framework, this states: "The planning system should contribute to and enhance the natural and local environment by: minimising impacts on biodiversity and providing net gains in biodiversity <i>where possible</i>, contributing to the Government 's commitment to halt the overall decline in biodiversity..."</p> <p>Gladman recognise that Policy CS6 is in general conformity with the ethos of the Framework, however as currently worded this is too onerous and may act to deter otherwise sustainable development from coming forward.</p>	Gladman recommend that the policy needs rewording to better align with the Framework, as follows: "Minimising impacts on biodiversity and <i>where possible</i> , proposals will be expected to secure a net gain in biodiversity..."	Noted. Para 109 NPPF ...providing net gains in biodiversity where possible... See alteration to Explanation paragraph 3.5.11
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	Concerned that Policy CS.6 is unsound as presently drafted in that it is not justified or consistent with National Policy. There is no requirement in the Framework for proposals to secure a net gain in biodiversity.	None specified.	Noted. Para 109 NPPF ...providing net gains in biodiversity where possible... See alteration to Explanation paragraph 3.5.11
Warwickshire County Council		Yes	Yes	Yes	Happy with the two natural environment polices and their explanations and that they cover the main areas including - statutory/non-statutory sites, the hierarchical approach to biodiversity put forward in the National Planning Policy Framework, green infrastructure, biodiversity offsetting and protected/other notable species.	Noted.	Suggest checking revised 3.5 Natural Environment Section with WCC Ecology
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	Concerned that Policy CS.6 is unsound as presently drafted in that it is not justified or consistent with National Policy. There is no requirement in the Framework for proposals to secure a net gain in biodiversity.	None specified.	Noted. Para 109 NPPF ...providing net gains in biodiversity where possible... See alteration to Explanation paragraph 3.5.11

Natural England - South Mercia Area		Yes	Yes	No	<p>There is much to support in this policy. However, the policy is not clear in the way that it sets out the mitigation hierarchy, as set out in paragraph 118 of the NPPF.</p> <p>There is no explicit reference to the mitigation hierarchy which applies through paragraph 118 of the NPPF. The references in paragraph A1 to safeguarding certain habitats, features and species does not seem to us to have the same effect as “avoid” in the mitigation hierarchy.</p> <p>The policy should also make it clear that if significant harm to biodiversity cannot be avoided, mitigated or, as a last resort, compensated for, planning permission will be refused (NPPF paragraph 118).</p> <p>Address as a minor modification: Support A. Biodiversity 2. requiring biodiversity enhancement, and would welcome it if the explanatory text could include a reference to securing biodiversity enhancement through the built environment. E.g. through features such as bat boxes, swift bricks and green roofs.</p> <p>The reference to Regionally Important Geological Sites (RIGS) in paragraph 3.5.6 is out of date. The term RIGS is no longer in use.</p>	<p>English Nature recommend the following changes:</p> <p>A. Biodiversity 1. (a) Proposals will be expected to secure a net gain in biodiversity by: 1. <i>Protecting and enhancing</i> existing habitats, including: (a) Sites of Special Scientific Interest, which will be subject to a high degree of protection. <i>Development proposals should seek to avoid impacts on SSSIs</i>. Development adversely affecting a SSSI, either directly or indirectly, will only be permitted in exceptional circumstances where the benefits of development clearly outweigh the likely impacts on the site and any broader impacts on the national networks of SSSIs.</p> <p>Replace the final paragraph under CS.6 A. Biodiversity with: “Where a development will have a negative impact on a biodiversity asset, mitigation will be sought in line with the mitigation hierarchy. Impacts should be avoided and, if this is not possible, mitigated. Where there would be a residual impact on a habitat or species and mitigation cannot be provided on site in an effective manner, developers will be required to offset the loss by contributing to appropriate biodiversity projects elsewhere in the area. Where an impact cannot be fully mitigated or, as a last resort, compensated for, then planning permission will be refused.”</p> <p>Altering Explanation paragraph 3.5.11 as follows: 3.5.11 “Good developments will deliver biodiversity enhancement. However, where biodiversity losses cannot be avoided or mitigated the NPPF requires, as a last resort, compensation for this loss to be made.”</p> <p>Address as a minor modification: Insert in Explanation paragraph 3.5.10 “Reference to securing biodiversity enhancement through the built environment. E.g. through features such as bat boxes, swift bricks and green roofs. Refer to the Town and Country Planning Association’s ‘Biodiversity by Design’, which is part of its suite of guidance for sustainable communities.”</p> <p>Explanation paragraph 3.5.6 - Change the term Regionally Important Geological Sites (RIGS) to Local Geological Sites.</p>	Support all requested changes with the exception of A. Biodiversity 1. (a). Prefer safeguarding and enhancing...
Ed Macalister-Smith		Not Specified	Not Specified	No	<p>There is no reference in CS.6, either in the Policy section, or in the Explanation, or in the Responsible Agency, to the AONB. At the very least there should be a cross reference to Section 4.2.</p> <p>Also in the Implementation / Monitoring Responsible Agency section, there should be a reference to the statutory role of the AONB, of which SDC is a formal part. The AONB CCB is an important partner, and indeed ally, in applying and defending the proposed policies.</p>	This omission should be remedied.	Policy CS.6 is applicable to the whole District including the Cotswolds AONB.
Overall Officer Response		As comments above					

Overall Officer Recommendation	<p>That the Inspector be requested to recommend that:</p> <p>In Part A 'Biodiversity', insert the words "and enhancing" after the word "Safeguarding" at 1.</p> <p>Replace the second sentence under paragraph (a) as follows: "Development proposals should seek to avoid impacts on SSSIs. Development adversely affecting a SSSI, either directly or indirectly, will only be permitted in exceptional circumstances where the benefits of development clearly outweigh the likely impacts on the site and any broader impacts on the national networks of SSSIs."</p> <p>In paragraph (c), delete all wording after "site" at the end of line 3.</p> <p>Replace the final paragraph in Part A as follows: "Where a development will have a negative impact on a biodiversity asset, mitigation will be sought in line with the mitigation hierarchy. Impacts should be avoided and, if this is not possible, mitigated. Where there would be a residual impact on a habitat or species and mitigation cannot be provided on site in an effective manner, developers will be required to offset the loss by contributing to appropriate biodiversity projects elsewhere in the area. Where an impact cannot be fully mitigated or, as a last resort, compensated for, then planning permission will be refused."</p> <p>In paragraph 3.5.6, delete the reference to RIGS.</p> <p>In paragraph 3.5.10 insert at the end: "They should also recognise and respond to the opportunity to secure biodiversity enhancement through the built environment, by incorporating features such as bat boxes, swift bricks and green roofs. The Town and Country Planning Association publication 'Biodiversity by Design' is a useful guide."</p> <p>In paragraph 3.5.11, delete the first and second sentences and insert: "Good developments will deliver biodiversity enhancement. However, where biodiversity losses cannot be avoided or mitigated the NPPF requires, as a last resort, compensation for this loss to be made."</p>
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Section 3. District Resources – 3.5 Natural Environment – Policy CS.6 Explanation

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire Wildlife Trust		Not Specified	Not Specified	No	<p>‘Good developments incorporate biodiversity considerations but can still result in some biodiversity loss when there are impacts that cannot be avoided through design and locations, or mitigated by other measures.’ There is no clear definition what a good development would constitute but, taking account of the principles in para 109 of the National Planning Policy Framework (NPPF), developments are required to minimise impacts on biodiversity and deliver gains in biodiversity wherever possible. Therefore good developments are those that have adequately taken account of the biodiversity issues and constraints, avoided and mitigated adverse effects and incorporated measures to deliver a net gain in biodiversity overall.</p> <p>By contrast, a development that cannot avoid or mitigate the impact of a development scheme and requires measures to offset the biodiversity loss, as detailed in the statement above, is likely to be the wrong development in the wrong place and is having to resort to ‘last resort’ measures in order to prevent it being refused. It is therefore important for the Local Authority to clarify this in the policy as the current statement is misleading and is inconsistent with the principle of para 109 of the NPPF.</p>	<p>Covered in Policy CS.06</p> <p>Amend the first sentence of para 3.5.11 of Policy C.S6 Good developments will avoid and minimise impacts on biodiversity and incorporate measures to deliver net gains in biodiversity. However, where biodiversity losses cannot be avoided through design and locations, or mitigated by other measures, the NPPF requires, as a last resort, compensation for this loss to be made. The principle of biodiversity offsetting is taking on increasing prominence.</p>	<p>Use Natural England wording as in Policy CS.6</p> <p>Altering Explanation paragraph 3.5.11 as follows: 3.5.11 Good developments will deliver biodiversity enhancement. However, where biodiversity losses cannot be avoided or mitigated the NPPF requires, as a last resort, compensation for this loss to be made.</p>
Overall Officer Response		See CS.06					
Overall Officer Recommendation		See CS.06					

Section 3. District Resources – 3.6 Green Infrastructure – Policy CS.7

Number of Supports: 1 Number of Objections: 6 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	Policy is too vague and unhelpful, and it is not a policy which will assist in the determination of application. Too prescriptive and too bland.	Delete	Noted
West Midlands HARP Planning Consortium	Tetlow King Planning	Not Specified	Not Specified	Not Specified	Reference to biodiversity offsetting arrangements and Green Infrastructure should be removed. Whilst biodiversity offsetting accomplishing some of the objectives of Green Infrastructure provision, they are not one in the same, and cannot be treated as such in respect to required offsetting contributions.	Remove reference to biodiversity offsetting arrangements.	Agree Remove the final paragraph of Policy CS.7 A. Where the impact of development on the biodiversity aspects of Green Infrastructure cannot be mitigated effectively on site, the principle of biodiversity offsetting in accordance with Policy CS.6 Natural Environment will apply.
Stratford Branch of Ramblers		Not Specified	Not Specified	No	"The Council will support the creation of new routes for walking, cycling and horse-riding to improve access to the countryside." Support this statement, but included should be a specific reference to maintaining and enhancing the current extensive network of footpaths.	Included a specific reference to maintaining and enhancing the current extensive network of footpaths.	Policy CS.7 A. covers the principle of protecting and enhancing existing Green Infrastructure assets (footpaths are one such asset). As does para 75 of the NPPF and Core Strategy para 7.1.9 of Healthy Communities. No change required within the GI policy.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	Policy is too vague and unhelpful, and it is not a policy which will assist in the determination of application. Too prescriptive and too bland.	Delete	Noted
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	Policy is too vague and unhelpful, and it is not a policy which will assist in the determination of application. Too prescriptive and too bland.	Delete	Noted
Warwickshire County Council		Not Specified	Not Specified	Not Specified	The core strategy fully supports the green infrastructure network that will help to promote healthy and active communities, this is also supported by the NPPF by conserving and enhancing the natural environment and promoting healthy communities. Public Health Warwickshire (PHW) supports green infrastructure and sustainable transport due to the evidenced link to improved health and wellbeing. PHW welcomes the acknowledgment of the value and use of open spaces being a green asset and making an important contribution to health and wellbeing. Allotments are also mentioned as being an important community facility and contribution to biodiversity and healthy lifestyles.	None.	Support noted.
Natural England - South Mercia Area		Yes	Yes	Yes	Natural England welcomes the inclusion of this policy. Recommend deleting the reference to biodiversity offsetting as this is already covered in Policy CS.6. It should be recognised that whilst biodiversity offsetting could make a contribution towards the local green infrastructure network, biodiversity offsetting is very specific and green infrastructure is about a much wider range of interests. We also suggest a minor amendment to the following policy wording as shown, to make it broader and more inclusion of other types of GI which could come forward: "Access to Green Infrastructure features within settlements and the countryside will be provided through, for example, local nature reserves, green corridors, waterway ('blue') corridors, allotments and woodland, together with connections to open spaces and the countryside."	Recommend deleting the reference to biodiversity offsetting as this is already covered in Policy CS.6. Add the words 'for example' to Policy CS.7 B. First para after criterion (5)	Agree. Remove the final paragraph of Policy CS.7 A. Where the impact of development on the biodiversity aspects of Green Infrastructure cannot be mitigated effectively on site, the principle of biodiversity offsetting in accordance with Policy CS.6 Natural Environment will apply. Add the words 'for example' to Policy CS.7 B. First para after criterion (5)

Warwickshire Wildlife Trust		Not Specified	Not Specified	No	<p>Warwickshire Wildlife Trust welcomes a policy promoting the protection, enhancement, creation and restoration of a green infrastructure network for the district. We believe the Policy CS.7 clearly outlines the many benefits that a green infrastructure network can provide for the district and also provides effective criteria to detail how it will be sought in all planning applications.</p> <p>The Trust has one issue with the policy in relation to the statement regarding biodiversity offsetting. We believe this statement repeats the provisions of Policy CS.6 but is less effectual as it is not considered within the context of the wider mitigation hierarchy detailed in para 118 of the NPPF. We believe this statement does not therefore serve any function in the green infrastructure policy and should be removed.</p> <p>Furthermore, the use of Biodiversity Offsetting as a means to deliver new green infrastructure should be discouraged.</p>	Warwickshire Wildlife Trust recommends that the statement referring to Biodiversity Offsetting in Policy CS.7 should be removed.	<p>Agree.</p> <p>Remove the final paragraph of Policy CS.7 A. Where the impact of development on the biodiversity aspects of Green Infrastructure cannot be mitigated effectively on site, the principle of biodiversity offsetting in accordance with Policy CS.6 Natural Environment will apply.</p>
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	Policy is too vague and unhelpful, and it is not a policy which will assist in the determination of application. Too prescriptive and too bland.	Delete	Noted
Overall Officer Response		Policy CS.7 Supported by Natural England, Warwickshire Wildlife Trust and WCC. Request to remove reference to Biodiversity Offsetting agreed.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that:</p> <p>The final paragraph of Policy CS.7 A. is removed.</p> <p>Where the impact of development on the biodiversity aspects of Green Infrastructure cannot be mitigated effectively on site, the principle of biodiversity offsetting in accordance with Policy CS.6 Natural Environment will apply.</p> <p>The words 'for example' are added to Policy CS.7 B. First para after criterion (5) Access to Green Infrastructure features within settlements and the countryside will be provided through, <i>for example</i>, local nature reserves, green corridors, waterway ('blue') corridors, allotments and woodland, together with connections between built up areas and the countryside.</p>					

Section 3. District Resources – 3.6 Green Infrastructure – Policy CS.7 B. Provision of Green Infrastructure

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Stratford Ramblers		Not Specified	Not Specified	Not Specified	Policy CS.7 supports the creation of new routes for walking, cycling... but no reference to the effect that existing footpaths will be maintained. This omission needs to be rectified, as there are many good paths and it is, indeed, important that they be maintained. It is not only residents who use the paths regularly, but the many visitors to the Stratford area. Please will you be more specific upon this point?	This omission needs to be rectified, as there are many good paths and it is, indeed, important that they be maintained. It is not only residents who use the paths regularly, but the many visitors to the Stratford area. Please will you be more specific upon this point?	Policy CS.7 A. covers the principle of protecting and enhancing existing Green Infrastructure assets (footpaths are one such asset). As does para 75 of the NPPF and Core Strategy para 7.1.9 of Healthy Communities. No change required within the GI policy.
Wilmcote Parish Council	Tyler-Parkes Partnership	Not Specified	Not Specified	No	Policy CS.7 proposes the creation of new routes for walking, cycling and horse riding to improve access to the countryside. This does not recognise the impact this would have on families living in the area. It is not consistent with the principles in the Framework, Government Guidance and Government statements.	Recommend extension to the Policy CS.7 (and CS.24) to rationalise the public footpath network to remove paths that currently pass through the homes of families living in the area. This will then make the Core Strategy 'sound'.	There is no intention to override the legal or other interests of residents in implementing this policy. See also CS.24 Healthy Communities
Overall Officer Response		The Core Strategy is a strategic document. It is not within the remit of the District Council to divert or maintain footpaths. There are procedures to do this via Warwickshire County Council.					
Overall Officer Recommendation		No change.					

Section 3. District Resources – 3.7 Historic Environment – Policy CS.8

Number of Supports: 0 Number of Objections: 6 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
West Midlands HARP Planning Consortium	Tetlow King Planning	Not Specified	Not Specified	Not Specified	Policy is not explicit enough in its references to proportionate protection.	None specified.	See overall response below.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	Section B - Unsound - it is not justified and not supported in NPPF. The non-designated heritage assets approach is not supported by national policy	The section should be rewritten to reflect the NPPF	See overall response below.
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	The Policy looks to give priority to the protection of heritage assets, but as written gives an inappropriate level of prominence to non-designated assets. As drafted this could lead to inappropriate decisions being made about a non-designated asset and the relative weight to be applied to their retention.	None specified.	See overall response below.
Gallagher Estates	Pegasus Planning Group	Yes	Yes	No	Section B - Unsound - it is not justified and not supported in NPPF. The non-designated heritage assets approach is not supported by national policy	The section should be rewritten to reflect the NPPF	See overall response below.
CPRE Warwickshire Branch		Not Specified	Not Specified	No	Policy CS.8 attempts to cover what is handled in the 2006 Adopted Plan by several different Policies. Appendix 3 lists currently 'saved' Policies and states that all will be replaced by one or another Policy in the Core Strategy. The number of Policies which Policy CS.8 attempts to replace are significant. The policy as worded is too general and unless made more detailed the present Policies listed as being replaced by Policy CS.8 should be retained as 'saved'.	Either add more detail to CS.8 or retain 2006 Local Plan policies for the historic environment in the 'saved list'.	Approach is consistent with the NPPF which distinguishes between designated heritage assets (as listed in Part A Criterion 1) and non-designated assets, thus giving greater protection to historic features of local importance.
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	No	Not Specified	Not Specified	The NPPF sets different tests for the consideration of applications that affect designated or non-designated assets. This not reflected in the proposed policy, the wording of which is more onerous as it requires exceptional circumstances to be proven for any proposal that might affect any heritage asset (both designated and non-designated). The NPPF only requires exceptional circumstances to be proven for development that may cause substantial harm to, or loss of, designated assets of the highest significance. In other instances, the guidance is clear that harm should be considered against the public benefit of a proposal. Policy is therefore unsound as it fails to comply with national policy.	Part B of Policy CS.8 should be amended: "Where proposals will affect a heritage asset, applicants will be required to undertake and provide an assessment of the significance of the asset using a proportionate level of detail relating to the likely impact the proposal will have on the asset's historic interest. Proposals which would lead to substantial harm to, or total loss of, designated heritage assets of the highest significance will only be permitted in exceptional circumstances. In assessing whether exceptional circumstances exist, the following factors will be considered: ..."	See overall response below.
Gladman Developments		No	Yes	No	Wording does not conform with NPPF. Need to distinguish between the degree of harm a proposal would result in between designated and non-designated assets. Policy applies blanket protection.	Rewrite CS.8 in line with NPPF	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	Section B - Unsound - it is not justified and not supported in NPPF. The non-designated heritage assets approach is not supported by national policy	The section should be rewritten to reflect the NPPF	See overall response below.

Overall Officer Response	Agreed that the policy should better reflect the NPPF.
Overall Officer Recommendation	<p>That the Inspector be requested to recommend that:</p> <p>Part B – The existing text is deleted and the following text inserted: "Any harm to the significance of a designated or non-designated heritage asset, or its loss, must be justified. Any harm will be weighed against the public benefits of the proposal. Applicants will need to demonstrate that all reasonable efforts have been made to sustain the existing use or find reasonable alternative uses. Consideration will also be given as to whether the works proposed are the minimum required to secure the long-term use of the asset or, where harm would result, the extent of the harm to the significance of the asset is mitigated. Where such harm can be fully justified, the District Council will require archaeological excavation and/or historic building recording as appropriate, followed by analysis and publication of the results."</p> <p>Part C First paragraph - Delete: "Both designated and non-designated historic features should be preserved in situ"</p> <p>DMC(2) - Insert following text after first sentence: "This approach is based on the view that historic remains should be seen as an opportunity rather than a constraint and should be used to inform the proposed design and contextual analysis. In particular, this can include incorporating such features into the proposed design to provide a historical narrative to the site."</p>

Section 3. District Resources – 3.7 Historic Environment – Policy CS.8 B. Proposals Affecting Heritage Assets

Number of Supports: 0 Number of Objections: 2 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	Section B -Unsound - it is not justified and not supported in NPPF. The non-designated heritage assets approach is not supported by national policy	Section should be rewritten to reflect NPPF	See overall response below.
English Heritage - West Midlands		Not Specified	Not Specified	No	Part B. The 4 criteria relating to exceptional circumstances - It is unclear whether all 4 criteria need apply or whether they are to be individually. Strongly advise Part B is revised to reflect the NPPF.	<p>Amend section B to include the following text : "Any harm to the significance of a designated or non-designated heritage asset, or their loss must be justified. Proposals will be weighed against the public benefits of the proposal;</p> <p>whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses , or mitigate the extent of the harm to the significance of the asset; and</p> <p>whether the works proposed are the minimum required to secure the long term use of the asset.</p> <p>Where such harm can be fully justified, the Council will require archaeological excavation and/or historic building recording as appropriate, followed by analysis and publication of the results.</p>	See overall response below.
Overall Officer Response		See overall response to CS.8					
Overall Officer Recommendation		See overall response to CS.8					

Section 3. District Resources – 3.8 Design and Distinctiveness – Policy CS.9

Number of Supports: 0 Number of Objections: 3 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
West Midlands HARP Planning Consortium	Tetlow King Planning	Not Specified	Not Specified	Not Specified	<p>We would encourage the Council to reference the potential for national standards in this policy. The Government's consultation proposed the revocation of both Secured by Design and Buildings for Life. This potential should be reflected in the policy to ensure that it is future proof.</p> <p>We question the Council's ability to charge for the Design Review Panel. Whilst recognising that a charge at the pre-application stage may be appropriate, it is unlikely that a charge at the application stage would be, given the planning application fee is envisaged to cover such analysis of design.</p>	None specified	See overall response below.
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	The DMC section sets stringent requirements for development management. It should be contained in the policy or deleted. The reference to Building for Life 12 should be deleted as it is a voluntary code and planning policy should not impose it.	Amend or delete relevant section in DMC. Delete reference to Building for Life 12	See overall response below.
Warwickshire and West Mercia Police		Yes	Yes	No	<p>Support Section B (7), however the lack of direct reference to 'Secured by Design undermines the effectiveness of the policy. Policy support by 'Secured by Design would help to ensure new development comply with a nationally recognised consistent standard. Propose minor changes to Para 3.8.2</p>	<p>Amend policy to include explicit reference to 'Secured by Design'</p> <p>Amend Para 3.8.2 with minor factual inaccuracies Paragraph 3.8.2 states that 'Secured by Design' is dated to 2004. This is incorrect, as Secured by Design is continually maintained and updated by the Association of Chief Police Officers (ACPO). Therefore, no date should be shown in paragraph 3.8.2.</p> <p>Paragraph (3) on page 61 references 'Police Architectural Design Advisors'. This should be corrected to 'Crime Prevention Design Advisors'. This correction should be made in all other places in the Core Strategy where 'Police Architectural Design Advisors' are referred to.</p>	See overall response below.
Gladman Developments		No	Yes	No	Gladman is unclear how this policy will be applied in a consistent manner to development proposal. The wording is ambiguous and could lead to uncertainties for the development industry when determining whether proposals would meet the policy requirements.	None specified.	See overall response below.
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	Referring to a SPD (Building for Life 12 and Secured by Design) within bullet point in Core Strategy Policy CS. 9 Design and Distinctiveness provides the SPD with inappropriate weight, SPDs have not been through the same statutory process as Core Strategy.	The references to Building for Life 12 and Secured by Design) should be deleted and placed in the explanatory text if necessary	See overall response below.
Warwickshire County Council		Not Specified	Not Specified	Not Specified	Support	n/a	n/a

Overall Officer Response	<p>The DMCs do not set 'requirements'. They provide applicants with detailed advice on policy interpretation and application. They also seek to encourage and remind applicants to follow best practice. The encouragement (not obligation) for community engagement, for example, is consistent with NPPF paragraph 189. References to suggested content of Design and Access Statements follow good practice reiterating that good design responds to local context and is indivisible from good planning (NPPF paragraph 56). SDC considers the encouragement of Building for Life 12 (BfL12), a national standard devised by among others the Home Builders Federation, to be appropriate although accepts that the reference to BfL12 in Policy as written may lack clarity.</p> <p>Good design is the outcome of the design process that starts with thorough contextual analysis. The policy cannot be prescriptive because good design cannot be prescribed, as acknowledged by NPPF paragraph 60. This policy sets out the principles that will be considered and includes pointers in respect of good design. As referenced in the explanatory text, the value of the Design and Access Statement is that it is the document where the applicant can set out their thoughts, reasonings and justifications for their proposed design. It assists SDC and interested parties in understanding the rationale for any proposed approach.</p> <p>SDC do not require every application to be submitted to the Design Review Panel and do not, therefore, include the costs of doing so in their pre-application charges. DMC(2) is therefore correct when it states that it is the responsibility of the applicant.</p> <p>Whilst it is acknowledged that Secured by Design is to be replaced by national standards in building regulations, it still provides good and relevant design guidance. It is there considered appropriate to retain reference to Secured by Design in the explanatory text.</p>
Overall Officer Recommendation	<p>For clarity, That the Inspector be requested to recommend that:</p> <p>Part B: Reword the first paragraph as follows: "High quality design will be achieved by ensuring that all development is:"</p> <p>Insert new DMC(1) and renumber subsequent DMCs: "The District Council supports the implementation of Building for Life 12. It provides applicants with a useful checklist for ensuring high quality design and meeting the requirements of the criteria set out in Part B.</p> <p>In DMC(3) and the Implementation and Monitoring Table (Responsible Agencies) replace "Police Architectural Liaison Officers" with "Crime Prevention Design Advisors".</p>

Section 3. District Resources – 3.8 Design and Distinctiveness – Policy CS.9 Explanation

Number of Supports: 1 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Natural England - South Mercia Area		Yes	Yes	Yes	N/A	Would welcome the inclusion in the explanation of a reference to the Town and Country Planning Association's suite of guidance for sustainable communities, including 'Biodiversity by Design and 'Climate Change Adaptation by Design'.	Agreed.
Overall Officer Response		Agreed that reference to these useful documents should be included in the Core Strategy.					
Overall Officer Recommendation		That the Inspector be requested to recommend that: Paragraph 3.8.2: Replace "(ACPO 2004)" with "(ACPO)," and then insert the following text between "(ACPO)" and "By Design": "Biodiversity by Design (TCPA, 2004), Climate Change Adaptation by Design (TCPA, 2007),					

Section 3. District Resources – 3.8 Design and Distinctiveness – Policy CS.9 Development Management Considerations

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	The DMC section sets stringent requirements for development management. It should be contained in the policy or deleted. The reference to Building for Life 12 should be deleted as it is a voluntary code and planning policy should not impose it.	Amend or delete DMC Delete reference to Building for Life 12	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	The DMC section sets stringent requirements for development management. It should be contained in the policy or deleted. The reference to Building for Life 12 should be deleted as it is a voluntary code and planning policy should not impose it.	Amend or delete DMC Delete reference to Building for Life 12	See overall response below.
Overall Officer Response		See overall response in respect of CS.9					
Overall Officer Recommendation		See overall response in respect of CS.9					

Section 4. District Designations – 4.1 Green Belt – Policy CS.10

Number of Supports: 1 Number of Objections: 20 Number of Unspecified: 3

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	Not Specified	Not Specified	Yes	N/A	N/A	N/A
Gladman Developments		No	Not Specified	No	<p>Identification of three parcels of land for release from the Green Belt for employment uses has not been as part of a wider full Green Belt review.</p> <p>In the absence of a comprehensive review the Council cannot be sure that these sites are the most appropriate site for release.</p> <p>Definition of settlement boundaries should not be used as a mechanism to prevent sustainable development from coming forward.</p>	<p>None specified.</p> <p>None specified.</p> <p>Undertake a full strategic review of the Green Belt as part of the Site Allocations DPD preparation.</p>	<p>See overall response below.</p> <p>See overall response below.</p> <p>Settlement boundaries will be defined in order to show how the proposed housing requirement can be met.</p>
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	Proposes the removal of an area of land from the Green Belt without justification or evidence.	Delete area 1 from the policy.	See overall response below.
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	No	Policy should specify that built up area boundaries will be defined for Local Service Villages in the Green Belt.	Amend final paragraph of policy accordingly.	See overall response below.
Bloor Homes (Western) Ltd		Yes	Yes	No	Should be provision made for Site Allocations DPD to give consideration to Green Belt boundaries at Studley.	Amend policy accordingly.	Intended scope of the Site Allocations DPD will allow this issue to be considered.
Quintessential Inns	Barton Willmore	No	Not Specified	Not Specified	<p>Should undertake a Green Belt Review given the identified need for one across the Coventry and Warwickshire HMA and NPPF guidance that they should be undertaken during the preparation of a Plan and be capable of enduring beyond the plan period.</p> <p>Three Main Rural Centres in the Green Belt should not be excluded from accommodating additional housing growth.</p>	<p>Undertake a Green Belt Review.</p> <p>Safeguard land in these locations in order to meet future needs beyond the plan period.</p>	<p>See overall response below.</p> <p>No need to identify further land for development in order to meet the proposed housing requirement.</p>
Rosconn Group	Pegasus Planning Group	No	No	No	<p>Insertion of the words 'and character' into (a), (b) and (c) does not accord with the NPPF.</p> <p>Intention that Site Allocations DPD will identify built up area boundaries for Local Service Villages is a form of Green Belt review which is not appropriate for the site allocations process.</p> <p>Doubt whether it is appropriate for neighbourhood plans in isolation to review the Green Belt.</p> <p>Removal of land east of Birmingham Road (Proposal SUA.3) has not been justified by the demonstration of exceptional circumstances.</p>	<p>Delete words 'and character' in each part of policy.</p> <p>None specified.</p> <p>None specified.</p> <p>Deletion of reference to Proposal SUA.3.</p>	<p>Impact on character is a key aspect of assessing harm to the Green Belt. See overall response below.</p> <p>Not intended that Neighbourhood Plans will do this.</p> <p>See overall response below.</p>
Ladbrook Park Golf Club	Savills - Birmingham	Yes	Yes	No	Does not provide for the removal of the Green Belt designation from the built up area boundaries once defined so the need to identify very special circumstances to justify any development proposal would remain.	Identify that Green Belt designation will be removed from the built up areas once defined.	See overall response below.

Mixed Farms Ltd	Savills - Reading	No	No	No	Amendment to the Green Belt boundary to the north of Stratford is not based on a comprehensive review of the entire Green Belt area. Without considering all available options, including land outside the Green Belt, it cannot be assured that the most sustainable pattern of development will be achieved.	None specified. None specified.	See overall response below. See overall response below.
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	Insertion of the words 'and character' into (a), (b) and (c) does not accord with the NPPF. Intention that Site Allocations DPD will identify built up area boundaries for Local Service Villages is a form of Green Belt review which is not appropriate for the site allocations process. Doubt whether it is appropriate for neighbourhood plans in isolation to review the Green Belt. Removal of land east of Birmingham Road (Proposal SUA.3) has not been justified by the demonstration of exceptional circumstances.	Delete words 'and character' in each part of policy. None specified. None specified. Deletion of reference to Proposal SUA.3.	Impact on character is a key aspect of assessing harm to the Green Belt. See overall response below. Not intended that Neighbourhood Plans will do this. See overall response below.
M Hale	Stansgate Planning	Yes	Not Specified	No	Policy should specify that built up area boundaries will be defined for Local Service Villages in the Green Belt.	Amend final paragraph of policy accordingly.	See overall response below.
Jack McKelvie	Richard Cobb	Not Specified	Not Specified	No	Land at The Slough, Studley could be removed from the Green Belt for future housing needs.	Delete land from the Green Belt.	No need to identify this site for development in order to meet the proposed housing requirement.
HIA Developments LLP	Framptons	Not Specified	Not Specified	No	Green Belt should be reviewed in relation to Henley-in-Arden; failure to do so would frustrate sustainable patterns of growth and render the Plan unsound as it has considered Henley with a closed mind. Release of land at New Road, Henley-in-Arden from the Green Belt would not undermine its underlying purposes.	Undertake a review of this land. Delete land from the Green Belt.	See overall response below. No need to identify this site for development in order to meet the proposed housing requirement.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	Insertion of the words 'and character' into (a), (b) and (c) does not accord with the NPPF. Intention that Site Allocations DPD will identify built up area boundaries for Local Service Villages is a form of Green Belt review which is not appropriate for the site allocations process. Doubt whether it is appropriate for neighbourhood plans in isolation to review the Green Belt. Removal of land east of Birmingham Road (Proposal SUA.3) has not been justified by the demonstration of exceptional circumstances.	Delete words 'and character' in each part of policy. None specified. None specified. Deletion of reference to Proposal SUA.3.	Impact on character is a key aspect of assessing harm to the Green Belt. See overall response below. Not intended that Neighbourhood Plans will do this. See overall response below.
Alison Foxon	Stansgate Planning	Not Specified	Not Specified	No	If land at Gorcott Hill is removed from the Green Belt it should include adjacent area to north-east up to A435 and District boundary.	Amend area of land to be removed from the Green Belt accordingly.	See overall response below.

Earlswood & Forshaw Heath Residents Association		No	No	No	<p>The District Council has not complied with either UK or EU legislation in the construction of this policy. It has not complied with its legal requirements to: (a) protect the Green Belt (NPPF para 9); or (b) undertake meaningful cross-boundary co-operation consultations (per NPPF paras 178 - 181).</p> <p>Deletion of 7 hectares at Gorcott Hill (Proposal REDD.2) from Green Belt is contrary to para. 80 in the NPPF.</p> <p>Meeting the needs of Redditch is not an exceptional circumstance.</p> <p>Intention to remove Local Service Villages from the Green Belt is contrary to current planning law.</p> <p>Intention to remove Local Service Villages from the Green Belt is contrary to the District Council's statement that there is no justification for making a significant reduction to its current extent.</p>	<p>Deletion of Proposal REDD.2.</p> <p>Deletion of Proposal REDD.2.</p> <p>None specified.</p> <p>None specified.</p> <p>None specified.</p>	<p>See overall response below.</p> <p>See overall response below.</p> <p>See overall response below.</p> <p>See overall response below.</p>
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Yes	Yes	No	<p>Insertion of the words 'and character' into (a), (b) and (c) does not accord with the NPPF.</p> <p>Intention that Site Allocations DPD will identify built up area boundaries for Local Service Villages is a form of Green Belt review which is not appropriate for the site allocations process.</p> <p>Doubt whether it is appropriate for neighbourhood plans in isolation to review the Green Belt.</p> <p>Removal of land east of Birmingham Road (Proposal SUA.3) has not been justified by the demonstration of exceptional circumstances.</p>	<p>Delete words 'and character' in each part of policy.</p> <p>None specified.</p> <p>None specified.</p> <p>Deletion of reference to Proposal SUA.3.</p>	<p>Impact on character is a key aspect of assessing harm to the Green Belt. See overall response below.</p> <p>Not intended that Neighbourhood Plans will do this.</p> <p>See overall response below.</p>
Barratt and David Wilson Homes (Mercia) Ltd	RCA Regeneration Ltd	Not Specified	Not Specified	No	<p>In order to support local housing need in the District the release of certain Green Belt land is necessary and is a more sustainable development strategy than a new settlement.</p>	<p>A review of the Green Belt is necessary in order to identify sites that could be released for housing development.</p>	<p>See overall response below.</p>
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	Not Specified	<p>If Council's lack of undertaking a Green Belt review is found to be flawed then future housing delivery could be jeopardised in relation to SUA.1.</p>	<p>None specified.</p>	<p>See overall response below.</p>
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	Not Specified	<p>Amend policy to support the recycling of brownfield land and not be qualified by reference to consistency with overall development strategy.</p> <p>Identify Juggins Lane, Earlswood in policy for removal from Green Belt to allow redevelopment for housing</p>	<p>Amend policy accordingly.</p> <p>Amend policy accordingly.</p>	<p>Appropriate that specific development proposals are considered against all provisions of the Plan.</p> <p>Proposal to redevelop this site for housing can be assessed against provisions of CS.10 and other policies.</p>
Margaret Boyes		Not Specified	Not Specified	Not Specified	<p>There should be no incursion into the Green Belt which should be left sacrosanct for future Stratfordians to enjoy.</p>	<p>None specified.</p>	<p>Specific incursion into the Green Belt has been fully justified.</p>
Rajkowski Architectural & Building Services	Parkwood Consultancy Services Ltd	Not Specified	Not Specified	No	<p>Green Belt boundaries should endure beyond the plan period so reference to just the Site Allocations DPD in this respect will fail to achieve this.</p>	<p>Should be made clear that sites to be removed from the Green Belt will have regard to longer term needs.</p>	<p>See overall response below.</p>
P Henson & Bird Group of Companies	Andrew Granger & Co	Not Specified	Not Specified	No	<p>Green Belt between Stratford and A46 should be reviewed to provide for a more sustainable longer term growth strategy for the town.</p>	<p>Carry out a review of this land.</p>	<p>No need to identify this area for development in order to meet the proposed housing requirement.</p>

Cathy Kimberley		Not Specified	Not Specified	No	Policy fails to acknowledge that NPPF states that a replacement building must not be materially larger than the one it replaces.	Policy CS.10(b) should be amended accordingly.	Wording is consistent with the intentions of the NPPF.
Wilmcote Parish Council	Tyler-Parkes Partnership	Not Specified	Not Specified	No	No demonstrable need or robust evidence to support Proposal SUA.3 East of Birmingham Road. No Green Belt review or consideration of alternative sites to justify removal of site from Green Belt. No robust exceptional circumstances to justify altering the Green Belt boundary.	Delete Proposal SUA.3. None specified. None specified	See overall response below. See overall response below. See overall response below.
Redditch Borough Council - Development Plans		Yes	Yes	Yes	N/A	N/A	N/A
Gordon Harrington		Not Specified	Not Specified	No	Land should not be removed from Green Belt without proper consultation and in depth evaluation of alternative brownfield sites.	None specified.	Preparation of the Plan has involved public consultation and assessment of the scope to use brownfield sites.

Overall Officer Response	<p>A number of representations express concern that specific areas of land are proposed to be removed from the Green Belt without a comprehensive review having been undertaken. This line of argument would have been valid had the District Council proposed to do so in order to allocate land for housing development as it would have been necessary to show that suitable land outside the Green Belt was not available and that other areas of land within the Green Belt were not available or as suitable. The Core Strategy sets out clearly the exceptional circumstances that apply in each of the three cases in order to provide specific employment opportunities or to facilitate the regeneration of the canal quarter in Stratford-upon-Avon.</p> <p>In response to the specific criticism of the exceptional circumstances cited by the District Council in support of Proposal SUA.3, the following points are made relating to the five purposes of the Green Belt in the NPPF: (i) the emphasis of this purpose, based on the original intentions of Green Belts, is to control the outward spread of conurbations into surrounding countryside rather than to restrict modest extensions of settlements on the outer edge of the Green Belt. (ii) agreed that not relevant for this site. (iii) it is a matter of fact that the site is, in part, previously developed (ie. brownfield) so on this specific point it is preferable to other sites on the edge of the town. (iv) the approach to the town along the Birmingham Road has become increasingly urbanised over the years, including by current housing development, and it is evident that an urban area has been reached. In this respect, the site is not an isolated one in otherwise open countryside. An assessment has been carried out of all the parcels of land on the edge of the town to gauge their availability and suitability for employment development compared with Proposal SUA.3. It shows that this site is the most appropriate for the intended purpose, despite its location in the Green Belt. (v) the comprehensive regeneration of the canal quarter cannot be achieved without the release of land elsewhere for businesses to relocate.</p> <p>Fundamentally, an alternative site to the Regeneration Zone for housing development would not deliver the benefits of that proposal as there would be no functional connection between them. In response to the criticism that no assessment of alternative sites has been undertaken to justify the removal of land east of Birmingham Road from the Green Belt, an analysis has been prepared which shows that there are no parcels of land on the edge of Stratford-upon-Avon lying outside the Green Belt which are available or suitable for the proposed purpose, apart from south of Alcester Road which is proposed to be allocated in any case. (See Appendix 2. Assessment of land on edge of Stratford-upon-Avon for employment development.) It is important to bear in mind that businesses wish to be in accessible locations and are generally of the opinion that sites south of the river are not attractive for their needs.</p> <p>The District Council recognises that the overall challenge of meeting development needs across the wider strategic housing market area will require a Green Belt Review to be undertaken, and that the Green Belt within Stratford District should be included in such a review. A sub-regional review is currently being commissioned. Phase 1 of this work will cover Coventry, Nuneaton and Bedworth, Rugby and Warwick in the context of the need to address options for peripheral growth around the city to meet the needs of Coventry itself. Phase 2 will cover North Warwickshire and Stratford-on-Avon and in Stratford's case would inform a future review of the Core Strategy either as part of the natural cycle of review or in the context of a review proving necessary were it to be demonstrated that the District needs to play a role in meeting the future housing needs of Birmingham and Solihull. It may not be necessary to identify built up area boundaries for every LSV in the Green Belt. This will be considered through the preparation of the Site Allocations DPD. The scope of this DPD is related specifically to the delivery of the overall development strategy and is not tantamount to being a form of Green Belt Review.</p> <p>The NPPF allows for limited infilling and redevelopment of sites in villages which may be sufficient to meet the housing requirement in certain LSVs identified in Policy CS.16. In order to be consistent on this matter, para. 4.1.7 in the explanation should be amended rather than the policy itself. Earlswood & Forshaw Heath Residents Association confuse the 'very special circumstances' that have to be applied in the determination of planning applications for inappropriate forms of development in the Green Belt and the 'exceptional circumstances' that are used to justify the amendment to Green Belt boundaries through the development plan process. The Council believes that the overall dispersal strategy is appropriate given the nature of the district and that LSVs in the Green Belt have a role to play in delivering this strategy in the manner proposed. The definition of built-up area boundaries and the treatment of the Green Belt in relation to these will be addressed through the preparation of the Site Allocations DPD.</p> <p>The removal of land at Gorcott Hill from the Green Belt has been thoroughly justified through joint working with Redditch and Bromsgrove Councils and the various evidence base studies that have been produced relating to the needs of Redditch and the assessment of the suitability of this specific site when compared with alternative sites for this specific purpose. In response to Earlswood and Forshaw Heath Residents Association's objection regarding the alleged failure by the District Council to fulfil its Duty to Co-operate obligations, there has been extensive collaboration with Redditch Borough Council and Bromsgrove District Council in producing the Core Strategy. The principle of the District Council having to consider releasing land to meet the housing and/or employment needs of Redditch has been long-established, including through the former Regional Spatial Strategy, and it has been addressed through the Duty to Co-operate process. The preparation of the respective development plans for the three local authorities has been a thorough and open process, and subject to public consultation at various stages. Gorcott Hill has been identified as being the most appropriate for employment development following an extensive assessment of land on the periphery of Redditch for this purpose, almost all of which is in the Green Belt. This is also the overarching exceptional circumstance that justifies the removal of this area of land from the Green Belt.</p> <p>The request to delete an additional area of land from the Green Belt around Gorcott Hall in relation to Proposal REDD.2 is reasonable as it involves a very small nib of land and would allow scope for a more comprehensive approach to be taken on the future use of Gorcott Hall.</p>
Overall Officer Recommendation	<p>That the Inspector be requested to recommend that Policy CS.10 is modified as follows:</p> <p>Area 3 to read '9 hectares at Gorcott Hill...' Also see Policy CS.10 Explanation. Also see Section 8.1 D REDD.2.</p>

Section 4. District Designations – 4.1 Green Belt – Policy CS.10 Explanation

Number of Supports: 0 Number of Objections: 2 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	The removal of the 15 hectares of land to the east of Birmingham Road, Bishopton has not been justified by the demonstration of exceptional circumstances as required by the NPPF. The release of this land from the Green Belt is based solely on providing scope for implementing the Regeneration Zone proposal, which we consider to be unsound and therefore the release of this land is unnecessary.	None specified.	See overall response below.
Cathy Kimberley		Not Specified	Not Specified	No	The previous guideline of 30% has proved useful in the past. Whilst proposals could be considered on a case by case basis consistency of approach could be assisted by such a percentage guideline.	None specified.	See overall response below.
Overall Officer Response		On balance, based on experience of applying the 30% threshold, the view is taken that a more flexible approach should be taken that allows the merits and impact of each individual proposal to be assessed against the provisions of Policy CS.10 and the NPPF. The explanation should be amended in order to be consistent with the final paragraph of Policy CS.10.					
Overall Officer Recommendation		That the Inspector be requested to recommend that para. 4.1.7 in the explanation to Policy CS.10 is modified as follows: Second sentence to read "This will include the definition of Built-Up Area Boundaries for those Local Service Villages that lie within the Green Belt where it is necessary to do so in order to provide for the housing requirement for these villages in accordance with the provisions of the overall development strategy."					

Section 4. District Designations – 4.1 Green Belt – Policy CS.10 Explanation 1. East of Birmingham Road, Stratford-upon-Avon

Number of Supports: 0 Number of Objections: 3 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	Proposal to remove 15 hectares of land east of Birmingham Road, Bishopton has not been justified by the demonstration of exceptional circumstances. Canal Quarter Regeneration Zone proposal is unsound so it is not appropriate to release this land from the Green Belt on this basis.	Delete East of Birmingham Road from explanation. None specified.	See overall response below. See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	Exceptional circumstance for removing land east of Birmingham Road from the Green Belt has not been demonstrated as the Regeneration Zone at present is undeliverable and no evidence has been provided to demonstrate that it is.	Delete East of Birmingham Road from explanation.	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	Proposal to remove 15 hectares of land east of Birmingham Road, Bishopton has not been justified by the demonstration of exceptional circumstances. Canal Quarter Regeneration Zone proposal is unsound so it is not appropriate to release this land from the Green Belt on this basis.	Delete East of Birmingham Road from explanation. None specified.	See overall response below. See overall response below.
Overall Officer Response		<p>The Core Strategy sets out clearly the exceptional circumstances that apply in relation to this land in order to facilitate the regeneration of the canal quarter in Stratford-upon-Avon. This is a fundamental component of the Core Strategy not just in terms of providing housing in a sustainable location but also to utilise more effectively a largely underused and unattractive area of the town.</p> <p>Many companies currently located in this area wish, in the shorter or longer term, to relocate in order to expand, improve their profile and be more accessible to the strategic road network. Sites close to the A46 are known to be more attractive for these companies rather than those on other sides of the town.</p>					
Overall Officer Recommendation		No change.					

Section 4. District Designations – 4.1 Green Belt – Policy CS.10 Explanation 2. North of Arden Road, Alcester

Number of Supports: 1 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Alcester Estates Ltd	Stansgate Planning	Yes	Not Specified	Yes	N/A	N/A	N/A
Overall Officer Response			Only representation submitted supports the Proposal.				
Overall Officer Recommendation			No change.				

Section 4. District Designations – 4.1 Green Belt – Policy CS.10 Development Management Considerations

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Earlswood & Forshaw Heath Residents Association		Not Specified	Not Specified	No	DMC(2) goes against the intention of para 80 of the NPPF as extensions are not permitted and there are specific conditions placed upon replacement buildings which have not been identified.	None specified	See overall response below.
Overall Officer Response		Policy CS.10 and DMC(2) are both consistent with the provisions of the NPPF with respect to the extension and replacement of existing buildings.					
Overall Officer Recommendation		No change.					

Section 4. District Designations – 4.2 Cotswolds AONB – Policy CS.11

Number of Supports: 2 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Cotswolds Conservation Board		Yes	Yes	Yes	N/A	N/A	N/A
Natural England - South Mercia Area		Yes	Yes	Yes	N/A	N/A	N/A
Overall Officer Response							
Overall Officer Recommendation		No change.					

Section 4. District Designations – 4.3 Special Landscape Areas – Policy CS.12

Number of Supports: 1 Number of Objections: 5 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	Sets a presumption against development proposals that would have any harmful effect on the distinctive character and appearance of such areas. This does not accord with a proper balanced approach to assessing the landscape and visual impact of a particular development and balancing any harm against its benefits.	Amend policy accordingly.	See overall response below
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Yes	No	Sets a presumption against development proposals that would have any harmful effect on the distinctive character and appearance of such areas. This does not accord with a proper balanced approach to assessing the landscape and visual impact of a particular development and balancing any harm against its benefits.	Amend policy accordingly.	See overall response below.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	Sets a presumption against development proposals that would have any harmful effect on the distinctive character and appearance of such areas. This does not accord with a proper balanced approach to assessing the landscape and visual impact of a particular development and balancing any harm against its benefits.	Amend policy accordingly.	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	Sets a presumption against development proposals that would have any harmful effect on the distinctive character and appearance of such areas. This does not accord with a proper balanced approach to assessing the landscape and visual impact of a particular development and balancing any harm against its benefits.	Amend policy accordingly.	See overall response below.
Natural England - South Mercia Area		Yes	Yes	Yes	N/A	N/A	N/A
George H Jackson OBE		Not Specified	Not Specified	No	The plan fails to recognise that the landscape of Stour Valley and its catchment area is geographically, geologically, historically and culturally quite distinctive and merits consideration as an area or district of special interest.	Consider how the distinctiveness of the Stour valley can be recognised in the context of its agricultural and tourist potential.	Special Landscape Areas Study does not identify Stour Valley as being appropriate for designation.
Overall Officer Response					It is entirely appropriate for a policy on Special Landscape Areas to take such a strong stance against development proposals that would have a harmful effect on them. Other factors will be taken into account as part of the balancing judgement in relation to individual proposals. This is made clear in the Development Management Considerations.		
Overall Officer Recommendation					No change.		

Section 4. District Designations – 4.4 Areas of Restraint – Policy CS.13

Number of Supports: 1 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	No	<p>Query whether there has been a full assessment of all land across the whole District, which considers each area on its merit for inclusion as an Area of Restraint (AoR) afresh. Concerned that the principle of the existing AoRs has been fundamentally accepted by the Council and only minor tweaks have been aimed for.</p> <p>Query whether the evidence base justifies the designation of these areas as AoR and protection above that of countryside areas.</p> <p>Removing the AoR designation would allow sites to be considered on their merit with opportunities for appropriate site-specific evidence to be submitted alongside development proposals, which could demonstrate the appropriate mitigation for any landscape impact.</p> <p>Second paragraph is unhelpfully vague. It is not known what 'large-scale' is considered to be in terms of development, nor how 'demonstrable community benefits' or a 'significant contribution to an objective of the Core Strategy' would be assessed.</p> <p>It is not clear why or how a developer would be required to demonstrate that no alternative site was available outside of the AoR.</p>	Policy should be deleted or simplified to only protect areas that are critical to the preservation of a particular setting.	See overall response below.
Environment Agency		Not Specified	Not Specified	Yes	Policy should specify that Area of Restraint in Alcester will not prevent any Water Framework Directive/River Basin Management Plan projects or schemes being delivered including the development of new fish passes, weir removal or the creation of a bypass channel.	Amend policy accordingly.	Unnecessary as policy will not restrict the principle of such measures being taken.
Overall Officer Response					<p>The Area of Restraint Study did have the remit to identify further areas for designation as is evident from the additional AoR proposed at Kineton. In many respects it is not surprising there are no other substantial changes proposed given the clearly defined purposes of the designation, including the principle that it should not overlap the Green Belt. There would be little purpose in any form of designation if all development proposals were considered on their merits.</p> <p>The District Council has produced robust evidence to justify this particular local designation based on the significant contribution that specific areas of land make to the character and setting of settlements. The second paragraph provides an important aspect of the policy. Because Areas of Restraint are a local designation it is appropriate to make provision for the merits of a large-scale development that would be contrary to the purpose of the designation to be assessed. It is not possible to specify in advance to what scale or form of development this provision of the policy may be relevant. It can only be applied on a case by case basis. An example of where it has been applied in the past is the Shakespeare Hospice which lies within the Shoterly Fields Area of Restraint in Stratford-upon-Avon.</p>		
Overall Officer Recommendation					No change.		

Section 4. District Designations – 4.5 Vale of Evesham Control Zone – Policy CS.14

Number of Supports: 1 Number of Objections: 0 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
South Worcestershire Councils		Yes	Yes	Yes	N/A	N/A	N/A
Alscot Estate	Jones Lang Lasalle	Not Specified	Not Specified	Not Specified	Atherstone Airfield is included within the Control Zone although it is the only land east of the A3400 that is so designated, which seems to be both arbitrary and inconsistent.	Delete Atherstone Airfield from the Control Zone	See overall response below.
Highways Agency		Not Specified	Not Specified	Not Specified	Policy should be expanded to ensure that any proposals also demonstrate compliance with the relevant transport policy and guidance for transport assessment and also satisfy any requirement to mitigate the transport impacts arising.	Amend policy accordingly.	See overall response below.
Overall Officer Response		It is unnecessary to amend the policy in the manner sought by the Highways Agency because these provisions are covered in Policy CS.25. It is appropriate for Atherstone Airfield to be included within the Control Zone because it is a major employment site in the area. Not including it would be an anomaly because it would then be about the Control Zone but not be covered by the policy.					
Overall Officer Recommendation		No change.					

Section 5. Development Strategy – 5.1 Distribution of Development – Policy CS.15

Number of Supports: 11 Number of Objections: 21 Number of Unspecified: 4

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
South Worcestershire Councils		Yes	Yes	Yes	The South Worcestershire Councils support the development strategy contained in CS.15. The revised housing requirement along with the distribution of development is also supported, with the focus on the main towns, the identification of an extended settlement at Gaydon, and the remaining distribution to the rural areas. The absence of any strategic allocation at Long Marston is also supported and welcomed.	None	Comments noted.
Peter and Helen Pires	North Rae Sanders	Yes	Yes	No	Here and throughout the draft Strategy reference to the new settlement at Gaydon should be deleted. A new settlement is not the most sustainable or suitable option for accommodating growth in the District and for meeting land supply needs.	The existing Strategy should be maintained and enhanced, with greater levels of development applied to the same settlement hierarchy with an expanded focus on settlements of a sustainable size including Southam.	Comments noted - see overall response.
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	<p>The Main Rural Centres should be sub-divided into two categories as per the 2010 Draft Core Strategy, which identified Alcester, Shipston and Southam as the Principal Main Rural Centres.</p> <p>The strategy and thus the Policy is unsound in placing reliance on Gaydon/Lighthorne Heath as part of the hierarchy. Notwithstanding the above comments, generally support the proposal that the distribution of development in the District will be based on a pattern of balanced dispersal, in accordance with the settlement hierarchy set out in the Policy.</p> <p>The balanced dispersal of housing site throughout the District is the only realistic way in which a sufficient number and range of housing sites can be secured in order to deliver the housing requirement for Stratford on Avon District.</p> <p>Section 7 in Policy CS.15 is superfluous, merely repeating elements to be found elsewhere in the Core Strategy.</p>	None specified, although implicit that part 7 should be deleted.	<p>The practical purpose of separating the MRCs into two categories is unclear.</p> <p>Comments on Proposal GLH are set out elsewhere.</p> <p>General support for the settlement hierarchy noted.</p> <p>Section 7 of the policy is fundamental in setting out the overarching principles that will be applied when assessing development proposals.</p>
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	Not Specified	Inconsistency with policy CS.10 which allows development on appropriate brownfield sites in the Green Belt. This may prejudice our Clients regarding the redevelopment of their "brownfield" site at Juggins Lane, Forshaw Heath.	None specified.	Policy CS.10 indicates that the redevelopment of brownfield sites may be appropriate, but that the location and type of development should be consistent with the overall development strategy. As such there is no certainty that acceptable forms of residential development will be identified. As such it is considered that any such development should be viewed as unplanned windfall and not be recognised under CS.15 as a formal aspect of the distribution of development.
Urban Renaissance Villages (URV) and Helical Bar	Barton Willmore	Yes	Yes	Yes	Growth in a wide variety of settlements will help to maintain local services and facilities and enhance sustainability. It will provide other local benefits, including more affordable housing. The inclusion of the dispersal approach therefore secures the most appropriate strategy for the District. It contributes to the provision of a more flexible supply of sites, as required by the NPPF (para 47) thereby ensuring that the Plan is "deliverable" and therefore "effective" and thus "sound".	None	Comments noted
Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	There is no clear evidence which demonstrates that the site at GLH will be deliverable during the Plan Period given the significant infrastructure works required to be carried out. There may also be land ownership issues.	The Council need to fundamentally review options for meeting their Objectively Assessed Need within the Plan period.	The representation appears in principle to query the deliverability of Proposal GLH rather than the inclusion of the New Settlement within Policy CS.15.

CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Yes	Yes	No	GLH is not the product of effective cross-boundary co-ordination. It will undoubtedly, due to its position on the M40 and location within the wider housing market area (HMA), meet housing needs associated with areas beyond the boundaries of Stratford-on-Avon. It may, therefore not meet the needs associated with the District (merely increase out-migration to a new settlement within the District, particularly with unmet needs within other parts of the HMA). In this respect, it is not considered that GLH is an effective means of meeting the housing needs of Stratford-on-Avon, although it may perform an important role in meeting the needs of the wider HMA.	Long Marston Airfield should be included as an additional allocation in order to provide Stratford on Avon with an effective Plan that delivers the Policies on housing requirement.	Comments noted. The District's housing requirement is driven largely by inward migration and it is correct to say that GLH is well placed in the context of the influences evident in the wider HMA. The potential inclusion of a second strategic development site is dependent on the conclusions reached about the housing requirement - see comments at CS.16.
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	No	Support the identification of Southam as an MRC.	None	Noted.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	<p>Supportive of the settlement hierarchy, but the role of Stratford-upon-Avon in relation to housing provision is unclear. The capacity of the principal settlement of the District and the most sustainable location to accommodate new development (Stratford-upon-Avon) should be maximised before consideration of less sustainable alternatives.</p> <p>The policy should be clear that the first principle is to encourage sustainable development on non-Green Belt sites at Stratford that do not harm the historical character or setting of the settlement. Where this capacity is reached, and only at this point, will development be channelled away from Stratford to a new settlement.</p> <p>With regard to the Main Rural Centres and Local Villages, these too should be the main focus of development before the consideration of a new settlement. There is significant capacity in the Main Rural Centres such as Bidford -on-Avon and the Category 1 villages. These locations have the capacity to play a key role in the delivery of new housing in existing service centres in advance of a new settlements consideration.</p>	<p><u>Part 1. Main Town: Stratford-upon-Avon</u></p> <p>First paragraph to read:</p> <p>"The town is the principal settlement in the District and as such is the main focus for new housing and employment. Services and infrastructure will be improved to reflect the scale of development that takes place.</p> <p>The role of the town centre as a focus of shopping, services and tourism will be maintained and enhanced. Development will be directed to the town which maintains its roles as the principal settlement where it does do not result in the release of land from the existing Green Belt, or harm the historic character and setting of the town".</p> <p><u>Part 3. New Settlement</u></p> <p>First paragraph to read:</p> <p>"Land in the vicinity of Gaydon and Lighthorne Heath to the west of the M40 is identified as location for new development to accommodate the needs of the District where it cannot be first sustainably located within the principal settlement of Stratford-upon-Avon, the Main Rural Centres or Villages".</p>	<p>No specific mention is made in Part 1 of the policy to SuA's role in the provision of housing and business development. This should be clarified - see recommendation.</p> <p>The approach suggested is at odds with the Council's preference for a pattern of balanced dispersal of growth. If the sustainable options for development at SuA have to be fully exhausted before other options are considered, one wonders how the natural growth of the town over the longer term should be accommodated.</p> <p>No options for further growth at SuA have been judged as sustainable and/or deliverable having regard to the infrastructure constraints and the evidence base. A similar judgement has been made about the MRCs and the Category 1 villages.</p> <p>The dispersed pattern of growth is also considered to be the appropriate response to the District's identification as having a 'best fit' within the Coventry and Warwickshire HMA but taking into account the influence exerted by the other adjoining HMAs.</p>
Bloor Homes (Western) Ltd		Yes	Yes	No	The overall approach to settlement hierarchy is supported. It is not appropriate to restrict development in settlements such as Bidford-on-Avon and Studley solely to committed sites.		Position on hierarchy is noted. Other comments are referenced within the responses to Policy CS.16.
Gladman Developments		Not Specified	Not Specified	No	<p>Whilst supporting the principle of neighbourhood planning, the Core Strategy should not be reliant on Neighbourhood Plans bringing forward sites for development in a timely manner.</p> <p>Object to the use of settlement boundaries, as they may preclude sustainable development being brought forward. Settlements limits arbitrarily restrict development. The strategy should not prioritise the use of brownfield sites.</p>		<p>The Council's Site Allocations Plan will identify suitable sites in those settlements where the Neighbourhood Plan process is not already underway. Settlement boundaries would be established to support the distribution of development proposed under Policy CS.15.</p> <p>The policy properly recognises that the re-use of land within existing settlements is an appropriate component of the strategy for delivering development.</p>

St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	No	<p>Support in principle the balanced dispersal based on a hierarchy of settlements.</p> <p>Do not support the proposed new settlement at Gaydon/Lighthorne Heath. There is no clear evidence to show that it is deliverable.</p> <p>The Sustainability Appraisal underplays the impact of Policy CS.15. The delivery trajectory is unrealistic. Meon Vale has more suitable and deliverable development potential.</p> <p>The omission of any reference to Large Brownfield Sites means CS.15 is at odds with AS.11.</p>	<p>In Part 7 of the Policy (Requirements):</p> <p>Insert "and rural brownfield sites" after the word "settlements" in line 1.</p> <p>Add the words "as well as to existing services and facilities" at the end of point (b).</p>	<p>General support for the hierarchy noted. In principle opposition to GLH noted - this issue is dealt with in other detailed responses.</p> <p>The impacts of additional development at Meon Vale are uncertain, particularly given its relationship with Stratford-upon-Avon.</p> <p>The STA suggests that development over and above that planned for is likely to require significant infrastructure investment to mitigate transport impacts on SuA. Policy AS.11 indicates that residential development on specific large rural brownfield sites is appropriate at a scale that would meet local needs. It is not certain that this form of development will be brought forward. As such it is considered that such development should be viewed as unplanned windfall and not be recognised under CS.15 as a formal aspect of the distribution of development. In view of the above, the suggested changes to Part 7 of the policy are considered unnecessary.</p>
Taylor Wimpey UK Ltd	Barton Willmore	Not Specified	Not Specified	Not Specified	<p>We broadly agree with the hierarchical approach to the distribution of development in order to take account of the sustainability of existing settlements. We also agree fully with the recognition of Stratford-upon-Avon as the single main town in the District.</p>	None	Position noted.
Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	Yes	<p>Support the strategy set out in Policy CS.15 and consider this is the most suitable approach for the District. Development should be focussed in the most sustainable locations in terms of availability of shops, facilities and services, as well as access by modes of transport other than the private car. In considering the appropriate pattern of development in the District it is important to acknowledge and assess the distinct functions that its different parts have now and should possess in the future. Central to this is preserving Stratford-upon-Avon's role as a focus of shopping, services and an internationally renowned tourist attraction.</p> <p>By identifying Gaydon / Lighthorne Heath as a new settlement, this ensures that a more limited level of growth can be proposed for the District's main settlement whilst ensuring its primary function would not be jeopardised through additional pressure on existing infrastructure. The creation of a new village centre at Gaydon / Lighthorne Heath would also ensure the new community will be in a sustainable location, with access to a wide range of services. Allocating a large proportion of the District's housing needs in Gaydon / Lighthorne Heath provides greater guarantees in terms of delivery when compared to a dispersal approach, as this enables a more focused provision of infrastructure rather than a larger number of infrastructure improvements spread across the district.</p>	None	Support noted.

B and M Glanfield	Framptons	No	No	No	The Sustainability Appraisal process has provided no substantive evidence to show that a wider dispersal option should not be preferred to the inclusion of a new settlement proposal.	Changes should be made to Policy CS.15 4. (Local Service Villages) to make it more flexible to allow sites such as the site at land to the east of Weston House, Welford-on-Avon to come forward. It is submitted that this site should be identified in the proposed Site Allocations Development Plan Document as being suitable for residential use.	The preferred distribution of development arises as a result of evidence drawn from a wide range of documents. The conclusions drawn from the Sustainability Assessment are acknowledged. Policy CS.15 is found to have no adverse impacts when assessed against the 15 SA objectives. The results of the various 'reasonable alternatives' assessments carried out are summarised in Appendix B of the April 2014 SA Report. The potential allocation of the site at Welford-on-Avon can be considered via the preparation of the Neighbourhood Plan for the village, which is underway at present.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	By distributing development as proposed, the strategy will not deliver the Vision and Objectives of the Plan and will potentially lead to social exclusion and polarisation of communities. Stratford-upon-Avon (SuA) should remain the focus for growth, particularly because it functions as a 'Key Urban Centre' within the CWLEP Strategic Economic Plan. The Strategy of directing growth to a new settlement away from SuA without first maximising the opportunities presented by the town at non-Green Belt sites is inconsistent with the strategic economic aspirations of the CWLEP. Population growth associated with 10,800 dwellings is predominantly amongst the elderly (75+), so a new settlement at large distances from SuA is not a sustainable approach to delivering against such acute specialist housing need. In terms of sustainable reliance upon a location for economic growth, it is significantly more robust and sound to rely upon a strategy that is diverse and multifaceted in the employment sectors that it offers. This has been recognised in successive development plan strategies where the focus has been at Stratford. A settlement that is fundamentally based upon the expansion of a single industry will be fragile to the economic circumstances of the industry for the future, and therefore the authority should maximise opportunities in established locations of employment in advance of developing a new settlement.	The Strategy should identify and promote bringing forward a higher level of growth at Stratford-upon-Avon on suitable, achievable and available non-Green Belt sites in advance of directing growth into a new settlement at Lighthorne/Gaydon.	SuA is indeed a key urban centre and the strategic housing and employment allocations reflect this. Population change in the District is predominantly driven by net migration. It should not be assumed that in-migrants will overwhelmingly be older people aged 65+. Housing needs to be provided to match the predicted job growth of 9500 over the plan period (Source: Joint SHMA). Proposal GLH provides for a wider range of job creation than seems to be implied by the representation. A substantial amount of development at Stratford-upon-Avon (SuA) is already committed. There is good reason not to add substantially to the committed growth expected to be delivered over the next 10 years.
Mixed Farms Ltd	Savills - Reading	Yes	Yes	No	A sustainable urban extension (SUE) at Stratford-upon-Avon is necessary to meet objectively assessed housing need, which is not properly reflected in CS.16	None specified	No particular comment is made about the approach set out in CS.15. No amendment of this particular policy would be required even in the event that the inclusion of the SUE were to be supported.
Wellesbour ne Matters	SLR Consulting	Yes	Not Specified	Yes	The distribution of development as set out in Policy CS.15 is generally supported. It identifies the broad basis for locational development objectives, and the undertaking to retain development within the established Built-Up Area Boundaries of Main Rural Centres is welcome. In addition, support is given to the identification of the new settlement of Gaydon and Lighthorne Heath as a major new growth point in the District.	None	Support noted.
Paul Ridgeway	Stansgate Planning	Yes	Not Specified	Yes	Policy rightly recognises that the towns and larger villages are suitable locations for the provision of further housing, employment and local services. This strategy is entirely appropriate, properly reflecting the nature of the settlements, and recognising that not only are they suitable to accommodate additional development but that they should do so. With the exception of Stratford upon Avon the Main Rural Centres are the most sustainable settlements in the District and we support the proposal to allocate housing to this tier of settlements.	None	Support noted.

Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	Generally support the proposal that the distribution of development in the District will be based on a pattern of balanced dispersal, in accordance with the settlement hierarchy set out in the Policy. However, we do not believe that the Council was right to reject the option of a sustainable urban extension to Stratford upon Avon itself in setting out its distribution of development proposals. It is by far the largest settlement in the District and an urban extension to the south east of the town is an appropriate and necessary approach to the organic growth of the Stratford upon Avon to assist in meeting the development needs of the District over the Plan period to 2031. The balanced dispersal of housing sites throughout the District should include the sustainable urban extension as the only realistic way in which a sufficient number and range of housing sites can be secured in order to deliver the housing requirement. Section 7 of the policy is superfluous.	None specified, although implicit that part 7 should be deleted.	A substantial amount of development at Stratford-upon-Avon (SuA) is already committed. There is good reason not to add substantially to the committed growth expected to be delivered over the next 10 years. For the longer term, the appropriate approach to further strategic development at SuA should be assessed via a future local plan. The evidence available did not support the choice of SE Stratford as a strategic option for growth that was deliverable in the short term having regard to the significant infrastructure challenges and the lack of a co-ordinated approach amongst the potential development partners. Section 7 of the policy is fundamental in setting out the overarching principles that will be applied when assessing development proposals.
Ladbrook Park Golf Club	Savills - Birmingham	Yes	Yes	Yes	Supports the proposals for development within the Local Service Villages and the identification of Wood End as a Category 4 Local Service Village.	None	Support noted.
M Hale	Stansgate Planning	Yes	Not Specified	Yes	Agree that the proposed pattern of balanced dispersal across a wide range of sustainable settlements is the most appropriate way to meet the housing needs of the District.	None	Support noted.
Margaret Boyes		Not Specified	Not Specified	Not Specified	Opposed to further development on the edge of Stratford-upon-Avon as this would put further pressure on the already overloaded highway system.	None	Comments noted.
K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	Yes	Agree that the proposed pattern of balanced dispersal across a wide range of sustainable settlements is the most appropriate way to meet the housing needs of the District.	None	Support noted.
H.G. Hodges & Sons Ltd.	Stansgate Planning	Yes	Not Specified	Yes	Agree that the proposed pattern of balanced dispersal across a wide range of sustainable settlements is the most appropriate way to meet the housing needs of the District.	None.	Support noted.

Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	Generally support the proposal that the distribution of development in the District will be based on a pattern of balanced dispersal, in accordance with the settlement hierarchy set out in the Policy. However, we do not believe that the Council was right to reject the option of a sustainable urban extension to Stratford upon Avon itself in setting out its distribution of development proposals. It is by far the largest settlement in the District and an urban extension to the south east of the town is an appropriate and necessary approach to the organic growth of the Stratford upon Avon to assist in meeting the development needs of the District over the Plan period to 2031. The balanced dispersal of housing sites throughout the District should include the sustainable urban extension as the only realistic way in which a sufficient number and range of housing sites can be secured in order to deliver the housing requirement. Section 7 of the policy is superfluous.	None specified, although implicit that part 7 should be deleted.	A substantial amount of development at Stratford-upon-Avon (SuA) is already committed. There is good reason not to add substantially to the committed growth expected to be delivered over the next 10 years. For the longer term, the appropriate approach to further strategic development at SuA should be assessed via a future local plan. Section 7 of the policy is fundamental in setting out the overarching principles that will be applied when assessing development proposals.
Midland Commercial Properties	Stansgate Planning	Yes	Not Specified	Yes	Policy rightly recognises the towns and larger villages are suitable locations for the provision of further housing, employment and local services. This strategy is entirely appropriate, properly reflecting the nature of the settlements, and recognising that not only are they suitable to accommodate additional development but that they should. With the exception of Stratford upon Avon the Main Rural Centres are the most sustainable settlements in the District and we support the proposal to allocate housing to this tier of settlements.	None	Support noted.
A Anson	Stansgate Planning	Yes	Not Specified	Yes	Agree that the proposed pattern of balanced dispersal across a wide range of sustainable settlements is the most appropriate way to meet the housing needs of the District. This is the only way in which the needs of all the settlements can be met, providing homes for people where they are most required, supporting existing services and facilities, and doing so in a sustainable manner.	None	Support noted.
Follett Property Holdings Ltd	Nigel Moor Planning	Not Specified	Not Specified	No	Policy fails to recognise the contribution from development of the large rural brownfield sites in the District. They should continue to be regenerated with new residential and employment opportunities and other suitable uses.	None specified.	The Council's preferred distribution of development does not rely upon the provision of homes on the identified Large Rural Brownfield Sites over and above those already committed.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Yes	Yes	No	The strategy and Policy is unsound in placing reliance on Gaydon/Lighthorne Heath as part of this hierarchy. The location is not, in our view, particularly sustainable and the likely long term effect of large scale residential development next to a motorway junction and on the edge of the District will be to promote longer and less sustainable travel patterns by private car. Generally support the proposal that the distribution of development in the District will be based on a pattern of balanced dispersal, in accordance with the settlement hierarchy set out in the Policy. However, we do not believe that the Council was right to reject the option of a sustainable urban extension to Stratford upon Avon itself in setting out its distribution of development proposals. It is by far the largest settlement in the District and an urban extension to the south east of the town is an appropriate and necessary approach to the organic growth of the Stratford upon Avon to assist in meeting the development needs of the District over the Plan period to 2031. The balanced dispersal of housing sites throughout the District should include the sustainable urban extension as the only realistic way in which a sufficient number and range of housing sites can be secured in order to deliver the housing requirement. Section 7 of the policy is superfluous.	None specified, although the deletion of parts 3 and 7 of the policy (New Settlement and Requirements) is implicit.	The rationale behind the selection of Proposal GLH as a preferred strategic location for growth is provided elsewhere. It is an appropriate component within the approach to distributing growth, particularly in helping to balance provision across the District having regard to the influences exerted by different housing market areas. A substantial amount of development at Stratford-upon-Avon (SuA) is already committed. There is good reason not to add substantially to the committed growth expected to be delivered over the next 10 years. For the longer term, the appropriate approach to further strategic development at SuA should be assessed via a future local plan. Section 7 of the policy is fundamental in setting out the overarching principles that will be applied when assessing development proposals.

Earlswood & Forshaw Heath Residents Association		No	No	No	<p>There have been unsubstantiated changes to the amount of development proposed in the LSVs. No consideration has been taken of the fact that several LSVs are washed over by the Green Belt. The amount of development required does not constitute 'limited infilling'. The approach relies on inappropriate development in the Green Belt. The SHLAA does not evidence the availability of sites in the LSVs.</p>	None specified.	<p>There is clearly a relationship between the overall quantum of development required and the amount proposed in the LSVs. The Council has undertaken an assessment of individual settlements sufficient to indicate that the anticipated scale of development is realistic and achievable.</p> <p>The impact of the extent of the Green Belt on the LSV designations has been considered at length. It is acknowledged that where the housing requirement cannot be accommodated as a result of appropriate development within the Green Belt, then suitable sites identified via future work will be excluded from the Green Belt as a result of the adoption of the Site Allocations Plan.</p>
William Davis Ltd		Not Specified	Not Specified	No	<p>The most sustainable strategy for growth in the district is to focus the majority of new development in the main settlement of Stratford-upon-Avon. We consider that accommodating the majority of growth in the area with the highest levels of existing services, facilities and infrastructure is the only truly sustainable option for development in line with the clear focus for Sustainable Development found in the Framework.</p> <p>The overall strategy is overtly one of dispersal which is not the most sustainable option. The approach is highly likely to increase private car use with the increased population in the rural area needing to travel in to Stratford for employment and the key services available in the Town which are not available in the rural areas. The approach clearly neglects development in Stratford-upon-Avon, the district's most sustainable location. The strategy fails to identify an effective approach to the review of built-up area boundaries.</p>	<p>Further provision should be made for development at Stratford upon Avon to ensure that sustainable development objectives are met, with a thorough review of the Built up Area boundary to provide opportunities for further sustainable development. If not undertaken at this stage the Core Strategy should set out a positive commitment to do so in the Allocations Document.</p>	<p>During the plan period the town of Stratford-upon-Avon will accommodate housing development on peripheral sites and via the regeneration zone. The quantum of development at Stratford-upon-Avon is commensurate with its relatively modest scale, notwithstanding it being the main town in the District.</p> <p>The available evidence shows that, without significant new infrastructure provision (eg secondary schooling and transport network), further expansion would produce severe pressures that are unlikely to be mitigated. Such development would thus be unsustainable (NPPF paragraphs 72 and 32 respectively).</p> <p>It is accepted that there is some lack of clarity concerning the definition of built-up area boundaries at Stratford-upon-Avon and the Main Rural Centres. Paragraph 8.1.4 could be revised to provide more certainty of the process. The Council's Regulation 18 consultation on the scope of the Site Allocations Plan indicates that the SAP will confirm changes to the settlement boundaries.</p>

Stagecoach Midlands		Yes	Yes	No	<p>A strategy of urban concentration makes best use of existing transport infrastructure. It supports travel mode shift across the improved network as a whole. Stagecoach Midlands nevertheless wishes to generally support the Council's Strategic Vision, and dispersal-based strategy, despite the fact that this approach is both relatively unusual, and counter-intuitive to most transport planning orthodoxy. However, we have reservations about the way the dispersal approach has been taken into the Plan policy.</p> <p>While small-scale gradual growth may well be more easily assimilated, it can only be inherently and almost entirely car dependent, when it is located in small settlements that have little if any other function than that of providing a place of residence. The principles supporting the need to maintain landscape and settlement character dominate the Plan and its policies, relegating or largely excluding other material important considerations which Stagecoach considers should be given much greater weight in the planning policy balance.</p> <p>Stagecoach supports the general principle that larger amounts of development should be delivered adjoining the larger service centres. These are also places that already support bus services running between half-hourly and hourly, and in some instances, more frequently still. The evidence base for the plan does not fully assesses the scope for the proposed housing distribution strategy to help sustain existing marginal commercial bus services, nor to catalyse more frequent services. Thus the opportunities to take advantage of sustainable transport are not fully assessed or taken up, contrary to paragraph 17 of the NPPF. Further reference is made to the cross-boundary impacts of car based trips, particularly on Warwick and Leamington Spa.</p>	<p>The opportunities to allocate larger housing numbers at certain key settlements should be taken up. This applies particularly to Alcester, Bidford, Southam and Wellesbourne.</p> <p>Beyond the larger rural service centres, the focus for a dispersal strategy for rural development should be rather stronger on those villages that already benefit from hourly bus services and that also have a population of at least 1200. Typically, these will be those designated as category 1 Local Service Villages such as Bishops Itchington, Fenny Compton, Harbury (including Harbury Parish adjoining Long Itchington), Long Itchington, and Stockton. We believe that up to 200 dwellings would be justified in such settlements.</p>	<p>Thinking purely in terms of the availability of public transport there is some logic in the points made. However, the Council has to weigh many sometimes contradictory factors in the balance when determining the preferred distribution of development.</p> <p>The availability of a reasonable level of public transport provision has been taken into account via the LSV methodology and only 5 of the 44 LSVs fail to meet the definition of having a 'fair' quality of provision, including as a minimum a morning and afternoon work service.</p>
Mr Mervyn Longford		Not Specified	Not Specified	No	<p>The over-simplistic analysis of consultation data has loaded development into unsustainable rural areas. The absence of a real infrastructure plan for the main town is unacceptable.</p>	<p>Include provision for a new bridge crossing the Avon to the north of the town and direct development to where it will support this.</p>	<p>The distribution of development has been informed by a comprehensive Strategic Transport Assessment and is supported by the County Council, which is the highway authority for the area.</p>
Rajkowski Architectural & Building Services	Parkwood Consultancy Services Ltd	Not Specified	Not Specified	No	<p>Each of the three indications of where development could take place against each of the four main development locations are put forward as requirements; i.e. as drafted it appears that each have to be met. This introduces an inherent conflict - both with national policy and also an internal conflict within the proposed policy as, for example, it requires unidentified sites to be identified in the SADPD and a Neighbourhood Plan.</p>	<p>To delete the word 'and' after the second of the three bullet points and replace it with 'or'.</p>	<p>The policy is considered to be clearly worded without the revision sought.</p>
One Property Group	Phase 2 Planning & Development Limited	Not Specified	Not Specified	No	<p>We generally support the overall settlement strategy as set out in Policy CS15. Our representations relate not to the principle of the strategy itself, therefore, but to the manner in which it will be put in to effect, specifically in respect of (a) the role of neighbourhood plans and (b) the reference to potential reclassification of Local Service Centres over time.</p>	<p>Include reference to site allocations through the Site Allocations Plan in categories 1, 2 and 4; and Delete reference to reclassification of villages in Part 4.</p>	<p>The representation fails to identify that allocations via the Site Allocations Plan (SAP) are already identified in Part 4 of the policy (LSVs).</p> <p>The Council is undertaking a Reg 18 consultation on the SAP, but is proposing to defer to the Neighbourhood Plan process where this is already underway. This is the case in Stratford-upon-Avon and almost all the Main Rural Centres.</p> <p>The SAP is thus likely to focus heavily on the LSVs. From a common sense perspective it seems entirely appropriate to keep under review the availability of key services within individual settlements. A change will arguably impact on the sustainability of bringing forward development in that settlement. The position would be reviewed annually via the Monitoring Report. The net impact of any changes is highly unlikely to have a material impact on the overall scale and distribution of development.</p>

Ewan and Deanna Fernie		Not Specified	Not Specified	Not Specified	Supports the submission made by Wilmcote PC. In addition highlights the danger that further expansion will change the nature of the village forever. Strategy should protect places such as Wilmcote with its unique historic significance as the site of Shakespeare's mother's home and as a place of outstanding natural beauty.	As Wilmcote PC	See comments below. The impact of potential development on heritage assets such as those mentioned will be fully assessed under the relevant policies of the Core Strategy.
Parkinson Estates	Framptons	Not Specified	Not Specified	No	Whilst supporting the principle that allocates growth to the LSVs, the policy wording as currently drafted fails to produce a clear development management policy, contrary to para.154 of the NPPF. CS.15 is not well drafted as a usable development management policy and is unsound on the basis of not being precise or offering certainty for prospective developers in relation to a key constraint in the form of the Green Belt.	Insert the following in CS.15 Part 4: Development will take place "including within identified settlements located in the Green Belt where special circumstances can be demonstrated"	The representations acknowledge the approach set out under Policy CS.10 but suggest the Green Belt issue must be dealt with via this Core Strategy document. However, the proposed Site Allocations Plan will be prepared as a Local Plan in full accordance with the development plan regulations. Consideration of the need to exclude specific parcels of land from the Green Belt where they are identified as suitable for development is appropriate in the context of preparing that subsequent plan.
Wilmcote Parish Council	Tyler-Parkes Partnership	Not Specified	Not Specified	No	<p>Concerns are summarised as follows:</p> <p>The policy of a dispersed pattern of growth into the local service villages is contrary to the sustainable development principles intrinsic within the Framework, as evidenced by the council commissioned Lepus Consultation Sustainability Appraisal;</p> <p>There is no evidence to suggest that the scale of development proposed could be satisfactorily achieved and there is evidence to suggest that the allocation of housing numbers to particular settlement has been derived from purely a desk- based exercise;</p> <p>The Sustainability Appraisal suggests that development on the scale proposed in the villages will put an unsustainable strain on services and facilities and encourage increased car based out-commuting, contrary to the requirements of the Framework;</p> <p>It is unsound to pursue a policy which necessitates incursion into the Green Belt in a number of different settlement areas throughout the local authority area without a comprehensive Green Belt review. Alterations to the Green Belt boundary should only be proposed in exceptional circumstances which have not been demonstrated;</p> <p>The feasibility of achieving sympathetic development on the scale proposed in the Core Strategy has not been tested. It is unsound to propose a policy when the deliverability is in doubt, all policies and proposals should be based on robust proportionate evidence. In this case, there needs to have been an assessment of the impact of the proposed scale of development for example, on the landscape, nature and heritage conservation, ecology, geology, highway safety and flood risk.</p>	That the Service Villages be allowed to grow through windfall development and in response to locally identified needs. Recommend a change in policy away from a pattern of dispersed development and instead encourage directing growth towards the main urban and main rural centres.	<p>The dispersal of development to the LSVs is based on an approach which focuses growth on those settlements that support local facilities and/or have good access via public transport to nearby settlements with local facilities. The approach is responsive to local circumstances in the rural area and consistent with paragraphs 54 and 55 of the NPPF. The 2012 SHLAA report and a number of evidence base studies specific to the LSVs (eg Historic Environment Assessment, Ecological and Geological Study, Landscape Sensitivity Study) confirm both the availability and the suitability of sustainable development sites.</p> <p>Policy CS.10 provides if necessary that the washed over nature of villages within the Green Belt can be considered via the preparation of the Site Allocations Plan. The approach recognises that some development will come forward through small-scale schemes on unidentified but suitable sites (windfall development). The extent to which additional allocations may be required will be assessed on a settlement by settlement basis via the preparation of a Neighbourhood Plan or the Site Allocations Plan.</p>

John Horner		Not Specified	Not Specified	No	The pattern of balanced dispersal is not sustainable development as specified in the NPPF. The approach to a dispersal strategy pre-dates the NPPF. The evidence base used to select Gaydon/Lighthorne reviewed the option of dispersal in the report. The further dispersal option was rejected in favour of the five other sites. As a consequence the dispersal strategy is not the most sustainable way of delivering the 2,800 dwellings associated with it. In the 2010 consultation that related to the dispersal strategy 85% of Parish Council respondents believed it to be unsustainable development and 75% of individuals believed it to be unsustainable development.	Carry out a rigorous social, environmental and economic sustainability analysis of the preferred and rejected options for distribution of development. This will mean the dispersal strategy is abandoned and either Long Marston Airfield, Wellesbourne Airfield or Southam options are selected in place of dispersal for the shortfall in housing provision.	<p>It is not clear which 2,800 dwellings are referred to. The dispersal strategy recognises the role played by existing towns and villages in the settlement hierarchy and builds on this in a sustainable fashion having regard to the evidence base.</p> <p>The conclusions set out in the 'Sustainability Appraisal of Alternative Strategic Options' (January 2014) are relevant. Assuming the 2,800 dwellings quoted to include the proposed development in the Local Centre Villages, it would not be appropriate to stifle sustainable development in the identified settlements.</p> <p>In the early part of the plan period 79 dwellings have been completed in these settlements and a further 627 dwellings are committed (31/03/14). The Council has taken into account the comments received during the 2012 consultation.</p>
Europipes UK Ltd	WYG Planning and Environment	Yes	Yes	Yes	Policy CS.15 clearly articulates the distribution of development which reflects the hierarchy of settlements outlined in the beginning of the Publication Draft Core Strategy. Part 2 also recognises that development will be delivered through the redevelopment of suitable land and property in Main Rural Centres Built-up Area Boundaries. This is consistent with the NPPF, which encourages the re-use of previously developed land.	None	Comments noted.
Overall Officer Response		<p>The proposed distribution of development is based upon a strategy of balanced dispersal and, in relation to each tier of the hierarchy, has fully taken into account the opportunities and constraints that are drawn from the evidence base. It is evident that, whilst there are concerns from specific quarters or about some aspects of the detailed policy wording, the general approach based on the identified settlement hierarchy is broadly endorsed. The comments made concerning Stratford-upon-Avon and the MRCs suggest that additional sites should be identified at both these levels of the hierarchy. This is principally a matter for Policy CS.16.</p> <p>The wording of Policy CS.15 provides the necessary flexibility to enable the identification of additional sites should that prove to be necessary to meet identified requirements. It is appropriate to clarify that Stratford continues to be a settlement where housing and business development should be accommodated - see recommended change.</p> <p>The inclusion of the new settlement continues to be justified as an important component of the dispersal strategy. The likely longer-term role of this settlement as a new Main Rural Centre is made clear in the explanatory text. There are no new issues raised in relation to the proposal to establish the Local Service Villages as a tier in the hierarchy that is suitable to accommodate carefully managed sustainable growth.</p> <p>As noted against the individual representations, Section 7 of the policy is considered fundamental in setting out the overarching principles that will be applied when assessing development proposals. It would be appropriate to clarify the point raised about defining Built-up Area Boundaries and this is dealt with under the response at 8.1.</p>					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Part 1 'Main Town: Stratford-upon-Avon' is modified as follows:</p> <p>Add at the end of the first sentence "and as such is a main focus for housing and business development"</p>					

Section 5. Development Strategy – 5.1 Distribution of Development – Policy CS.15 2. Main Rural Centres

Number of Supports: 3 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	Yes	Policy rightly recognises that the MRCs are suitable locations for the provision of further housing, employment and local services. Concur that this strategy is entirely appropriate, properly reflecting the nature of the settlements, and recognising that not only are they suitable to accommodate additional development but that they should. With the exception of Stratford-upon-Avon the 8 settlements are the most sustainable settlements in the District and are the most suitable places to accommodate additional housing. We support the proposal to allocate housing to this tier of settlements.	None	Support noted.
K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	Yes	Policy rightly recognises that the MRCs are suitable locations for the provision of further housing, employment and local services. Concur that this strategy is entirely appropriate, properly reflecting the nature of the settlements, and recognising that not only are they suitable to accommodate additional development but that they should. With the exception of Stratford-upon-Avon the 8 settlements are the most sustainable settlements in the District and are the most suitable places to accommodate additional housing. We support the proposal to allocate housing to this tier of settlements.	None	Support noted.
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	Yes	Support the identification of Bidford-on-Avon as an MRC	None	Support noted.
Overall Officer Response		None required					
Overall Officer Recommendation		No changes required.					

Section 5. Development Strategy – 5.1 Distribution of Development – Policy CS.15 3. New Settlement

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CPRE Warwickshire Branch		Not Specified	Not Specified	No	The inclusion of 'New Settlement' (CS15(3)) is unsound. This proposal is not justified as the housing requirement claimed to make it necessary is not correct. The need for this location against other sites is also not demonstrated.	Delete Part 3 of Policy CS.15	Issues around the identification of objectively assessed housing need and the choice of the preferred site for strategic development are fully discussed elsewhere. Deletion of the new settlement proposal is not justified.
Overall Officer Response		The New Settlement reference in Policy CS.15 is sound and should be retained.					
Overall Officer Recommendation		No changes required.					

Section 5. Development Strategy – 5.1 Distribution of Development – Policy CS.15 4. Local Service Villages

Number of Supports: 5 Number of Objections: 5 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CPRE Warwickshire Branch		Not Specified	Not Specified	No	The policy would allow (or require) significant development in small villages which are not suitable and which cannot accommodate new development without harm to their character. Many have Conservation Areas which would be harmed by development on the scale proposed. The scale of development that would be allowed under Policy CS16 for Categories 2, 3 and 4 villages would be damaging.	Replace Part (4) of Policy CS15 with Policy stating that development in Category 2, 3 and 4 villages should be restricted to local needs and and new housing should be allowed only as minor infill or as approved by a Neighbourhood Plan.	The Council is satisfied that the dispersed pattern of growth will support the sustainability of rural settlements. The proposed scale of growth is modest, even in the Category 2 LSVs where it equates to no more than 3-4 dwellings per annum over the plan period. Growth in the LSVs is proportional to scale and reflects to a large degree the historic pattern of incremental growth applicable to a majority of rural settlements.
Alan Griffith		Not Specified	Not Specified	Not Specified	Supports windfall development in LSVs to enable their expansion. Supports development to meet local demands. Development must be sustainable, but in villages such as Wilmcote there are already concerns about the environmental and safety impact of additional traffic. The strategy does not do enough to address this.	None specified	The comments are noted. Traffic growth associated with the scale of development proposed in the LSVs is strategically insignificant. Concerns about the local impact of additional vehicles will be addressed via the development management process.
Heritage Trustees Ltd	Stansgate Planning	Yes	Not Specified	Yes	The Council has identified a hierarchy for the more sustainable villages across the District which are capable of accommodating additional development. This accords with the dispersed approach and is an appropriate way to ensure the needs of as many settlements as possible can be met, providing at the sametime support for local services and facilities. Agree that the Council is right to allocate sites in these villages and allow development within their built up areas, to meet housing needs. In particular we support the designation of Long Marston as a local service village, thereby ensuring the provision of new housing to meet a wider range of housing needs and thereafter sustain the village and its existing services and facilities.	None	Comments noted.
A Anson	Stansgate Planning	Yes	Yes	Yes	The Council has identified a hierarchy for the more sustainable villages across the District which are capable of accommodating additional development. This accords with the dispersed approach and is an appropriate way to ensure the needs of as many settlements as possible can be met, providing at the sametime support for local services and facilities. Agree that the Council is right allocate sites in these villages, and allow development within their built up areas, to meet housing needs. In particular we support the designation of Long Compton as a Category 3 village, thereby ensuring the provision of new housing to meet a wider range of housing needs and thereafter sustain the village and its existing services and facilities.	None	Comments noted.
H.G. Hodges & Sons Ltd.	Stansgate Planning	Yes	Not Specified	Yes	The Council has identified a hierarchy for the more sustainable villages across the District which are capable of accommodating additional development. This accords with the dispersed approach and is an appropriate way to ensure the needs of as many settlements as possible can be met, providing at the sametime support for local services and facilities. Agree that the Council is right allocate sites in these villages, and allow development within their built up areas, to meet housing needs. In particular we support the designation of Long Marston as a local service village, thereby ensuring the provision of new housing to meet a wider range of housing needs and thereafter sustain the village and its existing services and facilities.	None	Comments noted.

M Hale	Stansgate Planning	Yes	Not Specified	Yes	<p>The Council has identified a hierarchy for the more sustainable villages across the District which are capable of accommodating additional development. This accords with the dispersed approach and is an appropriate way to ensure the needs of as many settlements as possible can be met, providing at the same time support for local services and facilities.</p> <p>Agree that the Council is right to allocate sites in these villages, and allow development within their built up areas, to meet housing needs. In particular we support the designation of Mappleborough Green as a Category 4 village, thereby ensuring the provision of new housing to meet a wider range of housing needs and thereafter sustain the village and its existing services and facilities.</p>	None	Comments noted.
The Taylor Family	Stansgate Planning	Yes	Not Specified	Yes	<p>The Council has identified a hierarchy for the more sustainable villages across the District which are capable of accommodating additional development. This accords with the dispersed approach and is an appropriate way to ensure the needs of as many settlements as possible can be met, providing at the same time support for local services and facilities.</p> <p>Agree that the Council is right to allocate sites in these villages, and allow development within their built up areas, to meet housing needs. In particular we support the designation of Oxhill as a Category 4 village. Almost no new housing has been provided within the village in recent years and the result is a settlement skewed heavily towards the older generation. This is often because people bought when they were younger with families, have often extended, and have chosen not to move away. The result is few smaller houses and little housing to meet the needs of those with lower budgets. The designation of Oxhill as a Category 4 settlement means an opportunity to provide new housing to meet a wider range of housing needs and thereafter sustain the village.</p>	None	Comments noted.
Mr Michael Lane		Not Specified	Not Specified	No	<p>Policy wholly unsound in that it proposes the dispersal of far too many new dwellings (about 18% of the District's predicted additional housing requirement of 10,800 during 2011-2031) over villages, many of which are, contrary to the conclusions set out in the Local Service Village (LSV) Methodology, unsustainable locations. As such, the proposals of this policy are contrary to the requirements of the NPPF and are also likely to cause harm to the character and appearance of many of the villages, especially those that are mainly in conservation areas and the Cotswolds AONB, again contrary to requirements of the NPPF.</p>	<p>The proposed amount of development in Category 3 and 4 LSVs in particular should be very significantly reduced and redirected to sustainable locations such as the proposed new settlement, the Main Rural Centres and, to a lesser extent, villages that already have a wide range of good key services and facilities such as those in Category 1 of the Methodology.</p>	<p>The Council is satisfied that the dispersed pattern of growth will support the sustainability of rural settlements. The proposed scale of growth is modest, in the Category 3 and 4 LSVs equating to no more than 2-3 dwellings per annum over the plan period.</p> <p>Growth in the LSVs is proportional to scale and reflects to a large degree the historic pattern of incremental growth applicable to a majority of rural settlements. Issues concerning the LSV methodology are responded to separately.</p>
Tiddington Village Residents Association		Not Specified	Not Specified	No	<p>The proposed scale of development at Tiddington is not consistent with the principles outlined in section 7 of CS.15. The village has no brownfield sites and is surrounded by agricultural land.</p>	None specified	<p>As with many LSVs, the envisaged growth is likely to involve elements of greenfield development. This does not make the growth unsustainable or produce any unresolvable conflict with section 7 of the policy. Issues concerning the LSV methodology are responded to separately.</p>
Ilmington Parish Council		Not Specified	Not Specified	No	<p>The Core Strategy is unsound as a significant proportion of the proposed housing growth is in unsustainable rural locations. Accept that it is necessary and desirable to disperse a proportion of the district's 2011-2031 additional housing requirement over its villages but believe that the proposal to disperse about 1,950, and possibly more, houses (nearly 20% of the district's total additional housing requirement of 10,800) over them is very excessive and will result in a large number of houses being built in unsustainable locations, contrary to requirements of the National Planning Policy Framework. It is also likely to cause harm to the character and appearance of many of the villages, especially those, like Ilmington, in conservation areas and the Cotswolds AONB, again contrary to the NPPF.</p>	<p>The LSV Methodology should be thoroughly revised and refined, and the proposed number of new houses in the Category 3 and 4 LSVs, including in Ilmington, should be significantly reduced, with the resulting shortfall being defrayed across locations that are sustainable such as, for example, the Main Rural Centres and the Category 1 and 2 LSVs.</p>	<p>The Council is satisfied that the dispersed pattern of growth will support the sustainability of rural settlements. The proposed scale of growth is modest, equating in Ilmington's case to no more than 2-3 dwellings per annum over the plan period.</p> <p>Growth in the LSVs is proportional to scale and reflects to a large degree the historic pattern of incremental growth applicable to a majority of rural settlements. Issues concerning the LSV methodology are responded to separately.</p>

John Read		Not Specified	Not Specified	No	Policy CS.15.4 states that development may take place in LSV's on 'suitable sites within their Built-Up Area Boundary (where defined) or otherwise within their physical confines'. However policy CS.16 under Development Management Considerations and in respect of counting towards the relevant housing target states 'The Local Service Village housing requirements apply to development in and adjacent to the village settlement itself, not the wider parish'. Because the phrases 'within their physical confines' may be seen as different to 'adjacent to the village settlement' there is scope for conflict between the two policies	The relevant wording in policies CS.15 and CS.16 should be made identical to avoid conflict of interpretation.	The wording in CS.16 reflects the cumulative impact of the options in CS.15/4, namely that development may take place on identified sites, sometimes outside but adjacent to the existing confines of the village, and on unidentified sites within the existing village.
Overall Officer Response		No new issues have been raised that suggest a need to recommend any modification in approach.					
Overall Officer Recommendation		No changes required.					

Section 5. Development Strategy – 5.1 Distribution of Development – Policy CS.15 7. Requirements

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	<p>In terms of the requirements set out in Section 7, there is the concern that the first bullet points regarding additional opportunities being secured for the benefit of the local community is unclear. The Policy needs to be amended to better explain this requirement as on face value, this bullet point could be interpreted to require the masterplan to show proposals, which cannot be justified under the requirements of S106 agreements or CIL regulations.</p> <p>Further clarification is required in respect of the expectation to engage with the community. Welbeck support the need for community consultation prior to the submission of a planning application. However, the expectation to engage with the Neighbourhood Plan process places an unnecessary constraint on proposals, as not all Parish Councils are moving forward with a Neighbourhood Plan.</p>	None specified	<p>The text initially referred to is applicable only to proposals that do not meet one or more of the requirements set out in section 7 (a) to (f). The intention is simply to identify the scope of material considerations that could influence the planning balance when considering such proposals.</p> <p>These would necessarily be restricted to bona-fide planning considerations and consistency with the CIL Regulations. Regarding community engagement, on reflection the wording is perhaps clumsy and could be improved through the minor change recommended here.</p>
Overall Officer Response		That the minor change recommended below would clarify the point regarding community engagement.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that the final paragraph of section 7 of the policy is modified as follows:</p> <p>Insert after "process" the words "where such a plan is under active preparation,"</p>					

Section 5. Development Strategy – 5.1 Distribution of Development – Policy CS.15 Explanation

Number of Supports: 0 Number of Objections: 3 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Heritage Trustees Ltd	Stansgate Planning	Yes	Not Specified	No	<p>The methodology identifying Long Marston as a Category 4 settlement is flawed because it should be assessed as having a good public transport service. Route 27 is a circular route running to and from Stratford upon Avon via Luddington, Welford, Long Marston, Broad Marston and Pebworth. It operates a service sufficient for work in Stratford upon Avon, and approximately every 2 hours throughout the rest of the day. In addition there are other services which run less frequently providing further links with Stratford upon Avon and the wider area. Overall the service is sufficient to warrant a score of 2. Indeed a greater increase in the number of houses in the village will mean more support for the bus services and the likelihood of an increase in the frequency of its visits to the village.</p> <p>Moreover it should be noted that the recent CODEX appeal (application reference Wychavon W/13/00132) includes a s106 requirement for a regular bus to link to Honeybourne Station which will pass within 500m of the southern edge of Long Marston (see attached proposed route, which forms part of the s106 agreement). From Honeybourne there are frequent train links to Oxford and Worcester. The bus service must be in place before the completion of 50 dwellings and will further enhance the connectivity of Long Marston.</p>	Re-categorise Long Marston as a Category 3 village	Route 27 does not provide a 2 hourly service during the afternoon. On this basis the categorisation is accurate. The current and envisaged services to Meon Vale and on to Honeybourne do not serve Long Marston. However, this situation can be kept under review and the categorisation will be amended if that proves to be appropriate at some future point.
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Yes	No	<p>Halford should be identified as a Category 4 settlement because it should be assessed as having a general store scoring at least one point. Current bus time tables show Route 50/50A running between Stratford upon Avon and Chipping Norton (and onward to Oxford). The early morning and late afternoon services run out to Idlicote Road, Halford, there being at least two work hour services in each direction to and from Stratford upon Avon Monday to Saturday. In addition to this Route 23/23A provides a further two journeys between Halford and Stratford upon Avon each day Monday to Saturday, with additional links to Shipston on Stour and Moreton in Marsh. This assessment shows the settlement meets the criteria for scoring 1 point for public transport.</p>	Include Halford as a Category 4 village.	The Council does not consider that the range of goods available from the kiosk at the filling station is sufficient to regard it as a general store. The bus services do not meet the requirement of providing a morning work service. On this basis the omission of Halford from the list of LSVs is accurate.
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	No	<p>The methodology identifying Snitterfield as a Category 3 settlement is flawed because it should be assessed as having a large general store and a good public transport service.</p>	Re-categorise Snitterfield as a Category 2 village	The Council has applied a consistent approach to the analysis of shop size and considers the store to be medium sized. It also considers the public transport provision to be fair rather than good. On this basis the categorisation is accurate.
Overall Officer Response		The categorisation of villages shown in the explanation to Policy CS.15 is considered accurate.					
Overall Officer Recommendation		No change required.					

Section 5. Development Strategy – 5.1 Distribution of Development – Policy CS.15 Development Management Considerations

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
John Read		Not Specified	Not Specified	No	Development Management Considerations bullet 3 states that the list of Local Service Villages is 'dynamic in order to reflect the sustainability of a particular LSV at any point in time.' Appendix 2 in describing the LSV methodology states that 'it should be noted that the information about service provision will need to be checked and updated on a regular basis in order to apply the LSV categorisation accurately.' Because of the 'cliff edge' banding of settlement size, there could be the perverse effect that approval of a single dwelling could result in an additional 25 dwellings being required within a settlement.	Should be explicitly stated that this check and possible update will be based only on the provision of the three services as defined in appendix 2 and not on any changed size of the settlement.	The methodology is specific in saying that it is new information about service provision that will lead to a reassessment of the points score.
Overall Officer Response		No change required.					
Overall Officer Recommendation		No change required.					

Section 5. Development Strategy - 5.2 Housing Development Policy CS.16

Number of Supports: 5 Number of Objections: 52 Number of Unspecified: 4

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
West Midlands HARP Planning Consortium	Tetlow King Planning	Yes	Yes	No	<p>Our most significant concern focuses on the chosen housing target. While the ERM Report may be useful to the Council, it is a poor relation to the SHMA. We do recognise that the SHMA indicates that the 2011-based household formation rates, rebased to the 2011 Census data, reflect the economic recession and a number of localised supply and demand-side constraints in place between 2006 and 2011; with Stratford-on-Avon's housing moratorium cited. Based upon the current economic recovery, household formation rates are likely to return to 2008-based rates earlier than anticipated in the SHMA.</p> <p>The SHMA clearly indicates that Stratford-upon-Avon is experiencing the greatest affordability pressures across the HMA and this in the recognised throughout the Council's evidence base that the district's housing needs are the most acute in the housing market area and in need of rectifying.</p> <p>It is noted that based upon the SHMA employment projections, the annual housing requirement would be between 754 and 776 per annum. Whilst appreciating that the Council may feel that employment projections alone are not sufficiently reliable to base their housing target, and there are particular demographics in Stratford-upon-Avon, of an ageing population, and the role that retirement migration will play, it is necessary to undertake an uplift. However, the Core Strategy contains no detailed employment projection to cross-reference to the employment projection within the SHMA.</p> <p>No consideration has been given to increasing the housing target to reflect affordable housing needs. The annual affordable housing need is likely to be underestimated. In particular, it is noted that the current Housing Register is only considered in relation to the Council's opinion as to those persons with greatest need, rather than all those in need, and that the calculation of affordable housing need is based upon a zero-migration scenario.</p>	<p>The Council is pursuing a purposely constrained approach, at odds with national planning policy and is therefore unsound.</p> <p>Reference to Core Strategy review required in policy.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>

Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	<p>OAN is below the demographic requirement of the plan and fails to take account of economic, market signals and affordability components. It is also out of line with the Council's commitment in the Coventry and Warwickshire LEP SEP to plan spatially on the basis of a job-led strategy. RPS has prepared an independent assessment of SDC OAN and recommends a figure of 16,500 dwellings. SDC's OAN must be established through a SHMA. The ERM assessment is not a SHMA.</p> <p>RPS concurs that using a hybrid approach to headship rates is appropriate. However, while the Council has assumed that this is the most appropriate manner to proceed also when establishing an OAN for Stratford, it has not observed, or chosen not to heed the advice set out in the SHMA, specific to Stratford on this matter which varies from the other authorities. For Stratford the SHMA recommends using the 2008 headship rate information from 2011 therefore leading to a higher level of need than would be required under the hybrid approach. The Council is fundamentally incorrect therefore that its OAN is associated with 540 dwellings per annum resulting in 10,800 dwellings. The SHMA actually recommends that the OAN for Stratford is 11,400 dwellings. The Council is therefore not meeting the OAN according to the 2013 SHMA recommendations.</p> <p>The figure of 75,000 new homes in the CWLEP is not linked to the provision of 94,500 jobs. The accurate reference from the SHMA is that 75,000 new homes quoted will only support 48,000 new jobs. A significant increase in housing is required if the CWLEPs target is to be achieved.</p> <p>The most recent information available from the Council in respect of jobs forecasts for Stratford is the remains the SHMA jobs led scenario which sets out a requirement for 475 jobs per annum based upon 2012 Experian Forecasts which would require a housing need of 754 dwellings per annum equating to 15,000 dwellings over the plan period. However, the 15,000 dwelling figure in the SHMA is based upon application of the 2011 headship rates evidence from 2011 through to 2031. It has not considered the recommended approach of applying headship rates in the SHMA which is the hybrid of applying 2011 headship rates to 2021 and then 2008 headship rates from 2021 to 2031. This indicates that the OAN for Stratford District is 16,500 dwellings.</p> <p>Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand. The SHMA sets out that the level of housing need in Stratford should be uplifted in order to deliver on affordability issues.</p>	<p>The assessment undertaken by RPS indicates that based upon the CWLEP jobs-led justification for its spatial strategy, supported by paragraph 11.23 of the SHMA that the OAN for Stratford District is 16,500 dwellings.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>
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Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	<p>RPS objects to the housing trajectory set out in Figure 1. The Council has identified an unjustified and unprecedented level of housing to be delivered within years 2016/17 and 2017/18. A contribution from this is identified to be from allocated sites. This is the 650 dwelling allocation from the Canal Quarter Regeneration Zone, however, no evidence is available that this will be delivered as programmed leaving the authority short on meeting its targets.</p> <p>The Council has also identified 750 dwellings within the same phase (2016/17 to 2020/21) to be delivered from the new settlement proposal. Given the prematurity of the proposal RPS does not consider that anything near 750 dwellings would ever be achieved in the phase as indicated. The area has no planning consent at this stage nor is it considered that this will be achieved in the near future. The delivery issues of a new settlement as proposed are not akin to providing an urban extension onto an existing urban area where services and facilities are typically available. A new settlement will require a considerably longer lead in period than the housing trajectory sets provides for.</p> <p>Regarding Gaydon/Lighthorne Heath New Settlement, RPS concludes that the new settlement will not deliver 2,500 dwellings during the plan period and therefore housing supply will fall short of the Council's target. Regarding the Canal Quarter Regeneration Zone, RPS concludes that it is a complex site of multiple owners (approximately 60) with no delivery mechanisms in place to bring it forward, especially no intentions for compulsory purchase. As such, the site will not deliver as anticipated.</p>	Allocate land at Bishopton Lane, Stratford-upon-Avon	<p>The high level of completions expected in 2016/17 and 2017/18 is a reflection of the need to rectify the shortfall since 2011 to maintain a 5 year supply.</p> <p>For clarification, in these two years only 80 homes are expected to come from the Canal Quarter (at Warwick House). This is a vacant office building on a separate land parcel from the rest of the allocation, delivery of which will not commence until 2019/20.</p> <p>As things stand there is no reason to assume that Proposal GLH will not deliver 2,500 dwellings during the plan period. More detailed analysis is being undertaken to underpin the Masterplan SPD for the site. This will address issues of scale, timing and deliverability. The Draft SPD is due to be reported to The Cabinet in October.</p> <p>While there are complex issues to resolve, there are no overriding reasons why it cannot be achieved over the plan period. There is evidence to show that large parts of the Canal Quarter are readily available for redevelopment and will be delivered in the short to medium term.</p>
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Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	<p>Stratford is the main town and has been recognised as such in successive development plans including the WM RSS, the most recent document to have been subject to independent examination. The Panel Report into the RSS sets out that Stratford District is one of two halves where the northern portion with the Green Belt abutting the central conurbation area is a part of the District that would understandably seek to constrain development. However, in the southern area Stratford Town is by far the largest settlement and represents the optimum location for substantial volumes of additional affordable housing to address the local shortage of workers in the tourism, cultural and local service sectors.</p> <p>In respect of the overall level of growth and strategic approach, the Panel Report in 2009 sets out that a figure of 10,500 dwellings could be identified for the District to minimise worsening affordability and enable the flexible delivery of affordable housing. In proposing this, the Panel did not consider the major expansion of Stratford-upon-Avon to be contrary to the historic character of the town. When considering the proposals for a new settlement within the District, the Panel concluded that the focus of growth should remain a distribution pattern that focused growth across the service centres, and primarily at Stratford-upon-Avon.</p> <p>While the above represents preceding strategic approaches, and it is entirely within the capacity of the local authority to determine the most appropriate, and a potentially revised strategy for the future from preceding approaches, the authority does need to ensure that it is evidence led, sound and will deliver the aspirations of the Plan's Vision and the strategic needs of the sub-region.</p> <p>The CWLEP SEP sets out a 'Jobs-Led Spatial Plan' and identifies Stratford Town as a 'Key Urban Centre'. While there is reference to the potential expansion of the Jaguar and Land Rover employment land at Gaydon for economic growth, there are no firm proposals in the SEP to support a new settlement or wider distribution of new housing development away from Stratford Town. As such the strategic framework in the CWLEP SEP is to support the development of Stratford-upon-Avon. The Strategy of directing growth to a new settlement away from Stratford town without first maximising the opportunities of presented by the town at non-Green Belt sites is therefore inconsistent with the strategic economic aspirations of the CWLEP.</p> <p>Work undertaken by RPS indicates that the principal driver of the population growth in Stratford will be within the age cohorts of 60/65 and over (an additional 18,000 people) and a reduction in working age cohorts (of 3,000). SDC is required to ensure that not only is the provision of the type of housing appropriate, but also the location of housing. For a District that will have significant levels of housing need in the age cohorts of 75+, the development of a new settlement at large distances from Stratford-upon-Avon is not a sustainable approach to delivering against such acute specialist housing need. The strategy would result in a significant amount of the population living in the new settlement being elderly.</p> <p>The new settlement does not address specifically the requirement to meet its own profile of housing need rather than a sound strategy that first maximises the opportunities for growth in accessible sustainable locations befitting of its population growth profile.</p>	<p>The Strategy should identify and promote bringing forward a higher level of growth at Stratford-upon-Avon on suitable, achievable and available non-Green Belt sites in advance of directing growth into a new settlement at Lighthorne/Gaydon. Policy CS16 should be amended to facilitate additional growth at Stratford-upon-Avon and the Area Profile for Stratford-upon-Avon be amended to include a non-Green Belt site allocation on the edge of Stratford Town, at Land at Bishopton Lane.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of: - CS.15 Distribution of Development - CS.21 Economic Development</p> <p>CS.18 provides for a mix of housing to meet the needs of the District to 2031. It is simplistic to assume that any development at Stratford town is immediately more sustainable than elsewhere as this belies the fact that development is likely to be some distance from the town centre with its shops and facilities. A new settlement offers the opportunity to provide a greater range of facilities within walking distance as well as, in the case of GLH access via public transport to other sustainable centres such as Kington and Leamington, as well as Stratford.</p>
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Gladman Developments		Not Specified	Not Specified	No	<p>This tempering of the full OAN should only occur if the Council can demonstrate that delivering the full OAN would result in significant and demonstrable harm which would outweigh the benefits. This has not been demonstrated. The Council need to use the true OAN figure (25,010 dwellings) as the starting point and undertake detailed work to establish if this scale of development is achievable. Only once this process has been gone through, can the Council propose a housing requirement which is of a lesser scale than the true OAN. The housing requirement of 10,800 dwellings is based primarily on a population growth scenario adjusted to account for trend migration over the previous 10 year period. Insufficient regard is given to both the employment and affordable needs of the district. The link between housing and employment is clearly established in national policy.</p> <p>The SHMA identifies that the adoption of an annual housing requirement of 540 dwellings per year will only support job growth of 65 jobs per year. Figures obtained from Oxford Economics show a strong history of job creation in the authority (800 jobs pa between 1991 and 2011). This level of job creation is twice the national average and is significantly higher than neighbouring authorities. Against this context it is notable that the Council appear to have ignored the evidence presented in the SHMA which finds economic led requirement of 15,080 to 15,520 dwellings for Stratford-on-Avon District.</p> <p>The 2012 SHLAA Review identifies a capacity of 3,144 units from deliverable and developable sites insufficient to achieve 10,800. However, a significantly greater capacity to deliver a scale of housing growth in excess of the proposed requirement, but due to the flawed methodological approach within the SHLAA the true scale of capacity for growth across the District has not been demonstrated (e.g. sites have been dismissed on the basis that they are within medium-high landscape sensitivity).</p> <p>No SA work has been undertaken on the reasonable alternatives presented within the SHMA the SA (2011) only assesses the implications of the delivery of 9,500, 10,300 and 13,000 dwellings). The economic driven projections demonstrated a need of 15,080 and 15,520 dwellings. Through the SA process reasonable alternatives such as 15,520 homes should have been assessed.</p> <p>Concern with potential impacts of changing the plan period and not carrying forward previous unmet need.</p>	<p>Based on up-to-date and robust analysis by Regeneris, Gladman recommend that the true OAN for Stratford-on-Avon is significantly higher than the proposed 10,800 housing target. Gladman suggest that the OAN for Stratford is 25,010 (1,245 dwellings per year).</p> <p>Gladman believe that the Council have been too strict in the application of policy in the determination of the suitability of housing land that has resulted in a vast underestimation of the capacity. This assessment is inconsistent with the findings of a recent appeal decision and is divergent to several allocations identified by the Council in this plan. A reassessment is required.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>Any undersupply from previous plan periods is included in the OAN. However, as acknowledged by the SHMA, there is no historic unmet need in Stratford-on-Avon District.</p>
Urban Renaissance Villages (URV) and Helical Bar	Barton Willmore	No	No	No	<p>The Joint SHMA (November 2013) for Coventry and Warwickshire, prepared by GL Hearn states that the objectively assessed housing need for the District is between 540-600 dwellings per annum (dpa) for the period 2011-2031, and recommends 570 dpa (11,400 total). Separate to this, the District Council has since commissioned ERM which reviewed available housing data and recommended a lower housing requirement (525-540 dpa), based solely on the requirements of the District.</p> <p>We understand that the District Council did not commission the SHMA. The SHMA was undertaken at the request of Coventry City Council - its Core Strategy having been withdrawn in April 2013, following the recommendations of the EiP Inspector. Whilst discussions between Stratford-on-Avon District Council and its neighbours are clearly ongoing, they cannot be described as having a 'constructive outcome' as the proposed housing requirement in Policy CS16 is below that advocated in the Joint SHMA.</p>	Not compliant with Duty to Co-operate.	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of Section 1.3 Cross Boundary Issues.</p>
Shipston-on-Stour and Stratford League of Friends	Carter Jonas - Oxford	Not Specified	Not Specified	No	Designation of Halford as category 4 LSV removed without justification. LSV methodology flawed.	Reinstate Halford as category 4 LSV.	See separate comments in respect of Appendix 2 and the LSV Methodology.

Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Our research utilising the Chelmer Housing and Population Model to derive evidence as to the full objectively assessed need for market and affordable housing. In our view, the full objectively assessed need for housing in Stratford on Avon 2011-2031 is 20,300 dwellings. The Coventry and Warwickshire Joint SHMA does not represent objectively assessed need in accordance with the requirements of the NPPF and PPG. Further, the Update to Review of Housing Requirements report by ERM, which reduces the purported housing need figure to 540dpa, does not accord with the requirements of the Framework and the guidance in PPG and is not a sound basis for deriving a housing requirement for the District. In relation to Policy CS.16, we find that the quantum of development proposed for Stratford upon Avon itself, approximately 2,590 homes, is insufficient as a contribution the Main Town in the District settlement hierarchy should make to meeting housing needs over the plan period. We have suggested that the town should accommodate at least a further 1,000 dwellings, which can be accommodated in a sustainable urban extension to the south east.</p>	<p>The housing requirement set out in Policy CS.16 fails to meet the full objectively assessed need for market and affordable housing. This is a serious and fundamental flaw in the soundness of the Core Strategy which cannot be remedied through modification. We respectfully request that the Council should be required to review its evidence as to the full, objective assessment of housing need in order to inform the preparation of the Core Strategy. We have suggested that the town should accommodate at least a further 1,000 dwellings, which can be accommodated in a sustainable urban extension to the south east.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p>
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Policy CS.16 fails to meet the full objectively assessed need for market and affordable housing. This is a serious and, in our view, fundamental flaw in the soundness of the Core Strategy which cannot be remedied through modification. We respectfully request that the Council should be required to review its evidence as to the full, objective assessment of housing need in order to inform the preparation of the Core Strategy.</p> <p>Our research utilising the Chelmer Housing and Population Model to derive evidence as to the full objectively assessed need for market and affordable housing. In our view, the full objectively assessed need for housing in Stratford on Avon 2011-2031 is 20,300 dwellings.</p> <p>The Coventry and Warwickshire Joint SHMA does not represent objectively assessed need in accordance with the requirements of the NPPF and PPG. Further, the Update to Review of Housing Requirements report by ERM, which reduces the purported housing need figure to 540dpa, does not accord with the requirements of the Framework and the guidance in PPG and is not a sound basis for deriving a housing requirement for the District.</p> <p>In relation to Policy CS.16, we find that the quantum of development proposed for Stratford upon Avon itself, approximately 2,590 homes, is insufficient as a contribution the Main Town in the District settlement hierarchy should make to meeting housing needs over the plan period. We have suggested that the town should accommodate at least a further 1,000 dwellings, which can be accommodated in a sustainable urban extension to the south east.</p>	<p>Policy CS.16 fails to meet the full objectively assessed need for market and affordable housing. This is a serious and, in our view, fundamental flaw in the soundness of the Core Strategy which cannot be remedied through modification. We respectfully request that the Council should be required to review its evidence as to the full, objective assessment of housing need in order to inform the preparation of the Core Strategy.</p> <p>In relation to Policy CS.16, we find that the quantum of development proposed for Stratford upon Avon itself, approximately 2,590 homes, is insufficient as a contribution the Main Town in the District settlement hierarchy should make to meeting housing needs over the plan period. We have suggested that the town should accommodate at least a further 1,000 dwellings, which can be accommodated in a sustainable urban extension to the south east.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p>

B and M Glanfield	Framptons	No	No	No	<p>The Gallagher Homes Ltd v Solihull MBC (April 2014) High Court Judgment found that there needs to be a distinction between the full objectively assessed needs figure and the 'policy on', housing requirement figure fixed by the Local Plan. There is also a distinction between OAN and household projections.</p> <p>The Council's position as expressed in the evidence base prepared prior to submission and the submitted plan itself does not make a distinction in a clear way or provide evidence to justify the move between the OAN and the housing requirement. The submitted plan leaps straight to a 'housing requirement' i.e. a 'policy on' approach rather than the full objective assessment of need for housing, namely the 'policy off' approach.</p> <p>Additionally the Core Strategy fails to provide an adequate explanation of the extent to which it has complied with the duty to co-operate with neighbouring authorities, in particular in terms of the Birmingham and Coventry and Warwickshire Housing Market Areas. For example, SDC commissioned G L Hearn to produce a review of an earlier Strategic Housing Market Assessment in January 2013 which focuses exclusively on Stratford District and gives no consideration to the identification of a 'Strategic Housing Market Area' in terms of para.47 of the NPPF. It is apparent that Stratford District cannot be viewed in isolation. It is part of a wider area and it should be noted that earlier drafts of the Core Strategy were subject to objections from neighbouring local authorities within the same Strategic Housing Market Area SHMA as Stratford.</p> <p>It is clear therefore that taking into account the unmet housing needs of Birmingham and Coventry and Warwickshire within the district of Stratford will undoubtedly increase the need for further housing options to meet the District's need. The focused consultation target of 10,800 homes does not include the unmet housing needs of Birmingham and Coventry & Warwickshire. A minimum of 13,600 dwellings in the plan period would need to be provided within the District and provision for this should be made by the most sustainable and deliverable options.</p>	<p>The plan should be subject to an immediate modifications process. That would allow for a strategy to be formulated to meet the full objectively assessed need based on a minimum of 13,600 dwellings for the period 2011 -2031 to adequately address the issue of the Birmingham and Coventry & Warwickshire SHMA. This will require, among other things, that proper consideration is given to accommodating development in a sustainable way.</p> <p>Increase the number of homes identified for the Local Service Villages, in particular the category 2 Local Service Villages.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of Section 1.3 Cross Boundary Issues.</p>
Jim Darling	Cerdea Planning	No	No	No	<p>The CWSHMA sets out that the assessed need for Stratford District is 11,400 homes (570pa) over the period 2011 – 2031. The Council are proposing to deliver only 10,800. The ERM Report considered the objectively assessed housing need lay between 10,500 and 10,800. The Council's own SMHA Update (Jan 2013) indicated a housing requirement of 14,500 new dwellings up to 2028, notably more dwellings sooner than the CWSHMA required and significantly higher than the ERM study. A further piece of evidence, the Housing Provisions Options Study 2012 Update (Jan 2013) concluded that the OAN fell between 12,000 and 13,000 for the period up to 2028.</p> <p>This wide range of conclusions indicates the difficulty in reaching an OAN. It nonetheless shows that in only one study was the OAN found to be at the low level the Council propose. A sceptic could say that the Council have undertaken several SHMAs to reach a requirement that is more politically palatable. Certainly by electing to propose the lowest housing requirement, the policy requirement to meet in FULL their objectively assessed housing need does not appear to have been met. On that basis, the plan is unsound.</p> <p>Notwithstanding the view that the housing requirement does not reflect the Council's FULL objectively assessed housing need, the manner in which the consultation report was presented did not enable respondents to separate Stoneythorpe with a site called 'North of Southam'. The positive aspects of Stoneythorpe were therefore watered down and nullified by the less desirable proposals North of Southam. If respondents preferred Stoneythorpe but considered the site North of Southam inappropriate, they would be driven to rank the site lower than they might if they two were separate, distorting the conclusions of this consultation. There was no good reason why Stoneythorpe should not be accompanied by a different option, such as the further disposal or alone as a freestanding highly sustainable new settlement.</p>	<p>Stoneythorpe, due to its size of c.800 dwellings, is ideally placed to make up the shortfall in the Council's housing requirement in one location. It is recognised that in sustainability terms, further increasing housing in the District's villages may be problematic. The provision of a new settlement, compact and committed to delivering a range of renewable technologies and other new technologies in communication, design and community welfare and living offers the opportunity to assist the Council now without adversely impacting on historic Stratford or the other settlements across the District. At the very least the site should be allocated within the plan as a 'safeguarded site' such that should a review take place and housing need be identified, the site can swiftly come forward to address that need.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>

Jack McKelvie	Richard Cobb	Not Specified	Not Specified	No	<p>Not convinced that the objective assessment of housing needs has been carried out in a robust manner. Furthermore, it does not properly take into account the wider needs of the region, in particular Birmingham's. Nor is there sufficient flexibility in the proposals to allow for additional housing to meet growth in local need should that be required in the longer term.</p> <p>On the basis of the latest assessment of housing supply (March 2014) Stratford have less than the required 5 year housing land supply and the housing growth provision underestimates the local need over the plan period. There is insufficient headroom in the calculations in the event of some sites not coming forward particularly as windfalls.</p> <p>Generally support the overall spatial strategy based on a wider dispersal of housing development across the District. It is evident that, if handled with care, the provision of small scale housing development in a range of the relatively more substantial villages in the area could help to promote more balanced communities, respond to identified local needs for low cost market and affordable housing and help to sustain the services they support.</p>	Allocate the site for future development	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See overall response in respect of 5 Year Housing land Supply (5YHLS) below.</p>
Peter and Helen Pires	North Rae Sanders	Yes	Yes	No	<p>New settlement at Gaydon/Lighthorne Heath should be deleted - it is not the most suitable option for meeting land supply needs.</p>	<p>Existing strategy should be maintained and enhanced with greater levels of development applied to the hierarchy, with an expanded focus on settlements of a sustainable size including Southam. On this basis Land off Daventry Road to the Southeast of Southam should be allocated for 200-315 units.</p>	<p>As things stand there is no reason to assume that Proposal GLH will not deliver 2,500 dwellings during the plan period. More detailed analysis is being undertaken to underpin the Masterplan SPD for the site. This will address issues of scale, timing and deliverability. The Draft SPD is due to be reported to The Cabinet in October.</p> <p>See separate comments in respect of Proposal GLH.</p>
Wellesbourne Matters	SLR Consulting	Yes	Yes	No	<p>Greater clarity required in respect of Large Rural Brownfield Sites (LRBS). Whilst a cross reference to CS.15 is included, it does not refer to the sites listed in AS.11. The implication is that any LRBS could be brought forward rather than those specifically identified within the scope of AS.11. The four sites in AS.11 appear to be listed as example sites but in order to provide greater certainty and make the policy more effective, CS.16 should make specific reference to the four sites.</p>	<p>Amend CS.16 A to read "Large Rural brownfield Sites (as identified and assessed in accordance with Policy AS.11): approximately 500 homes at the specific sites identified in Policy AS.11."</p>	<p>Noted. Amendment suggested (see below).</p>

Hallam Land Management	Marrons Planning	Not Specified	Not Specified	No	<p>The level of housing is 600 below OAN in the SHMA. Notwithstanding this, a more up-to-date analysis of key socio-economic data and housing market data suggests the minimum housing target for the period 2011 – 2031 should be 16,000 net new dwellings.</p> <p>We find the assertion that if provision were set at a level above 10,800, it would lead to a further unbalancing of the population by attracting in migrants who would be either of retirement age or intending to commute to jobs outside the District, difficult to understand:</p> <ul style="list-style-type: none"> - Proposals for the substantial growth in employment at Gaydon/Lighthorne Heath will offer the opportunity to reduce present levels of out-commuting from the District and will need to be supported by new housing of a scale that reflects the economic ambitions behind that proposal; - The distinction between 10,800 dwellings and 11,400 dwellings is, at the strategic level, no more than a level of flexibility that should be incorporated in the scale of housing provision so that the plan might respond to any future changes in the housing or employment markets; - There is no clear explanation as to why the additional 600 dwellings recommended in the SHMA would result in the imbalances referred to and there is no quantification of adverse impacts (in numerical terms) might be on the housing market and local economy. <p>Our research, the 'Coventry Sub-Regional Housing Study' (June 2014), concluded that the full OAN across the sub-region, based on the 2012 SNPP, a continuation of long term migration trends and the job creation forecasts as set out in the Coventry and Warwickshire LEP SEP suggest that the minimum housing target for Stratford on Avon should be 16,000 over the plan period.</p> <p>The essential difference between the Sub-Regional Housing Study and the SHMA arise from the use in the study of the 2012 Sub National Population projections and more recent Experian job-growth forecasts better able to reflect the growth in the UK economy. The study also notes that that insofar as Stratford on Avon is concerned, the provision of 16,000 dwellings makes no allowance for any potential unmet need from Birmingham, to be accommodated within the District over the plan period. This could amount to between 110 and 387 dwellings per annum or an additional 2,200 up to 7,740 new homes. The provision of 16,000 dwellings is therefore a recommended minimum target.</p>	<p>CS16 should be modified to read as follows in the first paragraph:</p> <p>Stratford on Avon District will meet its objectively assessed housing needs for the period 2011 to 2031. Provision will be made for at least 16,000 additional homes, distributed as follows based on the settlement hierarchy set out in Policy CS15. Hallam Land Management make no comment, at this stage, on necessary adjustments to the distribution of homes across the District and as set out in the policy. However, it is noted that the greater share of new homes (excluding the provision of 2,500 at Lighthorne Heath) is at Stratford-upon-Avon, the main rural centres and in the Local Service Villages. It would anticipate that much of the additional 5,200 new homes would be distributed across these settlements. It would also anticipate the necessary identification of further strategic allocations in part B of the policy.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>
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Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	<p>Taken together, the two housing needs studies prepared by Barton Willmore covering the Coventry and Birmingham housing market areas, respectively, suggest a minimum target of 18,200 (910pa) for Stratford-on-Avon District.</p> <p>This figure should be treated as an absolute minimum as of course at this stage, it is not known what proportion of its needs Coventry can meet within its own administrative boundaries and therefore what proportion may need to be accommodated within Stratford District. Even utilising the unsustainable lower housing figure, and assuming also inclusion of the unsustainable GLH proposal, within the distribution of development, the Council propose to 'deliver' 1,390 dwellings through windfall sites including an extraordinary 810 dwellings on windfalls sites in the Main Rural Centres. Leaving such a significant proportion of the housing element to chance can in no way be said to be 'planning positively' and cannot be a sound approach as the Council cannot guarantee that such numbers will be delivered.</p> <p>The Council's justification for this is that some sites will come through whilst the Core Strategy is under preparation. However the reason that sites are coming forward in advance of the Core Strategy is due, in the main, to the fact that the Council cannot demonstrate a five year supply of housing land due in no small part to a historic failure to meet housing targets post 2008. Therefore these 'early' applications are in fact dealing with historic unmet need and should not be off-set against future housing need. Regardless, the Council appear to be operating under a misconception that housing targets are a maximum rather than operating a 'positive planning' framework as required by the NPPF. Windfall development is unsecured to a far greater degree than proposed and identified sites and delivery from such a risk-laden source of land should be seen as a bonus and not form such a fundamental component of future supply.</p> <p>Given the Council have a current housing land supply shortfall; they are, in our opinion, a '20% authority' having failed to deliver sufficient housing in a number of consecutive years; and are an authority which is notoriously resistant to development as evidenced by past poor delivery and high success of residential applications on appeal; every effort should be made to ensure certainty in supply. These 1,390 dwellings should therefore be allocated to specific sites and given the focus appears to be on the Main Rural Centres, we suggest these should be allocated to these 8 settlements accordingly, looking also at those towns / villages which have not benefitted from or contributed to significant development in the previous plan period.</p>	<p>Increase the housing target to a minimum of 18,200.</p> <p>Delete windfall allowance for the Main Rural Centres and allocate additional homes to these 8 locations.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See overall response in respect of the housing trajectory below.</p>
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Miller Homes	RPS Group	Not Specified	Not Specified	Not Specified	<p>Within the MRCs there are no proposals for new housing allocations. The 2,830 dwellings comprise existing planning consents only, plus windfalls. In this context there is no plan for the MRCs, just merely reference to the delivery of existing planning consents and windfalls and there will be no new homes provided in the MRCs post 2021, other than potential windfalls. This will not meet the needs of the population which arises throughout the plan period. The Strategy being proposed in fact is not a Focused Dispersal Strategy but is a strategy of restraint post 2021 in the rural areas, only building out what is currently permitted in 2012 and then directing all new development to a new settlement.</p> <p>It is proposed that the LSVs will accommodate more development than the MRCs in the last ten years of the Plan. While the LSVs are a key component of the rural fabric of the District, they are not best placed to focus more development, in advance of the MRCs. The MRCs are identified as such for a reason in that they provide a source of services and facilities for the wider rural area, and as such should be the focus of new development in the rural areas. This approach therefore contradicts the identified settlement hierarchy for future planning housing and service provision.</p> <p>Bidford-on-Avon is identified as a Main Rural Centre and yet it is identified for no additional growth beyond the current consented 222 dwellings, all of which will be delivered within the first ten years of the Plan period. Bidford-on-Avon is capable of accommodating a sustainable development for 200 dwellings at land at Waterloo Road and it is unclear why the Council has not allocated it as it was identified in the SHLAA.</p>	<p>The Strategy has not identified an objectively assessed need for new homes and is therefore deficient in meeting its requirements under the NPPF. The outcome of this is that the authority will need to plan for a higher level of housing than is currently accommodated in the plan.</p> <p>This additional development should be distributed in accordance with the settlement hierarchy of the Plan, where the Main Rural Centres can play a positive role in accommodating new development throughout the plan period, particularly post 2021.</p> <p>Irrespective of the level of need being provided for, the allocation of new homes to a new settlement in advance of the need to provide new homes at the source of need, such as the Main Rural Centres runs contrary to the Councils principle of accommodating need where it arises. The Main Rural Centres distribution requirement should therefore be increased.</p> <p>The Main Rural Centre of Bidford-on-Avon is capable of providing 200 additional dwellings at the suitable site, Land at Waterloo Road. The Main Rural Centres requirement should be increased by 200 dwellings and an allocation made in the Bidford-on-Avon Area Strategy.</p>	<p>Over the whole plan period, it is proposed that the MRCs will deliver approximately 26% of all development compared to approximately 18% in the LSVs. Moreover, the MRCs will deliver a greater proportion in the early phases of the plan. This approach rightly reflects their status as sustainable locations for development. There is no requirement for a flat rate of development throughout the plan period.</p> <p>Post 2021, 340 dwellings are expected to be delivered in the MRCs. Whilst 100 will come from small windfalls, the remainder would be delivered as allocations through the Site Allocations Plan, as explained in paragraph 5.2.8.</p> <p>See overall response below in respect of Housing Trajectory.</p>
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CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	No	No	<p>The housing requirement does not meet the full, objectively assessed needs for market and affordable housing. Consequently, the Core Strategy does not identify sufficient key sites to meet the necessary housing strategy over the plan period. The Policy only seeks to meet the objectively assessed housing needs of Stratford on Avon District.</p> <p>Whilst in general the Joint SHMA adopts an appropriate framework and methodology for considering objectively assessed housing needs, it is not without shortcomings. The SHMA indicates this is based upon a Coventry-focused housing market area which suggests the SHMA does not look explicitly at what a Stratford-on-Avon centred housing market geography may look like. By their very nature housing market geographies are not definitive and will rarely match administrative boundaries, however, a relatively good picture of a Local Planning Authority's housing market area interactions can be built up. It is not clear within the evidence what Stratford-on-Avon's HMA is and therefore, what area has been used as the basis for: considering housing needs; undertaking co-operation with other authorities; and flowing from this planning for an appropriate housing requirement.</p> <p>The migration figures used have been artificially reduced, without sufficient rationale and evidence for the scale of reduction assumed and despite ONS evidence suggesting a lesser or no reduction is more reasonable. The 'mid-point' headship rates utilised are the only ones presented within the Joint SHMA that are realistic and justified by the evidence. They are not however set out as the 'baseline' in the SHMA (which adopts the suppressed headship rates as the 'baseline'), despite being the only realistic baseline view of household formation. This is not considered robust.</p> <p>The Joint SHMA clearly includes analysis of other factors such as 'market signals', past under-supply, affordable housing needs and supporting economic growth. However, the way these factors have been applied to inform a conclusion on full objectively assessed housing needs is less clear. It appears that such factors have been used as rationale for an uplift on PROJ1a. While an uplift (or upwards adjustment) is considered necessary, what 'baseline' it should be applied to and its scale needs a more explicit consideration.</p> <p>The Updated ERM Review concludes that an appropriate level of provision is 525-540 dwellings per annum based upon the PROJ1a 'midpoint' headship rate scenario in the SHMA, but with a lower end to reflect the lower migration figures put forward in the Updated Review. The Updated Review rejects that any upwards adjustment from this is necessary to meet objectively assessed needs taking account of economic factors, market signals or affordable housing needs, indicating that any figure above 540 dwellings per annum would be in excess of needs. This conclusion seems incongruous with the NPPF and NPPG which seeks to increase supply and particularly make upwards adjustment to supply over demographic led needs where market signals indicate. We would stress that this is a supply side response to those demand-led signals, and upwards adjustment is considered necessary to meet full objectively assessed housing needs.</p>	<p>The housing requirement should be increased to a minimum of 13,000 dwellings in order to meet objectively assessed housing needs in Stratford-on-Avon and contribute towards meeting needs across the housing market area. This figure must also consider including an element of unmet needs from Birmingham, but this evidence is yet to be completed.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>
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Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	No	<p>The Council have set out a housing requirement of 10,800 dwellings over the period 2011-2031 (540 dwellings per annum (dpa)). We are aware of Housing Needs studies produced by Barton Willmore covering the Coventry and Birmingham HMAs; when read together these suggest a minimum target of 910dpa for Stratford-on- Avon. Subsequently, to progress the Plan in a sound and robust manner we would suggest that Stratford-on-Avon District Council plan for a minimum of 910dpa (18,200 dwellings over the period 2011- 2031).</p> <p>The increase to this dwelling target will assist the Council in complying with the NPPF and PPG by enabling:</p> <ul style="list-style-type: none"> - Demographic need to be met; - Forecasted economic growth to be accommodated; - Sufficient affordable housing to be supplied; and - A significant contribution made towards addressing the adverse market signals. <p>In following the hierarchical approach as set out in Policy CS.15, we would anticipate that a substantial amount of this growth would be re-directed to Southam in its role as a Main Rural Centre and would promote the role that the land west of Southam could have in sustainably meeting this need.</p>	<p>Increase housing requirement</p> <p>Allocate more development to the MRCs including Southam</p> <p>Identify land to west of Southam as an allocation.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>
Sharba Homes	Barton Willmore llp	Yes	No	No	<p>No evidence which demonstrates satisfactorily that GLH will deliverable during the plan period given the significant infrastructure works required to be carried out early in the development. We also dispute the view advanced that it is very unlikely that existing settlements could accommodate the full and objectively assessed need for housing in the District over the Plan Period without damaging their role, character and distinctiveness and that GLH would be the most appropriate choice to meet these needs. We assume that this is view is arrived at, in part, using the GLH promoters own assessments of the surrounding villages published previously. However as highlighted during the last round of consultation, the promoters, for example, ruled out Kineton as a settlement capable of accommodating growth despite no evidence to support this and in the knowledge that the Council were granting planning permission for 90 dwellings in the village. It is therefore plainly evident that the evidence base produced by the promoters of GLH is self serving and in no way objective. The Council themselves have produced little evidence to support their assertions. There has been a failure to properly consider and robustly test alternatives to the strategy proposed, in particular sufficient and robust consideration has not been given to the alternative options for accommodating the 2,500 dwellings, currently proposed to be allocated to GLH.</p>	<p>SDC must meet its OAN.</p>	<p>As things stand there is no reason to assume that Proposal GLH will not deliver 2,500 dwellings during the plan period. More detailed analysis is being undertaken to underpin the Masterplan SPD for the site. This will address issues of scale, timing and deliverability. The Draft SPD is due to be reported to The Cabinet in October.</p> <p>See separate comments in respect of Proposal GLH. *See separate comments in respect of Appendix 2 LSV Methodology.</p>

CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	No	Not Specified	<p>CS.16 is not compliant with the duty to cooperate because it does not meet unmet needs from the Housing Market Area (both Birmingham and Coventry). As there is currently no evidence produced regarding unmet needs from Birmingham as the evidence is not at that advanced stage, how can Stratford on Avon know categorically that they do not need to help the city in meeting its unmet needs?</p> <p>It is clear that Birmingham does not have the capacity to meet its housing needs (unmet housing needs of between 1,520 to 3,415 per annum). This is underpinned by the Greater Birmingham & Solihull LEP Strategy for Growth.</p> <p>The Housing Market Area (HMA) for Birmingham is derived from the study undertaken by the Centre for Urban and Regional Development Studies at Newcastle University in constructing consistent geography housing market areas for England. It includes Stratford-on-Avon. In defining the proportion of Birmingham's unmet need that these local authorities should be taking, consideration has been given functional linkages between places where people live and work. These commuting and migration linkages have been quantified to establish the different degree of relationship that local authorities have with Birmingham. The average percentage represents the baseline degree of housing market linkage an area has with Birmingham, and therefore is representative of its 'starting share' of Birmingham's unmet needs which will need to be met in the Birmingham HMA. In addition the migration and commuting apportionment exercise, analysis of housing market signals for the local authorities have been undertaken to ascertain the strength of their housing markets as places where people want to live, and which would be attractive to developers. Stratford-on-Avon should proportionately be taking 2.8% of Birmingham's unmet housing needs. This would be an addition to Stratford-on-Avon's own objectively assessed housing needs.</p> <p>Many of authorities are substantially covered by Green Belt and in this context SDC will need to establish, under the duty-to cooperate, a common position. The implication is that additional unmet needs are likely to arise in surrounding local authorities, including SDC, which is largely beyond the Green Belt and has numerous areas suitable for accommodating growth (this position is not dissimilar to that of Aylesbury Vale).</p> <p>Furthermore, practically, the primary role of developments such as Gaydon/Lighthorne Heath in Stratford will be to meet the unmet housing needs of Birmingham rather than those of Stratford as a result of its location both to the North of the District and on the M40.</p>	Non-compliance with Duty to Co-operate	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of: - Section 1.3 Cross Boundary Issues - CS.15 Distribution of Development</p>
CPRE Warwickshire Branch		Not Specified	Not Specified	No	<p>The Core Strategy is based on the population and household forecasts in the Joint SHMA (2013) requiring 10,800 homes over the period 2011-2031. Data used in the SHMA is unsound.</p> <p>Population and household forecasts have been replaced by the ONS mid-2012 based population projections 2012 to 2037 (May 14) and project a population increase of 10,929 over the period, instead of the figure of 15,500. The ONS mid-2012 based projections are the valid and up-to-date basis for determining the Objectively Assessed Housing Need.</p> <p>Household size forecast used by the SHMA is also incorrect, assumes a continuing reduction in household size. The fall in household size as previously predicted has not occurred to 2011. The SHMA uses a figure of 6745 houses required for a population increase of 10,929; applying the 2011 Census figure of 2.18 persons per household, the housing requirement is 4793.</p> <p>The use of 'village categorisation' as a basis for locating significant numbers of new houses in villages is unjustified and would gravely damage many attractive villages in the District.</p>	<p>The figure of 10,800 should be replaced with provision for around 5,000 dwellings in Stratford District between 2011 and 2031.</p> <p>The housing provision set out in the CS (Policy CS16, page 87) should be replaced by the following: - Stratford-upon-Avon 2100 dwellings - Alcester 350 dwellings - N of Southam 165 dwellings - Windfalls outside SuA 660 dwellings - Other locations throughout District 1750 dwellings</p> <p>The Categorisation of villages should be removed or if retained the second section of CS16(B), which covers the proposed allocation of 1,950 houses to Local Service Villages, should be deleted.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>

Coventry & Warwickshire LEP (Planning Group)		Not Specified	Not Specified	No	<p>The CWLEP recognises that the Core Strategy makes strong connection between the need for employment growth and housing growth. The level of new housing growth proposed in CS16 is within the (midpoint) range of housing proposed in the SHMA endorsed by the C&W Joint Committee.</p> <p>However, a significant change from the last SDC Core Strategy consultation is the inclusion of the JLR site at Gaydon/Lighthorne Heath for up to 100ha of development. Despite this allocation there has been no adjustment on overall housing numbers as a consequence of its inclusion. It is acknowledged that there is little certainty about timescales, however this does not negate the need to consider the impact of this level of economic growth on the need for further housing within the district.</p>	<p>It is suggested that SDC should set out within the submission document how the implications of economic development on overall housing need will be further considered, by ensuring housing provision is meeting the requirements of economic development projections, including the economic growth aspirations as contained in the C&W SEP.</p>	<p>See separate comments in respect of Section 1.3 Cross Boundary Issues.</p>
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Bloor Homes (Western) Ltd	Yes	Yes	No	<p>We support the housing allocations at Allimore Lane (ALC1/2) and Banbury Road (SOU1). The Allimore Lane sites were granted planning permission on the 5th March 2014 and thus form commitments. We support the identification of Bidford-on-Avon as a main rural centre although note that the Core Strategy does not allocate any additional development which plainly ignores the fact that housing need and demand will continue to arise at Bidford-on-Avon during the whole of the plan period. The clearly is not an appropriate strategy for a town designated as main rural centre and as such suitable for housing development.</p> <p>In the context of representations concerning the overall level of housing and housing supply, additional housing allocations should be provided at Bidford-on-Avon and this should therefore be a matter that the Site Allocations DPD addresses in due course. This necessitates an amendment to the Bidford-on-Avon Area Strategy, Policy CS.16 as to the amount of housing to be accommodated at Bidford-on-Avon and Figure 1.</p> <p>We support the identification of Studley as a main rural centre. However, only a small amount of new housing is to be provided at Studley over the plan period. Again, there is no housing planned at Studley after 2021 despite its status as a main town. Maintaining this approach for more than 15 years is excessively restrictive as there exist opportunities for a modest scale of new development to be accommodated sensitively. This should therefore be a matter that the Site Allocations DPD addresses in due course and the Core Strategy should allow such provision. The Core Strategy must allow scope for the Green Belt to be reviewed. Areas of land around Studley exist that can be developed without harm to the critical role of the Green Belt in this location.</p> <p>In any event, given the accepted position in paragraph 5.2.8 and Figure 1 that there is still an amount of housing that remains to be distributed across the Main Rural Centres through the Site Allocation Documents (810 new homes according to Figure 1), then the expression of the housing requirement for this category in Policy CS.16 should be expressed as a minimum rather than approximately.</p> <p>We support the status of Long Itchington as Category 1, Fenny Compton, Napton-on-the-Hill and Salford Priors as Category 2, and Newbold-on-Stour as Category 3.</p> <p>We note the scale of growth that the consultation document intends is accommodated at these settlements in Policy CS.16. Critically, the scale of housing is referred to as an approximate range. This is important to allow for flexibility at the Site Allocations DPD stage to consider the development opportunities that exist in each of these settlements. Genuine development opportunities should not be stifled or restricted due to an overly prescriptive range being allocated to a settlement in the Core Strategy. Clearly to achieve the requirement of 1,950 in Policy CS.16 the levels of development will be towards the higher end of each category.</p> <p>We object to the reclassification of Long Marston from Category 3 to Category 4. The main justification appears to be the re-assessment of the provision of public transport. Whilst there may be a reduction in the provision of bus services to Long Marston, due regard should be had to the surrounding context, in particular, the redevelopment of Long Marston Depot will inevitably provide an increase in the public transport provision to the existing settlement. Furthermore, the development proposes educational facilities which would also improve the assessment of village.</p>	<p>The expression of the housing requirement in Policy CS.16 should be expressed as a minimum rather than approximately.</p> <p>Taking into account the surrounding context, Long Marston should be a Category 3 LSV.</p>	<p>See separate comments in respect of: - CS.10 Green Belt - Appendix 2 LSV methodology</p> <p>See overall response below in respect of housing trajectory.</p>
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Bloor Homes (Western) Ltd		Yes	Yes	No	<p>We remain of the view that the housing requirement of 10,800 is not adequate for the plan period either in the context of objectively assessed need or low levels of housing immediately prior to the plan period. We are aware that similar representations have been submitted by the Home Builders Federation and others which, consistent with the evidence base, support a level of housing that is greater than 10,800 dwellings. Moreover, Barton Willmore have prepared a Study examining objectively assessed need having regard to the two housing market areas within which Stratford-on-Avon is located. This demonstrates that the housing requirement should in fact be a minimum of 16,000 new homes over the period 2011-2031.</p>	<p>CS.16 should be amended accordingly. It follows that this additional housing should be accommodated in a manner consistent with the distribution strategy set out in Policies CS.15 and CS.16.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>
Quintessential Inns	Barton Willmore	No	No	No	<p>The Coventry and Warwickshire SHMA identifies that there is a stronger demand for homes in the District than elsewhere in the SHMA study area and highlighted economic growth issues and significant affordability issues within the District. The SHMA stated that the upper housing targets outlined for SDC (i.e. 600 dwellings per annum) will better support stronger growth in the work place and will improve affordability in the District whereas the figure of 540 dwellings per annum only supports “modest” economic growth. It is noted that SDC do not agree with this approach due to the large elderly population within the District. They also state within the consultation document that “new jobs do not necessarily have to be filled by in-migrants”. However, there is no evidence presented to suggest that if the local economy was boosted, new jobs would not be filled by in-migrants. By not taking the necessary steps to plan to improve economic growth and housing affordability through increasing their housing target further, SDC are not planning positively for growth, as is required by the NPPF.</p> <p>CS.16 does not take account of SDC’s full objectively assessed housing need, as outlined in the CWSHMA. In addition, it proposes to identify land required for BCC’s and CCC’s unmet housing needs after the SDC Core Strategy is adopted, through an early review. An alternative strategy would be to defer the submission of the Core Strategy until such a time as the requirements of BCC and the Coventry Sub-Region are made clear.</p>	<p>Housing target in CS.16 to be increased in order to meet SADC’s full objectively assessed housing need. In addition, the submission of the Core Strategy should be deferred until Birmingham’s and Coventry’s housing requirements within SDC are confirmed. This will allow the Core Strategy to demonstrate that it has met and allocated the full objectively assessed housing need for the District, as well as that for Birmingham and Coventry under the Duty to Cooperate. In taking this approach, SDC would be able to demonstrate that their Plan is positively prepared, as it would fully meet its objectively assessed housing needs, as well as contributing towards those of its neighbours.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of Section 1.3 Cross Boundary Issues.</p>

Quintessential Inns	Barton Willmore	No	No	No	<p>Policy CS.16 outlines a requirement for 10,800 dwellings (540 dwellings per annum) during the period to 2031 and suggests that SADC will meet this objectively assessed need in full, however, it does not refer to the need to assist neighbouring authorities in the same Housing Market Area (HMA) in meeting their objectively assessed housing requirements.</p> <p>Paragraph 1.3.6 of the Core Strategy acknowledges that SDC falls within two housing market areas, with the east of the District being influenced by Coventry and Warwickshire and the west of the District being influenced by Birmingham. Paragraph 1.3.8 goes on to identify that emerging evidence suggests that BCC are unable to meet the City's housing requirement within its administrative area. It also contradicts itself by stating that Coventry and Warwickshire authorities intend to meet their own objectively assessed housing needs, but then stating that the extent to which Coventry will achieve this is unknown. Paragraph 1.3.8 then states that SDC will continue to liaise with its immediate and wider neighbours and bring forward a review of the Core Strategy should evidence suggest that further housing provision is justified in SDC.</p> <p>There is limited evidence to suggest that an adequate level of cooperation has taken place between SADC, BCC and Coventry City Council (CCC) to address their housing requirements. In addition, it has long been apparent that BCC are unable to meet the City's housing requirements within their administrative area. Even with the release of a large area of Birmingham's Green Belt, they will still require land for an additional 30,000 dwellings, as first detailed in the Birmingham Development Plan Options Consultation (October 2012).</p> <p>We are aware of Housing Needs studies produced by Barton Willmore covering the Coventry and Birmingham HMAs; when read together these suggest a minimum target of 910 dwellings per annum for SDC. This equates to a minimum housing target of 18,200 dwellings over the Plan Period. However, this takes no account of any unmet housing need arising from CCC that may need to be accommodated in SADC.</p> <p>A number of other LPAs have recently been found to be in breach of the Duty to Cooperate by an Inspector at Examination stage for undertaking a similar approach (e.g. Rushcliffe). Whilst Rushcliffe engaged with other Authorities during the preparation of their Plan, an adequate allowance was not made to assist in meeting the housing needs of Greater Nottingham. As such, the Inspector found that Rushcliffe had not complied with the requirements of the Duty to Cooperate. Rushcliffe are now undertaking additional work to try and address this before the Plan can progress to Examination.</p> <p>To be legally compliant, CS.16 must fully meet the requirements of the Duty to Cooperate, and have full regard to the NPPF and PPG in addressing strategic priorities through the Plan.</p> <p>To meet the requirements of the Duty to Cooperate, SDC need to afford sufficient consideration to helping BCC and the Coventry Sub-Region meet their housing requirements. This should be done through the preparation of the Plan, as opposed to at a later date.</p>	<p>The overall housing target should be a minimum of 18,200 dwellings (910 dwellings per annum) to take account of the need to increase SDC's housing target, as well as the minimum likely requirement to accommodate growth from BCC.</p> <p>However, it does not include provision to accommodate some of CCC's unmet housing need, which would be in addition to this.</p> <p>By deferring the submission of the Core Strategy, detailed consideration may be given to the proportion of BCC's and the Coventry Sub-Region's housing needs which will need to be absorbed by SDC. This will allow the identification of sites, such as the site at Captain's Hill, Alcester, to absorb the required level of Birmingham and Coventry's housing supply to be identified within the Plan.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of Section 1.3 Cross Boundary Issues.</p>
Taylor Wimpey UK Ltd	Barton Willmore	Not Specified	Not Specified	Not Specified	<p>We are aware of two housing needs studies undertaken by Barton Willmore for the Coventry and Birmingham housing market areas, respectively. These suggest a minimum requirement of 910pda for SDC.</p>	<p>Increase housing requirement to 18,200 to comply with NPPF and redirect a substantial amount of growth to Stratford-upon-Avon.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>

Mixed Farms Ltd	Savills - Reading	Yes	Yes	No	<p>The proposed overall housing target, even though it has been increased from 9,500 (475 units pa) to 10,800 (540 units pa) for the period to 2031, remains inadequate. It does not take account of the true objectively assessed need for housing in the District and accordingly the proposed submission core strategy is not consistent with the requirements of the National Planning Policy Framework (NPPF).</p> <p>The Coventry and Warwickshire SHMA was published in November 2013, and indicates an objectively assessed need of 570 dwellings per annum or 11,400 dwellings over the plan period. Therefore the housing requirement identified via Policy CS.16 of the proposed submission core strategy is at least 600 dwellings below the objectively assessed housing need identified by the SHMA.</p> <p>Where a planning authority wants to depart from meeting the full objectively assessed need it must provide justifiable reasons for doing so and also agree that it is acceptable to do so with the other authorities in the same Housing Market Area. In this instance Stratford upon Avon Council has done neither of these things.</p> <p>To properly objectively assess housing need consideration needs to be given to population and household projections, taking account of migration and demographic change (although demographic projections should be considered as minimums as they are backward rather than forward looking). In addition the National Planning Policy Guidance indicates that employment trends and market signals such as land prices, house prices, rents affordability, rates of development and overcrowding are also considerations that should be taken into account when objectively assessing housing need.</p> <p>Taking account of these various factors there is a case for increasing the housing target for the District to beyond the 11,400 units identified by the SHMA. Evidence suggests that the true level of objectively assessed housing need is likely to be in the region of 15,300 to 20,300 units. The remedy is for the Core Strategy to adopt a more realistic approach to the identification of an appropriate housing target, based on the true objectively assessed housing need. There is also a need to review how housing could be accommodated in the Borough in the most sustainable manner. The most sustainable way to deliver housing for the District in the plan period is via a Sustainable Urban extension to the east of Stratford upon Avon.</p> <p>The SEUE was the subject of focused consultation carried out by the District Council in March 2014, being identified as Option D. In Mixed Farms response to the consultation, it was demonstrated that the SEUE is the most sustainable option for addressing the Council's housing land requirement in the period to 2031.</p>	<p>Significantly increase the housing requirement to reflect OAN and identify SE of Stratford-upon-Avon as a SUE to meet these needs.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of: - CS.15 Distribution of Development - AS.1 Stratford-upon-Avon</p>
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Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	Yes	<p>Support Policy CS.16, in particular the identification of a new settlement at Gaydon/Lighthorne Heath (GLH) for approximately 3,000 homes of which 2,500 will be built within the plan period.</p> <p>Our client currently controls 243 ha of land and is working collaboratively with the only other significant landowner who controls 44 ha. We understand that landowner has made separate submissions confirming that the land will be available for development and confirming that collaborative working arrangements are in place to ensure the comprehensive masterplanning of the development. JLR is working closely with CEG / Bird Group and SDC during the preparation of the Masterplan SPD and they have confirmed that they welcome the cohesive approach to the overall development proposals for this major site allocation.</p> <p>The technical assessments do not show any constraints which would prevent the delivery of the 3,000 dwellings. Indeed, the constraints analysis work carried out to date shows that there is a net developable area of circa 80 hectares. Based upon a density range of between 35 – 40 dwellings per hectare net, the site has capacity of up to 3,200 dwellings.</p> <p>It is proposed to submit an outline application for the first phase of development, including a full EIA, in advance of the Examination in order to further demonstrate deliverability. This would be determined as soon as possible after the adoption of the Plan (assumed Spring / Summer 2015) thus allowing first completions in 2016 / 2017. A scoping request will be submitted to SDC in the next few weeks for the first phase of development. We anticipate that the first completions would be possible by mid- 2016 with delivery rates dramatically increasing through 2017 and 2018.</p> <p>The Housing Trajectory Table identifies that GLH will deliver 750 dwellings by 2021, 875 dwellings between 2021/22 and 2025/26, and a further 875 dwellings between 2026/27 and 2030/31. There are no land ownership issues that would prevent the delivery of the proposed allocation in accordance with this housing trajectory.</p> <p>Detailed masterplanning will examine logical development phasing, housing typology and tenure which will be set out in the Masterplan SPD. This mixture will provide a variety of market products thus allowing the potential for maximum delivery rates to match market demand. Within the context of the current housing market, and in particular the forecast acceleration in housing delivery based upon central government economic and policy objectives, our client considers that the above trajectory is robust but cautious. Whilst the trajectory demonstrates that 2,750 dwellings could be delivered by 2031 (250 more than the allocation requires) including 750 dwellings by 2021, but these figures could in fact be higher should market conditions prevail, particularly in the first five years. For comparison, the build out rates of other sites allocated in Local Plans for some 2,000 dwellings (average 844) in the first 5 years are as follows:</p> <ul style="list-style-type: none"> - Land at Warfield (Bracknell Forest): 50, 150, 200, 200, 200 = 800 - Land at north Colchester (Colchester): 100, 150, 200, 200, 200 = 850 - Barton Farm (Winchester): 50, 100, 200, 200, 250 = 800 - South Wokingham Strategic Development Location (Wokingham): 100, 200, 200, 200, 225 = 925 <p>These figures were deemed appropriate by an Inspector at Local Plan Examinations. It is therefore clear that the housing trajectory put forward for GLH of 750 dwellings in the first five years is robust and the long term average of 200 dwelling per annum is conservative, particularly when viewed in the context the buoyant housing market conditions we are currently experiencing. It is therefore considered that Council's housing trajectory is robust with regards to GLH but that the yield from the site could exceed the Council's housing trajectory. CS.16 is therefore considered to be sound in this regard.</p>	None specified.	n/a
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St Modwen Developments Ltd	Barton Willmore llp	Yes	No	No	<p>In respect of Duty to Co-operate:</p> <p>Mindful however that the CWSHMA figures do not include any allowances for contributing to shortfalls in housing supply outside the HMA which is relevant to SDC as different parts of the District fall within different HMAs. Nine out of eleven of the District's neighbouring authorities do not form part of the Coventry and Warwickshire HMA and, at this stage, SDC has provided no evidence of joint working with these authorities or the consequences of any under supply in these areas. Shortfall of 32,900 dwellings from Birmingham will need to be met elsewhere in the HMA.</p> <p>Recent research undertaken by the Centre for Urban and Regional Development Studies (CURDS) at Newcastle University shows that the Birmingham HMA is made up of a 'best-fit' of 14 local authority areas, including SDC, of which a larger proportion, including the town centre and the majority of the main rural centres, sit within the Birmingham HMA.</p> <p>Whilst recognising that the evidence base is not currently complete, it is already clear that BCC cannot meet its own objectively assessed needs and will be looking to other surrounding authorities to accommodate housing.</p> <p>In respect of soundness:</p> <p>Do not consider the inclusion of the new settlement GLH to be justified or effective. It could take up to 8 years to see dwellings on the GLH site and on this basis it is unlikely the site will deliver 2,500 dwellings by 2031, creating a significant hole in the Council's Trajectory and the maintenance of a five year deliverable supply of housing land. CS.16 does not afford appropriate weight to the adverse impacts which are outlined in the SA/SEA.</p> <p>In terms of the overall housing requirement, LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. The Coventry Sub-Regional Housing Study (June 2014), prepared by Barton Willmore, is considered to provide the most up to date Objectively Assessed Housing Need for housing development within the Coventry Sub-Region. According to research sponsored by DCLG, Coventry, Warwick, Nuneaton and Bedworth, and Rugby form the 'Coventry Housing Market Area'. Stratford-on-Avon and North Warwickshire are both considered to be part of the 'Birmingham HMA', but have significant areas within and ties within the Coventry HMA.</p> <p>Through analysis of market signals, the study indicates that a significant boost in housing supply will be needed to improve affordability and bring house buying back in reach of the majority recommending a requirement of 5,100 dwellings pa across the Coventry and Warwickshire HMA between 2011 and 2031, with SDC delivering a minimum of 800 dwellings pa (16,000), not including any additional housing to accommodate Birmingham's needs. This would enable housing to match local job growth. Dependent on the extent to which Coventry's housing supply is constrained any further unmet need will need to be met within the other authorities of the HMA, e.g. SDC. Birmingham will also need to look to its own HMA to accommodate its unmet need, which includes Stratford-on-Avon. The Birmingham Sub-Regional Housing Study – Part 2 (February 2014), prepared by Barton Willmore, indicated that SDC could be required to accommodate between 110 and 387 dwellings pa in order to meet Birmingham's housing needs.</p> <p>On the basis of both the Coventry and Birmingham Sub-Regional Housing Studies, it is our view that SDCs housing requirement should be increased to 18,200 dwellings (910 dwellings pa) as a minimum.</p>	<p>It is recommended that the Council's housing requirement is increased to 18,200 dwellings (910 dwellings per annum) as a minimum in order to meet Stratford-on-Avon District's housing needs, reflecting the findings of the Coventry and Birmingham Sub-Regional Housing Studies, ensuring the Core Strategy is based on the District's objectively assessed housing needs and in turn positively prepared and justified and the Duty-to-Cooperate is fully complied with. In order to meet this additional housing, it is our view that Meon Vale (formerly known as the former Engineer Resources Depot, Long Marston) should be included as a site where housing should be directed to. It is our view that the new settlement at GLH should be withdrawn and instead the 2,500 dwellings should be dispersed within the spatial hierarchy, including existing sites such as Meon Vale (formerly known as the former Engineer Resources Depot, Long Marston). If however, the Inspector considers, despite our views, that there is evidence to support GLH, then we would draw further attention to our points in respect of the ambitious delivery rates, which we also consider are without evidence, and are covered within our 'Delivering Large Scale Housing Developments' Report.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of Section 1.3 Cross Boundary Issues.</p>
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University of Warwick	Turley Associates	Yes	Yes	Yes	<p>As a Main Rural Centre, Wellesbourne is anticipated to accommodate around 385 dwellings out of a total allocation of 2,830 for this category of settlement, from a district wide requirement of 10,800. There are no strategic allocations in Wellesbourne as planning permissions already exist to meet the plan period requirement. The University is concerned that, should the plan's housing requirement or its distribution to the settlement hierarchy be found unsound on the basis of the objections of others, consideration should be given to land to the west of Wellesbourne previously promoted by the University as surplus to its requirements which would provide an option for a strategic allocation to meet the district's housing needs.</p>	None specified.	<p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>See overall response below in respect of the Main Rural Centres.</p>
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Consortium of Developers	Barton Willmore	No	No	No	<p>Concerns about the SHMA's projection scenarios are raised:</p> <ul style="list-style-type: none"> - Headship Rates: other than for one scenario (PROJ 1 (SNPP)), sensitivity scenarios based on alternative headship rates are not presented in the SHMA. It is considered that these should be provided for all scenarios to provide the potential range of growth across the range of scenarios tested. - Migration Assumptions: more up to date migration assumptions from January 2014 show significantly higher trends, which have the potential to show significantly higher growth in households. - Economic Growth: the SHMA uses January 2013 Experian forecast data, which have been superseded by five subsequent quarterly job growth forecasts, all of which have been published since the UK economy has improved significantly. Using more up to date forecasts has the potential to show higher economic led household growth. - Market Signals: whilst the SHMA provides a significant level of detail in respect of market signals, it appears that no uplift has been made to respond to worsening trends as advised by national guidance, with the SHMA's conclusion recommending overall housing need of 3,750 dwellings (PROJ 1A – Midpoint Headship scenario). - Affordable Housing Need: the SHMA identifies a requirement of 1,356 dwellings per annum, which could not be delivered from the 3,750 overall dwelling per annum recommendation at current affordable housing quotas. A small upward adjustment of circa 10% would accommodate assessed need at current affordable housing quotas as stipulated in local planning policy. <p>The SHMA was prepared before the publication of the LEP SEP. It is unclear whether the SHMA takes the SEP into account. It is noted that the methodology employed in the joint SHMA is in keeping with the NPPF and PPG.</p> <p>Based on our analysis using Cambridge Econometrics/CWLEP employment forecasts, 5,100 dwellings pa should be planned for across the HMA. By adopting a lower housing figure than recommended, local authorities run the risk of exacerbating market dysfunction in relation to market signals and affordable housing delivery, as well as stymieing the ambitious plans of the CWLEP for economic growth and job creation which is reliant on sufficient new housing delivery if its ambitions are to come to fruition. In respect of Stratford District, this would translate to a recommended minimum housing target of 800 dwellings per annum or 16,000 dwellings over the period 2011-31.</p> <p>The figure of 800 dwellings per annum only reflects the District's OAN and does not take of any unmet needs arising elsewhere within the Coventry and Warwickshire HMA, nor the Birmingham HMA. Based on the extent to which Coventry's housing supply is constrained, any further unmet need would be required to be met within the other authorities in the HMA under the duty to cooperate. The Birmingham Sub-Regional Study, indicated that SDC could be required to accommodate between 110 and 398 dwellings to meet Birmingham's unmet need, resulting in a minimum 910 dwellings per annum.</p> <p>SDC intention to review the Core Strategy if and when it becomes apparent that they will be required to meet some of Coventry and Birmingham's needs constitutes a 'concrete action or outcome'. SDC are effectively deferring the identification of suitable sites to meet the needs of an adjoining authority, if evidence of this arrives, until some future and unknown date in the future, stating that when this occurs they will then review the Core Strategy to address this issue then.</p>	<p>In order to address our concerns and make the Plan sound, we consider it is necessary to reassess the objectively assessed level of housing need in light of the findings of the Coventry Sub-Regional and Birmingham Sub-Regional Study submitted by the Consortium, which when read together indicate that the Council should be planning for a minimum of 910 dpa / 18,200 dwellings over the period 2011 to 2031. In planning for this level of housing it would take account the OAN for the District and also the level of unmet need that has been identified for Birmingham (in the Birmingham Sub-Regional Study) that would need to be accommodated within Stratford. What this minimum figure does not take account of is any unmet need arising from the acknowledged likelihood that Coventry City will not be able to accommodate all of its own needs within its own administrative area. The consequence of this is that the housing requirement for Stratford is therefore actually going to be higher than the 910 dwelling per annum figure that is currently proposed.</p>	<p>*See overall response in respect of identifying Objectively Assessed Need (OAN) below. *See separate comments in respect of Section 1.3 Cross Boundary Issues.</p>
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Grevayne Properties Ltd	Cerde Planning	Not Specified	Not Specified	No	<p>The CWSHMA sets out that the assessed need for Stratford District is 11,400 homes (570pa) over the period 2011 – 2031. The ERM Report considered the objectively assessed housing need lay between 10,500 and 10,800. The Council's own SMHA Update (Jan 2013) indicated a housing requirement of 14,500 new dwellings up to 2028, notably more dwellings sooner than the CWSHMA required and significantly higher than the ERM study. A further piece of evidence, the Housing Provisions Options Study 2012 Update (Jan 2013) concluded that the OAN fell between 12,000 and 13,000 for the period up to 2028.</p> <p>This wide range of conclusions indicates the difficulty in reaching an OAN. It nonetheless shows that in only one study was the OAN found to be at the low level the Council propose. A sceptic could say that the Council have undertaken several SHMAs to reach a requirement that is more politically palatable. Certainly by electing to propose the lowest housing requirement, the policy requirement to meet in FULL their objectively assessed housing need does not appear to have been met. On that basis, the plan is unsound. Notwithstanding the view that the housing requirement does not reflect the Council's FULL objectively assessed housing need, the manner in which the consultation report was presented did not enable respondents to separate Stoneythorpe with a site called 'North of Southam'. The positive aspects of Stoneythorpe were therefore watered down and nullified by the less desirable proposals North of Southam. If respondents preferred Stoneythorpe but considered the site North of Southam inappropriate, they would be driven to rank the site lower than they might if they two were separate, distorting the conclusions of this consultation. There was no good reason why Stoneythorpe should not be accompanied by a different option, such as the further disposal or alone as a freestanding highly sustainable new settlement.</p>	The sites at Alcester Road represent sustainable options that will not cause harm the historic character of Stratford nor place undue pressure on the wider rural settlements.	<p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>
St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	No	<p>Notwithstanding the Council's position regarding their five year housing land supply, it is our view that there is significant levels of un-met need dating from the end of the previous plan period (i.e. 2008) and up to the beginning of the new plan period (i.e. 2011) which will simply be 'lost' and not accounted for. It is considered that the shortfall against the relevant Regional Spatial Strategy requirement for this period (500 dwellings per annum) amounts to 982 dwellings.</p> <p>The Council's lack of an up to date housing land supply is further compounded by the evidence provided in the Birmingham and Coventry Sub-Regional Studies, which indicate that the housing requirement should be increased from 10,800 dwellings to a minimum of 18,200 dwellings (910 dwellings per annum). This would require a significant amount of additional housing to be identified if the Council are to maintain a five year housing land supply.</p> <p>We therefore believe that the Council's five year housing land supply is less than 4.8 years, on the basis that the Council's housing requirement should be a minimum of 18,200 dwellings, a 20% buffer should be applied due to previous under delivery, which has continued after the end of the moratorium on the grant of planning permission for new housing sites, as well as the requirement to accommodate the unmet need. Notwithstanding our position regarding the Council's housing requirement, in agreeing with the Inspectors decision to allow residential development at Alcester in March 2014, the Secretary of State was of the opinion that there is no dispute that the Council does not have a five year housing supply and that in allowing the appeals there would remain a shortfall in the five year supply. Furthermore, it is noted that in allowing an appeal at Bishop's Itchington in January 2014 (Appeal Reference APP/J3720/A/13/2202961), the Inspector criticised the Council's five year housing supply for including sites which were not likely to come forward within the period.</p> <p>Our position is therefore that the actual five year housing land supply is significantly less than that acknowledged by the Council. The proposal at Meon Vale (formerly known as the former Engineer Resources Depot, Long Marston) would make a significant contribution to this shortfall, helping the Council to maintain a five year housing land supply.</p>	Include site at Meon Vale.	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See overall response in respect of 5 Year Housing Land Supply (5YHLS) below.</p> <p>For clarification, the previous plan period ended in 2011. 2008 was simply the date at which the first draft of the Core Strategy was published and was, at the time, considered a sensible start date for the Core Strategy itself.</p>

Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Shipston-on-Stour warrants a site allocation within the Core Strategy, particularly bearing in mind strategic sites of 160 dwellings have been identified in other Main Rural Centres. It should be noted that the mixed use ASL application delivers up to 174 extra care homes (comprising of up to 80 apartments and 130 cottages) whilst the second residential led application promotes 74 extra care apartment units. Both applications gained support from Warwickshire County Council because they addressed the total local need for Extra Care Homes in Shipston or made a good contribution towards it.</p>	<p>We recommend a similar allocation to that of SHIP.1 policy/strategic site allocation as identified in the 2008 and 2010 Draft is re-instated into the Core Strategy in order to address the town's retail needs, promote more sustainable travel patterns, create new jobs for the settlement, and to meet the town's general and specialist housing needs. It is considered the allocation should be extended onto the land south of Campden Road to the west of the Banner Homes site. This is considered necessary to ensure the town of Shipston receives equitable land of housing development in line with the suggested and objectively assess housing needs for the District and the suggested distribution of development to the key existing Centres.</p> <p>Without such an allocation, the Core Strategy fails to meet the objectively assessed needs for the town as set out in the evidence base and is therefore unsound.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See overall response in respect of the Main Rural Centres below.</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p>
Midland Commercial Properties	Stansgate Planning	No	No	No	<p>10,800 fails to meet SDC's OAN and ignores need arising from adjoining authorities such as the Greater Birmingham and Solihull LEP where Birmingham acknowledges it cannot meet its need. In addition, Coventry and Warwickshire HMA where Coventry is unlikely to be able to accommodate its own future housing needs in its area.</p> <p>It is unclear what the HMA is for the district and whether housing needs for the HMA are being met across it through Duty to Cooperate. Furthermore, migration trends suppress the likely scale of migration that Stratford on Avon could expect to accommodate and there is selective use of 'headship' rates.</p> <p>New population projections 2012 have been published since the SHMA and these can inform an assessment but in fact they actually distort picture. The lack of housing supply combined with the economic recession and constrained housing market over the most recent five year time period has driven a low migration rate. As house prices reduced and supply remained stagnant, people were not migrating to new locations as they would have done prior to the recession. As such it is clear that the 2012 projection is an artificially low projection of population change in Stratford-on-Avon in terms of a long term view up to 2031.</p> <p>The SHMA 2013 finds the economic led projection provides an assessment of between 754-776 homes per annum and uplifts are unjustifiably dismissed as having potentially unintended consequences through attracting retired in-migrants.</p> <p>Notwithstanding comment on the soundness of the overall housing requirement, the Core Strategy is over reliant on windfalls and this should be addressed by making additional allocations. It also relies on delivery of a new settlement at Gaydon/Lighthorne Heath which is a complex proposal that may not deliver the number of houses relied on in the plan period and as such the Plan lacks flexibility.</p> <p>The housing trajectory table identifies a reliance on windfalls in Stratford upon Avon, the Main Rural Centres and Other Rural Locations. In the Main Rural Centres it relies on 810 dwellings from windfalls which equates to about 100 dwellings per settlement which is considerable given the small size of the settlements (810 windfalls/8 MRC). It is stated as comprising 660 dwellings from large windfalls in phases 2 and 3. There does not appear to be any evidence to support this figure based on past trends, no evidence to suggest windfalls will materialise and there is no reason why the Plan cannot allocate sites in these settlements. Indeed the purpose of the plan is to provide some certainty in allocations rather than leave this to chance. The SHLAA 2012 considers sites within settlement with potential and demonstrates that there are no such sites available in many of the Main Rural Centres to accommodate this development and there is therefore a real chance that the Plan may not deliver the number of houses required.</p>	<p>The objectively assessed need should be revised to address the shortcoming of the SHMA identified above and the Plan must meet needs arising from adjoining areas that cannot be met in those areas (including Birmingham and Coventry). This will lead to an increase in the housing requirement which will mean making further housing allocations. Furthermore, there is an over reliance on windfalls and the Gaydon/Lighthorne Heath new settlement and more sites should be allocated to reduce reliance on these elements.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See overall responses in respect of 5 Year housing Land Supply (5YHLS) below.</p>

Ladbrook Park Golf Club	Savills - Birmingham	Yes	Yes	Yes	Support the identification of housing requirements of 10-25 homes in the category 4 LSVs, particularly Part C that provides for Neighbourhood Plans to identify sites to meet or exceed the proposed housing requirements.	None specified.	n/a
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Core Strategy housing requirement is unsound. In our view, using the Chelmer Model the full objectively assessed need for housing in Stratford-on-Avon 2011-2031 is 20,300 dwellings.</p> <p>We have also reviewed the Coventry and Warwickshire Joint SHMA prepared by G L Hearn and find that the housing need identified of 570dpa does not represent objectively assessed need in accordance with the requirements of the Framework and guidance in PPG. Further, the Update to Review of Housing Requirements report by ERM, which reduces the purported housing need figure to 540dpa, does not accord with the requirements of the Framework and the guidance in PPG and is not a sound basis for deriving a housing requirement for the District. In relation to Policy CS.16, we find that the quantum of development proposed for Stratford upon Avon itself, approximately 2,590 homes, is insufficient as a contribution the Main Town in the District settlement hierarchy should make to meeting housing needs over the plan period.</p>	<p>Housing requirement should be 20,300.</p> <p>Stratford-upon-Avon should accommodate at least a further 1,000 dwellings, which can be accommodated in a sustainable urban extension to the south east.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p>
Magdalen College	Savills - Reading	Not Specified	Not Specified	No	Support the identification of Quinton as a category 1 LSV. However, the allocation of 76-100 homes is not supported by the Council's own evidence (SHLAA 2012) which identified a parcel of land capable of accommodating up to 130 homes.	CS.16 should be amended in order that the amount of housing allocated to each of the category 1 LSVs is based upon the evidence: e.g. Quinton 76 - 130 homes.	The SHLAA identifies whether land COULD be developed not whether land SHOULD be developed. Whilst the SHLAA has informed decisions about the overall quantum and distribution of development, it is the role of the Core Strategy (and Site Allocations Plan) to determine what scale is appropriate, taking into account the preferred strategy as a whole. As such, it is considered that 76-100 homes is an appropriate range for Category 1 LSVs.

Gloucester Diocesan Board of Finance	Smiths Gore (inc Hives Planning)	Yes	Yes	No	<p>The increase in the total housing requirement is welcomed. However, we maintain that the most appropriate figure should be 600dpa (12,000 in total). Whilst we agree with the findings of the Coventry and Warwickshire SHMA and the December 2013 Update to Review of Housing Requirements for Stratford on Avon that the minimum housing requirement for the District would be 480dpa (9,600 in total) we disagree with the conclusion of the ERM that a figure of 540dpa (10,800 in total) is appropriate.</p> <p>No adjustment has been made to allow for local demographic circumstances. Whilst we agree that the slowdown in household formation is likely – at least in part – to be due to the effects of the recession (and the consequent impact on the housing market), we do not agree with the application of non-recession headship rates from 2021. Whilst the economy has not yet returned to pre-recession levels, the country is out of recession and it seems extremely cautious (and somewhat arbitrary) to wait 2021 to apply the pre-recession headship rates. Instead, it is reasonable to assume that pre-recession headship rates should be applied well before 2021 (especially given that housing demand has been suppressed, creating “pent up” demand).</p> <p>We agree with the findings of the SHMA that the housing requirement should be raised to increase labour supply in the District. However, the Update suggests that this is “both arbitrary and unwarranted.” The absence of a specific jobs target for the District does not excuse the Council from the provisions of the NPPF in respect of planning positively for growth. We do not agree that the potential for additional dwellings to be accommodated by retired workers or those who work outside the District, allows the Council to simply not provide these dwellings, which would support the local economy and improve affordability in the housing market – key drivers in the NPPF.</p> <p>Whilst it is acknowledged that the District is one of the least affordable, the Update appears to suggest that increasing the local supply of housing is unlikely to lead to an increase in the provision of affordable housing. Rather, it notes that the supply of new affordable homes will be determined principally by local policy including the requirement for developers to provide on-site affordable housing. Whilst this may be true, there is an upper limit to the policy requirement that the Council can viably apply and beyond this the only way to increase provision of affordable housing is to raise the total requirement in order to deliver more affordable housing at any given policy percentage requirement.</p>	The total housing requirement for the District should be increased to 600 dpa (12,000 dwellings over the plan period).	See overall response in respect of identifying Objectively Assessed Need (OAN) below.
Gallagher Estates	Pegasus Planning Group	Yes	Yes	No	<p>The full objectively assessed need for housing 2011-2031 is 20,300 dwellings (see also Housing Background Paper submitted as an Appendix to our representations. This paper utilises the Chelmer Housing and Population Model to derive evidence as to the full objectively assessed need for market and affordable housing).</p> <p>The housing need identified in the SHMA of 570dpa does not represent objectively assessed need in accordance with the requirements of the Framework and guidance in PPG. Further, the Update to Review of Housing Requirements report by ERM, which reduces the purported housing need figure to 540dpa, does not accord with the requirements of the Framework and the guidance in PPG and is not a sound basis for deriving a housing requirement for the District.</p> <p>We find that the quantum of development proposed for Stratford-upon-Avon itself, approximately 2,590 homes, is insufficient as a contribution the Main Town in the District settlement hierarchy should make to meeting housing needs over the plan period. The Council’s own evidence supports growth of at least 1,000 dwellings south east of the town, which can include the Category 1 Local Service Village of Tiddington. On the basis of our findings regarding objectively assessed need, all settlements in the settlement hierarchy referred to in Policies CS.15 and CS.16, can and should accommodate significantly higher levels of housing growth.</p>	The housing requirement set out fails to meet the full objectively assessed need for market and affordable housing. In this regard, the Core Strategy has not been positively prepared, is not justified by the evidence provided, is not effective and is not consistent national policy. This fundamental flaw in the soundness of the Core Strategy is not one which cannot be remedied through modification. We respectfully request that the Council should be invited to withdraw the Core Strategy in order to review its evidence as to the full, objective assessment of housing need. In the alternative and at the very least, this important preliminary finding we invite the Inspector to reach should lead to a suspension of the examination.	See overall response in respect of identifying Objectively Assessed Need (OAN) below.

Gloucester Diocesan Board of Finance	Smiths Gore (inc Hives Planning)	Yes	Yes	No	<p>In order to be found 'sound', the Core Strategy needs to provide for a total of 12,000 dwellings over the plan period. On this basis, Policy CS16 requires consequential amendments to the distribution strategy in order to provide for this level of housing. The NPPF requires local authorities to plan positively for growth in rural areas, in particularly in terms of a prosperous rural economy. This is a step-change in national policy and as a result the Core Strategy needs to acknowledge the need for rural areas to maintain vitality and viability as well as the urgent need to improve housing affordability. One of the reasons to provide a higher housing requirement for the District is so that the level of housing provided is at a level where it will support the economy – this necessarily needs to include the rural economy which is highlighted as important in the NPPF.</p> <p>The LSVs have been identified as the most sustainable of the rural settlements and therefore growth in these villages should not be limited to 1,950 dwellings over the plan period, or 10-25 dwellings per village, as currently proposed. The current strategy is not soundly justified, having regard to the need to increase the housing requirement of the District, and is not consistent with national policy.</p>	<p>We support an increase in the total housing requirement from 540 to 600 dpa equal to 1,200 homes over the plan period. These should be provided in the rural areas, predominantly within the LSVs, in order to meet the objectives of providing for full objectively assessed housing needs. CS.16 should therefore allow for c.3,000 homes to be provided in the LSVs, or up to 50 per village.</p>	<p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p>
Rugby Borough Council		Yes	Yes	Yes	<p>The proposed housing requirement of 10,800 dwellings does not meet the assessed need of 11,400 dwellings, as identified in the joint Coventry and Warwickshire SHMA, as the figure does not include an uplift as detailed within the joint SHMA to support a stronger growth in the workforce within the district. Notwithstanding this, the proposed level of growth is consistent with the range of 3750-3800 (pa) agreed by the Coventry and Warwickshire Joint Committee for Economic Growth and Prosperity and as such is supported by Rugby Borough Council. The acknowledgement of the SHMA as evidence and the inclusion of Stratford within the Coventry and Warwickshire HMA is welcomed.</p> <p>The commitment of Stratford to work with its immediate and wider neighbours in accordance with the duty to co-operate is welcomed, as is the commitment to review the Core Strategy where evidence which identifies further housing provision is justified is also welcomed. However, it is requested that this be enshrined in policy and be more detailed in its implementation, whereby, the review will commence where need within the HMA as a whole cannot be met, as is agreed by the Joint Committee.</p> <p>A review policy is also relevant to the proposed Jaguar Land Rover extension. An addition from previous consultation drafts is the inclusion of the Jaguar Land Rover expansion at Gaydon/Lighthorne Heath for up to 100ha of development. Despite this allocation there has been no adjustment on overall housing numbers as a consequence of its inclusion. Whilst the Core Strategy it acknowledges that there is little certainty about timescales, this does not negate the need to consider the impact of this level of economic growth on the need for further housing within the district. A review of the housing requirement as a consequence of the progress of Jaguar Land Rover must be detailed within policy to ensure that this is fully clarified and committed.</p>	<p>Include the review of the Core Strategy in respect of the housing requirement and JLR in policy.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate response to 'Section 1.3 Cross Boundary issues' in respect of reviewing the Core Strategy.</p>
Warwickshire County Council		Yes	Yes	Yes	<p>The Coventry and Warwickshire SHMA, has considered population dynamics, economic growth trends, potential housing market dynamics and affordable housing needs in each area. These are brought together to provide an assessment of housing need for each local authority within the sub-region. Unless, there is significant other evidence that we are not aware of, the County Council supports the conclusions of the Joint SHMA as robust strategic evidence and therefore fundamental in shaping development strategies and strategic polices. The SHMA mid- point number of 10,800 is supported.</p>	<p>None specified.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>

Dallas Burston	Framptons	No	No	No	<p>The Council has failed to fully demonstrate compliance with the criteria as set out in Gallagher Homes Ltd v Solihull MBC and has a policy on approach rather than a policy off approach. The Core Strategy fails to provide an adequate explanation of the extent to which it has complied with the duty to co-operate with neighbouring authorities, in particular in terms of the Birmingham and Coventry and Warwickshire Housing Market Areas.</p> <p>SDC commissioned GL Hearn to produce a review of an earlier SHMA in January 2013. The review focuses exclusively on Stratford District. No consideration is given to the identification of a 'Strategic Housing Market Area' in terms of para 47 of the NPPF. It is apparent that Stratford District cannot be viewed in isolation. It is part of a wider area and it should be noted that earlier drafts of the Core Strategy were subject to objections from neighbouring local authorities within the same Strategic Housing Market Area as Stratford.</p> <p>10,800 homes does not include the unmet housing needs of Birmingham and Coventry and Warwickshire and is not in accordance with the NPPF. A minimum of 13,600 dwellings (an additional 2,800) in the plan period would need to be met within the District, 700 of which could be delivered at Stoneythorpe Magna.</p>	Amend Policy CS16 B (Strategic Allocations) - include reference to a new Strategic housing allocation Land at Dallas Burston Polo Club for 700 dwellings and care retirement community.	See overall response in respect of identifying Objectively Assessed Need (OAN) below.
Barratt and David Wilson Homes (Mercia) Ltd	RCA Regeneration Ltd	Not Specified	Not Specified	No	<p>The evidence base indicates a substantial shortfall in achieving this objective based on a housing growth target of 10,800. This is an inadequate target and therefore the policies will not achieve this vision. The evidence base shows that the proposed housing target does not take account for the maximum amount of economic growth that the district could accommodate. This is based on the assumption that the economy remains unstable at the present time. As such the growth target of 10,800 is a conservative figure which will not provide sufficient housing for the district should the economic targets be accurately met.</p> <p>The Council's evidence base notes that the ability to deliver 12,800 new homes to maximise economic growth. Furthermore the housing growth rate has increased over the last year, thus demonstrating more confidence in the market which is likely to continue.</p> <p>Furthermore, there is no justification for adopting a target of 10,800 new homes but rather this was simply taken as a mid-point figure based on the projected housing scenario PROJ3. Such a figure is not considered to represent the objectively assessed needs for the District, as required under paragraph 47 of the NPPF.</p>	None specified.	See overall response in respect of identifying Objectively Assessed Need (OAN) below.
Follett Property Holdings Ltd	Nigel Moor Planning	Not Specified	Not Specified	No	<p>CS.16 indicates approximately 500 dwellings for Large Rural Brownfield Sites but the Housing Trajectory indicates that this figure refers to the 500 dwellings granted planning permission at Long Marston and on which construction has started. No other sites are included for the Large Rural Brownfield category. This makes no provision for the potential contribution from the Harbury Site in addition to those dwellings recently granted planning permission. As set out subsequently an additional 500 dwellings can be accommodated on the Harbury site with associated development and infrastructure.</p> <p>The Core Strategy includes a further allowance for large windfalls (i.e. sites of between 5 and 99 homes) of 160 homes in Stratford-upon-Avon and 660 homes across the Main Rural Centres - a total of 820 dwellings not allocated in the Core Strategy itself. This approach appears to be self-defeating when the purpose of the Core Strategy is to make provision for the established level of housing needed for the district council area. This is particularly so when no additional housing is proposed for the Large Rural Brownfield sites. These additional 820 dwellings can be allocated to the large rural brownfield sites.</p>	We therefore propose that the dwelling figure for Large Rural Brownfield Sites be increased from 500 to 1320.	Policy AS.11 permits homes to come forward on the identified Large Rural Brownfield Sites. Although they have been listed separately in CS.16, SDC is not relying on the further delivery of homes from these sites to meet its housing requirement. Any additional homes in accordance with AS.11 would therefore comprise an additional source of windfalls.

Earlswood & Forshaw Heath Residents Association		No	No	No	<p>SDC does not have a credible 5 year Housing Land Supply at the time of submitting the draft CS for inspection and therefore falls foul of the NPPF. In April 2014 SDC admitted that it did not have 5 years housing land supply available and that the position fell back to 4.5 years for a number of technical reasons. We believe that, as it took SDC two and a half years to achieve a housing land supply of 4.5 years, it is not credible that it could find the remaining 0.5 year's supply (10%) in less than 1 month.</p> <p>The NPPF requires SDC to demonstrate a five-year supply of deliverable housing sites otherwise housing policy is out of date. Demonstrating housing supply is not just about housing numbers, deliverability is key. Part of the sudden increase in SDC's housing land supply has come from a re-working of the allocations outside Stratford and the larger towns under their 'dispersal approach". It is evident to us that SDC is so panicked by the rush by builders to develop in Stratford that it has, without any consultation or consideration of the consequences, altered its mix of future housing every time a new draft CS has been produced.</p> <p>For example, in the previous version of the Core Strategy the LSV figure was 1,800 homes. The submission Core Strategy includes a figure of 1,950. This has been plucked out of thin air in order, we believe, to meet the 5 year housing land supply requirements and have the CS accord with the requirements of NPPF. Of the 10,800 homes "objectively assessed" for the next 17 years, 150 have just appeared in last few weeks. We raise concerns that these additions have not been "objectively assessed" with the correct objectivity in mind. There is no evidence to support any other objective other than that of finding 5 years housing land by any means possible.</p> <p>The newly objectively assessed 150 LSV houses equates to 1.4% of total housing objectively assessed, which equates to 3.6 weeks' worth of housing over a 5 year period. There is absolutely no evidence to prove that SDC did any research in the few of weeks between the publication of the March 2014 and the May 2014 draft Core Strategy, so how could this policy accord with the requirements of NPPF, Para 47? We can further evidence our belief that this is the case by drawing the Inspector's attention to the previous iterations of this policy from previous draft CSs. That being the case, the CS fails the 5 year development land requirement of NPPF, Para 49.</p>	None specified.	<p>See the overall response in respect of the 5 Year Housing Land Supply (5YHLS) below.</p> <p>The figures for the overall quantum of development for the LSVs are based on an approximate mid-point of the specified ranges. The increase by 150 units results from changes to the LSV categorisations (i.e. the number of villages within each category) and takes account of two large brownfield developments considered to fall within their respective villages (Maudslay Park at Great Alne and Compton Buildings at Fenny Compton). This totals 1,925 homes which has been rounded up to 1,950, comfortably within the overall range of between 1,315 and 2,200 homes.</p>
Stagecoach Midlands		Yes	Yes	No	<p>The evidence base for the Plan, or the strategy, do not fully assesses the scope for the proposed housing distribution strategy to help sustain existing marginal commercial bus services, nor to catalyse more frequent services. Thus the opportunities to take advantage of sustainable transport are not fully assessed or taken up.</p>	<p>To make the Core Strategy sound, the quanta allocated to the Main Rural Centres of Alcester, Bidford, Southam and Wellesbourne in particular, could and should be increased to secure and improve public transport in each of those settlements.</p> <p>We do not see that overwhelming limits or constraints to development exist that would prevent the allocation of between 200-400 additional units, depending on suitable sites being identified, having due regard to the full range of other planning policy considerations.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>

Bloor Homes and Hallam Land Management	Boyer Planning	Yes	Yes	No	<p>My clients are working to bring forward the West of Shotton site which was identified in the Local Plan Review (Policy STR2.a and Proposal SUA.W) and for which outline planning permission was granted in October 2012. Presently we are working to discharge the pre-commencement conditions and to prepare Reserved Matters applications that will shortly be submitted to the LPA. The West of Shotton scheme is rightly identified at para 5.2.6 of the consultation document as a 'commitment'.</p> <p>It is an central component of housing land supply at Stratford-upon-Avon and in the District more generally; contributing to the five year supply of housing and providing surety of supply over the longer term. Its development is of course consistent with the spatial strategy included in the consultation document that rightly identifies Stratford-upon-Avon as a main focus for future development given its pre-eminent role in the District. The town is a wholly sustainable location at which to concentrate future development. Its development will also bring forward the Stratford Western Relief Road, which is referred to as critical infrastructure in Table 1, as well as other community infrastructure including areas of open space and the relocation of the existing Primary School in Shotton. In this regard, we note that Appendix 3 identifies the relationship between Core Strategy Policies and Saved Policies from the Local Plan – which the West of Shotton proposal was. Whilst Policy STR2.a of the Local Plan is to be replaced by Policy CS.16, there is no reference to the treatment of Proposal SUA.W.</p>	<p>Given its pivotal contribution to meeting the future housing requirement of 10,800 new homes, the Core Strategy should clarify that Proposal SUA.W is similarly included with Policy CS.16. In conjunction with this we would repeat that it would be right for the West of Shotton development, as an existing commitment, to also be shown on the Policies Map to explain to the reader where the future developments can be expected to take place. The Proposals Map (page 215) should therefore also include the annotation of the West of Shotton proposal in order to give a proper representation of the proposed site allocation: Proposal SUA.2; which immediately adjoins this committed development and the alignment of the Stratford Western Relief Road (which is referenced in Proposal SUA.2).</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>Noted. See amendment below to Figure 1.</p>
William Davis Ltd		Not Specified	Not Specified	No	<p>The Core Strategy is accompanied by a report on 5 year Housing Land Supply, as at March 2014, dated May 2014 which purports to show 4.8 years supply of housing. Whilst this is less than 5 years supply, it is considered that the actual supply in practice is significantly worse than this document implies, for the following reasons:</p> <ul style="list-style-type: none"> - Based on the requirement of 10,800 dwellings which is not an objective assessment of housing need; - 5% buffer has been applied when a 20% is more appropriate in the light of persistent under delivery of housing within the district (only 751 46% of the required 1620 homes were delivered between 2011 and 2014); - Relies on significant additional provision from windfall and have not provided compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply; - Additional strategic allocations in CS16 (Canal Quarter and Gaydon/Lighthorne Heath) are ambitious proposals which carry significant risks of under-delivery particularly in the short term. We have severe reservations regarding the viability of the Canal Quarter which involves the relocation of existing businesses, remediation of the site and then complete development of the housing and employment land uses will be a lengthy process. (We note that the evidence concludes that "dwellings are in Rural Centres this is in relation to meeting the scale of windfall development identified in the Housing Trajectory Table on page 89 of preparation"). Similarly it should not be expected that any dwellings will be delivered on the Gaydon/Lighthorne Heath New Settlement within the first five years of the Plan given the time required for the preparation of a Masterplan and provision of necessary infrastructure; - Doubtful whether further unallocated sites anticipated to come forward through Neighbourhood Plans and a future Allocations Document will come forward quickly enough to contribute to supply in the first 5 year period of the Plan. 	<p>*Additional provision needs to be made for housing preferably in the form of non-strategic sites that can contribute to housing supply within the first 5 years of the Plan.</p>	<p>See overall response in respect of 5 Year Housing Land Supply (5YHLS) below.</p> <p>As things stand there is no reason to assume that Proposal GLH will not deliver 2,500 dwellings during the plan period. More detailed analysis is being undertaken to underpin the Masterplan SPD for the site. This will address issues of scale, timing and deliverability. The Draft SPD is due to be reported to The Cabinet in October.</p> <p>While there are complex issues to resolve, there are no overriding reasons why it cannot be achieved over the plan period. There is evidence to show that large parts of the Canal Quarter are readily available for redevelopment and will be delivered in the short to medium term.</p>

Coventry City Council - Planning Policy Manager		Not Specified	Not Specified	Not Specified	<p>We welcome the commitment that SDC will meet its OAN for housing. In this context we also recognise that the Coventry and Warwickshire Joint Committee (of which SADC is a member) endorsed a paper which supported the Joint SHMA for the sub-region, supporting an annual housing delivery requirement of 3,750-3,800 homes. The number of homes proposed by SDC (540 per annum) is 30 dwellings below the OAN identified in the Joint SHMA, but assuming each of the other local authorities meet their proportion of the need in full would still sit within the range agreed by the Joint Committee. As such, we do not object in principle, but would however invite the Inspector to draw their own conclusions on whether or not SAC should be planning for the additional 600 dwellings or if indeed making a contribution towards a level of growth that sits within the range is acceptable.</p>	None specified.	See overall response in respect of identifying Objectively Assessed Need (OAN) below.
Rajkowski Architectural & Building Services	Parkwood Consultancy Services Ltd	Not Specified	Not Specified	No	<p>The total number of houses for which the Plan seeks to make provision is insufficient to make full and proper provision to account for the needs of the District - having regard to the needs of other neighbouring authorities - as set out in the recent SHMA.</p> <p>In addition it is considered that the allocation of 2500 homes for the new settlement is unrealistic - irrespective of the merits or otherwise of the actual proposed location. It will simply not be feasible to secure and sell (ie. DELIVER) development of this quantum in a new settlement by 2031.</p> <p>The shortfall is likely to be such that it would be wrong to limit potential contingencies to Stratford and Main Rural Centres when Local Service Villages offer potential for additional development and could benefit from additional housing.</p>	<p>To reappraise housing needs and increase this to approximately 12,000; *To increase the housing distribution pro rata across the existing settlement hierarchy (i.e. excluding the new settlement) to reflect the increased requirement;</p> <p>To reduce the allocation for a new settlement to a more realistic 1,500 within the Plan Period and accordingly to increase the quantum delivered in MRCs and LSVs each by 500;</p> <p>To make it clear that LSVs will be considered for additional housing sites, where appropriate, to provide a contingency allowance for possible further needs.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>As things stand there is no reason to assume that Proposal GLH will not deliver 2,500 dwellings during the plan period. More detailed analysis is being undertaken to underpin the Masterplan SPD for the site. This will address issues of scale, timing and deliverability. The Draft SPD is due to be reported to The Cabinet in October.</p> <p>See separate comments in respect of Proposal GLH.</p>
One Property Group	Phase 2 Planning & Development Limited	Not Specified	Not Specified	No	<p>Given that we consider 1,500 to be the maximum delivery from GLH in the plan period, this would leave a shortfall of 1,000 units. We consider that there is scope at the Main Rural Centres and Local Service Villages to make up either all or a significant proportion of that shortfall. In terms of the Main Rural Centres, there is a strong argument to say that these settlements are already not 'pulling their weight' in terms of the contribution that they can and should be making to the overall development strategy. Taken together, the population of the Main Rural Centres is in the region of some 40,000 persons (compared to 27,500 persons at Stratford-Upon-Avon), and their significance to the overall settlement pattern of the district cannot therefore be over-stated. Currently, the Core Strategy proposes some 2,830 units for the 8 Main Rural Centres equates to an average of roughly 350 each. The provision of an additional 650 units to the Main Rural Centres represents an average of just over 80 units per settlement, which on the basis of the SHLAA should be achievable. 3,480 units out of the total of 10,800 would be just over 32% of the District total, which is still relatively modest given the function and size of these settlements. That there is additional scope for development at the Main Rural Centres is confirmed in Section D of the policy, which acknowledges that in the event of a shortfall elsewhere, additional allocations at these settlements could be made.</p> <p>Increasing the overall yield for the Local Service Villages by 350 units from 1,800 to 2,150 is actually within the range of new housing already identified by the Core Strategy. Removing the lower end of the range, and treating the upper end as a target to be met immediately realises a commitment to an additional 350 homes. Not only would the extra 350 homes fall within the ranges previously subject to consultation, but the total equates, over the 44 LSVs, to an average of just 8 additional homes per Local Service Village (compared to the previous mid-range assumption).</p>	Given reduction at GLH by 1,000, increase MRCs by 650 and LSVs by 350.	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p>

Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	<p>10,800 is not positively prepared and objectively assessed - should be between 12,000 and 14,000 homes, exclusive of any requirement from Birmingham.</p> <p>Reference in CS.16 to 500 homes from brownfield sites. Not aware that any sites have been properly identified to meet this figure. Nor has the Council robustly assessed brownfield sites across the District to establish to what extent they may be available for development within the plan period.</p> <p>Reference to site allocations in CS.16, however the Council should have identified the brownfield sites on a plan as part of the Core Strategy, given its commitment to release those sites in preference to greenfield sites.</p>	None specified.	See overall response in respect of identifying Objectively Assessed Need (OAN) below.
A C Lloyd Homes Ltd	Delta Planning	Yes	No	No	<p>10,800 is an insufficient level of housing provision. It is believed that a higher figure should be applied that is consistent with background evidence and recent Inspector's decisions within the District.</p> <p>GL Hearn 'Housing Provision Options Study' (2011) considered housing projections for the plan period 2008-2028 and recommended a robust and positive figure of 11,000-12,000 dwellings. The Shottery Inspector's decision found that 11,000 – 12,000 was justified.</p> <p>Even if the Council consider that the aforementioned GL Hearn report and decision are out of date, they have failed to give proper consideration to further, more up to date, evidence. The GL Hearn 2012 Update (Jan 13) based on new demographic information including the 2011 Census and new population projections, advice within NPPF, found that an objective assessment of development needs would fall between 12,000 and 13,000 homes over the plan period 2008-2028.</p> <p>The figures contained with the ERM Review of Housing Requirements for Stratford-on-Avon District Council' (April 2013) recommended a housing figure of between 9,500 and 10,000 dwellings would be more appropriate. This figure is not realistic and does not take proper account of past migration given the housing moratorium and the effects of the recession. Furthermore, these figures, if applied, would not assist in the provision of affordable housing or economic growth.</p> <p>The Council has also failed to take into proper consideration the GL Hearn Coventry and Warwickshire Joint Strategic Housing Market Assessment (November 2013) which confirms that the impact of the moratoria on housing provision in the latter half of the 2001-2011 decade has had implications on population growth. It recommended an up-lift in housing numbers to support economic growth and improve housing affordability and recommended a figure of 11,400.</p> <p>At recent appeal decision at Gaydon Road, Bishop's Itchington (January 2014), whilst the Inspector does not make an assessment of housing requirements in advance of the examination of the Core Strategy, she does highlight the GL Hearn Report in respect of the CWSHMA and suggests that the 570 per annum figure or 11,400 over 20 years with a minimum of 480 per annum as being broadly consistent with the findings that were confirmed as relevant in the Shottery decision.</p>	It is considered that as a minimum the CWSHMA figures for Stratford should be applied which recommends provision of 11,400 dwellings over the plan period. However it is also considered appropriate to review this figure if evidence becomes available from within the housing market area or adjacent market areas that Stratford District needs to help accommodate growth from those areas.	See overall response in respect of identifying Objectively Assessed Need (OAN) below.

John Horner		Not Specified	Not Specified	No	<p>The control process lacks clarity and precision. The dispersal element of the housing provision requires small number of homes to be built over a 15 year period. The phasing and delivery table (FIG 1) considers LSV as one entry. The numbers in LSV include market housing and local needs housing. There is no indication how the LPA intends to control market housing construction to ensure there is sufficient head room for local needs housing within the allocated number. For example a category 2 village might require 30 local needs homes spread over 15 years. However a market development might build 60 market houses in one development, being less than the 75 permitted, and so the local needs housing when built will result in more homes being built than in the policy.</p>	<p>An assessment made of expected local needs housing and ensure there is sufficient headroom available. Or limit all building to no more allocation/15 per year and give local needs housing requirements priority.</p>	<p>Need to be clear as to what is meant by 'local needs housing' and how this differs from 'affordable housing', for example. It is envisaged that affordable housing will be provided in villages through S106 agreements on market sites, thus contributing to meeting local housing needs.</p> <p>Whilst CS.16 sets indicative ranges for the amount of housing the Council considers reasonable in each category of village, the upper end of the range should not necessarily be seen as a maximum. If the local community wanted to bring forward additional housing to meet specific identified local needs (whether affordable or market) then they could do so either through a Neighbourhood Plan, a Community Right To Build Order or in accordance with CS.15 Part 6.</p>
Bidford-on-Avon Parish Council		Not Specified	Not Specified	Not Specified	<p>Concern that the figure of 10,800 is still below the preferred figure of 12,000 (as per the Shottery Inquiry). Rejection of the Core Strategy by the Inspector on this basis would cause anger and frustration in the District particularly in those communities preparing Neighbourhood Plans and extend the period of a planning vacuum.</p>	<p>None specified.</p>	<p>See overall response in respect of identifying Objectively Assessed Need (OAN) below.</p>
Wilmcote Parish Council	Tyler-Parkes Partnership	Not Specified	Not Specified	No	<p>Dispersal of 1,950 homes, including strategic allocations in settlements washed-over by the Green Belt such as Wilmcote. This scale of development is inappropriate within the Green Belt without a Green Belt review and demonstrable exceptional circumstances.</p> <p>The scale of development coupled with windfall will put strain on existing services and facilities.</p>	<p>Wilmcote Parish Council formally requests that the Service Villages be allowed to grow through windfall development and in response to locally identified needs. They recommend a change in policy away from a pattern of dispersed development and instead encourage directing growth towards the main urban and main rural centres.</p>	<p>The strategy of dispersal and how sites are delivered in accordance with this strategy are separate issues. In theory, the entire housing requirement for Wilmcote could be delivered through windfalls. However, to provide certainty to residents, SDC considers land should be allocated either through the Site Allocations Plan or through a Neighbourhood Plan, and offers SDC encouragement and support to Wilmcote Parish Council in respect of the latter.</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p>
Listers Group		Yes	Yes	No	<p>Support the principle of the identification of the Canal Quarter Regeneration Zone but it is not clear how the dwelling yields have been calculated. We recognise that the Core Strategy has to be deliverable but it is important not to underestimate its potential. Notwithstanding this, even if the yield does not increase, the figure of 650 should not be seen as an artificial constraint on the number of units delivered.</p> <p>For example, the Masons Road site is identified as having a gross area of 4.4ha, but a developable area of 3.6ha. It is unclear why this has been reduced since normally gross site areas include incidental open spaces and the land identified for open space alongside the canal has specifically been excluded. Densities of 50dph have also been assumed and does not explain why higher densities have not been considered (Warwick House is assumed at 190dph). We would not suggest this represents a typical or desirable density but does demonstrate higher densities could be achieved.</p> <p>As currently presented, the viability appraisal does not appear to give any express consideration to the costs associated with relocation. The landowner incentive in this case needs to accommodate the costs of acquiring alternative land, constructing premises and relocating plant and equipment. We consider relocation viable but the combination of CIL and potentially reduced development potential from a lower yield could affect viability.</p>	<p>Increase dwelling yield from 650 to 700 and ensure that references to the Canal Quarter in CS.16 and SUA.1 are expressed as a minimum.</p>	<p>See separate comments in respect of SUA.1 Canal Quarter Regeneration Zone.</p>

John Read		Not Specified	Not Specified	No	<p>CS. 16 identifies a number of circumstances when housing will count towards the District 'windfall' total including small infill schemes, Local Needs schemes after the preparation of a Site Allocations Plan, and additional development delivered by a Neighbourhood Plan above that set out in the Core Strategy. However, the policy does not contain a windfall target over the plan period (whereas the previous version did). It is therefore unclear how windfall sites will be accounted for.</p>	<p>CS.16 should either include a specific target for windfall or be re-written to allocate windfall sites to other relevant categories e.g. the target for LSVs.</p>	<p>In such a large and dispersed District, it is not considered appropriate to have a single windfall figure for the whole District. Rather, the overall windfall allowance has been divided between the settlement hierarchy to provide more certainty as to how and when windfalls will come forward as set out in the Housing Trajectory (Figure 1).</p>
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Objectively Assessed Need (OAN):

The Core Strategy housing requirement of 10,800 is based on the evidence presented in the GL Hearn 'Coventry and Warwickshire Joint SHMA' (November 2013) and the ERM 'Update to the Review of Housing Requirements for Stratford-on-Avon District Council' (December 2013). It is not based on any previous technical studies that considered the District's housing needs in isolation. To understand how SDC has arrived at the OAN of 10,800 it is first necessary to understand the background to the preparation of the technical evidence.

Prior to publication of the PPG, SHMAs tended to look solely at housing need and demand in the context of a housing requirement set elsewhere. For Stratford-on-Avon, the Housing Provisions Options Study (HPOS) was prepared in June 2011 by GL Hearn to consider the District housing requirement. This recommended a range of figures, of which the Council selected a requirement of 8,000 homes. In 2012, SDC lost an appeal on Land West of Shotton. In his report, the Inspector concluded that, on the evidence before him, a figure of 11,000 to 12,000 more closely accords with the NPPF for the period 2008 to 2028. In light of this, SDC commissioned ERM to reconsider the HPOS study and formulate a housing requirement for the District. This study was published in April 2013. This recommended a figure of 9,500 to 10,000 for the same period. During this time, Coventry City Council submitted, and was asked to withdraw, its Core Strategy because of concerns regarding its housing requirement, particularly in respect of cross-boundary issues. In response, authorities across Warwickshire decided to commission GL Hearn to prepare a joint SHMA for the period 2011 to 2031. Based on midpoint headship rates i.e. part return to trend (e.g. 2011 data for the period 2011 – 2021 and 2008 data for the period 2021 – 2031) and a further uplift for affordability and economic growth, the SHMA recommended a figure of 570pa or 11,400 for the plan period.

Although SDC did not commission the joint SHMA it was a partner authority and was involved in its preparation. Following publication of the SHMA in November 2013, SDC considered it prudent to retain ERM to update their previous work in light of the new SHMA. This updated Review was published in December 2013. ERM supported much of the SHMA, including GL Hearn's use of mid-point headship rates. They also echoed GL Hearn's caution about the instability of economic projections. ERM did, however, explicitly disagree with applying further uplifts to the housing figure to try and ease affordability because of the local demographic context, specifically, the fact that more housing is likely just to attract wealthy in-migrants rather than those of a working age. ERM also ran their own projections based on the modelling in the SHMA but using even more up-to-date demographic data particularly in respect of migration.

The figure of 10,800 is based on the work of ERM (which in turn is informed by the SHMA). ERM's midpoint projections result in a figure of 10,500 (compared to 10,800 in the SHMA). Given that any housing over 9,800 will contribute to economic growth, they cautioned SDC against any further significant uplift and recommended a range of 10,500 to 10,800 (the higher end providing sufficient scope for improved affordability and economic growth). Thus, the 10,800 is not "a lower figure taken from the SHMA". It is an objective assessment of need, albeit one that incorporates a smaller uplift applied to a lower migration trend than many respondents consider appropriate. Nonetheless, the methodological approach follows that of the PPG. The rationale of these assumptions is based on the findings in the ERM report which question the validity of the otherwise assumed direct relationship between employment, migration and the resident population/labour force. Whilst it is noted that the provision of additional housing may well lead to a boost in economic growth, in a District like Stratford-on-Avon which on the whole attracts wealthy older households, this cannot be guaranteed, and additional housing may simply lead to a disproportionate number of out-commuters and elderly in-migrants. This would do nothing to contribute to the creation of sustainable communities and moreover, would contribute to a further un-balancing of the population.

It is important to understand that there is a difference between Objectively Assessed Needs (OAN) and the housing requirement. The housing requirement takes into account whether the District can actually accommodate the OAN or whether, through the Duty to Co-operate, part of the OAN must be met by neighbouring Districts. This works in reverse and OAN from neighbouring Districts can, if appropriate, be added to the District OAN to form the housing requirement for the District. The OAN forms the housing requirement because in respect of Coventry and Warwickshire, each individual Warwickshire District has committed to meeting its OAN and to date there is no reason to believe that Coventry's OAN will need to be partly accommodated within Stratford. Furthermore, none of the other adjacent Districts to SDC has made a request through the Duty to Co-operate for SDC to accommodate any of their OAN. As such, there is no change between the OAN and the housing requirement.

It is appropriate that the SHMA does not take account of additional housing needs from outside the housing market area. This is because the SHMA considers OAN, not housing requirements. If there is additional housing that needs to be taken account of from neighbouring authorities, these are on top of the OAN and are matters for individual local authorities through the Duty to Co-operate.

The Duty to Co-operate applies to strategic planning issues that cross administrative boundaries and in principle, this clearly would include an issue such as housing provision. However, if the issue can be satisfactorily resolved within individual local authority boundaries, the Duty to Co-operate requires that this should be an agreed outcome from a collective process but would not require further action. As explained above, this is the case in respect of Stratford-on-Avon and its Neighbouring Districts. With the exceptions of Birmingham and Coventry, there are considered to be no uncertain Duty to Co-operate issues in respect of housing. This position will remain under on-going review.

In the case of Birmingham, SDC accepts that part of the District does relate functionally to Birmingham/Solihull and its housing market. However, the scale of the housing shortfall in Birmingham is as yet not wholly defined and the extent to which its immediate neighbours within the market area can accommodate any shortfall is also not yet known. If at some future stage there were to be an acceptance that housing needs relating to the Birmingham population should appropriately be met within Stratford District, it would form part of the District housing requirement (but not its OAN).

However, at the current time, there is no good reason to delay the preparation of the SDC Core Strategy given the resultant lack of certainty that would provide. Instead, should it become necessary, the Council is committed to an early review of the Core Strategy to deal with this issue in collaboration with other local authorities in the Housing Market Area. Should it prove to be necessary, a similar approach will be adopted in relation to Coventry. In this regard the Council will maintain its on-going co-operation with other Councils in the housing market area.

Any undersupply from previous plan periods forms part of the OAN for the District. It is different from shortfall since the start of the current plan period which is taken account of in the 5YHLS calculation. The SHMA considered this issue but found that against the Regional Plan targets, there was no undersupply across the HMA as a whole.

It is important to note that, despite its title 'objectively assessed need', the process advised by the PPG is difficult to regard as entirely objective. It requires assumptions and decisions (which are by their very nature subjective) to be made about appropriate relationships between housing and economics. Not only is this relationship inherently dynamic, but it is neither fixed nor direct. This is especially true for individual Districts within any given housing market area. The NPPF recognises this instability, hence its requirement in paragraph 47 that Local Plans meet their objectively assessed needs for the housing market area. The crucial issue of importance about OAN is that it is "policy off", as confirmed by the Solihull High Court Judgement. The starting point is to objectively assess need and then determine whether other planning policies require that less housing should be provided in the area. This is the approach SDC has followed.

Whilst the SHMA makes recommendations for individual Districts, GL Hearn "ascribe a greater weight to the HMA-level conclusions" noting that "there may be wider evidence which forms part of the evidence base regarding more local dynamics and issues, including in regard to local economic growth potential, which may provide a basis for refining estimates herein". The SHMA sets out a minimum provision of 3,335 homes per annum and an assessed need of 3,750 to 3,800 homes per annum across the HMA for the period 2011 to 2031. The OAN of 10,800 or 540pa is accepted by the Councils within the HMA as being consistent with this range. The range has been formally agreed by all Councils across Coventry and Warwickshire, which are committed to working together to ensure that housing needs across the HMA are met.

Housing Trajectory:

Part A of Policy CS.16 sets the overall quantum of housing for the different parts of the District for the plan period. These figures therefore include completions, commitments, allocations and windfalls, as appropriate. Figure 1 shows that windfalls are expected to come forward in Stratford-upon-Avon, the Main Rural Centres and Other Rural locations. The Core Strategy Housing Trajectory shows that the Housing Requirement will be exceeded, demonstrating in-built flexibility within the plan. The accompanying footnote states that the Council will update the Housing Trajectory at the time of Submission. This work suggests the Core Strategy will deliver at least 11,500 homes to 2031; a minimum of a 6% increase over the figure of 10,800. This is considered to be a reasonable contingency should the Housing Trajectory not deliver as anticipated.

It is important to remember that even the presumption in favour of sustainable development does not mean every site considered sustainable should be developed. It is a policy mechanism designed to speed up development that accords with the Local Plan and a means to ensure that Local Plans are kept up-to-date. Providing OAN are met through a positive approach to planning, there is no obligation for local planning authorities to permit additional development over and above this level, whether it is considered sustainable or otherwise, other than that being brought forward through neighbourhood planning processes. Indeed, as stated in para.12 of the NPPF, "this National Planning Policy Framework does not change the statutory status of the development plan as the starting point for decision making."

Whilst at first glance the Council appears not to have met its annual housing target in 9 of the previous 13 years, this situation is not as straightforward as the figures suggest since it ignores the fact that a housing moratorium, approved by the then Government Office for the West Midlands, was in place between 2006 and 2011. The moratorium was introduced because the rate of development experienced between 2001 and 2006 had significantly exceeded that envisaged under the West Midlands RSS. The moratorium presumed against the grant of permission for most planning applications seeking to provide new homes. However, due to the 'time-lag' between obtaining planning permission and actually building homes on site, although the moratorium 'ended' in 2011 the residual effects were still felt in 2011/12 and 2012/13. This is because the moratorium applied to permissions and not the construction of homes. As such, in order for homes to be completed in 2011/12 and 2012/13, applications would have needed to have been submitted and granted in 2010/11 or earlier i.e. during the moratorium. It is reasonable to consider that SDC is a '5% buffer' authority. This is as concluded by the Inspector and Secretary of State following the Shottery Inquiry in 2012. There has been no material change since then. SDC therefore remains a 5% authority.

Whilst the inclusion of a total of 1,390 homes from windfalls appears high, it is important to understand how the figure has been derived. Firstly, the Council has distinguished between windfall supply from large and small sites. Of the windfall allowance, a total of 570 are expected to come forward on small sites of up to 4 homes (excluding residential garden land) in Phases 2-4 of the plan: 90 in Stratford-upon-Avon, 150 in the Main Rural Centres and 330 in other rural locations. Given the nature of the District (i.e. large rural District, numerous settlements each with older residential areas), this rate is considered reasonable and justified. Moreover, it should be noted that the Council is not relying on windfalls to deliver its housing trajectory until Phase 2 of the Core Strategy (i.e. 2016/17 onwards). The remaining 820 is based on an allowance for large windfalls in Stratford-upon-Avon and the Main Rural Centres in Phases 2 and 3. Whilst the Council expects a large proportion of this figure to come forward prior to adoption of the Core Strategy, the remainder will be delivered as allocations through the Site Allocations Plan, as explained in paragraph 5.2.8. The Council is committed to preparing its Site Allocations Plan by the end of 2015/16 (Regulation 18 consultation ends on 2 October 2014).

SDC accepts that the inclusion of 820 as windfalls in Figure 1 Housing Trajectory and the accompanying paragraph 5.2.8 is incorrect and has caused some confusion and unnecessary objection to the Core Strategy. It is therefore proposed to amend Figure 1 and paragraph 5.2.8 in this respect. It must be stressed that this is a correction and does not change the Council's approach to either its overall strategy or the preparation of the Site Allocations Plan itself, which is to identify sufficient sites to meet the 10,800 in full, including a number of contingent sites, as appropriate. Thus, the Council is not relying on unjustified rates of windfalls to meet its housing requirement.

Notwithstanding the above, although the Core Strategy runs to 2031, in accordance with the NPPF (paragraph 47) the Council should identify specific sites, where possible, in years 11-15 (i.e. 2021+). Furthermore, as the Planning Practice Guidance states, 'Local Plans can pass the test of soundness where local planning authorities have not been able to identify sites or broad locations for growth in years 11-15'. As such, by seeking to identify the full Core Strategy housing requirement (including contingent sites and an appropriate allowance for windfalls), the Council is fully meeting its plan-making obligations. In this respect, objections to proposed post 2021 allocations based on fears relating to deliverability might be considered immaterial.

The Council has prepared an updated Housing Trajectory which includes additional commitments as of 30 June 2014. An allowance for some of these commitments was already included in the Trajectory Table as windfalls and thus, these figures have been reduced accordingly (and the corresponding 'with permission' figures increased). Other commitments were not identified and these have been added to the overall total. Taking this into account, the updated Trajectory also corrects the error in respect of "large windfalls" which should have been listed in the 'allocated sites' columns. For example, 330 homes in the MRC Unspecified Row and 90 in the Stratford-upon-Avon Row each in Phases 2 and 3. The updated Trajectory also specifically identifies the Canal Quarter Regeneration Zone.

Main Rural Centres:

In the context of Stratford-on-Avon District, it is appropriate to have identified the 8 MRCs as sustainable locations for development. Whilst it is accepted that the 8 MRCs have a combined population of some 40,000 residents, it would be a oversimplification to apportion an equivalent quantum of development, because in terms of functionality (i.e. level and range of services and facilities), the 8 MRCs are neither a single entity nor do the sum of the eight parts match or exceed that of Stratford-upon-Avon as the main town. As a proportion of the overall housing requirement, the quantum proposed for the MRCs is therefore considered appropriate. The Council expects some 2,833 homes (26% of the total housing requirement) to be delivered across the eight Main Rural Centres (MRC) during the plan period. Of these, 220 have already been built, 1,088 have planning permission and 150 are expected to be delivered as windfalls on small sites. 715 have been specifically identified as Core Strategy allocations in Phases 1 and 2, on sites in Alcester and Southam. The remaining 660 homes will come forward from 2016/17 onwards on currently unspecified sites across the MRCs. These will be identified through the Site Allocations Plan, although the Council expects that a proportion will achieve planning permission prior to the adoption of the Core Strategy.

Because the quantum of development in individual MRCs is not yet known, CS.16A simply states the overall quantum for the MRCs as a whole. It is not deemed necessary for the Core Strategy to identify additional allocations in the MRCs since this will be done through the Site Allocations Plan. As such, the totals for individual MRCs shown in Figure 1 will increase as the 'MRC Unspecified' allowance is apportioned accordingly. This approach does not defer key decisions about where or when development will happen. Rather, in accordance with paragraph 47 of the NPPF, CS.16 identifies broad locations for growth (i.e. 2,833 across the MRCs) in years 6-10 and where possible years 11-15. Notwithstanding this, it is acknowledged that the 660 homes have been incorrectly attributed to the windfall allowance, when they should be attributed to allocations.

5 Year Housing Land Supply:

It is important not to confuse the overall housing requirement and the 5 year housing land supply (5YHLS), particularly in respect of any undersupply or shortfall. The latter is a component of the former. The 5YHLS is a comparison between the anticipated supply of new homes against the number of homes required to be built (i.e. the housing requirement). As such, any shortfall since the beginning of the plan period is only taken account of within the 5YHLS calculation. A separate issue is that of any shortfall in supply from the previous plan period. This shortfall is taken account of in the identification of the housing requirement for the plan

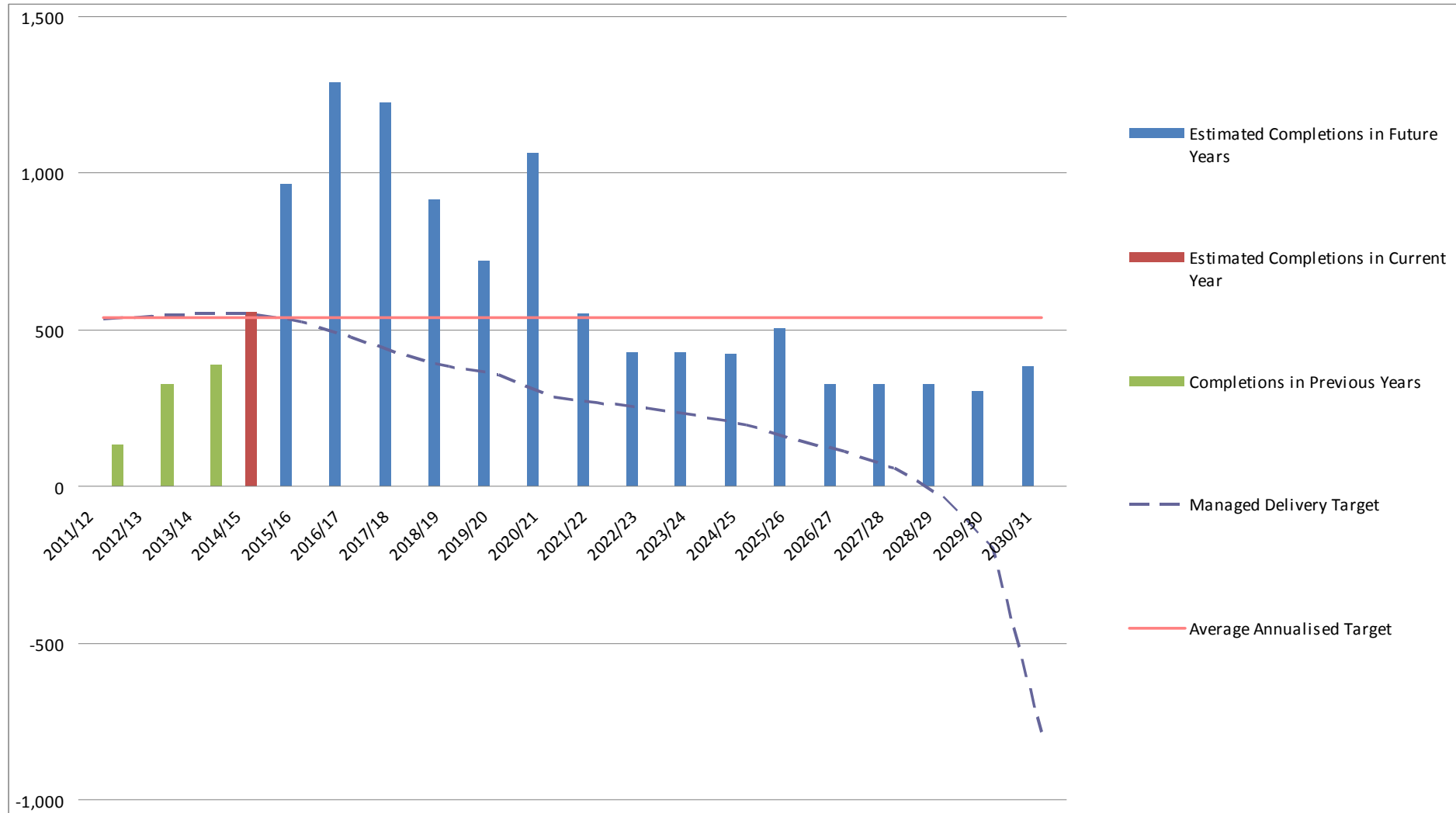
	<p>period. To add the shortfall from the beginning of the plan period back onto the overall housing requirement for the plan period would be to double count it.</p> <p>In respect of the 5 Year Housing Land Supply (5YHLS), the Council published its annual update to the 5YHLS on 1 May 2014, showing the land supply position as of 31 March 2014. This calculation did not specifically accompany the Core Strategy. As such, it is important to understand that whilst the 5YHLS calculation showed a land supply equivalent to 4.8 years, it specifically excluded sites identified in the Core Strategy that did not have planning permission. When these are added to the 5YHLSC, over 5 year supply is achieved. Notwithstanding this, on 5 August 2014 the Council published a revised 5YHLS calculation (as of 31 March) demonstrating an equivalent of 5.4 years worth of land supply. Again this revised calculation excludes sites identified in the Core Strategy that currently do not have planning permission. As such, the 5YHLS should be regarded as a minimum. The Council will publish a 5YHLS calculation which will incorporate the Core Strategy proposals to accompany Submission of the Core Strategy.</p> <p>The Council is dealing with the undersupply since 2011 through its 5YHLS calculations which require any shortfall to be rectified within the first 5 years. The high levels of expected completions shown in the Housing Trajectory graph are testament to this fact. It is important not to confuse undersupply from previous plan periods (which forms part of the OAN for the current plan period) and undersupply within the current plan period (which is dealt with in the 5YHLS calculation). The 5YHLS is simply a measurement of the current land supply position and is a component of the housing requirement for the plan period.</p> <p>SHLAA:</p> <p>In respect of the SHLAA, the Council is undertaking a review to ensure robust and up-to-date evidence. However, it is important to note that the Council is not using the findings of the SHLAA to limit the overall quantum of housing in the District. Whilst it has helped inform the strategy of distribution, the requirement of 10,800 is based solely on evidence relating to objectively assessed housing needs, which the Council considers to be 10,800 homes for the period 2011-2031.</p>
Overall Officer Recommendation	<p>That the Inspector be requested to propose the following modifications:</p> <p>In Part A:</p> <ul style="list-style-type: none"> - Delete "around" and replace with "at least" - Amend the bullet points accordingly: - SUA: approximately 2,690 homes - MRC: approximately 2,900 homes - GLH: approximately 2,500 homes - LSV: approximately 1,950 homes - Other Rural Locations: approximately 1,290 homes <p>In Part B:</p> <ul style="list-style-type: none"> - 1st bullet point insert "<i>within the plan period from a total of approximately 1,010 homes</i>" between "homes" and "on" - Last bullet point insert "<i>within the plan period from a total of approximately 3,000 homes</i>" between "homes" and "on" <p>Paragraph 5.2.6:</p> <p>Delete the last sentence and replace with the following text: "<i>The figure for the Large Rural Brownfield Sites refers to those listed in Policy AS.11 and represents the number of homes with planning permission from these sites. Whilst further homes may come forward from this source in accordance with Policy AS.11, the District Council is not relying on this supply to meet its housing requirement. Any additional homes would therefore comprise an additional source of windfall supply. The remainder of the housing requirement is being delivered through the remaining strategic allocations as set out in Policy CS.15, through the Site Allocations Plan, with an allowance made for 'windfall' sites. Notwithstanding the above, it should be noted that whilst the Council considers the housing requirement to be appropriate for the District, local communities may wish to make additional provision through the auspices of Neighbourhood Planning. In accordance with Policy CS.18, the Council will also count 'extra care' and specialised accommodation for older people (whether Use Class C2 or C3) as part of its housing requirement. In respect of C2 provision, the number of units provided will be based on assumptions regarding the number of homes they release onto the market. This District-wide provision will not however count against individual settlement requirements. Provision will be monitored through the Annual Monitoring Report.</i>"</p> <p>Delete paragraph 5.2.8 and replace with the following text as paragraph 5.2.7. Existing paragraph 5.2.7 to become 5.2.8. New text as follows:</p> <p><i>"The Core Strategy also makes provision for further sites to be allocated in Stratford-upon-Avon and the Main Rural Centres in Phases 2 and 3 of the Plan. These sites will be allocated through the Site Allocations Plan, which the District Council has committed to preparing by the end of 2015/16. The Council anticipates that a proportion of this provision will have obtained planning permission and be under construction by 2015/16. Thus, the Site Allocations Plan will identify and allocate land to meet any residual shortfall in supply, taking account of the overall supply of windfalls across the District. This pragmatic and flexible approach is consistent with the Planning Practice Guidance which allows for Core Strategies to be found sound where they do not identify specific sites in years 11-15. The Site Allocations Plan will also allocate sites to meet any shortfall of housing in each Local Service Village as appropriate, and will assess the need for further contingent housing sites to be identified in Stratford-upon-Avon and the Main Rural Centres. These contingent sites would only be released during the plan period if monitoring shows there is a significant shortfall in the amount of housing already delivered."</i></p> <p>Insert following text as new DMC(5):</p> <p><i>"For the avoidance of doubt 'extra care' and specialised accommodation for older people (whether Use Class C2 or C3) will be counted as part of the District housing requirement. In respect of C2 provision, the number of units provided will be based on assumptions regarding the number of homes they release onto the market."</i></p> <p>Amend Figure 1 in respect of the following:</p> <ul style="list-style-type: none"> - up-dated figures as of March 2014 - Additional permissions to June 2014 - Apportion large windfall allowance in MRCs and SUA to allocations - Identify Canal Quarter and Shottery as separate commitments - Include Large Rural Brownfield Sites within Other Rural locations - Include District-wide C2 provision <p>For clarification, phasing schedules for Gaydon/Lighthorne Heath and the Canal Quarter Regeneration Zone are included in Proposals GLH and SUA.1, respectively.</p>

Fig.1 Housing Trajectory - Table

Location	Phase 1 (2011 /12 – 2015/16)			Phase 2 (2016/17 – 2020/21)			Phase 3 (2021/22 – 2025/26)			Phase 4 (2026/27 – 2030/31)		Total
	Built	With Permission	Allocated	With Permission	Allocated	Windfall	With Permission	Allocated	Windfall	Allocated	Windfall	
Stratford-upon-Avon	365	161	0	585	0	30	37	0	30	0	30	1,238
Canal Quarter	0	0	0	0	160	0	0	280	0	210	0	650
West of Shottery	0	90	0	600	0	0	110	0	0	0	0	800
Main Town	365	251	0	1,185	160	30	147	280	30	210	30	2,688
Alcester	57	72	80	2	270	0	0	0	0	0	0	481
Bidford-on-Avon	2	156	0	131	0	0	0	0	0	0	0	289
Henley-in-Arden	48	14	0	4	0	0	0	0	0	0	0	66
Kineton	8	1	0	91	0	0	0	0	0	0	0	100
Shipston-on-Stour	66	42	0	173	0	0	0	0	0	0	0	281
Southam	8	55	40	13	325	0	0	0	0	0	0	441
Studley	20	38	0	38	0	0	0	0	0	0	0	96
Wellesbourne	22	176	0	194	0	0	0	0	0	0	0	392
MRC Unspecified	0	0	0	0	300	50	0	300	50	0	50	750
MRC Total	231	554	120	646	895	50	0	300	50	0	50	2,896
Local Service Villages	85	300	0	493	72	0	0	500	0	500	0	1,950
Lighthorne Heath	0	0	0	0	750	0	0	875	0	875	0	2,500
Large Rural Brownfield	22	138	0	420	0	0	120	0	0	0	0	700
Rural Elsewhere	80	141	0	123	0	90	0	0	90	0	90	614
Other Rural Locations	102	279	0	543	0	90	120	0	90	0	90	1,314
District Wide C2	82	13	0	87	0	0	26	0	0	0	0	208
Total	865	1,397	120	2,954	1,877	170	293	1,955	170	1,585	170	11,556

Footnote to The Housing Trajectory Table: The Table presents the housing supply situation as of 30 June 2014. The Council will update the Housing Trajectory to reflect the latest position at the time of Examination.

Fig.1 Housing Trajectory – Graph



Section 5. Development Strategy - 5.2 Housing Development Policy CS.16 A. Housing Requirement

Number of Supports: 1 Number of Objections: 21 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Barratt and David Wilson Homes (Mercia) Ltd	RCA Regeneration Ltd	No	Not Specified	No	10,800 does not meet the objectively assessed needs of Stratford District and will not deliver the vision or objectives.	Plan unsound - none specified.	See overall response to CS.16 in respect of identifying Objectively Assessed Need (OAN).
Gladman Developments		Not Specified	Not Specified	No	Object that the OAN is 10,800. It must be outlined that although the adoption of 25,010 dwellings for the plan period would address Stratford's housing needs, this requirement potentially ignores those unmet needs arising elsewhere (particularly from Birmingham and Coventry). Against this context, Gladman submit that in order to meet Duty to Cooperate, the adoption of the OAN based housing requirement (25,010) is sound subject to future review. The timing of this review must take place following the identification of the extent of what these needs are and where they should be accommodated. Stratford must continue to work closely with its neighbouring and partnership authorities to ensure that should any needs arise, then a solution can be found efficiently and effectively.	Regeneris have identified the full OAN requirements of Stratford to be 25,010. This figure is significantly higher than that currently proposed by the District Council. In order to maximise the delivery of this need, there is a requirement for the Council to radically alter their existing strategy. The Council should look to adopt a mixed strategy to deliver new development. New settlements and strategic sites have their role to play, but this must be supported by a dispersal strategy that recognises the needs and opportunities provided by the District's villages to accommodate housing need. In context of this significant need, Gladman submit to the Council land West of Wellesbourne as a strategic site for housing. Gladman consider the site suitable for the delivery of 1,500 dwellings over the plan period. The site is capable of to benefit from and enhance existing services and facilities currently available in the settlement, and represents a suitable option for a sustainable urban extension.	See overall response to CS.16 in respect of identifying Objectively Assessed Need (OAN).
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	No	No	<p>The Policy makes provision for 10,800 new homes over the Plan period. It is considered that this is unsound as it is not justified when based on the available evidence.</p> <p>DCLG Household Projection Tables dated April 2013, show that the projection in households in the District between 2011 and 2021 is for the District to grow by an additional 6170 and if it were assumed that this was rolled forward to 2031 at the same rate, this would equate the Plan having to provide 12,340 dwellings over the Plan period.</p> <p>In addition to this 12,340 figure is the need to accommodate any residual shortfall, as identified in the Council's own 5-year supply calculation dated May 2014. This identified a shortfall of 869 dwellings against what should have been achieved by the start of the Plan period. This would equate to circa 660 dwellings per annum.</p> <p>The SHMA readily accepts that it does not address the Duty to Cooperate for housing needs outside of the Housing Market Areas and cannot be considered to meet the requirements for an objectively assessed need and is therefore unsound.</p> <p>This analysis also serves to show that the Council would be unable to meet its 5-year supply commitments, with either a 5% or 20% allowance for previous underperformance.</p>	Given that the Plan has to make a greater allowance for additional housing in the District, then there is a need for further allocations to be made and Part B of the Policy should allocate land to the north of 18 Salford Road, Bidford-on-Avon for up to 150 dwellings.	See overall response to CS.16 in respect of identifying: - Objectively Assessed Need (OAN) - 5 Year Housing Supply - Housing Trajectory

CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	No	<p>The housing provision figure does not meet the objectively assessed housing needs of the District and that further provision should therefore be made. Much of the additional provision should be directed towards the Main Rural Centres. It is too low, meaning the Plan is not positively prepared or properly justified. The settlement hierarchy in CS.15 acknowledges the relative sustainability of the Main Rural Centres and identifies that they are suitable to accommodate additional development. The evidence that they are not suitable to accommodate more than is presently allocated is weak. Indeed reference is only made to the SHLAA, to impact on character, and to infrastructure capacity.</p> <p>The 2012 SHLAA cannot be considered to be entirely accurate:</p> <ul style="list-style-type: none"> - it discounted all sites with a high or medium/high landscape impact, yet several sites with that designation have now achieved planning permission including SOU.2. - it discounted all sites which had potential heritage impacts but this excludes potential for sensitively designed schemes - Core Strategy excludes sites included within the SHLAA broad locations. Broad locations are only so designated because they are considered suitable for development without harm to character. <p>CIL monies can be combined to pay for infrastructure improvements which overcome Council's previous concerns regarding impacts on infrastructure. *A proper review may be required to identify the most appropriate parcels for development as the capacity of the Main Rural Centres is much higher than previously thought.</p>	The number of houses to the Main Rural Settlements should be increased.	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres - 5 Year Housing Land Supply <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p>
CALA Homes (Midlands) Ltd	Stansgate Planning	No	No	No	<p>There is no flexibility in the plan to allow for a scenario where the new settlement does not deliver the completions required. There is a risk of relying on this proposal to deliver as there are known difficulties in terms of the substantial infrastructure to be provided before a certain amount of development can take place. The work needed, land control and funding for it is uncertain. Lead in times may therefore be longer than expected at this at point in time and there is a strong likelihood fewer houses will be delivered in the plan period than allowed for.</p>	More sites should be allocated to reduce the reliance on the Gaydon/Lighthorne Heath new settlement.	See separate comments in respect of CS.16 (D).

Heritage Trustees Ltd	Stansgate Planning	Yes	Not Specified	No	<p>The housing provision figure does not meet the objectively assessed housing needs of the District. Further provision should be made and some of this should be directed towards the LSVs. The LSV figure is too low, meaning the Plan is not positively prepared or properly justified. We have consistently supported the dispersal approach as the only way to meet the very real housing needs of the whole of the District, including the problems facing rural communities.</p> <p>The Council has concluded that it can accommodate some 8,300 dwellings under the dispersal approach, leaving the remaining 2,500 to be accommodated in a new settlement. There is, however, little evidence to show that 8,300 is the maximum number of dwellings which could be accommodated by existing settlements through dispersal without detriment to character or infrastructure capacity.</p> <p>The 2012 SHLAA indicates that the existing settlements could accommodate some 8232 dwellings (including sites already benefiting from planning permission but excluding the 500 completions 2008-2011). This figure has been taken through to the Core Strategy with little alteration. This assessment, however, cannot be considered to be entirely accurate as the SHLAA:</p> <ul style="list-style-type: none"> - considered 39 LSVs; the Core Strategy now contains 44 LSVs. - discounted all sites with a high or medium/high landscape impact, yet several sites with that designation have now achieved planning permission. - discounted all sites which had potential heritage impacts but this excludes potential for sensitively designed schemes <p>CIL monies can be combined from small sites to pay for infrastructure improvements which overcome Council's previous concerns regarding impacts on infrastructure.</p>	<p>The Council has given little consideration to the real capacity of its more sustainable villages. With the need for additional housing acknowledged, the Council must increase the allocation to the Local Service Villages.</p>	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres - 5 Year Housing Land Supply <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p>
H.G. Hodges & Sons Ltd.	Stansgate Planning	Yes	Not Specified	No	<p>The housing provision figure does not meet the objectively assessed housing needs of the District. Further provision should be made and some of this should be directed towards the LSVs. The LSV figure is too low, meaning the Plan is not positively prepared or properly justified. We have consistently supported the dispersal approach as the only way to meet the very real housing needs of the whole of the District, including the problems facing rural communities.</p> <p>The Council has concluded that it can accommodate some 8,300 dwellings under the dispersal approach, leaving the remaining 2,500 to be accommodated in a new settlement. There is, however, little evidence to show that 8,300 is the maximum number of dwellings which could be accommodated by existing settlements through dispersal without detriment to character or infrastructure capacity.</p> <p>The 2012 SHLAA indicates that the existing settlements could accommodate some 8232 dwellings (including sites already benefiting from planning permission but excluding the 500 completions 2008-2011). This figure has been taken through to the Core Strategy with little alteration. This assessment, however, cannot be considered to be entirely accurate as the SHLAA:</p> <ul style="list-style-type: none"> - considered 39 LSVs; the Core Strategy now contains 44 LSVs. - discounted all sites with a high or medium/high landscape impact, yet several sites with that designation have now achieved planning permission. - discounted all sites which had potential heritage impacts but this excludes potential for sensitively designed schemes <p>CIL monies can be combined from small sites to pay for infrastructure improvements which overcome Council's previous concerns regarding impacts on infrastructure.</p>	<p>The Council has given little consideration to the real capacity of its more sustainable villages. With the need for additional housing acknowledged, the Council must increase the allocation to the Local Service Villages.</p>	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres - 5 Year Housing Land Supply <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p>

Urban Renaissance Villages (URV) and Helical Bar	Barton Willmore	Not Specified	Not Specified	No	<p>The housing requirement fails to be “positively prepared”. ERM’s lower requirement does not have regard to the needs outside the District and therefore the housing requirement is not based on an objectively assessed need and fails to meet the housing needs of all the community include in particular older people, for which there is an acknowledged increasing demand.</p> <p>The Core Strategy is not justified. The Council has not put forward a robust assessment to demonstrate that higher levels of housing provision would not increase affordability or support economic growth. The proposed housing requirement is not based on effective joint working on cross boundary strategic priorities as it does not reflect the housing needs established in the Joint SHMA.</p> <p>The Core Strategy is not consistent with the NPPF as it does not meet the full housing needs.</p> <p>We therefore remain concerned as to whether the figure of 540dpa will satisfactorily address the objectively assessed housing needs for the District and in the absence of further justification, if the proposed housing level is justified and therefore “sound”.</p>	The Core Strategy should include clear housing policies that meet the needs and demands of the elderly, in line with the Council’s evidence base to ensure that it is “justified” and “effective”, which are key tests of soundness (NPPF, para 182).	See overall response to CS.16 in respect of identifying Objectively Assessed Need (OAN).
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	No	<p>The housing provision figure does not meet the objectively assessed housing needs of the District. Further provision should be made and some of this should be directed towards the LSVs. The LSV figure is too low, meaning the Plan is not positively prepared or properly justified. We have consistently supported the dispersal approach as the only way to meet the very real housing needs of the whole of the District, including the problems facing rural communities.</p> <p>The Council has concluded that it can accommodate some 8,300 dwellings under the dispersal approach, leaving the remaining 2,500 to be accommodated in a new settlement. There is, however, little evidence to show that 8,300 is the maximum number of dwellings which could be accommodated by existing settlements through dispersal without detriment to character or infrastructure capacity.</p> <p>The 2012 SHLAA indicates that the existing settlements could accommodate some 8232 dwellings (including sites already benefiting from planning permission but excluding the 500 completions 2008-2011). This figure has been taken through to the Core Strategy with little alteration. This assessment, however, cannot be considered to be entirely accurate as the SHLAA:</p> <ul style="list-style-type: none"> - considered 39 LSVs; the Core Strategy now contains 44 LSVs. - discounted all sites with a high or medium/high landscape impact, yet several sites with that designation have now achieved planning permission. - discounted all sites which had potential heritage impacts but this excludes potential for sensitively designed schemes <p>CIL monies can be combined from small sites to pay for infrastructure improvements which overcome Council’s previous concerns regarding impacts on infrastructure.</p>	The Council has given little consideration to the real capacity of its more sustainable villages. With the need for additional housing acknowledged, the Council must increase the allocation to the Local Service Villages.	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - 5 Year Housing Supply - Housing Trajectory - Main Rural Centres <p>See separate comments in respect of CS.15 Distribution of Development.</p>

Midland Commercial Properties	Stansgate Planning	Yes	Not Specified	No	<p>The housing provision figure does not meet the objectively assessed housing needs of the District and that further provision should therefore be made. Much of the additional provision should be directed towards the Main Rural Centres. It is too low, meaning the Plan is not positively prepared or properly justified. The settlement hierarchy in CS.15 acknowledges the relative sustainability of the Main Rural Centres and identifies that they are suitable to accommodate additional development. The evidence that they are not suitable to accommodate more than is presently allocated is weak. Indeed reference is only made to the SHLAA, to impact on character, and to infrastructure capacity.</p> <p>The 2012 SHLAA cannot be considered to be entirely accurate:</p> <ul style="list-style-type: none"> - it discounted all sites with a high or medium/high landscape impact, yet several sites with that designation have now achieved planning permission including SOU.2. - it discounted all sites which had potential heritage impacts but this excludes potential for sensitively designed schemes - Core Strategy excludes sites included within the SHLAA broad locations. Broad locations are only so designated because they are considered suitable for development without harm to character. <p>CIL monies can be combined to pay for infrastructure improvements which overcome Council's previous concerns regarding impacts on infrastructure.</p> <p>A proper review may be required to identify the most appropriate parcels for development as the capacity of the Main Rural Centres is much higher than previously thought.</p>	The number of houses to the Main Rural Settlements should be increased.	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres - 5 Year Housing Land Supply <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p>
The Taylor Family	Stansgate Planning	Yes	Not Specified	No	<p>The housing provision figure does not meet the objectively assessed housing needs of the District. Further provision should be made and some of this should be directed towards the LSVs. The LSV figure is too low, meaning the Plan is not positively prepared or properly justified. We have consistently supported the dispersal approach as the only way to meet the very real housing needs of the whole of the District, including the problems facing rural communities.</p> <p>The Council has concluded that it can accommodate some 8,300 dwellings under the dispersal approach, leaving the remaining 2,500 to be accommodated in a new settlement. There is, however, little evidence to show that 8,300 is the maximum number of dwellings which could be accommodated by existing settlements through dispersal without detriment to character or infrastructure capacity.</p> <p>The 2012 SHLAA indicates that the existing settlements could accommodate some 8232 dwellings (including sites already benefiting from planning permission but excluding the 500 completions 2008-2011). This figure has been taken through to the Core Strategy with little alteration. This assessment, however, cannot be considered to be entirely accurate as the SHLAA:</p> <ul style="list-style-type: none"> - considered 39 LSVs; the Core Strategy now contains 44 LSVs. - discounted all sites with a high or medium/high landscape impact, yet several sites with that designation have now achieved planning permission. - discounted all sites which had potential heritage impacts but this excludes potential for sensitively designed schemes <p>CIL monies can be combined from small sites to pay for infrastructure improvements which overcome Council's previous concerns regarding impacts on infrastructure.</p>	The Council has given little consideration to the real capacity of its more sustainable villages. With the need for additional housing acknowledged, the Council must increase the allocation to the Local Service Villages.	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres - 5 Year Housing Land Supply <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p>

P Henson & Bird Group of Companies	Andrew Granger & Co	Not Specified	Not Specified	No	<p>The proposed 10,800 is 600 under the OAN of 11,400 as identified in the SHMA. This highlights a failure to meet the objectively assessed housing needs during the plan period and demonstrates that the Local Planning Authority is not planning positively for the growth of the District.</p> <p>The previous Focused Consultation stated that with the number of homes built or expected to be built totalling approximately 8,300, there was a figure of 2,500 to find. If the 600 is included, this totals 3,100 which should be a minimum target and not a maximum, especially when questions can be raised over the deliverability of commitments and proposed allocations, and furthermore the reliance on windfall sites to deliver the required number of dwellings over the plan period.</p> <p>In this respect the Core Strategy fails to recognise the role of Stratford town as the key location for new growth and to plan accordingly in line with the NPPF and the SHMA.</p>	<p>The Core Strategy needs to allow for further growth at Stratford town by primarily reviewing the green belt between the town and the A46 to the north and allowing for a new self contained, sustainable Garden Village Suburb which would assist in ensuring the requisite number of new homes and jobs are provided for in this key location.</p>	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres
A Anson	Stansgate Planning	Yes	Not Specified	No	<p>The housing provision figure does not meet the objectively assessed housing needs of the District. Further provision should be made and some of this should be directed towards the LSVs. The LSV figure is too low, meaning the Plan is not positively prepared or properly justified. We have consistently supported the dispersal approach as the only way to meet the very real housing needs of the whole of the District, including the problems facing rural communities.</p> <p>The Council has concluded that it can accommodate some 8,300 dwellings under the dispersal approach, leaving the remaining 2,500 to be accommodated in a new settlement. There is, however, little evidence to show that 8,300 is the maximum number of dwellings which could be accommodated by existing settlements through dispersal without detriment to character or infrastructure capacity.</p> <p>The 2012 SHLAA indicates that the existing settlements could accommodate some 8232 dwellings (including sites already benefiting from planning permission but excluding the 500 completions 2008-2011). This figure has been taken through to the Core Strategy with little alteration. This assessment, however, cannot be considered to be entirely accurate as the SHLAA:</p> <ul style="list-style-type: none"> - considered 39 LSVs; the Core Strategy now contains 44 LSVs. - discounted all sites with a high or medium/high landscape impact, yet several sites with that designation have now achieved planning permission. - discounted all sites which had potential heritage impacts but this excludes potential for sensitively designed schemes. <p>CIL monies can be combined from small sites to pay for infrastructure improvements which overcome Council's previous concerns regarding impacts on infrastructure.</p>	<p>The Council has given little consideration to the real capacity of its more sustainable villages. With the need for additional housing acknowledged, the Council must increase the allocation to the Local Service Villages.</p>	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres - 5 Year Housing Land Supply <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p>
K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	No	No	No	<p>There is no flexibility in the plan to allow for a scenario where the new settlement does not deliver the completions required. There is a risk of relying on this proposal to deliver as there are known difficulties in terms of the substantial infrastructure to be provided before a certain amount of development can take place. The work needed, land control and funding for it is uncertain. Lead in times may therefore be longer than expected at this at point in time and there is a strong likelihood fewer houses will be delivered in the plan period than allowed for.</p>	<p>More sites should be allocated to reduce the reliance on the Gaydon/Lighthorne Heath new settlement.</p>	<p>See separate comments in respect of CS.16 (D).</p>

K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	No	<p>The housing provision figure does not meet the objectively assessed housing needs of the District and that further provision should therefore be made. Much of the additional provision should be directed towards the Main Rural Centres. It is too low, meaning the Plan is not positively prepared or properly justified. The settlement hierarchy in CS.15 acknowledges the relative sustainability of the Main Rural Centres and identifies that they are suitable to accommodate additional development. The evidence that they are not suitable to accommodate more than is presently allocated is weak. Indeed reference is only made to the SHLAA, to impact on character, and to infrastructure capacity.</p> <p>The 2012 SHLAA cannot be considered to be entirely accurate:</p> <ul style="list-style-type: none"> - it discounted all sites with a high or medium/high landscape impact, yet several sites with that designation have now achieved planning permission including SOU.2. - it discounted all sites which had potential heritage impacts but this excludes potential for sensitively designed schemes - Core Strategy excludes sites included within the SHLAA broad locations. Broad locations are only so designated because they are considered suitable for development without harm to character. <p>CIL monies can be combined to pay for infrastructure improvements which overcome Council's previous concerns regarding impacts on infrastructure. *A proper review may be required to identify the most appropriate parcels for development as the capacity of the Main Rural Centres is much higher than previously thought.</p>	The number of houses to the Main Rural Settlements should be increased.	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres - 5 Year Housing Land Supply <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p>
Gaydon Parish Council		No	Yes	No	<p>Figure of 10,800 is too high. A lower figure would remove the need for the GLH proposal.</p> <p>The mid-2012 projected population figures show a reduction of housing needs across all of Warwickshire of between 25% and 39%. Coventry is shown with a higher requirement of 70%. However, analysis of the numbers of people in single age groups for each year from 2002 to 2031 identifies two problems with this projection. The 2 universities currently have about 13,500 international students. From 2005 there has been an increase in these cohort numbers but not a corresponding outflow. Between 2002 and 2004 the inflow was between 2400 and 3700. From 2005 inflow increased to 7700 by 2011. At this time universities sought to increase international students. There was not a corresponding change in outflow until 2009 to 2011 but this was still less than the inflow 3 years earlier. This suggests that international students are on courses that have not yet finished. The higher inflow is reflected in the population projections since it takes the 6 year average from 2007 to 2012. This represents a temporary number that over time should rectify with corresponding inflow and outflow. It does not make sense to build houses for a population that will not be there. If you factor out the international student bulge figure then it is unlikely that Coventry will be asking Stratford to meet its housing need.</p>	The housing figures require revising in line with the mid-2012 population projections which are considerably lower than the 10,800 dwellings in the proposed submission Core Strategy. This would ensure that we start with a plan based on up-to-date information.	<p>The proposal for a new settlement at Gaydon/Lighthorne Heath is necessary to contribute to meeting Stratford-on-Avon District's housing needs of 10,800. Whether it becomes necessary or appropriate to meet any of Coventry's housing needs is still to be determined through the Duty to Co-operate. An update to the Joint SHMA has been commissioned but is yet to be finalised. Whilst it is understood that the 2012 SNPP suggests a reduced level of population growth for Stratford-on-Avon and certain other Warwickshire Districts, the impact across the housing market area as a whole appears more neutral. The Council will assess the new evidence when it is available. However, it acknowledges the instability of District-level projections in comparison with those for the wider market area. A housing requirement of 10,800 appears likely to remain consistent with housing needs across the housing market area.</p>

Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	<p>CS.16 proposes a housing requirement 600 below the OAN identified in the SHMA, justified by its Report by ERM. SDC dismisses any uplift in numbers above the baseline for demographic or affordability reasons as unwarranted. The Council's approach is inappropriate. If the Council departs from its OAN such a departure must be agreed with other authorities in the HMA otherwise the OAN in the HMA will not be met contrary to the NPPF.</p> <p>The "What Homes Where?" website toolkit based on 2008 household projections and the DCLG 2011 based interim household projections provide useful starting points and baseline figures for benchmarking. The toolkit identifies household growth of 13,872 (693 per annum) over the plan period whilst the 2011 interim household projections indicate a household growth of 617 per annum between 2011 – 2021. If the standard National Housing & Planning Advice Unit (NHPAU) methodology for converting household growth into number of dwelling is applied the equivalent figures are 713 and 635 dwellings per annum respectively. The figure of 635 dwellings per annum derived from 2011 based household projection reflects a recessionary trend whilst the 713 dwellings per annum derived from 2008 based data represents a long term trend.</p> <p>With regards to the SHMA and the ERM Report, there are three main concerns:</p> <ul style="list-style-type: none"> - household formation rates - economic trends / forecasts - attitude to worsening market signals such as affordability and rates of development. <p>A hybrid approach to the use of the 2008 and 2011 data is recommended in acknowledgement of a gradual recovery from the slowdown in household formation rates due to the recession and its impact on the housing market. However it is questionable if the mid-point scenario used in the SHMA is sufficient. The SHMA ignores the impact of a restricted housing supply on the suppression of household formation rates. The Council has persistently under delivered housing for which the SHMA makes no additional allowance.</p> <p>The SHMA's job led scenario is based on Experian economic forecast data which is older and potentially more pessimistic in outlook than the more up to date data used to inform the LEP SEP. Even more confusing the SHMA job led scenario uses 2011 headship rates rather than the midpoint figure as discussed above. However irrespective of these inconsistencies between the SEP and the SHMA the Council has determined that any uplift to the OAHN on the grounds of economic trends is unwarranted.</p> <p>The Council also defers assessing any increase in OAHN from the proposed expansion of Jaguar Land Rover.</p> <p>With regards to worsening trends in market signals, whilst the Core Strategy indicates that the District has a poor house price to income ratio, the highest rents in the HMA, and high average house prices, the Council rejects the recommendations of the SHMA to increase its OANN accordingly against the advice in the NPPF that the more significant the affordability constraints and the stronger other indicators of high demand, the larger the improvement in affordability needed and therefore the larger the additional supply response should be.</p>	<p>The housing requirement set out in CS16 should be expressed as a minimum because it is overly based on demographic projections. The Council must acknowledge the NPPF with its greater policy emphasis on housing provision and its approach to start with full OAN. The Council has failed to acknowledge that demographic projections are just the starting point and economic trends and market signals should also be considered in the calculation of OAN. If the Core Strategy is to be found sound the full objective assessment of need for market and affordable housing should be met.</p>	<p>See overall response to CS.16 in respect of identifying Objectively Assessed Need (OAN).</p> <p>See separate comments in respect of:</p> <ul style="list-style-type: none"> - Section 1.3 Cross Boundary Issues - CS.16 housing Development - CS.21 Economic Development - Proposal GLH
Solihull Metropolitan Borough Council - Policy & Spatial Planning		Not Specified	Yes	Not Specified	<p>Although at the lower end of the SHMA figure, SDC has met the Duty to Co-operate in this respect.</p>	None specified.	n/a

Client - Upper Quinton c/o NGA	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	10,800 has not been positively and objectively assessed as a need. The figure should be at least between 12,000 and 14,000 excluding any requirement from Birmingham.	None specified.	See overall response to CS.16 in respect of identifying Objectively Assessed Need (OAN).
One Property Group	Phase 2 Planning & Development Limited	Not Specified	Not Specified	No	<p>Assuming adoption in 2015, this Core Strategy is only looking forward some 16 years from the date of adoption, and in the context of the delivery of new towns or new villages, this is in a very short timeframe.</p> <p>Firstly, a new settlement inevitably requires an approval process that is longer than for smaller or less controversial applications; a period required for Masterplanning and public engagement before even an Outline application is submitted, and thereafter there will be the normal process of detailed permission, discharge of conditions, and obtaining the other necessary approvals, all of which tend to be more protracted given the scale and complexity of the development, and the fact some items of infrastructure need to be delivered from scratch, rather than by upgrading existing services. Previous research has shown that it is not untypical for new settlements/large scale urban extensions to take around 5 years from the start of the planning process (i.e. post allocation) to commencement, although there are many examples of schemes that have taken far longer than that.</p> <p>Secondly, is the rate of delivery: build rates are of course governed by sales rates, as the developer or developers involved will only build at a rate commensurate with sales. In the early years at least, delivery rates are relatively low compared to urban extensions or smaller sites and sales rates on new settlements tend to be comparatively slow in the early years, and the progress towards full production takes time, as the new settlement itself takes time to establish. Given the limited build period of around 10 years from 2021 to 2031, and even assuming a generous average of 150 units per annum (market and affordable) over the first 10 years (likely to be less in the initial years), then a new village/new settlement is only likely to deliver 1500 units in the Plan period. Multiple developers can help keep build rates up, but ultimately it is the rate at which the house buying public wants to buy new property in that location that determines build rate, not the number of developers. In practice, multiple house-builders are competing with each other, and therefore there is no simple formula that says if one house-builder can deliver 4 sales per month, so two can deliver 8 etc.</p> <p>The need to be realistic about the rate of delivery does not of itself make a new village/new settlement an inappropriate option, and we do not seek to suggest that the proposal for a new settlement at Gaydon/Lighthorne is incorrect in principle. But in order to be Effective, it is important to be realistic as to both the speed with which a new settlement can start to deliver homes on the ground, and the rate at which new homes could actually be delivered thereafter. It will also be necessary to accommodate the shortfall in delivery elsewhere, or at least have the flexibility in the Plan to ensure that the shortfall can be met elsewhere.</p>	<p>In the light of the above, we consider that the scale of development deliverable within the Plan period should be adjusted to a more realistic 1,500 units. We consider the shortfall in provision needs to be made up elsewhere in the District (e.g. Main Rural Centres and Local Service Villages).</p> <p>In any event, and irrespective of the above, Proposal GLH requires clear targets for delivery. At the moment, the proposal states simply that 2,500 homes should be completed by 2031, but if monitoring of delivery is to be effective, there is a need to include earlier targets against which delivery can be measured e.g. date of approval of the SPD (or AAP), date of commencement of development, date of delivery of first homes, date of delivery of first 500 homes, date of delivery of first 1,000 homes. Only by regular monitoring targets will it be possible to take action in the event that the proposal is unable to deliver the full 2,500 in the Plan period.</p>	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres - 5 Year Housing Land Supply <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p>
Paul Ridgeway	Stansgate Planning	Yes	Not Specified	No	There is no flexibility in the plan to allow for a scenario where the new settlement does not deliver the completions required. There is a risk of relying on this proposal to deliver as there are known difficulties in terms of the substantial infrastructure to be provided before a certain amount of development can take place. The work needed, land control and funding for it is uncertain. Lead in times may therefore be longer than expected at this point in time and there is a strong likelihood fewer houses will be delivered in the plan period than allowed for.	More sites should be allocated to reduce the reliance on the Gaydon/Lighthorne Heath new settlement.	See separate comments in respect of CS.16 (D).

M Hale	Stansgate Planning	Yes	Not Specified	No	<p>The housing provision figure does not meet the objectively assessed housing needs of the District. Further provision should be made and some of this should be directed towards the LSVs. The LSV figure is too low, meaning the Plan is not positively prepared or properly justified. We have consistently supported the dispersal approach as the only way to meet the very real housing needs of the whole of the District, including the problems facing rural communities.</p> <p>The Council has concluded that it can accommodate some 8,300 dwellings under the dispersal approach, leaving the remaining 2,500 to be accommodated in a new settlement. There is, however, little evidence to show that 8,300 is the maximum number of dwellings which could be accommodated by existing settlements through dispersal without detriment to character or infrastructure capacity.</p> <p>The 2012 SHLAA indicates that the existing settlements could accommodate some 8232 dwellings (including sites already benefiting from planning permission but excluding the 500 completions 2008-2011). This figure has been taken through to the Core Strategy with little alteration. This assessment, however, cannot be considered to be entirely accurate as the SHLAA:</p> <ul style="list-style-type: none"> - considered 39 LSVs; the Core Strategy now contains 44 LSVs. - discounted all sites with a high or medium/high landscape impact, yet several sites with that designation have now achieved planning permission. - discounted all sites which had potential heritage impacts but this excludes potential for sensitively designed schemes <p>CIL monies can be combined from small sites to pay for infrastructure improvements which overcome Council's previous concerns regarding impacts on infrastructure.</p>	<p>The Council has given little consideration to the real capacity of its more sustainable villages. With the need for additional housing acknowledged, the Council must increase the allocation to the Local Service Villages.</p>	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Housing Trajectory - Main Rural Centres - 5 Year Housing Land Supply <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>SDC acknowledges the need to maintain the vitality of rural areas, hence the significant change in policy between the current Local Plan, which restrains development in the countryside, and the approach set out in the Core Strategy, which proposes over 25% of overall development to 2031 to villages and the rural area (including on Large Rural Brownfield sites). In this respect, the Core Strategy is consistent with national policy.</p>
See overall response to CS.16.		See overall response to CS.16.					
See overall response to CS.16.		See overall response to CS.16.					

Section 5. Development Strategy - 5.2 Housing Development Policy CS.16 B. Strategic Allocations

Number of Supports: 6 Number of Objections: 16 Number of Unspecified: 3

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Gladman Developments		Not Specified	Not Specified	No	<p>Raise concerns around the process the Council have undertaken when selecting Gaydon/Lighthorne Heath as the location for the new settlement. This was the only option presented within the Focused Consultation in 2013, and as such it would appear that decisions were made regarding this site prior to the additional consultation in February 2014. There has been a lack of transparency and clarity in the Councils decision making and therefore it is unclear whether this new settlement is the most appropriate strategy for the District or not.</p> <p>As stated in previous submission made to the Focused Consultation (February 2014) Gladman submit that SADC should not be progressing with just one new settlement / SUE (proposal GLH). Linked to the significant need to increase the proposed housing requirement (as discussed through the Regeneris OAN) the Councils proposals will not deliver the scale of growth necessary to meet the true needs. Gladman contend that it would be appropriate in combination with the existing proposed dispersal and new settlement approach, to include at least one further SUE across the district. Gladman object to the methodology used by the Council, as it is too simplistic and could potentially result in the illogical categorisation of some settlements. The role and function of the local service centres and how they reflect the components of a sustainable community should also be considered. This should go significantly further than merely addressing the settlement size and access to a small number of services and facilities.</p> <p>Gladman believe the assessment process should have been significantly more in depth and should have considered a number of additional factors, including:</p> <ul style="list-style-type: none"> - demographic and socio-economic profile of the settlements - the balance and mix of housing stock (in terms of type, size, tenure) and its fit to housing needs (current and future) of the community - Availability of employment opportunities and the ability and potential of the settlement to host economic activity - Relationship with other settlements and the importance it may have for the wider hinterland. - Facilities and Services available in the settlement. <p>The Council have provided no clear rationale for how the scale of growth allocated to each of these categories has been determined. These appear to be arbitrary figures, which do not reflect a thorough assessment of the Local Service Villages and are not evidentially based. The Council need to be able to show through their evidence base documents the process they have gone through to reach these decisions.</p>	<p>Gladman object to the approach taken in Part B of this Policy. In categorising settlements the methodology applied is too simplistic.</p> <p>Gladman question the transparency in the process taken by the Council in the identification of the new settlement at GLH as a preferred strategic option. The Council failed to present strategic alternatives for consultation to this site until in 2014. The process seems to have been predetermined.</p>	<p>See separate comments in respect of:</p> <ul style="list-style-type: none"> - Proposal GLH - Appendix 2 LSV Methodology <p>See separate comments in CS.16 in respect of Main Rural Centres.</p>

Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	<p>We have severe misgivings as to the viability and deliverability of the 650 dwellings at the Canal Quarter, involving as it does the relocation of existing businesses which is dependent on development of new sites and premises, including in the Green Belt.</p> <p>From the Council's own evidence (PBA Reports dated March 2014) it is clear that very little reliance should be placed on the Canal Quarter to deliver housing over the plan period. The scheme relies on a local engineering firm successfully relocating together with the agreement of another firm to break its lease. The consultants note that the major occupier has said it may not move and recommend that "the Council should be cautious in relying on its delivery in meeting their housing needs". Subsequent phases are even more unlikely to be delivered, as the report makes clear. At best, only the Warwick House proposals could be relied upon and this is a scheme which is for specialist housing, fell outside the scope of the report and, we suggest, is almost certainly counted elsewhere as a commitment.</p> <p>The identification of Gaydon/Lighthorne Heath is not a sustainable response to meeting the housing needs of the District. Furthermore, it is not credible to suggest that delivery of new dwellings can commence in 2016/17 and progress thereafter and an average annual rate of 166 per year. Experience suggests that after an initial surge in interest such a location will struggle to sustain such completion rates.</p>	Sustainable Urban Extension delivering 1,00 units to the southeast of Stratford-upon-Avon should be allocated to meet housing needs.	<p>As things stand there is no reason to assume that Proposal GLH will not deliver 2,500 dwellings during the plan period. More detailed analysis is being undertaken to underpin the Masterplan SPD for the site. This will address issues of scale, timing and deliverability. The Draft SPD is due to be reported to The Cabinet in October.</p> <p>While there are complex issues to resolve, there are no overriding reasons why it cannot be achieved over the plan period. There is evidence to show that large parts of the Canal Quarter are readily available for redevelopment and will be delivered in the short to medium term.</p>
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	Yes	Support the settlement hierarchy and allocation of housing levels to villages, appropriate to their size and sustainability and support the indicative numbers proposed, acknowledging that some villages will be able to accommodate more. The Council must be aware that it is reasonable for a village to provide the top end of the range and occasionally more. The Council must not dismiss larger schemes but should apply the final part of CS.15 which refers to detailed masterplan and proper justification.	None specified.	Dealt with through the Site Allocations Plan.
The Bird Group of Companies	Framptons	Yes	No	No	<p>The figure of 10,800 dwellings is not supported as it fails to meet the full objectively assessed needs of the District. The housing market for Stratford upon Avon clearly includes the Birmingham HMA and the Coventry and Warwickshire HMA. The plan fails to demonstrate how it will meet these needs and should plan on an interim basis for a minimum of 13,600 dwellings.</p> <p>Housing should be directed to the most sustainable locations at a scale commensurate with the role, function and capacity of the settlement. This should be done on a settlement by settlement basis with the intention to deliver the most sustainable development. Additional provision for housing should be made at Stratford upon Avon and this will help meet the needs of the District and the wider strategic housing market areas with an identified shortfall namely Coventry and Birmingham.</p>	Include reference to a new Strategic housing allocation SUA.4 Land south of A46 Stratford upon Avon for 750 dwellings which should be removed from the Green Belt. Consequential changes to Part A and SUA.1.	<p>See separate comments in respect of CS.16 and Objectively Assessed Need (OAN).</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p>
Heritage Trustees Ltd	Stansgate Planning	Yes	Not Specified	Yes	Support the settlement hierarchy and allocation of housing levels to villages, appropriate to their size and sustainability and support the indicative numbers proposed, acknowledging that some villages will be able to accommodate more. The Council must be aware that it is reasonable for a village to provide the top end of the range and occasionally more. The Council must not dismiss larger schemes but should apply the final part of CS.15 which refers to detailed masterplan and proper justification.		Dealt with through the Site Allocations Plan.
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	No	Additional land should be allocated to meet the OAN of the District. As a Main Rural Centre, Shipston-on-Stour is a sustainable settlement to accommodate additional housing development to help support services and meet housing needs.	Allocate land west of Shipston-on-Stour, south of Campden Road for 70 homes.	<p>See overall response to CS.16 in respect of Main Rural Centres.</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>Dealt with through the Site Allocations Plan.</p>

H.G. Hodges & Sons Ltd.	Stansgate Planning	Yes	Not Specified	Yes	Support the settlement hierarchy and allocation of housing levels to villages, appropriate to their size and sustainability and support the indicative numbers proposed, acknowledging that some villages will be able to accommodate more. The Council must be aware that it is reasonable for a village to provide the top end of the range and occasionally more. The Council must not dismiss larger schemes but should apply the final part of CS.15 which refers to detailed masterplan and proper justification.	None specified.	Dealt with through the Site Allocations Plan.
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	In light of the fact that the figure of 10,800 is unsound, further strategic allocations need to be made.	Include land north of 18 Salford Road, Bidford for 150 dwellings as a strategic allocation.	See overall response to CS.16 in respect of identifying: - Objectively Assessed Need (OAN) - Main Rural Centres
Warwickshire County Council		Not Specified	Not Specified	Not Specified	The Core Strategy should have robust policy so that sufficient capacity exists for key County Council Services i.e. school places in rural areas, transportation and sustainable transport matters should be addressed.	None specified.	See separate comments in respect of CS.15 Distribution of Development.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	We have severe misgivings as to the viability and deliverability of the 650 dwellings at the Canal Quarter, involving as it does the relocation of existing businesses which is dependent on development of new sites and premises, including in the Green Belt. From the Council's own evidence (PBA Reports dated March 2014) it is clear that very little reliance should be placed on the Canal Quarter to deliver housing over the plan period. The scheme relies on a local engineering firm successfully relocating together with the agreement of another firm to break its lease. The consultants note that the major occupier has said it may not move and recommend that "the Council should be cautious in relying on its delivery in meeting their housing needs". Subsequent phases are even more unlikely to be delivered, as the report makes clear. At best, only the Warwick House proposals could be relied upon and this is a scheme which is for specialist housing, fell outside the scope of the report and, we suggest, is almost certainly counted elsewhere as a commitment.	None specified.	While there are complex issues to resolve, there are no overriding reasons why it cannot be achieved over the plan period. There is evidence to show that large parts of the Canal Quarter are readily available for redevelopment and will be delivered in the short to medium term.
Hayward Developments Ltd	Stansgate Planning	Not Specified	Not Specified	No	It is considered that Gaydon has the capacity to accommodate more than 10 – 25 dwellings during the Plan period without harm to the established character of the settlement or the surrounding countryside. The village is not affected by environmental designations and is in a sustainable location to major employment opportunities at Jaguar Land Rover, Aston Martin Lagonda, and the Heritage Motor Centre. Further the village is close to Kineton, a Major Rural Centre, and the services and facilities including a school at Lighthorne Heath. The sustainability of the village would be increased should the Council's proposals for a new settlement at Gaydon/Lighthorne Heath come to fruition. It is considered that the individual circumstances of the village should be taken into account to supplement matters of the size of the settlement and the provision key services. Such circumstances would include proximity to other settlements providing key services and facilities, in accordance with the National Planning Policy Framework, and employment opportunities.	The village of Gaydon should be reclassified as a Category 3 Local Service Village capable of accommodation 26 – 50 dwellings over the Plan period.	See separate comments in respect of Appendix 2 LSV Methodology.

Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Yes	Yes	No	<p>We have severe misgivings as to the viability and deliverability of the 650 dwellings at the Canal Quarter, involving as it does the relocation of existing businesses which is dependent on development of new sites and premises, including in the Green Belt.</p> <p>From the Council's own evidence (PBA Reports dated March 2014) it is clear that very little reliance should be placed on the Canal Quarter to deliver housing over the plan period. The scheme relies on a local engineering firm successfully relocating together with the agreement of another firm to break its lease. The consultants note that the major occupier has said it may not move and recommend that "the Council should be cautious in relying on its delivery in meeting their housing needs". Subsequent phases are even more unlikely to be delivered, as the report makes clear. At best, only the Warwick House proposals could be relied upon and this is a scheme which is for specialist housing, fell outside the scope of the report and, we suggest, is almost certainly counted elsewhere as a commitment.</p> <p>*The identification of Gaydon/Lighthorne Heath is not a sustainable response to meeting the housing needs of the District. Furthermore, it is not credible to suggest that delivery of new dwellings can commence in 2016/17 and progress thereafter and an average annual rate of 166 per year. Experience suggests that after an initial surge in interest such a location will struggle to sustain such completion rates.</p>	Sustainable Urban Extension delivering 1,00 units to the southeast of Stratford-upon-Avon should be allocated to meet housing needs.	<p>As things stand there is no reason to assume that Proposal GLH will not deliver 2,500 dwellings during the plan period. More detailed analysis is being undertaken to underpin the Masterplan SPD for the site. This will address issues of scale, timing and deliverability. The Draft SPD is due to be reported to The Cabinet in October.</p> <p>While there are complex issues to resolve, there are no overriding reasons why it cannot be achieved over the plan period. There is evidence to show that large parts of the Canal Quarter are readily available for redevelopment and will be delivered in the short to medium term.</p>
K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	No	<p>Additional land should be allocated to meet the objectively assessed housing needs of the District, and that much of this additional requirement should be directed towards the Main Rural Centres. Southam is one of the Main Rural Centres and is therefore a sustainable settlement suitable to accommodate additional housing development.</p>	Allocate approximately 270 houses on land adjacent to the A423 at Southam.	<p>See overall response to CS.16 in respect of identifying:</p> <ul style="list-style-type: none"> - Objectively Assessed Need (OAN) - Main Rural Centres
Richard Hoskin		Not Specified	Not Specified	Not Specified	<p>The development of LSV's would put a serious strain on existing services. Small windfall development would however help to maintain and enhance our local community of Wilmcote. No account appears to have been taken of issues (e.g. flooding, ecology, character, heritage, Green Belt) that could affect village life. The green belt has existing boundaries - where are the exceptional circumstances that might cause development outside of these? Any development should be viable, sustainable and wanted by the local community who also want to have a say so as to meet with why they live in the area in the first place.</p>	*None specified	<p>*See separate comments in respect of:</p> <ul style="list-style-type: none"> - CS.15 Distribution of Development - Appendix 2 LSV Methodology
The Taylor Family	Stansgate Planning	Yes	Not Specified	Yes	<p>Concur that a pattern of balanced dispersal across a wide range of sustainable settlements is the most appropriate way to meet the housing needs of the District. However, the figure of 10,800 is inadequate and should be increased. If additional development is to be provided the majority should be directed to the Main Rural Centres with some additional development to the Local Service Villages, which have not so far been required to accommodate much development but which are highly suitable to do so.</p>	None specified.	<p>See separate comments in respect of CS.16 Objectively Assessed Need (OAN).</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>Dealt with through the Site Allocations Plan.</p>
Midland Commercial Properties	Stansgate Planning	Yes	Not Specified	No	<p>Additional land should be allocated to meet the objectively assessed housing needs of the District, and that much of this additional requirement should be directed towards the Main Rural Centres, including Southam which is a sustainable settlement suitable to accommodate additional housing development.</p>	Land east of Banbury Road, Southam should be included as a strategic allocation for 30-40 homes	<p>See overall response to CS.16 in respect of Main Rural Centres.</p> <p>See separate comments in respect of CS.15 Distribution of Development.</p> <p>Dealt with through the Site Allocations Plan.</p>

Paul Ridgeway	Stansgate Planning	Yes	Not Specified	No	Additional land should be allocated to meet the objectively assessed housing needs of the District, and that much of this additional requirement should be directed towards the Main Rural Centres, including Studley which is a sustainable settlement suitable to accommodate additional housing development.	Land south of The Slough, Studley should be included as a strategic allocation for 60 homes	See overall response to CS.16 in respect of Main Rural Centres. See separate comments in respect of CS.15 Distribution of Development. Dealt with through the Site Allocations Plan.
Earlswood & Forshaw Heath Residents Association		No	No	No	<p>We fail to understand the maths of how the LSV figure of 1,950 has been arrived at without any further work when SDC has previously admitted that the LSV figure of 1,800 was the maximum number that could be accommodated in the LSVs. Where do the extra 150 come from?</p> <p>No consideration has been taken (irrespective of whether 1,800 or 1,950 are built in the LSV) of the fact that some of these villages are washed over by the Green Belt. 475 of these houses will be built in 10 villages in the Green Belt representing 24% of LSV housing. This cannot be accommodated by "limited infilling" as per the NPPF and is therefore outside the law.</p> <p>This figure is not objectively assessed, and not the most appropriate strategy when compared with alternatives. The SHLAA dates from 2008 and is out of date and cannot be used in any meaningful way to inform the Submission Core Strategy. The SHLAA 2012 Review maps do not indicate anything like the amount of housing identified in the Core Strategy.</p> <p>Development in the Green Belt is to satisfy unmet demand for housing and this does not meet the Green Belt requirements as set out in the NPPF. SDCs approach is ultra vires.</p>		The figures for the overall quantum of development for the LSVs are based on an approximate mid-point of the specified ranges. The increase by 150 units results from changes to the LSV categorisations (i.e. the number of villages within each category) and takes account of two large brownfield developments considered to fall within their respective villages (Maudslay Park at Great Alne and Compton Buildings at Fenny Compton). This totals 1,925 homes which has been rounded up to 1,950, comfortably within the overall range of between 1,315 and 2,200 homes.
A Anson	Stansgate Planning	Yes	Not Specified	Yes	Part B of CS.16 sets out the range of numbers of dwellings to be accommodated in the different categories of village. This is an appropriate strategy to ensure the housing needs of all can be met, appropriate to their size and sustainability. In the light of this we support the indicative number of houses proposed for each category of village, whilst noting that in certain circumstances some villages will be able to accommodate more. The Council must be aware that that is reasonable for villages to accommodate up to the top end the range if sites are appropriate, particularly if there is local support and the Council must not dismiss larger schemes, but should instead apply the final part of Policy CS.15, which refers to a detailed Masterplan and proper justification.	None specified.	Dealt with through the Site Allocations Plan.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	<p>We have severe misgivings as to the viability and deliverability of the 650 dwellings at the Canal Quarter, involving as it does the relocation of existing businesses which is dependent on development of new sites and premises, including in the Green Belt. From the Council's own evidence (PBA Reports dated March 2014) it is clear that very little reliance should be placed on the Canal Quarter to deliver housing over the plan period. The scheme relies on a local engineering firm successfully relocating together with the agreement of another firm to break its lease. The consultants note that the major occupier has said it may not move and recommend that "the Council should be cautious in relying on its delivery in meeting their housing needs".</p> <p>Subsequent phases are even more unlikely to be delivered, as the report makes clear. At best, only the Warwick House proposals could be relied upon and this is a scheme which is for specialist housing, fell outside the scope of the report and, we suggest, is almost certainly counted elsewhere as a commitment.</p>		While there are complex issues to resolve, there are no overriding reasons why it cannot be achieved over the plan period. There is evidence to show that large parts of the Canal Quarter are readily available for redevelopment and will be delivered in the short to medium term.

Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	<p>We have severe misgivings as to the viability and deliverability of the 650 dwellings at the Canal Quarter, involving as it does the relocation of existing businesses which is dependent on development of new sites and premises, including in the Green Belt.</p> <p>From the Council's own evidence (PBA Reports dated March 2014) it is clear that very little reliance should be placed on the Canal Quarter to deliver housing over the plan period. The scheme relies on a local engineering firm successfully relocating together with the agreement of another firm to break its lease. The consultants note that the major occupier has said it may not move and recommend that "the Council should be cautious in relying on its delivery in meeting their housing needs".</p> <p>Subsequent phases are even more unlikely to be delivered, as the report makes clear. At best, only the Warwick House proposals could be relied upon and this is a scheme which is for specialist housing, fell outside the scope of the report and, we suggest, is almost certainly counted elsewhere as a commitment.</p> <p>The identification of Gaydon/Lighthorne Heath is not a sustainable response to meeting the housing needs of the District. Furthermore, it is not credible to suggest that delivery of new dwellings can commence in 2016/17 and progress thereafter and an average annual rate of 166 per year. Experience suggests that after an initial surge in interest such a location will struggle to sustain such completion rates.</p>	<p>Recommend a similar allocation to that of SHIP.1 as identified in the 2008 and 2010 Draft is re-instated. The allocation should be extended onto the land south of Campden Road to the west of the Banner Homes site. *Without such an allocation, the Core Strategy fails to meet the objectively assessed needs (including for Shipston-on-Stour) as set out in the evidence base and is therefore unsound.</p>	<p>As things stand there is no reason to assume that Proposal GLH will not deliver 2,500 dwellings during the plan period. More detailed analysis is being undertaken to underpin the Masterplan SPD for the site. This will address issues of scale, timing and deliverability. The Draft SPD is due to be reported to The Cabinet in October.</p> <p>While there are complex issues to resolve, there are no overriding reasons why it cannot be achieved over the plan period. There is evidence to show that large parts of the Canal Quarter are readily available for redevelopment and will be delivered in the short to medium term.</p>
Tiddington Village Residents Association		Not Specified	Not Specified	No	<p>We feel that the Local Service Village methodology has disadvantaged the village of Tiddington and has not been fairly applied across the district. Some villages were consulted at a much earlier date than our village and had more input. Decisions had already been made when we heard about the matter.</p> <p>The points system for deciding on Local Service Villages is arbitrary and too generalised; not taking into account important finer points. Tiddington scored highly but has (at present) only just over 600 houses, so scored a 3 (villages with 999 houses also scored a 3!). Tiddington is unique due to its proximity to Stratford e.g. traffic queues. Although there is a bus service (scoring another 3), the area suffers massive congestion and traffic delays (with buses often running up to an hour late!). The scoring for the school is unreliable, as although Tiddington has a primary school, it is nearly full, with no plans for expansion, so would be unable to accommodate the extra children, so this score of 3 is misleading also. How objectively assessed are the seemingly arbitrary allocations to each category of LSV? What evidence of local participation is there in coming to the LSV choice and allocations? What are the facts backing up the choices on LSVs? Are there any reasonable alternatives and is there a sustainability appraisal? Is there any sound infrastructure planning to support the LSV housing allocations?</p>	<p>The following modifications are needed to make this part of the Core Strategy more sound:</p> <ul style="list-style-type: none"> - LSV criterion needs to be objectively assessed - Residents need to be consulted with sufficient time to respond appropriately - Facts need to be provided to back up the choices made regarding the LSV housing allocations and/or the criterion used for allocating points - A reasonable alternative to the LS V housing allocations is needed - A full sustainability appraisal should be conducted - An infrastructure plan to support the LS V housing allocation should be provided <p>These modifications would help to make this part of the Core Strategy more sound as it would show that the LS V housing allocation would have been more positively prepared. As such, the decisions made would be more clearly justified and, therefore, effective.</p>	<p>See separate comments in respect of Appendix 2 LSV Methodology.</p>
M Hale	Stansgate Planning	Yes	Not Specified	Yes	<p>Support the settlement hierarchy and allocation of housing levels to villages, appropriate to their size and sustainability and support the indicative numbers proposed, acknowledging that some villages will be able to accommodate more. The Council must be aware that it is reasonable for a village to provide the top end of the range and occasionally more. The Council must not dismiss larger schemes but should apply the final part of CS.15 which refers to detailed masterplan and proper justification.</p>	<p>None specified.</p>	<p>Dealt with through the Site Allocations Plan.</p>
V & R Stephan		Not Specified	Not Specified	No	<p>Inadequate infrastructure - the small town of Stratford-upon-Avon cannot cope with the large influx of housing and we strongly object to the use of Green Belt.</p>	<p>Stop large scale housing development in and around Stratford-upon-Avon.</p>	<p>See separate comments in respect of CS.15 Distribution of Development.</p>

Overall Officer Response	<p>The purpose of identifying LSVs was an acknowledgement that villages need to continue to grow organically and flourish. Other than their Green Belt designation, there is considered no fundamental difference between villages within or outside the Green Belt. They are sustainable communities; arguably, even more sustainable given their location in respect of the wider sub-region. Given the scale of development proposed and the flexibility of the approach of setting a range, the Council considers that this development can be met within the realms of Green Belt policy. Furthermore, the quantum specified is for the total plan period from 2011 to 2031, of which approximately over one third has already been built or has planning permission and is expected to be built. Whilst it is agreed that a single development equivalent in scale to the 368 homes (assuming the midpoint) proposed in the Green Belt would likely be contrary to the purposes of the Green Belt, it is reasonable to assume that this scale of development could be achieved across a range of small sites across the 11 LSVs in the Green Belt. Furthermore, by setting a development range, there is flexibility within CS.16 and LSVs outside the Green Belt should the Green Belt villages not deliver the assumed midpoint. Notwithstanding this, there is opportunity through the Site Allocations Plan process to inset villages from the Green Belt if it transpired that the scale of development could not be accommodated in a particular village without removing it from the Green Belt.</p>
Overall Officer Recommendation	

Section 5. Development Strategy - 5.2 Housing Development Policy CS.16 C. Site Allocations

Number of Supports: 7 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Gladman Developments		Not Specified	Not Specified	No	Part C of Policy CS.16 refers to the Council encouraging communities to prepare neighbourhood plans to identify sites to meet or exceed the housing requirements set out above. However, to ensure the delivery of these dwellings the Council will prepare a Site Allocations Plan by 2016. Gladman agree that there is an element of uncertainty that Neighbourhood plans will come forward and that these will identify sites to deliver this element of Policy CS.16. The Council are justified in their approach to provide contingency in terms of ensuring the identification and delivery of allocations in these areas through a site allocations plan.	None specified.	n/a
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	Yes	Support the approach that ideally Neighbourhood Plans will identify sites but where this does not happen the Site Allocations Plan will ensure that sites are allocated to meet the housing needs of the LSVs, recognising that where settlements are washed over by the Green Belt, the allocation will be through the Site Allocations DPD.	None specified.	n/a
Heritage Trustees Ltd	Stansgate Planning	Yes	Not Specified	Yes	Support the approach that ideally Neighbourhood Plans will identify sites but where this does not happen the Site Allocations Plan will ensure that sites are allocated to meet the housing needs of the LSVs, recognising that where settlements are washed over by the Green Belt, the allocation will be through the Site Allocations DPD.	None specified.	n/a
M Hale	Stansgate Planning	Yes	Not Specified	Yes	Support the approach that ideally Neighbourhood Plans will identify sites but where this does not happen the Site Allocations Plan will ensure that sites are allocated to meet the housing needs of the LSVs, recognising that where settlements are washed over by the Green Belt, the allocation will be through the Site Allocations DPD.	None specified.	n/a
A Anson	Stansgate Planning	Yes	Not Specified	Yes	Support the approach that ideally Neighbourhood Plans will identify sites but where this does not happen the Site Allocations Plan will ensure that sites are allocated to meet the housing needs of the LSVs, recognising that where settlements are washed over by the Green Belt, the allocation will be through the Site Allocations DPD.	None specified.	n/a
H.G. Hodges & Sons Ltd.	Stansgate Planning	Yes	Not Specified	Yes	Support the approach that ideally Neighbourhood Plans will identify sites but where this does not happen the Site Allocations Plan will ensure that sites are allocated to meet the housing needs of the LSVs, recognising that where settlements are washed over by the Green Belt, the allocation will be through the Site Allocations DPD.	None specified.	n/a
The Taylor Family	Stansgate Planning	Yes	Not Specified	Yes	Support the approach that ideally Neighbourhood Plans will identify sites but where this does not happen the Site Allocations Plan will ensure that sites are allocated to meet the housing needs of the LSVs, recognising that where settlements are washed over by the Green Belt, the allocation will be through the Site Allocations DPD.	None specified.	n/a
Kinwarton Parish Council		Not Specified	Not Specified	Yes	Essential the Core Strategy is in place and we do not see anything in the Submission Core Strategy that should cause delay.	None specified.	n/a
Overall Officer Response		*See also overall response to CS.16					

Overall Officer Recommendation	*See also overall response to CS.16
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Section 5. Development Strategy - 5.2 Housing Development Policy CS.16 D. Phasing and Delivery

Number of Supports: 4 Number of Objections: 7 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Gladman Developments		Not Specified	Not Specified	No	<p>Part D of this policy refers to the phasing and delivery of housing and states allocated sites will only come forward ahead of their phasing timescale if monitoring shows a significant shortfall in housing delivery across the previous phases. Gladman object to this element of the policy and specifically ask the question; what is the harm of these sites coming forward ahead of any proposed phasing.</p> <p>Support the need for a contingency approach, but suggest that this flexibility in terms of an increased housing requirement and over allocation should be factored into the Core Strategy, rather than coming through the Site Allocations Plan.</p>	None specified.	See overall response below.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	<p>There neither any need, nor any support in national policy for a phasing and delivery element to CS.16. Part D is unsound as it not supported by any evidence which justifies it and it is not in accordance with national policy.</p> <p>There is no policy basis for attempting to set a maximum level of housing development over the plan period or any part of it and to prevent over-provision. Such a policy is one which restricts unnecessarily the supply of new housing. If delivery of new housing in the District keeps pace with a trajectory (based on a figure which meets objectively assessed needs), other policies in the Core Strategy and the Framework will ensure only sustainable development which accords with the plan can be permitted. Equally, if development does accord with the plan, the presumption in favour of sustainable development in paragraph 14 from the Framework prevails and proposals should be permitted without delay.</p>	None specified.	See overall response below.
One Property Group	Phase 2 Planning & Development Limited	Not Specified	Not Specified	No	<p>We note that the Core Strategy provides for the Site Allocations Plan to allocate additional sites, should it appear as if the housing trajectory is failing to be met. However, there are two problems with this approach: (1) The Site Allocations Plan is programmed to be adopted within a year or so of the Core Strategy, and therefore realistically, any provision is unlikely to be evident by then; (2) Other than the broad Housing Trajectory, the Plan does not contain any clear mechanism for monitoring under-performance.</p> <p>Specific targets for monitoring should be included for the principal allocations (GLH in particular), and key milestones for housing delivery generally should be set, by reference to the Trajectory. These milestones can then trigger actions to remedy any shortfall. One measure of flexibility that should be included within the Plan is the treatment of the housing targets in the first four bullet points of Section A of CS16 as minimum requirements. In the absence of clear mechanisms and actions for monitoring, the Plan will not be Effective.</p>	<p>Increase the Main Rural Centres housing provision to 3,480;</p> <p>Increase the Local Service Village housing provision to 2,150;</p> <p>Identify clear and specific targets for housing supply to ensure monitoring is able to trigger remedial actions;</p> <p>Amend CS16 to refer to housing requirements for Stratford upon Avon, Main Rural Centres, New Settlement and Local Service Villages as minimum requirements.</p>	<p>See separate comments in respect of: - CS.15 Distribution of Development - CS.16 Housing Development</p> <p>See overall response below.</p>
CALA Homes (Midlands) Ltd	Stansgate Planning	Yes	Not Specified	Yes	<p>As a contingency, the Site Allocations Plan will need to consider the need to identify further sites in Stratford upon Avon and the Main Rural Centres which can then be released if monitoring shows a significant shortfall in the amount of housing being delivered against the housing requirement.</p> <p>It is important that Core Strategies are sufficiently flexible to deal with changes which might occur during the Plan period, particularly during the earlier years when a review is unlikely to be progressed. The contingency plan set out in this policy is a suitable way of ensuring the District Council will be able to release additional sites for development when the need arises.</p>	<p>Policy wording should be strengthened to refer to 'will identify further housing sites...'</p> <p>Policy should be expanded to set out precisely what the trigger will be. At present the trigger is stated to be 'significant shortfall' (paragraph 5.2.8), but there is no definition of this. Similarly the triggers for bringing sites forward from a later phase of the Plan should be clearly set out recognising, of course, that it takes time to bring additional sites forward for development.</p>	Noted. See overall response below.

Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	The fundamental thrust of Government policy is the need to boost significantly the supply of housing. Under the NPPF the requirement to meet the full objectively assessed needs for market and affordable housing is an absolute one except insofar as there is any inconsistency with other policies set out in the NPPF. There is no justification for the phasing and delivery proposal for allocated sites as set out in CS16 (D). Indeed the Council's proposed holding back of development will worsen housing affordability.	None specified.	See overall response below.
K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	Yes	As a contingency, the Site Allocations Plan will need to consider the need to identify further sites in Stratford upon Avon and the Main Rural Centres which can then be released if monitoring shows a significant shortfall in the amount of housing being delivered against the housing requirement. It is important that Core Strategies are sufficiently flexible to deal with changes which might occur during the Plan period, particularly during the earlier years when a review is unlikely to be progressed. The contingency plan set out in this policy is an suitable way of ensuring the District Council will be able to release additional sites for development when the need arises.	Policy wording should be strengthened to refer to 'will identify further housing sites...' Policy should be expanded to set out precisely what the trigger will be. At present the trigger is stated to be 'significant shortfall' (paragraph 5.2.8), but there is no definition of this. Similarly the triggers for bringing sites forward from a later phase of the Plan should be clearly set out recognising, of course, that it takes time to bring additional sites forward for development.	Noted. See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	There neither any need, nor any support in national policy for a phasing and delivery element to CS.16. Part D is unsound as it not supported by any evidence which justifies it and it is not in accordance with national policy. There is no policy basis for attempting to set a maximum level of housing development over the plan period or any part of it and to prevent over-provision. Such a policy is one which restricts unnecessarily the supply of new housing. If delivery of new housing in the District keeps pace with a trajectory (based on a figure which meets objectively assessed needs), other policies in the Core Strategy and the Framework will ensure only sustainable development which accords with the plan can be permitted. Equally, if development does accord with the plan, the presumption in favour of sustainable development in paragraph 14 from the Framework prevails and proposals should be permitted without delay.	None specified.	Noted. See overall response below.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	There neither any need, nor any support in national policy for a phasing and delivery element to CS.16. Part D is unsound as it not supported by any evidence which justifies it and it is not in accordance with national policy. There is no policy basis for attempting to set a maximum level of housing development over the plan period or any part of it and to prevent over-provision. Such a policy is one which restricts unnecessarily the supply of new housing. If delivery of new housing in the District keeps pace with a trajectory (based on a figure which meets objectively assessed needs), other policies in the Core Strategy and the Framework will ensure only sustainable development which accords with the plan can be permitted. Equally, if development does accord with the plan, the presumption in favour of sustainable development in paragraph 14 from the Framework prevails and proposals should be permitted without delay.	None specified.	See overall response below.
Midland Commercial Properties	Stansgate Planning	Yes	Not Specified	Yes	As a contingency, the Site Allocations Plan will need to consider the need to identify further sites in Stratford upon Avon and the Main Rural Centres which can then be released if monitoring shows a significant shortfall in the amount of housing being delivered against the housing requirement. It is important that Core Strategies are sufficiently flexible to deal with changes which might occur during the Plan period, particularly during the earlier years when a review is unlikely to be progressed. The contingency plan set out in this policy is an suitable way of ensuring the District Council will be able to release additional sites for development when the need arises.	Policy wording should be strengthened to refer to 'will identify further housing sites...' Policy should be expanded to set out precisely what the trigger will be. At present the trigger is stated to be 'significant shortfall' (paragraph 5.2.8), but there is no definition of this. Similarly the triggers for bringing sites forward from a later phase of the Plan should be clearly set out recognising, of course, that it takes time to bring additional sites forward for development.	Noted. See overall response below.

Paul Ridgeway	Stansgate Planning	Yes	Not Specified	Yes	<p>Strongly support the recognition that, as a contingency, the Site Allocations Plan will consider the need to identify further sites in Stratford upon Avon and the Main Rural Centres which can then be released if monitoring shows a significant shortfall in the amount of housing being delivered against the housing requirement.</p> <p>It is important that Core Strategies are sufficiently flexible to deal with changes which might occur during the Plan period, particularly during the earlier years when a review is unlikely to be progressed. The contingency plan set out in this policy is a suitable way of ensuring the District Council will be able to release additional sites for development when the need arises.</p>	<p>Policy wording should be strengthened to refer to 'will identify further housing sites...'</p> <p>Policy should be expanded to set out precisely what the trigger will be. At present the trigger is stated to be 'significant shortfall' (paragraph 5.2.8), but there is no definition of this. Similarly the triggers for bringing sites forward from a later phase of the Plan should be clearly set out recognising, of course, that it takes time to bring additional sites forward for development.</p>	Noted. See overall response below.
Ainscough Strategic Land	Pegasus Planning Group	Yes	Not Specified	No	<p>There neither any need, nor any support in national policy for a phasing and delivery element to CS.16. Part D is unsound as it not supported by any evidence which justifies it and it is not in accordance with national policy.</p> <p>There is no policy basis for attempting to set a maximum level of housing development over the plan period or any part of it and to prevent over-provision. Such a policy is one which restricts unnecessarily the supply of new housing. If delivery of new housing in the District keeps pace with a trajectory (based on a figure which meets objectively assessed needs), other policies in the Core Strategy and the Framework will ensure only sustainable development which accords with the plan can be permitted. Equally, if development does accord with the plan, the presumption in favour of sustainable development in paragraph 14 from the Framework prevails and proposals should be permitted without delay.</p>	None specified.	Noted. See overall response below.
Overall Officer Response		<p>It is proposed to include additional text in Part D specifying that the AMR will include the monitoring mechanism to determine whether additional sites should be brought forward. This is considered appropriate as the AMR will be published annually thus providing regular and up-to-date opportunities to respond flexibly to the housing supply situation. Leaving this to a DPD or SPD would delay effective and necessary remedial action. In respect of defining significant undersupply or specifying what the trigger will be, SDC is conscious not to seek to apply an arbitrary figure. As such, the 5 year housing land supply calculation is considered to be the appropriate mechanism for determining whether additional land should be brought into the 5 year supply.</p> <p>It is noted that there is no reference to phasing in the NPPF. However, in accordance with the tests of soundness, Local Plans need only be 'consistent' with national policy and the lack of explicit reference in national guidance to a policy approach being advocated through a Local Plan does not automatically render the Local Plan unsound. Rather, the question is whether the inclusion of a phasing policy in a Local Plan is consistent with the general thrust of national planning policy. Notwithstanding the fact that phasing and the management of development are integral to the achievement of sustainable communities (e.g. the relationship to infrastructure provision and the CIL), there are numerous references to the concept of phasing in the Planning Practice Guidance (PPG). For example, para.002 in the section on Local Plans states that "the Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered" (emphasis included). Para.008 goes further to state that 'where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions).' Phasing is also fundamental to ensuring that the Council can demonstrate a continual 5 year supply of housing (as required by the NPPF). Indeed, the 5 year supply calculation would be the mechanism to bring forward allocated sites sooner than anticipated. It is important to note that CS.16 does not seek to set a maximum level of housing. Instead, it seeks to manage the delivery of sites to meet the identified objectively assessed need. Phasing is also crucial to ensuring the Plan is flexible. The identification of 'contingent' sites (in other words phase 5 sites) in the Site Allocations Plan provides the Council with the means to bring forward additional and/or alternative sites to continue to meet the OAN and 5 year supply. A plan without contingent sites would not be sufficiently flexible to adapt to rapid change contrary to the presumption in favour of sustainable development (NPPF para.14). It is also worth noting that although the 12 core planning principles listed in para.17 of the NPPF are not numbered, it is prescient that the first is that planning should be "genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting a positive vision for the future of the area". This can only be achieved when there is certainty which sites will be developed and when.</p>					
Overall Officer Recommendation		<p>The Inspector is requested to make the following modifications to Part D:</p> <ul style="list-style-type: none"> - Insert the following text to the end of the first paragraph: <i>"The calculation of 5 year housing land supply as set out in the Annual Monitoring Report will provide the mechanism for managing housing delivery and updating the Housing Trajectory to bring forward additional sites if required."</i> - Insert the following text as an additional paragraph at the end of Part D: <i>"If evidence demonstrates that significant housing needs are arising from accelerated economic development in the District, the Council will first seek to re-phase the delivery of housing sites and/or identify additional sites, but will also bring forward a review if it is evident that the housing needs cannot be adequately addressed without such a review."</i> 					

Section 5. Development Strategy - 5.2 Housing Development Policy CS.16 Fig.1 Housing Trajectory

Number of Supports: 0 Number of Objections: 9 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	The Housing Trajectory relies upon a windfall allowance of 1,390 dwellings (an average of 93 dwellings pa 2016-2031). This figure is not justified and CS.16 is unsound in placing reliance upon it. As the Core Strategy is implemented a significant number of schemes should come forward as allocations in either a Site Allocations DPD or through Neighbourhood plans which would previously have emerged as windfall sites. It is, therefore, in our view unwise to rely on a level of windfall completions contributing such a significant proportion of overall completions and it is unclear how the allocations identified in plans will compliment or replace this allowance.	None specified	See overall response below
Paul Ridgeway	Stansgate Planning	Not Specified	Not Specified	Not Specified	The housing trajectory table relies on windfalls in Stratford upon Avon, the Main Rural Centres and Other Rural Locations. In the Main Rural Centres it relies on 810 dwellings from windfalls which equates to about 100 dwellings per settlement which is considerable given the small size of the settlements (810 windfalls /8 MRC). It is stated as comprising 660 dwellings from large windfalls in phases 2 and 3 (paragraph 5.2.7/5.2.8). There does not appear to be any evidence to support this figure based on past trends, no evidence to suggest windfalls will materialise and there is no reason why the Plan cannot allocate sites in these settlements. Indeed the purpose of the plan is to provide some certainty in allocations rather than leave this to chance. The SHLAA 2012 considers sites within settlement with potential and demonstrates that there are no such sites available in many of the Main Rural Centres to accommodate this development and there is therefore a real chance that the Plan may not deliver the number of houses required.	There is an over reliance on windfalls and more sites should be allocated to reduce reliance on this element.	See overall response below.

CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	Not Specified	No	<p>Housing trajectory is not deliverable and therefore is not effective. In particular this relates to the reliance on GLH to deliver one quarter of the 10,800 and the project's proposed phasing.</p> <p>GLH is expected to deliver 2,500 in Phases 2-4 (2016/17-2020/31) and further beyond 2031, with 750 dwellings expected in the 5 year period 2016/17-2020/21. There is no first completion date set out in the Core Strategy nor are there more specific details in the Core Strategy's housing trajectory or the 5 year land supply papers prepared for 31 March 2014 evidencing how GLH will come forward in the timescales suggested.</p> <p>It is agreed that an average delivery c.170 dwellings a year could be delivered over the plan period once a first completion has been achieved, although it should be noted that this is unlikely to be achieved in the first years. Further whilst the average delivery rate might be achievable, there are key issues of timing and total number of dwellings across the Plan period that will affect this average rate.</p> <p>With regard to the 600 dwellings in the first 5 years, this is at odds with the trajectory set out in the Submission Core Strategy by 150 dwellings. It is not clear where the additional dwellings have been tested by either Peter Brett or the District Council and demonstrated to be deliverable.</p> <p>Further it is significantly unlikely that the first dwellings will be delivered in 2016. Before completions commence across the site, it is necessary to agree a Masterplan SPD (as set out by Policy GLH), secure planning permission, discharge all the pre- commencement conditions, deliver the necessary enabling infrastructure and complete the first dwellings within a year from the adoption of the plan. Whilst this may be possible on a smaller site, the nature of a new settlement has far greater complexity and it is considered this rate of delivery in the period 2016/17-2020/21 is unlikely. Moreover, the evidence has not been prepared to reflect the delivery rates assumed by the Council for this new settlement.</p> <p>There are particular highway constraints associated with the GLH scheme which need to be adequately discharged before the development can commence. This includes significant work to delivering upgrades to the Strategic Network, including the M40, which are yet to be agreed with the highways agency. The position is set out in the note from Mode Transport accompanying these representations.</p> <p>The housing trajectory is not effective as it is not deliverable over the plan period. The trajectory fails to take into account the lead-in times for delivering strategic sites. There is no explicit recognition within the Core Strategy that the GLH allocation might not deliver at the rate anticipated in the Housing Trajectory and thus no effective means by which to secure the delivery of additional housing in order for the DC to meet its housing needs.</p>	<p>The total number of homes expected in the first 5 years and across the plan period need to be reduced with the assumed start of GLH moved back to Phase 3. Long Marston Airfield should be included as an allocation to ensure an effective plan that meets housing needs.</p>	<p>See separate comments in respect of Proposal GLH.</p>
CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	Not Specified	No	<p>Trajectory is not effective as there is no justification or evidence for the delivery timescales for GLH and a lead-in time of 1 year. (See other representation re Housing Trajectory).</p>	<p>The total number of homes expected in the first 5 years and across the plan period need to be reduced with the assumed start of GLH moved back to Phase 3. Long Marston Airfield should be included as an allocation to ensure an effective plan that meets housing needs.</p>	<p>See separate comments in respect of Proposal GLH.</p>

Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	The Housing Trajectory relies upon a windfall allowance of 1,390 dwellings (an average of 93 dwellings pa 2016-2031). This figure is not justified and CS.16 is unsound in placing reliance upon it. As the Core Strategy is implemented a significant number of schemes should come forward as allocations in either a Site Allocations DPD or through Neighbourhood plans which would previously have emerged as windfall sites. It is, therefore, in our view unwise to rely on a level of windfall completions contributing such a significant proportion of overall completions and it is unclear how the allocations identified in plans will compliment or replace this allowance.	None specified	See overall response below.
Gallagher Estates	Pegasus Planning Group	Yes	Not Specified	No	The Housing Trajectory relies upon a windfall allowance of 1,390 dwellings (an average of 93 dwellings pa 2016-2031). This figure is not justified and CS.16 is unsound in placing reliance upon it. As the Core Strategy is implemented a significant number of schemes should come forward as allocations in either a Site Allocations DPD or through Neighbourhood plans which would previously have emerged as windfall sites. It is, therefore, in our view unwise to rely on a level of windfall completions contributing such a significant proportion of overall completions and it is unclear how the allocations identified in plans will compliment or replace this allowance.	None specified	See overall response below.
HIA Developments LLP	Framptons	Not Specified	Not Specified	No	For Henley-in-Arden, a total of 66 homes is identified of which all have either been built or have permission. There is no new development proposed and this cannot be considered as planning positively to meet the assessed needs for this settlement.	Allocate additional land at new Road Henley-in-Arden	See separate comments in respect of the Main Rural Centres in response to CS.16.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	The Housing Trajectory relies upon a windfall allowance of 1,390 dwellings (an average of 93 dwellings pa 2016-2031). This figure is not justified and CS.16 is unsound in placing reliance upon it. As the Core Strategy is implemented a significant number of schemes should come forward as allocations in either a Site Allocations DPD or through Neighbourhood plans which would previously have emerged as windfall sites. It is, therefore, in our view unwise to rely on a level of windfall completions contributing such a significant proportion of overall completions and it is unclear how the allocations identified in plans will compliment or replace this allowance.	None specified	See overall response below.
Follett Property Holdings Ltd	Nigel Moor Planning	Not Specified	Not Specified	No	The Housing Trajectory shows estimated completions of 750 dwellings for the Lighthorne Heath new settlement for the five year period 2016/17 – 2020/21 (Phase 2). This assumes full planning permission with all pre-development conditions agreed by April 2016, less than two years away, and an average of 150 dwellings built for this 5 year period. This is simply quite unrealistic both in terms of the time required to obtain the necessary full planning permission and an average completion rate over this 5 year period. Experience elsewhere in growth areas such as at Didcot and Bicester in Oxfordshire, suggests completion rates - once the necessary infrastructure is in place – in the range 50-100 dwellings during the initial years of such large scale development. A maximum completion figure of 400 dwellings for Phase 2 at Lighthorne Heath appears much more appropriate. This shortfall together with the over reliance on windfalls at Stratford-upon-Avon and the Main Rural Centres in Phase 2 indicates the necessity for the 500 dwellings feasible at Harbury Estate which can be phased over the plan period.	None specified	See separate comments in respect of Proposal GLH.
Alan Marks		Not Specified	Not Specified	No	Housing Trajectory makes the assumption that the 800 homes at Shottery are already delivered. This is flawed as there are outstanding land ownership issues that still need to be resolved and the development may not go ahead.	None specified	The 800 homes at Shottery are included as a commitment in the 'with permission' column. This is correct as the site has extant outline planning permission. The expected timescales for delivery of this site are considered realistic.
Overall Officer Response		*See overall response to CS.16					

Overall Officer Recommendation	*See overall recommendations to CS.16
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Section 5. Development Strategy - 5.2 Housing Development Policy CS.16 Development Management Considerations

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
John Read		Not Specified	Not Specified	No	DMC (4) uses different wording from CS.15 and AS.10 in respect of development in LSVs which could lead to conflict in interpretation, particularly in respect of sites on the periphery of villages.	Amend DMC (4) to match CS.15 and AS.10: 'within their Built-Up Area Boundaries (Where defined) or otherwise within their physical confines'.	Not agreed. The purpose of DMC(4) is to provide guidance in respect of the monitoring of housing completions and when completions will be counted against the LSV requirement as opposed to the Rural Area housing requirement. This is different to the intention of the wording in CS.15 and AS.10 which is to provide guidance whether a site should be granted planning permission.
Overall Officer Response		See also overall response to CS.16					
Overall Officer Recommendation		See also overall response to CS.16					

Section 5. Development Strategy - 5.3 Affordable Housing Policy CS.17

Number of Supports: 1 Number of Objections: 10 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
West Midlands HARP Planning Consortium	Tetlow King Planning	Yes	Yes	No	Do not consider level of housing sufficient to meet affordable housing need. Even assuming 35%, this equates to 3,780 compared to the level of identified need as being 4,660. AH viability evidence shows a number of amendments that have not been made to the policy e.g. some areas will not meet the target. Additional policy requirements (e.g. CS4 and biodiversity off-setting) and impacts on viability have not been taken into account.	Raise the housing target.	See overall response below.
Hallam Land Management	Marrons Planning	Not Specified	Not Specified	Not Specified	Table 66 of the CWSHMA sets out the estimated affordable housing needs for each of the constituent districts. The figures include provision for the recovery of any backlog in provision at 2011. The assessment indicates that Stratford on Avon requires some 133 affordable homes per annum. This equates to 25% of the overall housing requirement, as set out in the CWSHMA. On that basis, our clients find that there is no proper supporting evidence emerging from this work to support a level of policy provision in the order of 35% in Policy CS16. (Strategic Objective 15) and Policy CS17 part A.	None specified.	See overall response below.
Jim Darling	Cerda Planning	No	No	No	The 2013 joint Coventry and Warwickshire Strategic Housing Market Assessment (CWSHMA) is referenced throughout the CS, notably at section 1.3 (cross boundary issues) and the explanatory text for Policies CS16 and CS17. It is evident that the Council rely heavily on this piece of evidence to inform their market and affordable housing need, the housing market area and the type, mix and tenure required. A sceptic could say that the Council have undertaken several SHMAs to reach a requirement that is more politically palatable. Certainly by electing to propose the lowest housing requirement, the policy requirement to meet in FULL their objectively assessed housing need does not appear to have been met. On that basis, the plan is unsound.	None specified.	See overall response below.
Urban Renaissance Villages (URV) and Helical Bar	Barton Willmore	Yes	Yes	No	Not appropriate to require extra care or C2 uses to include provision of AH owing to higher operational costs, management charges and creation of a "social split".	Relax wording in Part D to enable extra care schemes to make off-site provision and not under "only" exceptional circumstances. Policy unclear as to whether C2 uses should provide AH or not.	See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	Whilst SDC adopts the 35% from the SHMA it does not adopt the 11,400 (upon which it is based). This is inequitable and by reducing the overall housing need the Council is reducing its ability to deliver affordable housing.	Reduce the expectations of affordable housing.	See overall response below.
Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	No	Do not object to 35% onsite requirement at Gaydon/Lighthorne Heath but note 2011 Census which shows across the District 14% of housing stock is AH. Wonder whether AH needs might better be served through part onsite / part off-site provision to provide AH in surrounding rural settlements.	Wording within the policy or supporting text should refer to potential for part onsite / part off-site AH provision in respect fo Gaydon/Lighthorne Heath.	See overall response below.
St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	Yes	35% AH target and maximum and minimum tenure splits not supported by robust evidence. Differentiation between affordable rented and social rented is unjustified. *Terms "pepperpotting" and "clusters" are contradictory. Term "in-perpetuity" only justified in respect of rural exceptions. Intended scope of "benchmark standards" to be set out in SPD is unclear. *Reference to "low-cost market housing" needs to be elaborated.	Evidence does not support the detail of the policy and should be bolstered or the policy amended. Reference to "pepperpotting" should be removed. *Reference to "in-perpetuity" should be removed and only relate to rural exceptions AH. Clarity required in respect of "benchmark standards" and "low-cost market housing".	CS.17 seeks to "pepperpot" the clusters so as to prevent the grouping together of the AH clusters. This is consistent with NPPF para.50 which seeks to ensure sustainable, inclusive and mixed communities. Distinction between "affordable rent" and "social rent" established in the definition of AH in NPPF Appendix 2 and included within the SHMA (e.g. Table 100).

Retirement Security Ltd	Framptons	Not Specified	Not Specified	No	No evidence to justify provision of AH from C2 'extra care' schemes which renders such schemes unviable and unmanageable.	Omit reference to specialised accommodation where the accommodation is C2 use.	See overall response below.
McCarthy & Stone Retirement Lifestyles Limited	The Planning Bureau	Not Specified	Not Specified	No	Requirement for AH provision on C2 'extra care' schemes is unviable and unjustified.	Remove references to AH requirement from 'extra care;' schemes.	See overall response below.
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	CS.17 contrary to AH Viability evidence which shows 35% on schemes less than 10 not viable and not consistent with latest government thinking Must be mindful of cumulative impacts on viability. Potential viability error in not distinguishing between gross and net site area. AH Viability evidence shows that 35% on the Canal Quarter site is unviable. Reference to SPD within CS.17, CS.18 & CS.26 inappropriate.	Amend CS.17 to reflect findings of AH Viability evidence including in respect of the Canal Quarter. Amend threshold to reflect Government thinking. Reference to SPD should be moved to supporting text if necessary.	See overall response below.
Client - Upper Quinton c/o NGA	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	CS.17 simply seeks 35% AH from market housing sites. It does not identify appropriate locations for AH and is not a proactive approach to the provision of AH, which is contrary to NPPF.	CS.17 should be rewritten to be more proactive, for SDC to carry out a proper assessment of AH needs and identify suitable locations for such provision.	The SHMA identifies AH need. *Provision of AH from market sites complies with NPPF para.50 and helps achieve sustainable mixed communities. CS.15 identifies the locations where new housing will be provided, including through rural exceptions AH. The SAP will also identify specific housing sites.
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	CS.17 does not take into account the additional costs of developing PDL.	CS.17 should refer to the need to adjust AH provision on PDL sites.	See overall response below.
Overall Officer Response					<p>CS.17 is consistent with the findings of the AH Viability evidence. CS.17 acknowledges the fact that the evidence found that 35% on-site provision was likely to be marginal on sites of 9 homes or fewer. Hence CS.17 seeks a commuted sum for such schemes. The AH Viability evidence distinguishes between gross and net site areas and included contingency and abnormal cost assumptions in its modelling and tested a range of PDL sites. This evidence has informed the policy requirements. CS.17 also has flexibility and allows for lower AH provision if "credible site specific evidence of viability indicates otherwise".</p> <p>The purpose of technical evidence is to inform, but not dictate the policy approach. Planning requires a number of considerations to be taken 'in the round'. The Council acknowledges that there are areas of the District where 35% AH provision may be challenging but this has to be seen in the context of overall delivery including where the majority of development to meet the District needs will occur. As noted in the Harman Report ('Viability Testing Local Plans Advice for Practitioners' - June 2012), a Local Plan can be said to be deliverable if sufficient sites are viable to deliver the plan's housing requirements over the plan period. This is not the same as ensuring all sites are viable or lowering the AH requirement to the least viable site. It is proposed to amend the text to "fewer than 10". This is not to change the policy approach by seeking contributions from additional sites but rather for clarification, to remove the contradiction between Part A and Part B relating to sites of more than 0.2ha but fewer than 5 homes, as set out in the proposed policy. It is important to note that whatever size of site, CS.17 is sufficiently flexible and allows for lower affordable housing provision if "credible site specific evidence of viability indicates otherwise".</p> <p>Some respondents argue that 35% affordable housing requirement is not justified by the SHMA, citing the figure of 133 affordable units in Table 66 and then calculating this against the overall housing target of 570pa to arrive at a 23% requirement. This misrepresents the evidence. The SHMA qualifies the figure of 133 in paragraph 8.72 stating that this figure should be treated as a minimum and net need increases by around 100pa. This would result in a 41% requirement against 570pa. However, the SHMA is not the only evidence in respect of affordable housing - the Council has also undertaken a 'Plan Viability and Affordable Housing Study' as required by NPPF paragraphs 173 and 174. This demonstrates that on the whole 35% is viable. Notwithstanding this, some respondents also argue that 35% assumes delivery of 570pa and as SDC is reducing its overall requirement to 540pa, it should reduce the affordable housing percentage accordingly. However, it is important to note that the majority of new housing in the District is to cater for migration, a proportion of which will be affordable (i.e. contained within the 233 homes). The figure of 540pa is based on lower migration assumptions. Thus, as this figure reduces so too does the affordable housing need it generates, as affordable housing is a component of overall housing and not additional to it.</p> <p>Notwithstanding the above, it is proposed to make a number of amendments to the policy to clarify interpretation following the representations made.</p>		

Overall Officer Recommendation	<p>The Inspector is requested to make the following modifications:</p> <p>Part A: - Rename as "Requirement and Thresholds" - Delete "a minimum of"</p> <p>Part B: - Rename as "On-site Provision" - Replace "between 5 and 9 homes" with <i>"fewer than 10 homes in accordance with Part A"</i> - Insert new fourth paragraph: <i>"Full or partial off-site provision of general needs affordable housing on sites proposing 10 or more homes will only be permitted where exceptional circumstances have been demonstrated to the Council's satisfaction. Schemes providing specialised accommodation may provide affordable housing off-site where such provision has been justified to the Council's satisfaction. In both circumstances the alternative form of provision will be equivalent or better in all respects to the affordable housing were thus to have been provided on-site in accordance with Part A of the policy."</i></p> <p>Part C: Delete last sentence of second paragraph beginning "The expectation is..." and replace with <i>"In accordance with the housing type and size mix required by Policy CS.18, the following preferred tenure mix will also apply. The final mix achieved on any site will be informed by the up-to-date position set out in the Development Requirements SPD, taking account of any relevant site specific issues and evidence of local circumstances."</i></p> <p>Part D: - Rename as "On-site Integration" - Delete first sentence. - Delete second paragraph.</p> <p>Part E: - Reword as follows: <i>"The provision of affordable housing will be required irrespective of the availability of public subsidy. Schemes will remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. All affordable housing will reflect the Council's quality benchmark standards in respect of affordable housing allocation, monitoring and management arrangements as set out in the Development Requirements SPD."</i></p> <p>Paragraph 5.3.6: - Insert new last sentence: <i>"The viability evidence also found that development of the Canal Quarter Regeneration Zone was less viable with 35% affordable housing provision. Given the housing mix expected to be provided, and the potential for a higher quantum of flatted homes, it is recommended that a lower affordable housing requirement is set for this particular site. This is included in Proposal SUA.1."</i></p>
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Section 5. Development Strategy - 5.3 Affordable Housing Policy CS.17 A. Requirement

Number of Supports: 0 Number of Objections: 3 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	As written the Policy could seek higher than 35% AH provision without justification.	Delete "minimum" from CS.17.	See overall response below.
Urban Renaissance Villages (URV) and Helical Bar	Barton Willmore	Not Specified	Not Specified	No	Provision of AH from specialised accommodation (including extra care) is not appropriate.	Relax wording of Part D to enable such schemes to provide off-site or financial contribution and not in "only exceptional" circumstances.	See overall response below.
John Horner		Not Specified	Not Specified	No	35% across the District misappropriates the evidence. AH is required disproportionately in SUA and the MRCs compared to the rest of the District.	AH should be provided based on local needs where those needs are identified. *All new dwellings should make a financial contribution to AH.	See overall response below.
Overall Officer Response		See overall response in respect of CS.17					
Overall Officer Recommendation							

Section 5. Development Strategy - 5.3 Affordable Housing Policy CS.17 B. Site Size Thresholds

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
John Read		Not Specified	Not Specified	No	Discrepancy between Part A and Part B of Policy CS.17 in respect of sites of 1-4 units on sites above 0.2ha.	Part B should be reworded to state that sites of 1-4 homes on more than 0.2ha should make an off-site contribution, where an on-site contribution is not proposed.	Agreed - see overall response below.
Overall Officer Response		Amend Part B to remove contradiction on sites larger than 0.2ha but providing less than 5 homes. See overall response to CS.17					
Overall Officer Recommendation		See overall recommendation to CS.17					

Section 5. Development Strategy - 5.3 Affordable Housing Policy CS.17 C. Affordability and Tenure

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
West Midlands HARP Planning Consortium	Tetlow King Planning	Yes	Yes	No	<p>CS.17 overly prescriptive - whilst it may indicate a preference it must be flexible. Affordable Rent is the Government's preferred tenure and as such on funded schemes the Council would need to depart from the tenure requirements.</p> <p>Not evident whether the 20% Affordable Rent is based on 80% flat market value and any decrease would indicate a greater number of Affordable Rented properties could be delivered as opposed to Social Rent.</p> <p>CS.17 should be flexible as tenure mix will be dependent upon site specific viability issues. *Query the use of pepperpotting and clustering as they are different concepts.</p>	Include flexibility and less prescription in CS.17 regarding tenure requirements.	See overall response below.
Overall Officer Response		See overall response to CS.17.					
Overall Officer Recommendation							

Section 5. Development Strategy - 5.3 Affordable Housing Policy CS.17 D. On-site Provision and Integration

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Urban Renaissance Villages (URV) and Helical Bar	Barton Willmore	Not Specified	Not Specified	No	CS.17 refers to off-site provision only in exceptional circumstances. This should be relaxed to allow extra care schemes to more easily provide an off-site contribution and not just in exceptional circumstances.	Relax wording of Part D to encourage greater delivery of specialised housing by allowing either an on-site or an off-site contribution.	See overall response below.
Overall Officer Response		See overall response to CS.17					
Overall Officer Recommendation							

Section 5. Development Strategy - 5.4 Housing Mix and Type CS.18

Number of Supports: 0 Number of Objections: 15 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
West Midlands HARP Planning Consortium	Tetlow King Planning	Not Specified	Not Specified	No	CS.18 is overly restrictive and whilst can encourage delivery of particular types, departures should be viewed on their individual merits. *Preventing affordable flats is impractical. *Support Section C although we would request clarification in relation to the affordable housing implications of such developments.	Clarification in relation to the affordable housing implications of such developments.	See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	Not Specified	None specified.	Remove "expectation" and replace with "will seek a range of size and mix of properties in accordance with local demand" Table should be removed or presented as an indicative requirement Remove all references to SPD as unlawful Section D should be removed as not justified locally or against the reform of housing standards.	See overall response below.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	CS.18 is far too rigid and is not flexible enough to ensure delivery of housing across the District through the plan period. Attempting to micro-manage the precise mix of market housing that would be appropriate for a given location at a given point in time to 2031 is not conducive to a plan which is effective or justified. The attempt in Part D to use planning policy to make mandatory a Building Regulation standard which is optional is neither justified nor supported by the NPPF and is unsound.	None specified.	See overall response below.
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	Policy is overly prescriptive and unnecessary. NPPF requires LPAs to identify the size, type and tenure of housing, reflecting local demand, not to prescribe the type of housing being provided. Policy does not allow 1 and 2 bedroom affordable houses to be provided as flats, which limits the opportunities for house builders to provide such houses on sites and could breach other planning objectives, such as those relating to the need for good design.	Policy is not consistent with the NPPF and should be revised to remove reference to specific percentages of house type provision.	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	CS.18 is far too rigid and is not flexible enough to ensure delivery of housing across the District through the plan period. Attempting to micro-manage the precise mix of market housing that would be appropriate for a given location at a given point in time to 2031 is not conducive to a plan which is effective or justified. The attempt in Part D to use planning policy to make mandatory a Building Regulation standard which is optional is neither justified nor supported by the NPPF and is unsound.	None specified.	See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	Council cannot expect a particular mix of housing: must reflect local demand in accordance with NPPF. Policy runs to 2031 and needs to be flexible. Flexibility proposed through use of SPD, however, it is not lawful for SPD to contain actual policy or amend policy. Size and type mix does not reflect likely population profile (e.g. growth of older people aged 65+) and needs flexibility.	Replace "expectation" with "The Council will seek a range of size and mix of properties in accordance with local demand". Remove table in part B or present as an indicative requirement of the District. Remove unlawful references to SPD. Remove Section D as not justified locally or contrary to Government's reforms of housing standards.	See overall response below.
Urban Renaissance Villages (URV) and Helical Bar	Barton Willmore	Yes	Yes	No	NPPF and PPG stress the importance of meeting the housing needs of older people and this is confirmed by the SHMA which states that the relative number of older people in the District is expected to increase significantly. Vital that sufficient provision and targets are made to address these needs. Currently, the Council only provides a breakdown of these numbers by location and not by type.	Core Strategy should include clear housing policies that meet the demands and needs of the elderly.	See overall response below.

Bloor Homes (Western) Ltd		Yes	Yes	No	Referring to SPD in policy gives them a greater weight of significance which is inappropriate.	Remove from policy and make reference in supporting text only if necessary	See overall response below.
Gladman Developments		Not Specified	Not Specified	No	CS.18 is too prescriptive and inflexible to meeting local needs that can change from sub area to sub area within a district. Housing mix must be evidenced locally and kept up-to-date to ensure that needs aren't overlooked. An inflexible policy could deliver housing that isn't required by local people in the area that would serve to inflate prices of existing dwellings in these categories due to lack of supply.	None specified.	See overall response below.
Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	<p>Potential conflict between Part A which seeks balanced communities and the opportunity to provide a wider range of dwellings within larger scale developments and Part B which appears prescriptive.</p> <p>Part B is overly prescriptive and does not reflect the "dynamic market" across the District over the Plan period. Demand and needs will inevitably change over time and vary from place to place. There must be flexibility for house builders, who are best placed to respond to current market demand and housing needs appropriate to local circumstances.</p> <p>The specification of precise percentages rather than 5% ranges goes beyond the SHMA. *Policy precludes affordable apartments based on a snapshot in time current market conditions.</p> <p>Part D appears to presume beyond the latest official DCLG policy on Building Regulations and setting future standards for the design and construction of new homes.</p>	Delete Part B	See overall response below.
Taylor Wimpey UK Ltd	Barton Willmore	Yes	Yes	No	<p>Potential conflict between Part A and Part B which recognises the importance of creating sustainable communities and the opportunity to provide a wider range of dwelling types and sizes within larger scale developments.</p> <p>Part B too prescriptive and does not take into consideration that demand and need will change over the plan period and will differ across the District.</p>	Suggest that there is flexibility through the introduction of a range of percentages within the housing mix to reflect the current market demand and location.	See overall response below.

St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	No	<p>Potential conflict between Part A which seeks balanced communities and the opportunity to provide a wider range of dwellings within larger scale developments and Part B which appears prescriptive.</p> <p>Part B is overly prescriptive and does not reflect the “dynamic market” across the District over the Plan period. Demand and needs will inevitably change over time and vary from place to place. There must be flexibility for house builders to reflect current market demand and housing needs appropriate to local circumstances.</p> <p>The specification of precise percentages rather than 5% ranges goes beyond the SHMA.</p> <p>Part C is too narrowly focussed and should reflect the evidence by more explicitly promoting a full continuum of options for older persons ranging from care homes (clearly C2) to bungalows (clearly C3).</p> <p>Part D appears to presume beyond the latest official DCLG policy on Building Regulations and setting future standards for the design and construction of new homes.</p> <p>DMC items (4) and (5) are fundamentally flawed. The level of care and the Use Class should each be highly pertinent as to whether or not affordable housing is provided.</p> <p>Inappropriate to impose Warwickshire County Council internal space standards and care support arrangements via the planning system.</p> <p>The term “extra care” used in Part C and DMC (4) and (5) has no established planning meaning and therefore serves to confuse rather than to clarify.</p>	<p>Parts A and B should be rephrased to remove potential conflict; The prescriptive elements should be removed.</p> <p>Part C should be improved, with reference to C2 and C3 Uses; DMC (4) and (5) are flawed and should be removed.</p>	<p>See separate comments in respect of CS.17 Affordable Housing.</p> <p>See overall response below.</p>
Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	No	<p>Housing range mix can best be determined at the planning application stage. In respect of GLH early phases will be majority family housing to support market demand.</p> <p>Policy doesn't acknowledge that demand will change over time.</p> <p>Support Part C and consider GLH offers a significant opportunity to incorporate it within market housing.</p>	<p>Should acknowledge that a flexible approach will be applied.</p> <p>Revisions to table to give indicative ranges.</p>	See overall response below.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	<p>CS.18 is far too rigid and is not flexible enough to ensure delivery of housing across the District through the plan period.</p> <p>The attempt in Part D to use planning policy to make mandatory a Building Regulation standard which is optional is unsound.</p>	None specified.	See overall response below.
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Support the positive aspects of the policy that deliver such accommodation. However, CS.16 does not meet full OAN and does not adequately meet the needs for extra care and CS.18 does not stress the urgent need specialised accommodation.</p>	Lack of OAN is serious flaw and cannot be rectified through modification. Council must review its evidence.	<p>See separate comments in respect of CS.16 Housing Development.</p> <p>See overall response below.</p>
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	<p>Reference to SPD implies greater significance which is inappropriate.</p>	Reference to SPD should be removed from Policy and only included within explanatory text if necessary.	See overall response below.
Warwickshire County Council		Not Specified	Not Specified	Not Specified	<p>This reflects the County Council general position and is supported.</p> <p>RE monitoring - there should be a general statement about what happens to the evidence and reviewing of any policy.</p> <p>SPD should be prepared at the earliest opportunity to provide clear guidance to developers.</p>	RE monitoring - there should be a general statement about what happens to the evidence and reviewing of any policy.	See overall response below.

Overall Officer Response	<p>Para.50 of the NPPF requires LPAs to identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. Policy CS.18 is based on the current demand for housing in the particular location of Stratford-on-Avon District based on evidence in the SHMA. It establishes the mix that is required across the District by the end of the plan period and a base-position for providing an appropriate mix of housing to meet District-wide needs. SDC fully acknowledges that the mix on individual sites will vary and demand will change over time. However, it is appropriate to ensure that applicants are presented with the most up-to-date information. Since the appropriate mix is based on evidence, but takes account of other policy objectives and strategies, it is right that it is set out in SPD. The SPD cannot alter the requirements established in policy and it is not the Council's intention to do so. The reference in policy to SPD provides clarification to applicants in this respect.</p> <p>The purpose of the housing mix is to ensure that a range of housing types are provided on each site. However, it is not the Council's intention that the mix is followed slavishly: such an approach would be unreasonable. It is the recommended starting point to for schemes to follow, informed by design considerations, evidence of a local need for a particular type or size of housing, and evidence of scheme viability. The final mix should be the outcome of discussions between the applicant, the Council's Development Management and Housing Services, and the housing association. It is likely, for example, that smaller sites will have a narrower mix because of design considerations, whereas larger sites, by virtue of their size can more easily accommodate a wider range of housing types and sizes. There is, therefore, no conflict between Part A and Part B of CS.18.</p> <p>Planning policies are informed by, but not dictated by the evidence: they are moulded in the round. The evidence forms the starting point for policy which is then shaped by other relevant considerations including the aims and objectives of relevant strategies and plans and the views of the community and stakeholders. Planning policies are not required to simply repeat the evidence verbatim and not doing so does not render them unsound. Indeed, quite the opposite.</p> <p>The housing mix set out in CS.18 is based on the SHMA but takes account of the objectives, experience and best practice of the Council's Housing Service and its partner housing associations in successfully delivering affordable housing across the District. Hence why this informed approach, reflecting local circumstances, advocates provision of affordable houses, bungalows and maisonettes and not flats or apartments: not only are flats a less flexible form of accommodation, they are difficult to let and manage and are not an attractive form of housing to tenants in Stratford-on-Avon District.</p> <p>It is the Council's understanding that the application of the Building Regulation higher accessibility standard is an option for LPAs to determine, and not a matter for individual applicants to decide on a case-by-case basis. The reference in CS.18 replaces the requirement for Lifetime Homes and seeks to anticipate Government Policy by the time of the Core Strategy examination. The justification for this approach is the acknowledgement that Stratford-on-Avon has an ageing population and needs homes that are easily adaptable to meet any specialised care requirements that enable residents to continue living independently, as opposed to having to move to dedicated care complexes. Indeed, in this regard, it is considered correct that CS.18 does not specify the quantum of housing to be provided for older people. Whilst the District has an ageing population, the current approach is to enable residents to live independently for as long as possible (hence the need for accessibility standards). As such, SDC is seeking a balanced mix of housing which includes extra care housing allowing the market to meet demand. It is not for SDC to dictate what type of housing people should live in when they get older. In respect of the viability implications, an allowance for the equivalent Lifetime Homes cost implications has been included in the Affordable Housing and Plan Viability Study, which found that inclusion of such a requirement was viable. Moreover, a review of Government research on cost impacts of changes in building regulations and Code for Sustainable Homes suggests that past forecasts of price changes have never affected costs to the extent forecast. Thus, in the absence of any other evidence, the assumption is considered reasonable.</p> <p>For clarification, amendments are proposed in respect of extra care accommodation.</p>
Overall Officer Recommendation	<p>The Inspector is requested to make the following modifications:</p> <ul style="list-style-type: none"> - Part B: Reword first paragraph as follows: "<i>The following table sets out the preferred type and size mix of homes that will apply, in accordance with the tenure mix set out in Policy CS.17 Affordable Housing. The final mix achieved on any site will be informed by the up-to-date position set out in the Development Requirements SPD, taking account of any relevant site specific issues and evidence of local market circumstances.</i>" - Part B: Reword last paragraph as follows: "<i>To maximise flexibility in the housing stock, 1 and 2 bed affordable homes should be provided through an appropriate mix of bungalows, maisonettes and houses, whilst 3 and 4 bed affordable homes should be provided as houses. All 1 and 2 bed affordable homes will be built with bedrooms capable of satisfactorily accommodating 2 occupiers in each bedroom (i.e. double or twin bedrooms).</i>" - Part C: Reword first paragraph: "<i>Specialised accommodation is housing that meets the needs of vulnerable people of whatever age, including for example, 'extra care' accommodation for elderly people. Schemes that provide specialised accommodation whilst promoting independent living will be supported in accordance with Policy CS.16 Housing development provided all of the following criteria are met:</i>" - DMC: Insert new DMC(3) and renumber subsequent DMCs: "<i>In respect of Part B, in line with providing an appropriate mix of affordable homes, such onsite provision should reflect the broad range of market homes. For example, a scheme for 3 and 4 bed market homes should not normally provide all affordable homes as 1 and 2 bed homes.</i>" -DMC(2): Reword: "<i>Part B of this policy does not apply to schemes providing specialised accommodation in accordance with Part C. Schemes that do not meet the requirements of Part C will be treated as general needs housing and subject to the provisions of this policy.</i>" - DMC(4): Insert additional text at end of paragraph: "<i>Extra Care accommodation is defined in the Glossary of Technical Terms.</i>" <p>Typo: Part B Table - delete "fix table re market and affordable dwelling types" in first cell.</p>

Section 5. Development Strategy - 5.5 Existing Housing Stock and Buildings CS.19

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire and West Mercia Police		Yes	Yes	No	<p>Welcome and support the overall proposed policy approach to control the location and development of new Homes in Multiple Occupation (HMO). This is because the emergency services do encounter problems with such developments e.g. HMO are frequently recorded for breaches of fire safety regulations. They are also amongst the most common type of domestic dwelling for where crimes against the occupants take place. Other typical problems associated with such properties include increased levels of burglary and a proliferation of on-street parking, which prevents ease of access by emergency vehicles. Such problems are multiplied exponentially where HMO are concentrated in particular areas.</p> <p>Despite these common and well documented problems, CS.19 makes no reference to them at all in the proposed criteria for assessing whether planning permission should be granted for HMO. This seriously undermines its effectiveness and resultant soundness.</p>	<p>Propose the following amendments to CS.19, in order to resolve all of our concerns and thus ensure the policy's effectiveness in soundness terms: '...The subdivision or conversion of existing buildings into dwellings or existing houses into flats or Homes in Multiple Occupation (HMO) will be supported where:</p> <ol style="list-style-type: none"> (1) The residential use is acceptable in principle; 2) Conversion provides a satisfactory living environment and amenity for the intended occupiers; (3) There would be no significant adverse impact on the amenities of neighbouring properties by virtue of the intensification of use; (4) Secured by Design measures are incorporated throughout; (5) Highway safety and ease of access for emergency vehicles is not detrimentally affected; and (6) Appropriate fire precaution facilities and equipment are provided of such type, number and location as is necessary to ensure fire safety. 	<p>SDC acknowledge the concerns raised and these issues should be satisfactorily covered in the determination of any planning application, planning conditions and through Building Regulations.</p> <p>See also separate comments in respect of CS.9 Design and Distinctiveness..</p>
Overall Officer Response		Notwithstanding the above, it is considered appropriate to stress the importance of safe living environments.					
Overall Officer Recommendation		The Inspector is requested to make the following modification: In the second paragraph of Part A, insert "safe" between "satisfactory" and "living".					

Section 5. Development Strategy - 5.6 Gypsies and Travellers and Travelling Show People Policy CS.20

Number of Supports: 0 Number of Objections: 2 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
National Federation of Gypsy Liaison Groups	Derbyshire Gypsy Liaison Group	Yes	Yes	No	<p>Criterion (a) should not refer to the Cotswolds Area of Natural Beauty or the need to comply with Policy CS11. Policy CS11 gives adequate protection to the AONB and all development in the AONB must comply with Policy CS11 so there is no need to duplicate the policy in CS20</p> <p>Criterion (b) should not refer to Special Landscape Areas. Local designations should not preclude Traveller sites and Policies to protect the SLAs elsewhere should be sufficient.</p> <p>Criterion (c) should be deleted. If such protection is required it should apply to all development and be included in CS11. Including this in CS20 is discriminatory.</p> <p>Criterion (g) is too onerous. Everything after the word "services" should be deleted</p> <p>Criterion (i) should be deleted. It suggests all Traveller sites must be on brownfield sites. This is too restrictive.</p> <p>Criterion (l) should be deleted. It deals with management, not land use and thus has no place in a Local Plan.</p>	Amend policy accordingly	See overall response below.
Warwickshire and West Mercia Police		Yes	Yes	No	<p>Policy needs to account for transit pitches. Policy needs to allow for the possibility that sites will grow over time and might be occupied by different groups. Policy needs to recognise the need for easy access to Emergency Services. Policy needs to acknowledge the need for partnership working to bring forward sites through planning applications. Policy needs to encourage 'Secured by Design' Standards.</p>	Amend policy accordingly	See overall response below
Environment Agency		Not Specified	Not Specified	Not Specified	<p>Amend criterion (d) to: ' the site should avoid areas prone to fluvial, pluvial or surface water flooding, and exclude areas with a 1 in 100 or greater annual probability of flooding'</p>	Amend policy accordingly	See overall response below
Overall Officer Response		<p>National Federation of Gypsy Liaison Groups (NFGLG): In relation to criterion (a) and (c) the purpose of including references to the AONB is to make it clear that development can be considered in these locations. Criterion (b) does not preclude development in the SLA.</p> <p>Whilst it is accepted that criterion (g) may need to be given greater or lesser weight depending on the merits of a particular site the criterion is considered appropriate.</p> <p>It is not the intention of criterion (i) to suggest that all Gypsy and Traveller sites must be on brownfield land. The policy needs to be amended to make this clear.</p> <p>Criterion (l) is considered appropriate and consistent with Planning Policy for Traveller Sites which states that policies should "promote peaceful and integrated co-existence between the site and the local community (paragraph 11 (a) refers).</p> <p>Environment Agency: Amend criterion (d) as suggested</p> <p>Warwickshire and West Mercia Police: The 2014 Update to the GTAA did not identify any need for transit pitches. The other changes suggested are relatively detailed and could be incorporated in the Gypsy and Traveller Local Plan where appropriate. The reference to Emergency Services could however be added in Policy CS.20.</p>					

Overall Officer Recommendation	<p>That as a consequence of the representation from the NFGLG the Inspector be requested to recommend amendments to Policy CS.20 as follows:</p> <p>In line 2 delete the words “supported where all the following criteria are met” and insert “considered against the following criteria”</p> <p>Replace criterion (d) with the following: “the site should avoid areas prone to fluvial, pluvial or surface water flooding, and exclude areas with a 1 in 100 or greater annual probability of flooding;”</p> <p>In line 2 of criterion (g), after the word “health” insert “and emergency”</p> <p>In line 2 of criterion (i), after the word “land” insert “where available and suitable”</p>
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Section 5. Development Strategy - 5.6 Gypsies and Travellers and Travelling Show People Policy CS.20 Explanation

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Overall Officer Response		No representations submitted on this topic. As a consequence of work undertaken to inform the Gypsy and Traveller Accommodation Assessment 2014 the Text at 5.6.1 needs amending to recognise that there is a site in the district being used by Travelling Showpeople. An alternative location will need to be identified for that because it is within the Land East of Birmingham Road (Proposal SUA.3) which is allocated for employment.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that the text at 5.6.1 is replaced as follows:</p> <p>In the second sentence of paragraph 5.6.1, delete the wording after the comma and insert "the Council's Gypsy and Traveller Needs Assessment 2014 Update indicates that there is no need for transit site provision in the District. A site used by Travelling Showpeople has been identified at Lower Langley Farm, this is within an area allocated for employment (Proposal SUA.3). The Council will work with the developers of SUA.3 and the operators of the site to identify an alternative site. If necessary the Council will allocate a site within the Gypsy and Traveller Local Plan."</p>					

Section 5 Development Strategy – 5.7 Economic Development Policy CS.21

Number of Supports: 5 Number of Objections: 9 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
West Midlands HARP Planning Consortium	Tetlow King Planning	Not Specified	Not Specified	No	A more flexible approach should be considered to reflect paragraph 22 of the NPPF that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.	Amend policy accordingly.	The policy provides for such a case to be made and DMC(1) provides guidance on this.
Gladman Developments		Not Specified	Not Specified	No	<p>Concerned with the quantum of employment land to be allocated by the plan, the range of employment needs sought to be addressed by the plan, and the ability of the Core Strategy to deliver this growth in consideration of the level of housing currently proposed.</p> <p>In consideration of the latest OE projections and past trends it is clear that the plan is not based on the most up-to-date evidence of employment need, and under estimates employment need.</p> <p>The policy does not sufficiently recognise the diversity of employment needs throughout the district. OE projections suggest there will also be significant requirements for wholesale and retail. The policy is therefore potentially preventing these needs from being realised, and therefore further constrains the economic prospects of the district.</p>	The strategies for employment and housing are not integrated and do not take full account of relevant market and economic signals. The shortfall of housing provided against economic need will provide barriers to investment and promote inward commuting.	See overall response below.
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	Not Specified	Yes	Yes	n/a	n/a	n/a
Wellesbourne Matters	SLR Consulting	Yes	Yes	No	The policy and associated Employment Land Study (2011) fail to take into account the significance of Wellesbourne Airfield.	An additional paragraph should be added to the policy as follows: "Development within the existing airfields at Long Marston, Snitterfield and Wellesbourne will be supported where it promotes the business, leisure, training and emergency service support functions connected to the aviation industry."	It would be inappropriate to change Policy CS.21 in this way but Policy CS.25.E relating to aviation should be amended to cover this matter.
Alscot Estate	Jones Lang Lasalle	Not Specified	Not Specified	Not Specified	<p>Has the following principal concerns with this policy:</p> <ul style="list-style-type: none"> - the overall quantitative scale of the provision of 35 hectares of employment land for the District is insufficient. - its qualitative distribution, with particular regard to the predominance of B1(a) and B1(b), is too narrowly defined. - its distribution geographically is unduly restrictive, with insufficient provision for Stratford upon Avon and its hinterland. - limited opportunity for businesses south of the River Avon to locate their premises such as from Shipston towards Stratford upon Avon. 	The reference to Class B1a and Class B1b uses should be replaced with all uses within Class B. Add the words "and the business parks that they are situated in" after the words "the expansion of businesses".	First point - see overall response below. Second point - this would be too open-ended.
CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	Not Specified	No	<p>The Council have produced no evidence to demonstrate alignment between its chosen housing figure (10,800 dwellings) and employment land figure (35 hectares of employment land).</p> <p>There is no evidence to explain where the 35 hectares of employment land has come from; furthermore there is no evidence to state this could support 10,800 dwellings.</p> <p>The policy relies upon a reduction in out commuting to achieve the balance between the delivery of a lower number of housing and the employment land proposed. The Council have produced no evidence to substantiate that this can be achieved.</p>	A modelling exercise needs to be undertaken to ascertain the number of jobs the delivery of 35 hectares of employment land can support. This then needs to be converted into an appropriate housing number which could sustain this level of employment land development based on the current observed levels of commuting in the District.	See overall response below.

Coventry & Warwickshire LEP (Planning Group)		Yes	Not Specified	Yes	n/a	n/a	n/a
Europipes UK Ltd	WYG Planning and Environment	Not Specified	Not Specified	No	Policy should be amended to allow redevelopment of existing employment sites where a developer can demonstrate that the loss of employment land will not have an adverse impact on the supply of employment land and to allow for developers to confirm instances where existing employment uses are to be relocated elsewhere (thereby not impacting on employment provision) to allow for redevelopment of existing employment sites.	Amend policy accordingly.	The policy provides for such a case to be made and DMC(1) provides guidance on this.
Aston Martin Lagonda Ltd	Stansgate Planning	Yes	Yes	Yes	n/a	n/a	n/a
St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	No	The consistency of the policy with the NPPF could be improved. Paragraph 111 encourages the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value.	Insert the following in the policy: "Scope for business uses will be provided on previously developed sites in rural areas, dependent upon the nature of the activities involved, the character of the site and its accessibility".	This issue is already dealt thoroughly in Policy AS.10 Countryside and Villages and Policy AS.11 Large Rural Brownfield Sites.
Redditch Borough Council - Development Plans		Yes	Yes	Yes	n/a	n/a	n/a
Warwickshire Wildlife Trust		Not Specified	Not Specified	No	Concerned about the ecological evidence available to justify the allocation of 100ha of land at Gaydon/ Lighthorne Heath for employment purposes.	The ecological evidence base should be updated for the GLH employment allocation	See response to Proposal GLH.
Cal Gavin Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	Not Specified	Question whether 35 hectares is sufficient both in quantum and location/choice to properly satisfy the needs of this District in the Plan period to 2031 and beyond.	None specified.	See overall response below.
Philip Baker Trust	Turley Associates	Not Specified	Not Specified	No	It is unclear whether some of the 35 hectares is expected to be developed for other employment uses such as B1c Light Industry, B2 General Industrial and B8 Storage or Distribution. The basis of the policy is the Employment Land Study (2011) which underplays the requirements for B2 and B8 sites in the district across the plan period. The conclusions in the Employment Land Study appear to be at odds with the Coventry and Warwickshire LEP Strategic Economic Plan (2014) which identifies manufacturing, engineering and logistics and distribution as important existing sectors which present future growth opportunities.	An updated Employment Land Study is required.	See overall response below.
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	The policy seeks to restrict redevelopment or conversion of existing employment sites. It takes no account of the need to recycle "brownfield" sites, particularly where they are of a "non-conforming" user and where they are contaminated. It takes no account of the type and style of business which is operating on the particular site. It should be more flexible and reflect better on the Government's policy for economic growth and change.	Amend policy accordingly.	Policy CS.10 Countryside and Villages covers this matter and there is a cross reference to it in this policy to make sure that the importance of supporting the rural economy is acknowledged in the overall economic development strategy for the District.
Rugby Borough Council		Yes	Yes	Yes	n/a	n/a	n/a

Sport England		Not Specified	Not Specified	Yes	Consideration should be given to sport as a robust and sustainable economic option.	Policy should acknowledge that in certain circumstances weight should be given to D1 uses on Class B Business Parks.	Policy CS.21 already provides scope for such uses to be provided in certain circumstances.
Overall Officer Response		<p>The District Employment Land Study makes it clear that, in providing additional employment land, the emphasis should be on increasing opportunities for Class B1a and Class B1b uses in order to support higher value economic growth. Given the character of Stratford District it is unsurprising that the emphasis towards employment provision in the future will be on Class B1 businesses. It should be borne in mind that the Strategic Economic Plan covers the Coventry and Warwickshire sub-region and various parts of it have different roles to play due to their nature and location. The policy is not stating there should be no further provision of opportunities for Class B2 and B8 uses and there will no doubt be opportunities arising for such provision to be made over the plan period. Proposal ALC.3 and, to a lesser extent, Proposal SOU.1 provide scope for this.</p> <p>The nature of Class B developments in the past should not, in itself, be taken as providing the basis for deciding the scale of appropriate provision in the future. The District Employment Study took into account a much wider range of factors including forecast changes in the demography of the District's population, education and skills and commuting patterns. For example, the District has a relatively small proportion of working age residents compared with the national and regional average. This is mostly due to a larger proportion of older, retired people which has direct implications in terms of the size of the local labour market. The amount of B2 and B8 floorspace provided in the District in recent years has been dominated by specific circumstances relating to Gaydon, for Aston Martin, and the former Ministry of Defence depot at Long Marston respectively. For this reason it would be inappropriate and unrealistic to assume that this would be repeated.</p> <p>The amount of land specified in the policy is consistent with both the District Employment Land Study and the emerging Coventry & Warwickshire Strategic Employment Land Study for the period to 2031. The provision of 35 hectares of new employment land over the plan period is an appropriate balance between supporting the District's local economy and its demographic characteristics. Focusing on higher value activities could help to reduce the level of out-commuting given the imbalance between the types of jobs available in the District and the comparatively high level of skills and qualifications held by its residents. The need to provide further land after 2031 will be considered in a future review of the Core Strategy.</p> <p>The justification for the proposed housing provision of 10,800 dwellings is covered under Policy CS.16.</p>					
Overall Officer Recommendation		No change.					

Section 5 Development Strategy – 5.8 Retail Development and Main Centres Policy CS.22

Number of Supports: 1 Number of Objections: 2 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Co-operative Group Property Division	NJL Consulting	Not Specified	Not Specified	No	<p>Policy specifies a threshold of 1,000sq.m (gross), above which would be considered major development and would in principle be directed towards Stratford upon Avon. It is not clear how that threshold has been arrived and whether that is the Council's locally defined threshold informing when a retail impact assessment may or may not be required.</p> <p>This is a requisite point of clarity and justification to inform the setting of a threshold. It is entirely plausible that developments of a lower scale could have significant impacts.</p>	None specified.	See overall response below.
Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	Yes	n/a	n/a	n/a
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	<p>There are a number of flaws with this policy in relation to its inconsistency with the Council's evidence base on retail needs and its inconsistency with the NPPF and NPPG:</p> <ul style="list-style-type: none"> - the proposed retail / town hierarchy is at odds with the evidence base which recognises Stratford as the main centre within the district followed by the main market towns of Alcester, Shipston and Southam. - there is no justification for the 1,000 sq m threshold which is not consistent with the 2,500 sq m threshold in the NPPF and the Council have not applied or addressed any of the tests/criteria set out in the NPPG on this particular issue. - the 1,000 sq m threshold is at odds with the Council's retail evidence and is not based on any retail evidence supporting the Core Strategy. - whilst the policy refers to development over 1,000 sq m being suitable to meet the needs of the new Gaydon/Lighthorne Heath settlement, no reference is given to meeting the needs of existing settlements. Some of the existing Main Rural Centre have an equally large urban population and a significantly larger rural hinterland population compared to the new settlement. - no reference is given to meeting the needs of Shipston's residents despite the need for a 2,500 sq m foodstore being set out in the 2008 Retail Assessment under Scenario 1, which is the preferred strategy in terms of reducing journey miles, creating more sustainable shopping patterns, and meeting the needs of communities. - the Scenario 1 strategy has not been retracted through the various updates of the Retail Assessment with the latest 2014 version stating: 'the particular figures for certain towns suggest that there would be merit in the Local Plan process in assessing opportunities for certain towns to increase market retention which could reduce the need to travel - this reflects the conclusions of the original retail study'. 	Amend policy accordingly.	See overall response below.

Overall Officer Response	<p>The initial Convenience Goods Retail Study produced in 2008 set out two distinctive scenarios and their implications for additional floorspace and other planning-related matters. The District Council decided to take a precautionary approach towards the provision of large-scale retail provision due to the sensitive nature of the rural market towns. Whilst it is accepted that scenario 1 will mean that local residents have to travel further to use large foodstores, the distances involved are not substantial and there is plenty of scope for linked trips.</p> <p>The 1,000 square metre threshold is used as a basis for considering whether a full retail impact assessment is required, although an assessment may still be sought for schemes below this threshold in specific circumstances. This threshold was originally identified in Policy COM.19 in the District Local Plan Review. Its continued use is supported in the Comparison Goods Retail Study produced in 2011. It recommended that this threshold remained appropriate, rather than 2,500 square metres, due to the significant proportion of floorspace already located outside Stratford town centre. Furthermore, it concluded that additional significant out-of-centre retail development could impact adversely on strategies for improving the town centre and the potential for retail investment. These factors are equally applicable to convenience goods retailing and to the Main Rural Centres given the modest scale of shopping and commercial activities they support.</p> <p>In any case, the policy provides for a case to be made for a large foodstore to be provided outside the centres of the larger rural settlements taking into account a range of factors including, including impact on town/village centres. This provision has already been used to promote and grant permission for such foodstores on the edges of Southam and Wellesbourne.</p> <p>There is a clear distinction between the existing main rural settlements and the proposed new settlement at Gaydon/Lighthorne Heath. The former already have established commercial centres that have a wide ranging role in meeting the needs of local residents. Conversely, a range of retail and commercial facilities need to be attracted to the new settlement from scratch, not just a foodstore. The policy makes it clear that the appropriate scale of retail provision is related to the needs of the new settlement not to serve a wider area. Any planning application for retail development associated with the new settlement will be assessed on this basis.</p>
Overall Officer Recommendation	No change.

Section 5 Development Strategy – 5.8 Tourism and Leisure Development Policy CS.23

Number of Supports: 1 Number of Objections: 2 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	Not Specified	n/a	n/a	n/a
Environment Agency		Not Specified	Not Specified	Not Specified	Marinas and moorings have the potential to cause deterioration in water quality and may compromise the objectives of River Basin Management Plans.	Amend second sentence in paragraph 7 to read: 'Additional permanent moorings and marinas will only be supported where there is adequate access, availability of existing facilities such as transport links or shops, adequate water resources and foul waste infrastructure, and it can be demonstrated that the Water Framework Directive status of navigable Rivers will not deteriorate.'	See overall response below.
Warwickshire Wildlife Trust		Not Specified	Not Specified	No	Concerned about the wording of the seventh paragraph of the policy which promotes 'increased' access to canals and navigable waterways within the district. A balance needs to be drawn between optimising their usage and preserving their natural features and functions which could conflict with Policy CS.4 which aims to protect and enhance the district's watercourses and water environment.	Amend wording of policy as follows: 'Increased access to and use of canals and existing navigable waterways in the District will be encouraged where it respects and works with the natural features and functions of the watercourse.'	See overall response below.
St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	No	There is a conflict between the third paragraph of Policy CS.23 and Policy AS.11 (2) in regard to Meon Vale (previously known as the Former Engineer Resources Depot, Long Marston).	Third paragraph of Policy CS.23 should be amended as follows: "Elsewhere in the District, unless subject to site-specific policy establishing the principle of tourism and leisure related development is acceptable, large-scale proposals for new and major extensions to existing tourism-related development will need to be justified taking into account...".	This would be an appropriate clarification to make.
Natural England - South Mercia Area		Yes	Yes	Yes	Welcome the encouragement of increased access and use of the District's canals, but any extension to the area of navigable waterway or creation of marinas and moorings would need to ensure there were no impacts on the natural environment.	Amend policy accordingly.	See overall response below.
Overall Officer Response		The issues raised by Natural England, Warwickshire Wildlife Trust and the Environment Agency regarding impact on canals and navigable waterways and the provision of moorings and marinas merit an adjustment to the wording of the policy to reflect their concerns. The distinction between existing navigable waterways and proposals to extend them should also be made.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy CS.23 is modified as follows:</p> <p>Amend the third paragraph to read: "Elsewhere in the District, unless established through other provisions of the Plan such as Policy AS.11 Large Rural Brownfield Sites, large-scale proposals for new and major extensions to existing tourism-related development..."</p> <p>Amend the first sentence of the seventh paragraph to read: "Increased access to and use of canals and existing navigable waterways in the District will be encouraged, including the provision of moorings and marinas, where it respects and works with the natural features and function of the watercourse. Any proposed extension to or creation of new navigable waterways must ensure there are no overall detrimental impacts on the natural environment."</p> <p>Amend second sentence of the seventh paragraph to read: "...such as transport links or shops, adequate water resources and foul waste infrastructure, and it can be demonstrated that the Water Framework Directive status of navigable rivers will not deteriorate. Such schemes should not compromise..."</p>					

Section 6 Area Strategies – 6.1 Stratford-upon-Avon Area Strategy – Future development issues

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire and West Mercia Police		Yes	Yes	No	Until a policy is included in the Core Strategy relating to the evening and night-time economy, it is ineffective and therefore wholly unsound in relation to the evening/night-time economy.	Amend plan accordingly.	See overall response below.
Overall Officer Response		While the concerns raised by Warwickshire and West Mercia Police are important, they are mostly of an operational nature and not appropriate for inclusion in the Core Strategy. Specific issues can be addressed through the consideration of specific planning applications or other procedures, eg. licensing. Part 7 of Policy CS.9 Design and Distinctiveness identifies the need to ensure that proposals would achieve safe forms of development.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.1 Stratford-upon-Avon Area Strategy – Policy AS.1

Number of Supports: 1 Number of Objections: 2 Number of Unspecified: 4

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	Concerned that far too much credence is given to unsubstantiated concerns that the character of the town will “deteriorate” if further housing development takes place. Have not seen any evidence which supports this, and it appears to be the principal reason why the level of new development proposed over the plan period in the largest settlement in the District is constrained in the manner it is.	None specified.	See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	Land at Bishopton Lane, Stratford should be identified as a housing allocation.	Amend Area Strategy accordingly.	See overall response below.
The Bird Group of Companies	Framptons	Not Specified	Not Specified	Not Specified	Land south of the A46, Stratford should be added as a housing allocation.	Amend Area Strategy accordingly.	See overall response below.
Warwickshire and West Mercia Police		Yes	Yes	No	Without direct support within Policy AS.1, the police and emergency services infrastructure required to support development in Stratford-upon-Avon may not be delivered. The absence of any reference to emergency services infrastructure requirements is also inconsistent with Appendix 1 of the Core Strategy (Infrastructure Delivery Plan), which does reference them. Consider Policy AS.1 as drafted to be ineffective in delivering emergency services infrastructure and consequently inconsistent with the policy requirements of the NPPF.	Make the following amendment to the sixth bullet point of Part B of Policy AS.1: 'Support the provision of emergency services and the enhancement of health and medical facilities at Stratford Hospital.'	This would be appropriate.
Taylor Wimpey UK Ltd	Barton Willmore	Not Specified	Not Specified	Not Specified	Based on the objectives set out in Policy AS.1 it is clear that Stratford-upon-Avon should be delivering a substantially greater quantity of housing than proposed.	None specified.	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	Concerned that far too much credence is given to unsubstantiated concerns that the character of the town will “deteriorate” if further housing development takes place. Have not seen any evidence which supports this, and it appears to be the principal reason why the level of new development proposed over the plan period in the largest settlement in the District is constrained in the manner it is.	None specified.	See overall response below.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	Concerned that far too much credence is given to unsubstantiated concerns that the character of the town will “deteriorate” if further housing development takes place. Have not seen any evidence which supports this, and it appears to be the principal reason why the level of new development proposed over the plan period in the largest settlement in the District is constrained in the manner it is.	None specified.	See overall response below.
Gordon Harrington		Yes	Not Specified	Not Specified	n/a	n/a	n/a

Overall Officer Response	Most of the representations on this topic are from house builders expressing concern about the scale of further development proposed in the town. The District Council has justified its overall strategy elsewhere in the Plan and this position is appropriately reflected in the Area Strategy. On that basis, there is no need to identify additional sites for development in order to meet the proposed housing requirement.
Overall Officer Recommendation	That the Inspector be requested to recommend that Policy AS.1 is modified as follows: Amend sixth bullet point of Part B to read: "Support the provision of emergency services and the enhancement of health and medical facilities at Stratford Hospital."

Section 6 Area Strategies – 6.1 Stratford-upon-Avon Area Strategy – Policy AS.1 C. Economic

Number of Supports: 1 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Philip Baker Trust	Turley Associates	Not Specified	Not Specified	Yes	n/a	n/a	n/a
Overall Officer Response		Only one representation was submitted on this topic which is in support.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.1 Stratford-upon-Avon Area Strategy – Policy AS.1 D. Transport

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire County Council		Not Specified	Not Specified	Not Specified	<p>Options for provision of a bus station within the town centre have already been considered by a study undertaken by consultants which was completed in 2011.</p> <p>The County Council commissioned consultants to undertake a feasibility study to evaluate options for a possible southern Park and Ride scheme in Stratford-upon-Avon which reported in 2011.</p> <p>The most realistic prospect of a road link between Warwick Road and Bridgeway being brought forward would be as part of comprehensive redevelopment proposals for the Bridgeway area.</p> <p>There would appear to be merit in upgrading Lucy's Mill Bridge to make it more accessible. There are however several constraints which would need to be overcome before an improvement scheme could be delivered.</p>	None specified.	See overall response below.
Overall Officer Response		The County Council has provided a position statement on four of the transport-related principles in the Stratford Area Strategy. Whilst it is unclear at this point in time how any of them will be progressed, they remain worthy of further consideration and possible implementation during the plan period and should continue to be identified in the Core Strategy.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.1 Stratford-upon-Avon Area Strategy – Proposal SUA.1 Canal Quarter Regeneration Zone

Number of Supports: 0 Number of Objections: 7 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	On the basis of the Council's own evidence the proposal is not viable or deliverable.	Delete Proposal SUA.1	See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	No evidence has been made available to demonstrate the individual sites within the Canal Quarter can collectively deliver 650 dwellings. * The land within the allocation is in numerous land holdings which will all have independent interests, potential legal covenants and commercial land interests and affect delivery. There are no proposals for compulsory purchase and many businesses are operational and have particular needs associated with their circumstances. It is not apparent as to whether there is a preferred developer(s) on board to deliver the scheme either comprehensively or in parcels.	Delete Proposal SUA.1	See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	Not Specified	Development will be private sector led and reliant on the willingness of landowners and tenants to dispose of their legal interests. Relocation is dependent on suitable premises being made available thereby adding another layer of complexity. Phasing specified is overly optimistic with the effect that dwelling completions are likely to be pushed back towards the latter part of the plan period. The level of affordable provision is overestimated and the external costs underestimated in the viability appraisal for the proposal.	Need to provide a more reliable estimate of the timescale for new residential dwellings to be completed on this site.	See overall response below.
Philip Baker Trust	Turley Associates	Not Specified	Not Specified	No	It is unclear as to how the Council proposes to respond to the loss of employment uses other than through the allocation of land at Birmingham Road and South of Alcester Road. Whilst additional employment land should be planned for to replace that due to be lost through the redevelopment of the Canal Quarter, a requirement for specific sites to accommodate the relocation of businesses from the Regeneration Zone is neither practical nor enforceable through the planning process.	None specified.	See response to Proposal SUA.2.
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	Reference to a masterplan should be deleted as it has not been through a statutory process and a greater weight of significance is implied which is inappropriate.	Amend proposal accordingly.	It is appropriate to make reference to the intention to produce a masterplan for the area.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	On the basis of the Council's own evidence the proposal is not viable or deliverable.	Delete Proposal SUA.1	See overall response below.

CPRE Warwickshire Branch		Not Specified	Not Specified	No	Too much employment land is being lost to housing.	Amend proposal accordingly	See overall response below
Listers Group		Yes	Yes	No	It is important that the potential scale of development is not underestimated because the Canal Quarter is arguably the most sustainable location for new development in the District and there is a need to ensure that the overall scale of development is sufficient to ensure that development is viable.	Increase the dwelling yield to at least 700 units.	See overall response below.
Overall Officer Response	<p>Various housebuilders contend that the Regeneration Zone is not viable or deliverable. While there are complex issues to resolve, there are no overriding reasons why it cannot be achieved over the plan period. There is evidence to show that large parts of the Canal Quarter are readily available for redevelopment and will be delivered in the short to medium term. Amendments proposed relating to the delivery trajectory and affordable housing in response to comments to CS.16 Housing Development and CS.17 Affordable Housing, respectively. It would be appropriate to clarify and update the anticipated timescales for delivering the proposal.</p> <p>In response to CPRE, the provision of 3 hectares is appropriate given the limited extent to which existing companies in this area are known to want to relocate at some stage and because businesses do not find the area to be very accessible for their operational requirements. There is no evidence that the Morrisons site is available for redevelopment to housing.</p> <p>In response to Listers, it is appropriate for the District Council to be cautious about the number of dwellings specified in the proposal to be delivered during the plan period, although there is the prospect of a higher figure being suitable and achievable.</p>						
Overall Officer Recommendation	<p>That the Inspector be requested to recommend that Proposal SUA.1 is modified as follows:</p> <p>In 'What is to be delivered' after "Housing - approx 650 dwellings by 2031" insert "of which up to 25% will be provided as a mix of affordable homes"</p> <p>In 'When is it to be delivered' delete text and replace with: "Phase 2 (2016/17 - 2020/21) approx. 160 homes; Phase 3 (2021/22 - 2025/26) approx. 280 homes; Phase 4 (2026/27 - 2030/31) approx. 210 homes; Post 2031 approx. 350 homes"</p>						

Section 6 Area Strategies – 6.1 Stratford-upon-Avon Area Strategy – Proposal SUA.2 South of Alcester Road

Number of Supports: 0 Number of Objections: 3 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CPRE Warwickshire Branch		Not Specified	Not Specified	No	<p>This proposal has no justification. The Employment Land Study recommends a Business Park to compete with other Districts but no actual need for such a development is shown.</p> <p>The Core Strategy does not suggest there is any shortage of employment in the town; the jobs available lead to much in commuting to the town.</p> <p>The extent of need for relocation of businesses from the town is not demonstrated. The 'outworn' employment area is capable of continued use with some redevelopment. If the part of the Canal Quarter Zone which lies north of the Canal is left mainly in employment use, little or no need for such 'relocation' will arise.</p>	Delete Proposal SUA.2.	See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	<p>The SHLAA is very clear that this site is unsuitable for residential development. However, the reasons are equally applicable to employment generating development, if not more so due to the size and scale of potential employment buildings set in the landscape.</p> <p>The Landscape Sensitivity Study concludes that commercial development is inappropriate in this area. SUA.2 is therefore not supported by the landscape evidence and no justification is given by the Council for discounting this evidence.</p>	Delete Proposal SUA.2.	See overall response below.
Philip Baker Trust	Turley Associates	Not Specified	Not Specified	No	<p>Support the proposed allocation but consider that the range of acceptable uses is too narrowly drawn and as a minimum the allocation should be widened to include B2, B8 and other commercial uses.</p> <p>The Employment Land Study does not fully reflect the requirements for B2 and B8 floorspace within the district over the plan period, and as such emerging Proposal SUA.2 should be amended to enable B2, B8 and other commercial uses at the site.</p> <p>The range of uses which currently exist in the Regeneration Zone extend beyond B1 uses, and include B2, B8 and a range of other sui generis commercial uses such as car dealerships.</p> <p>Restricting half of the site to accommodating relocation of businesses from the Canal Quarter Regeneration Zone is neither practical nor enforceable through the planning process.</p>	Wording of proposal should be amended as follows: "(i) Class B1, B2 and B8 uses (ii) Other commercial uses (sui generis) where these do not conflict with National Policy or other policies within this plan."	See overall response below.
Overall Officer Response					<p>In response to CPRE, the need to provide additional employment land to support the economy of the town is supported by the Employment Land Study. Likewise it is known that various companies within the Regeneration Zone, including a very large one north of the canal, wish to relocate in order to expand and/or operate more effectively.</p> <p>In response to Miller Homes and Taylor Wimpey, whilst the Landscape Sensitivity Study concludes that this area of land is highly sensitive to commercial development, the location of the site makes it suitable for employment development in order to meet the economic needs of the town. This approach to the town will be affected by the construction of the Western Relief Road which, together with its associated lighting, will make the edge of the urban area in the vicinity of the site more pronounced in any case.</p> <p>In response to the Philip Baker Trust, the District Council has clear evidence to justify the release of 10 hectares for new economic investment in the town for Class B1 uses in accordance with the Employment Land Study. There is no justification for making further land available during the plan period other than to provide scope for businesses to relocate from the Canal Quarter. On that basis, there is a clear functional, and therefore legally enforceable relationship between the release of all or part of the other 10 hectares identified in Proposal SUA.2 and the delivery of the Canal Quarter Regeneration Zone. It should be noted that there is no restriction on the class of uses that can be accommodated on this part of the site subject to them being related to businesses relocating from the Regeneration Zone.</p>		

Overall Officer Recommendation	No change.
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Section 6 Area Strategies – 6.1 Stratford-upon-Avon Area Strategy – Proposal SUA.3 East of Birmingham Road

Number of Supports: 3 Number of Objections: 8 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	Does not accord with the NPPF, particularly at paragraph 83 and as established through case law, which requires the demonstration of exceptional circumstances to warrant the removal of land from the Green Belt. The reference to the delivery of “uses that will help to facilitate the relocation process” is unclear and not explained or justified anywhere.	Delete Proposal SUA.3	See overall response below. The Green Belt issue is addressed under Policy CS.10.
Alan Griffith		Not Specified	Not Specified	Not Specified	The proposal for a new business area north of the A46 and moving companies to there seems totally uncommercial without a huge injection of cash. By the time you add on all costs of moving a company it just does not work. The commercial and industrial businesses need to be close to their employees. It would result in development crossing a key planning boundary (A46) which would start to merge Stratford to villages, ruining the environment of the area and ruin the approach to Stratford for tourists. There are alternatives that should be looked at within the boundaries of Stratford based upon the key highways and environmental corridors etc.	None specified.	See overall response below.
CPRE Warwickshire Branch		Not Specified	Not Specified	No	This would create a new urban sprawl on the north side of the A46 Northern Bypass, on what is now open land in the Green Belt. In no way can this proposal be justified under the ‘exceptional circumstances’ test for removing land from the Green Belt through the Local Plan procedure.	Delete Proposal SUA.3.	See overall response below. The Green Belt issue is addressed under Policy CS.10.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	The allocation is not included within the current SHLAA evidence. Neither is there other evidence to illustrate its deliverability. The site is not covered by the Landscape Sensitivity Assessment. On this basis there is no assessment or evidence of the landscape impact of this allocation. The allocation is therefore void of supporting evidence and not justified.	Delete Proposal SUA.3	See overall response below.
The Bird Group of Companies	Framptons	Yes	Yes	Yes	n/a	n/a	n/a
Mixed Farms Ltd	Savills - Reading	No	No	No	The District Council has not undertaken a comprehensive review of the Green Belt to inform its choice of sites to be excluded from the Green Belt area.	Delete Proposal SUA.3.	This issue is addressed under Policy CS.10 Green Belt.
Natural England - South Mercia Area		Yes	Yes	Yes	Suggest an additional reference to the need to protect the traditional orchard.	Amend proposal accordingly.	There is only a small remnant of the orchard remaining and its condition means that it is not worth protecting.

Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	Does not accord with the NPPF, particularly at paragraph 83 and as established through case law, which requires the demonstration of exceptional circumstances to warrant the removal of land from the Green Belt. The reference to the delivery of “uses that will help to facilitate the relocation process” is unclear and not explained or justified anywhere.	Delete Proposal SUA.3	See overall response below. The Green Belt issue is addressed under Policy CS.10.	
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	Does not accord with the NPPF, particularly at paragraph 83 and as established through case law, which requires the demonstration of exceptional circumstances to warrant the removal of land from the Green Belt. The reference to the delivery of “uses that will help to facilitate the relocation process” is unclear and not explained or justified anywhere.	Delete Proposal SUA.3	See overall response below. The Green Belt issue is addressed under Policy CS.10.	
Philip Baker Trust	Turley Associates	Not Specified	Not Specified	No	There are no exceptional circumstances demonstrated to support release of the site from the Green Belt.	Delete Proposal SUA.3.	This issue is addressed under Policy CS.10 Green Belt.	
Environment Agency		Not Specified	Not Specified	Not Specified	The following points should be added to the specific requirements: - Deculvert the watercourse and restore a natural sinuous channel. - Reduce flood risk within the development site and wider community by investigating opportunities to manage flood risk upstream that provides additional ecosystem services.	Amend proposal accordingly.	First point is reasonable. Second point is not applicable as the site is not within a flood risk area.	
Morrison Park Home Estates	R Perrin - Planning Consultant	Not Specified	Not Specified	Yes	n/a	n/a	n/a	
Wilmcote Parish Council	Tyler-Parkes Partnership	Not Specified	Not Specified	No	The Council’s own evidence, the ‘Canal Quarter and Two Associated Employment Sites Viability and Deliverability Report’, recommends that this allocation be excluded from the plan as there is no identified need in the plan period and no exceptional circumstances or Green Belt review to justify excluding the site from the Green Belt. The independent employment report clearly states that whilst a new business park is required close to the A46 and Stratford Parkway station, the size of the park should be limited to between 5 and 10 hectares. The report recommends that some employment floorspace should continue to be provided in the area referred to as the Canal Quarter Regeneration Zone.	Delete Proposal SUA.3.	See overall response below.	
Overall Officer Response		<p>The District Council remains of the view that this site is needed in order to implement the Canal Quarter Regeneration Zone but for no other purpose. Further progress needs to be made with landowners, companies and other parties to show how the proposal will be achieved in an appropriate and deliverable manner. The main site specific issue raised relates to the impact industrial and commercial development would have on the landscape and the setting of the town. The District Council does not dispute the fact that the site is beyond a well established edge to the town created by the A46 and will extend the urban form. However, it is well contained in the landscape and development will not be visible from long distances. The treatment of the mature hedgerows along the southern and western boundaries of the site will be critical in these respects and is identified in the specific requirements of the proposal.</p> <p>There is a clear justification made for releasing this site for specific purposes that, on balance, override the relatively limited landscape impact that development will cause subject to appropriate mitigation. An assessment has been carried out of all the parcels of land on the edge of the town to gauge their availability and suitability for employment development compared with Proposal SUA.3. It shows that, along with land south of Alcester Road, this site is the most appropriate for the intended purpose, despite its location in the Green Belt.</p>						
Overall Officer Recommendation		That the Inspector be requested to recommend that Proposal SUA.3 is modified as follows: Insert an additional Specific Requirement to read: “deculvert the watercourse through the site and restore a natural sinuous channel.”						

Section 6 Area Strategies – 6.2 Alcester Area Strategy – Proposal ALC.1 North of Allimore Lane (south)

Number of Supports: 1 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
T Wythes		Not Specified	Not Specified	No	Area identified should include all of the land north of Allimore Lane and a plan be agreed for the whole area.	Amend boundary accordingly.	See overall response below.
Natural England - South Mercia Area		Yes	Yes	Yes	Reference should be made to protecting the traditional orchard.	Amend Proposal accordingly.	See overall response below.
Overall Officer Response		Proposal ALC.1 has planning permission and the boundary identified reflects the extent of that permission. The merits of adjacent land for development can be considered through the preparation of the Site Allocations DPD. The traditional orchard relates to the area of land referred to in the other representation.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.2 Alcester Area Strategy – Proposal ALC.3 North of Arden Road

Number of Supports: 1 Number of Objections: 1 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Environment Agency		Not Specified	Not Specified	Not Specified	The second bullet point in the specific requirements should read 'protect and enhance the watercourse that runs along the southern boundary'	Amend proposal accordingly.	This would be appropriate.
Cal Gavin Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	Not Specified	Should make it clear that this site should be brought forward immediately and with appropriate access for early development to meet local needs.	Amend proposal accordingly.	See overall response below.
National Trust		Yes	Yes	No	Insensitive development of large buildings has the potential to harm the setting of Coughton Court which is a heritage asset of the highest importance (Grade 1 listed). The evidence base does not show that the Council has addressed this issue at all and it is not reflected in the proposal.	Impact of the proposed development should be assessed in detail.	See overall response below.
Alcester Estates Ltd	Stansgate Planning	Yes	Not Specified	Yes	n/a	n/a	n/a
Overall Officer Response		<p>There is no obvious impact that development of this site would have on the character or setting of Coughton Court. The building itself and its curtilage parkland is about 1.5 km from the site with many landscape features between them. However, it would be appropriate for this matter to be specified in the wording of Proposal ALC.3.</p> <p>The District Council would welcome the early implementation of this proposal and there is no overriding reason why this should not be the case. However, it is not in a position to require this to happen.</p>					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Proposal ALC.3 is modified as follows:</p> <p>Amend second bullet point in specific requirements to read: "protect and enhance the watercourse that runs along the southern boundary"</p> <p>Insert additional specific requirement to read: "the form of development should cause no harm to the setting of Coughton Court"</p>					

Section 6 Area Strategies – 6.3 Bidford-on-Avon Area Strategy – Context

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	Some of the information in the context is unhelpful. There is nothing recorded which could imply that Bidford is a poorly performing Main Rural Centre, when compared to the others in the District.	None specified.	See overall response below.
Overall Officer Response		The information provided in the context section of the Area Strategy is a fair reflection of the characteristics of Bidford.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.3 Bidford-on-Avon Area Strategy – Future development issues

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Reference	Respondent	Agent	Legally compliant	Duty compliant	Sound	Positively Prepared	Justified	Effective	Consistent with National Policy	Reasons	Changes Sought	Officer Comment
0713/0001	Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	Not Specified	Not Specified	Not Specified	Not Specified	<p>The approach adopted is not consistent with guidance in the NPPF in respect of supporting sustainable rural settlements.</p> <p>There is minimal evidence to qualify residents' concerns about expansion of the village as a strategy for directing development elsewhere.</p> <p>Additional development would actively support the provision of new services and maintain those which are already in place.</p> <p>Paragraph 6.3.13 is factually incorrect. The Landscape Sensitivity Study noted that whilst this was a sensitive landscape, the area could accommodate development.</p>	None specified.	See overall response below.
Overall Officer Response			The District Council maintains that the scale of development provided for in Bidford is appropriate and sufficient given its character and service base. The reference taken from the Landscape Sensitivity Study does not relate specifically to the site promoted in this representation but to the western flank of the village as a whole. It is acknowledged that this specific site is identified as being of medium landscape sensitivity to housing development.									
Overall Officer Recommendation			No change.									

Section 6 Area Strategies – 6.3 Bidford-on-Avon Area Strategy – Policy AS.3 Bidford-on-Avon

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	No	Does not make any allowance for new housing development in Bidford. There is nothing in the evidence base to support the Plan's position that there are no strategic allocations put forward for this Main Rural Centre.	Land to the rear of 18 Salford Road, Bidford should be allocated.	See overall response below.
Overall Officer Response		There is no need to allocate this site for development in order to meet the proposed housing requirement.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.4 Henley-in-Arden Area Strategy – Policy AS.4 Henley-in-Arden

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Environment Agency		Not Specified	Not Specified	Not Specified	Include the following points in section A Environmental: - Protect the River Alne and tributaries from any development which could cause detrimental impacts on an important population of White Claw Crayfish. - River is impacted by a number of weirs through the centre preventing fish migration. Investigate fish pass/or weir removal. - Reduce flood risk within the development site and wider community by investigating opportunities to manage flood risk upstream that provides additional ecosystem services.'	Amend policy accordingly.	See overall response below.
Overall Officer Response		Certain aspects of the additions sought by the Environment Agency can be addressed through the development management process. However, the issue about weirs and fish passes is a physical intervention that could reasonably be included.					
Overall Officer Recommendation		That the Inspector be requested to recommend that Policy AS.4. A Environmental be modified as follows: Insert an additional bullet point to read: "Investigate the removal of weirs and/or the provision of fish passes on the River Alne through the town."					

Section 6 Area Strategies – 6.5 Kineton Area Strategy – Policy AS.5 Kineton

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	Has sufficient infrastructure to accommodate a quantum of development well in excess of the 100 dwellings proposed. Make it clear that this figure is a minimum and that it excludes the 90 dwelling consented scheme. Kineton is a key and sustainable target for new housing to help meet the serious shortfall.	Amend policy accordingly.	See overall response below.
Environment Agency		Not Specified	Not Specified	Not Specified	Include the following point in section A Environmental: - the River Dene is impacted by a number of weirs that prevent fish migration and contribute to siltation. Development should investigate and contribute to fish pass/or weir removal.	Amend policy accordingly.	See overall response below.
Overall Officer Response		There is no need to identify further land in Kineton in order to meet the proposed housing requirement. As such, the 100 dwellings figure should include the 90 dwellings with consent. The request by the Environment Agency relates to a physical intervention that could reasonably be included in the policy.					
Overall Officer Recommendation		That the Inspector be requested to recommend that Policy AS.5.A Environmental be modified as follows: Insert an additional bullet point to read: "Investigate the removal of weirs and/or the provision of fish passes on the River Dene."					

Section 6 Area Strategies – 6.6 Shipston-on-Stour Area Strategy – Policy AS.6 Shipston-on-Stour

Number of Supports: 0 Number of Objections: 3 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Co-operative Group Property Division	NJL Consulting	Not Specified	Not Specified	No	<p>A revised capacity assessment should be carried out which may warrant further consideration of planning for more significant retail development.</p> <p>Should a revised capacity assessment warrant further consideration of planning for more significant development, any such revision and conclusions upon capacity is then required to consider a further step than has been undertaken in the various studies.</p>	Update the Retail Study.	The Retail Study is sufficiently up-to-date to provide robust evidence.
Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Policy and vision for Shipston ignores the need for a main food supermarket in the town as advocated by the Council's Retail Study for Scenario 1.</p> <p>The NPPF confirms that objectively assessed needs should be met even if these cannot be met within town centre and edge of centre locations. This need should be addressed in a positive manner through the Core Strategy. No evidence has been presented as part of the Core Strategy process to highlight why these needs should not be met.</p> <p>The need for extra care specialist housing in the Shipston area should be mentioned in the Area Strategy and provision should be made for its delivery.</p>	Allocate land at Campden Road to include provision for a foodstore and extra care housing.	The decision on an appeal relating to this site is due in October. The implications of this will be brought to the attention of the examination Inspector.
Environment Agency		Not Specified	Not Specified	Not Specified	<p>Include the following points in section A Environmental:</p> <ul style="list-style-type: none"> - presumption against development in locations that may be required for flood alleviation measures in the future. - reduce flood risk within the development site and wider community by investigating opportunities to manage flood risk upstream that provides additional ecosystem services, including a wetland area within Shipston on Stour that is designated as a Local Nature Reserve. - investigate river restoration and weir removal/fish pass options that could contribute to relieving flood risk, utilising available land to the east of the town. 	Amend policy accordingly.	See overall response below:
Europipes UK Ltd	WYG Planning and Environment	Not Specified	Not Specified	No	<p>The text at the beginning of the policy does not allow developers to demonstrate viability in the delivery of social improvement items.</p> <p>It is not clearly presented how the list of social improvements correlates with the Infrastructure Delivery Plan, eg. in relation to Shipston High School.</p> <p>Policy should include details of the expected housing delivery across the Plan Period (as stated in para. 6.6.21).</p> <p>Part C should acknowledge that employment uses on the existing industrial estate may not be required for the total plan period.</p>	<p>First Paragraph to become second paragraph and to read "The Council will apply the following principles...Developers will be expected to contribute to the achievement of these principles where it is appropriate, reasonable and viable for them to do so. Delivery of social improvements should be better articulated in terms of providing justification from and a link to the Infrastructure Delivery Plan.</p> <p>Insert paragraph at beginning of policy to read: "Based on the strategy set out in Section 5 of this Core Strategy, Shipston-on-Stour will provide in the region of 235 homes, plus windfall development, over the plan period.</p> <p>Section C, second paragraph should read "Tilemans Lane provides 2ha of employment land. Existing business use should be supported and retained for employment purposes provided the use of the continued use of the land for employment purposes is justified"</p>	See overall response below.

Overall Officer Response	<p>In response to the Environment Agency, the points raised are to some extent embraced by the first and fifth bullet points in section A. However, an additional bullet point would be appropriate to encapsulate the scope of these issues in a generic manner.</p> <p>In response to Europipes UK Ltd, it is important to bear in mind that the principles identified in the policy are not expected to be achieved entirely through the development proposals. They set down a list of what the community wishes to see provided through various mechanisms. Viability is a component part of assessing whether a contribution is appropriate and reasonable but it is only relevant or applicable to some of the principles identified. The Infrastructure Delivery Plan is the definitive source for developers to gauge what they are expected to contribute to. Again, the policy identifies a wide range of principles that are not necessarily related to what developers will be expected to contribute towards. It is not necessary to state in the area strategy policy the scale of housing provision to be made as this is specified elsewhere in the Plan. The retention of employment uses is appropriate as a matter of principle but Policy CS.21 provides scope for a case to be considered for alternative uses.</p>
Overall Officer Recommendation	<p>That the Inspector be requested to recommend that Policy AS.6.A Environment is modified as follows:</p> <p>In Part A Environmental: Add at end of first bullet point: "...ensuring that land which may be required for flood alleviation measures is kept free from development." Add at end of fifth bullet point: "...possibly through the provision of a wetland area in association with measures aimed at managing flood risk upstream of the town." Add an additional bullet point to read: "Investigate the scope to utilise land to the east of the town for flood alleviation and biodiversity purposes."</p>

Section 6 Area Strategies – 6.6 Shipston-on-Stour Area Strategy – Policy AS.6 B. Social

Number of Supports: 0 Number of Objections: 3 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Shipston High School		Not Specified	Not Specified	No	Final bullet point in Part B Social should specify that the preferred location for an all-weather pitch would be Shipston High School.	Amend policy accordingly.	It is premature to be so specific on this matter.
Shipston High School		Not Specified	Not Specified	No	Should acknowledge the need for Shipston High School to be redeveloped in order to be expanded, and the improvements to sports facilities should specify the construction of a new, school/community sports hall and all weather pitch.	Amend policy accordingly.	See overall response below.
Shipston-on-Stour Town Council		Not Specified	Not Specified	No	Third bullet point in Part B Social should be replaced with "Improve leisure facilities in the town, both built and open spaces. For example refurbish the Townsend Hall". Fifth bullet point in Part B Social should be replaced with "Improve the public rights of way network, in particular access to open countryside".	Amend policy accordingly.	It would be appropriate to reflect current Town Council policy in these respects.
Overall Officer Response		The latest situation with Shipston High School according to Warwickshire County Council is that it will undergo a programme of phased redevelopment. The level of development within the priority area could determine whether or not a sixth form is provided in the future.					
Overall Officer Recommendation		That the Inspector be requested to recommend that Policy AS.6 is modified as follows: Replace 3rd bullet point in Part B Social with: "Improve leisure facilities in the town, both built and open spaces, including the refurbishment of Townsend Hall." Replace 5th bullet point in Part B Social with "Improve the public rights of way network, in particular access to open countryside."					

Section 6 Area Strategies – 6.7 Southam Area Strategy – Context

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Southam Town Council		Not Specified	Not Specified	Not Specified	In para 6.7.4 the words 'police station' should be removed as Southam no longer has one.	Amend text accordingly.	This is a factual update.
Overall Officer Response							
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Section 6.7 is modified as follows:</p> <p>Delete the words "police station" from paragraph 6.7.4.</p>					

Section 6 Area Strategies – 6.7 Southam Area Strategy – Future development issues

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Southam Town Council		Not Specified	Not Specified	Not Specified	<p>Para. 6.7.8 should state that the Area of Restraint should be protected from all development and the words 'although small parcels may be suitable for development' should be removed and replaced by 'this area should be preserved as a Country Park for the benefit of the residents of Southam'</p> <p>In para 6.7.20 the words 'plus windfall developments' should be removed.</p>	Amend text accordingly.	See overall response below.
Overall Officer Response		<p>The reference to small parcels of land is taken from the Landscape Sensitivity Study and relates to the entire western flank of the town not just the Area of Restraint so it would be inappropriate to delete it. The Area of Restraint policy (CS.13) applies to this specific area. Although there is no intention by the County Council to designate this area as a Country Park, the scope to make it a public open space should be identified in Policy AS.7.</p> <p>Deleting reference to windfall developments would not accurately reflect the overall housing strategy.</p>					
Overall Officer Recommendation		See Policy AS.7.					

Section 6 Area Strategies – 6.7 Southam Area Strategy – Policy AS.7 Southam

Number of Supports: 0 Number of Objections: 2 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	No	Recognise the need to enhance green infrastructure along the Stowe Valley as part of any development and would look to formalise pedestrian access routes and deliver a landscaping scheme that took account of the surrounding area. Would also look to promote a scheme that respected the setting of the Holy Well and dealt sensitively with this feature.	Allocate land off Holywell Road, Southam for housing development.	No need to identify this area for development in order to meet the proposed housing requirement.
Peter and Helen Pires	North Rae Sanders	Yes	Yes	No	Land at Daventry Road, Southam should be identified for housing development.	Amend plan accordingly.	No need to identify this area for development in order to meet the proposed housing requirement.
Environment Agency		Not Specified	Not Specified	Not Specified	Include the following points in Part A Environmental: - Create flood storage upstream of Southam to alleviate flooding in the town. - Investigate river restoration opportunities at confluence with the Itchen to promote fish passage and improve migratory opportunities.	Amend policy accordingly.	See overall response below.
Overall Officer Response		The points raised by the Environment Agency relate to physical interventions that could reasonably be included in the policy.					
Overall Officer Recommendation		That the Inspector be requested to recommend that Policy AS.7 is modified as follows: Insert additional bullet points in Part A Environmental to read: "Create flood storage upstream of Southam to alleviate flooding in the town." and "Investigate river restoration opportunities at the confluence of the River Stowe with the River Itchen to promote fish passage and improve migratory opportunities." Insert an additional bullet point in Part B Social to read: "Investigate the scope to designate additional land along the Stowe valley to the west of the town as public open space."					

Section 6 Area Strategies – 6.7 Southam Area Strategy – Proposal SOU.1 West of Banbury Road

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CPRE Warwickshire Branch		Not Specified	Not Specified	No	Would create a separate, isolated new area of housing south of the A425 which is the effective east-west bypass of the town.	Delete Proposal SOU.1	Site now has planning permission subject to completion of S106 Agreement.
Overall Officer Response							
Overall Officer Recommendation		Insert a factual note to state that this site was granted detailed planning permission on 6 August 2014 subject to the completion of a section 106 Agreement.					

Section 6 Area Strategies – 6.7 Southam Area Strategy – Proposal SOU.2 West of Coventry Road

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Battlefields Trust		Not Specified	Not Specified	No	Site is part of the likely location of the Battle of Southam. Need to have a greater understanding of the site's significance so that judgements can be made about the sustainability of the proposed development.	District Council needs to take steps to understand the significance of the battlefield through a full investigation.	See overall response below.
Overall Officer Response		As acknowledged in the representation, this site has planning permission. A condition on the permission will require a programme of archaeological investigation to be approved by the local planning authority and undertaken before any development takes place.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.8 Studley Area Strategy – Policy AS.8 Studley

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Environment Agency		Not Specified	Not Specified	Not Specified	Include the following point in section A Environmental: - Investigate river restoration opportunities to promote fish passage and improve migratory opportunities.	Amend plan accordingly.	See overall response below.
Jack McKelvie	Richard Cobb	Not Specified	Not Specified	No	Land at The Slough, Studley should be identified for housing development and removed from the Green Belt.	Amend plan accordingly.	No need to identify this area for development in order to meet the proposed housing requirement.
Overall Officer Response		The point raised by the Environment Agency relates to a physical intervention that could reasonably be included in the policy.					
Overall Officer Recommendation		That the Inspector be requested to recommend that Policy AS.8 is modified as follows: Insert additional bullet point in Part A Environmental to read: "Investigate river restoration opportunities to promote fish passage and improve migratory opportunities."					

Section 6 Area Strategies – 6.8 Studley Area Strategy – Policy AS.8 A. Environmental

Number of Supports: 1 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Redditch Borough Council - Development Plans		Yes	Yes	Yes	n/a	n/a	n/a
Overall Officer Response		Only one representation submitted on this topic which was in support.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.9 Wellesbourne Area Strategy – Future development issues

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Gladman Developments		Not Specified	Not Specified	Not Specified	The airfield is not a constraint to development, as suggested in para. 6.9.14, but an opportunity that can support the realisation of the developments needs of the existing community. There is little evidence provided by the Council to support the economic value attached to the current flying functions at Wellesbourne Airfield in Policy AS.9.	None specified.	See overall response below.
Overall Officer Response		Wellesbourne Airfield supports a wide range of flying activities that offer a range of economic, commercial and recreational benefits to its users and to the functioning of the District.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.9 Wellesbourne Area Strategy – Policy AS.9

Number of Supports: 0 Number of Objections: 2 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Wellesbourne Matters	SLR Consulting	Yes	Yes	No	<p>Part C Economic has not been prepared in accordance with the provisions of the NPPF to provide for the encouragement of a strong competitive economy.</p> <p>The policy also fails to fully reflect paragraph 33 of the NPPF which requires "When planning for...airfields... plans should take account of their growth and role in serving business, leisure, training and emergency service needs".</p>	<p>Replace the text under Part C. Economic to establish a more positive approach to economic development at Wellesbourne:</p> <ul style="list-style-type: none"> - Retain and support the enhancement of the established flying functions and aviation related facilities at Wellesbourne Airfield. - Promote employment development in the village. - Improve local job opportunities by continuing to secure the redevelopment of the M40 Distribution Park for uses within Class B. - Support proposals to further enhance visitor attractions in the area including Wellesbourne Airfield, Charlecote Park and Compton Verney. Links between these attractions and Wellesbourne will be encouraged. 	See overall response below.
University of Warwick	Turley Associates	Yes	Yes	No	<p>Wider B1 business use is likely to be the means of utilising the existing buildings on the HRI site, and is more likely to result in a successful redevelopment of the site.</p>	Amend policy accordingly.	See overall response below.
Overall Officer Response		<p>In response to Wellesbourne Matters, a more positive statement about Wellesbourne Airfield would be appropriate given its importance to the local economy.</p> <p>In response to the University of Warwick, if a proposal comes forward to re-use or redevelop the HRI site it can be assessed against the provisions of the final paragraph in Policy CS.21 Economic Development and the first part of Policy AS.11 Large Rural Brownfield Sites.</p>					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy AS.9 is modified as follows:</p> <p>Amend second bullet point in Part C. to read: "Retain and support the enhancement of the established flying functions and aviation related facilities at Wellesbourne Airfield."</p>					

Section 6 Area Strategies – 6.9 Wellesbourne Area Strategy – Policy AS.9 C. Economic

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
University of Warwick	Turley Associates	Not Specified	Not Specified	Not Specified	<p>The University has recently secured Certificates of Lawfulness of Existing Use and Development for B1b use with a range of ancillary uses, as well as residential (given there are a number of houses on the site) so that short-term re-use by parties other than the University can be allowed.</p> <p>Wider B1 business use is likely to be the means of utilising the existing buildings, and is more likely to result in a successful redevelopment of the site.</p>	Redraft final bullet point under section C Economic as follows: 'Support the use and possible redevelopment of the HRI site for business, research or education purposes with associated residential use.'	See overall response below.
Overall Officer Response		Whilst the CLUED acknowledges there are some Class B1 and residential uses on the HRI site, both are limited in scale and do not justify such an open-ended approach as is sought. If a proposal comes forward to re-use or redevelop the HRI site involving business or residential uses, it can be assessed against the provisions of the final paragraph in Policy CS.21 Economic Development and the first part of Policy AS.11 Large Rural Brownfield Sites.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.10 Gaydon/Lighthorne Heath

Number of Supports: 3 Number of Objections: 26 Number of Unspecified: 7

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	Not Specified	Not Specified	Memorandum on Transport accompanying submission.	n/a	n/a
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	Not Specified	Appendix 9 to evidence with specific comments in relation to viability and GLH.	n/a	See overall response below.
CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	Not Specified	No	GLH is not the product of effective cross-boundary co-ordination. GLH will undoubtedly, due to its position on the M40 and location within the wider housing market area (HMA), meet housing needs associated with areas beyond the boundaries of Stratford-on-Avon. It may, therefore not meet the needs associated with the District (merely increase out-migration to a new settlement within the District, particularly with unmet needs within other parts of the HMA). In this respect, it is not considered that GLH is an effective means of meeting the housing needs of Stratford-on-Avon, although it may perform an important role in meeting the needs of the wider HMA.	The total number of dwellings assumed from GLH for delivery in the first 5 years (phase 2) and across the Plan period must be reduced to reflect timescales for deliverability. Long Marston Airfield should be included as an additional allocation in order to provide an effective Plan that delivers the Policies on housing requirement (CS16).	See overall response below.
Warwickshire and West Mercia Police		Not Specified	Not Specified	Not Specified	Letter from WYG accompanying Warwickshire Police and West Mercia Police submission	n/a	n/a
CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	Not Specified	No	It is considered that Proposal GLH is not Justified in respect of when it is to be delivered. The assumed speed of delivery is unjustified and there is no evidence that this is realistically achievable. There are a number of factors which suggest that it is not: a) Proposal GLH (page 162) within the Core Strategy requires a Masterplan SPD to be produced and approved before the Council grants planning permission for any development. b) Lead-in times for large developments (first identification/allocation to first completion) are significant; and c) The timing and financing of key transport infrastructure, including the necessary works to the strategic transport network such as M40 widening remains problematic. CALA has no objection in principle to the allocation of GLH, however the timescales for it identified are unrealistic and housing completions will not be delivered in 2016/17 as suggested by the trajectory.	The timescales for delivery of GLH should be put back to 'Phase 3' of the Core Strategy and this should be reflected in the Housing Delivery Trajectory.	See overall response below.
Bishops Itchington Parish Council		Not Specified	Not Specified	No	The analysis of findings arising out of the community consultation phase, resulting in the selection of GLH, is deeply flawed being devoid of any population weighting and, therefore, open to considerable doubt. In terms of sustainability, no proper transport and traffic assessment has been carried out. The choice of this site is contrary to paragraphs 17 and 111 of the NPPF as the alternative site, Long Marston Airfield, is a brownfield site.	To undertake a revised analysis of findings and a rigorous transport and traffic assessment with regard to both the GLH and Long Marston Airfield sites, in conjunction with Warwickshire County Council which will show that the latter site should be the preferred one and cited in the Core Strategy.	See overall response below.

CPRE Warwickshire Branch		Not Specified	Not Specified	No	No need for the proposal (see related reps on overall housing requirement). The location would be an unsustainable greenfield housing site unrelated to any existing settlement and dependent on road access. It would be car-dependent and be the residence of car commuters using the M40 motorway. It is nowhere near a railway station and public transport would be limited. It does not comply with the policies for a sustainable location in any way. Loss of best and most versatile agricultural land is contrary to NPPF.	Delete Proposal GLH. Some limited housing at the existing Lighthorne Heath (up to 200 dwellings) should be considered under other policies, but no housing should be sited on the north east side of the Banbury Road (B4100).	See overall response below.
Gladman Developments		Not Specified	Not Specified	Not Specified	Concerns regarding the process that the Council have undertaken in order to identify the proposed new settlement at Gaydon / Lighthorne Heath (Proposal GLH). The decision making process lacks clarity and transparency and appears to have been undertaken through an illogical consultation process. Predicated on inaccurate overall housing target for the district. It will reduce JLR's capacity to expand.	Replace GLH with Wellesbourne Airfield (Wellesbourne West).	See overall response below.
Warwickshire and West Mercia Police		Yes	Yes	No	Proposal GLH should include reference to provision of a new Police Station. Add additional bullet under 'what is to be delivered: 'Infrastructure to enable the provision of emergency services to the site.'	Amend Proposal GLH accordingly	The need for a Police presence in the new settlement is included in the policy reference to 'community facilities', as is confirmed by the specific references at paragraph 6.1 and Section 5 of the IDP. No amendment is considered necessary.
FORSE		No	Not Specified	No	The plan as submitted does not comply with paragraph 182 of the Framework in that it is not: a) Justified - the plan is not the most appropriate strategy, when considered against the reasonable alternatives and is not based on proportionate evidence; b) Effective - the proposed developers do not control all of the land required to deliver the scheme; and c) Consistent with national policy - the proposed New Settlement is not sustainable development. On account of the manifest conflict with the Framework, the submitted plan is not legally compliant. Detailed comments submitted in relation to: - public consultation - Strategic Environmental Assessment - other alternatives more sustainable (Long Marston Aerodrome, South East Stratford, Southam North) - land ownership constraints at GLH - historic environment - transport - noise - settlement form and design	a) Omit a New Settlement from the Strategy in favour of a return to a 'Dispersal Strategy' for new housing across the district; or b) Substitute one of the more suitable and sustainable sites for the New Settlement instead of the proposed site adjacent to the village of Lighthorne Heath.	See overall response below.
FORSE		No	Not Specified	No	Authorisation form.	n/a	n/a
Chesterton & Kingston Parish Meeting		No	No	No	Detailed comments in relation to suitability of GLH against the following factors: - air quality - biodiversity - climate change - economic factors - health - historic environment - material assets	Core Strategy should revert to dispersal option.	See overall response below.
FORSE		No	Not Specified	No	List of groups and individuals supporting the representation.	n/a	n/a

George Wood		No	Not Specified	No	M40/J12 and local roads have inadequate capacity which will be exacerbated by HS2 construction. Inadequate consultation with Burton Dassett Parish Council.	n/a	See overall response below.
John Bingham		Not Specified	Not Specified	No	Inappropriate use of a greenfield location, M40 is a source of noise and emissions, demand for and viability of bus service to Stratford upon Avon. Location will not satisfactorily fulfil the housing demands of the district.	Suggests that should replace GLH with Long Marston Airfield.	See overall response below.
Natural England - South Mercia Area		Yes	Yes	Yes	Reference to the protection of Ancient and Semi-natural Woodland is required.	Amend Proposal GLH accordingly.	The SPD and Masterplan for GLH will consider this and Policy CS.6 provides higher level protection.
Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	Yes	Support Proposal GLH.	n/a	n/a
FORSE		No	Not Specified	No	Noise report by IDIBRI Acoustic Consulting	n/a	See overall response below.
FORSE		No	Yes	No	Covering letter for representations.	n/a	n/a
FORSE		No	Not Specified	No	Transport Report by PFA Consulting	n/a	See overall response below.
FORSE		No	Not Specified	No	Copy of letter regarding Warwickshire Wildlife Trusts representations on the Core Strategy.	n/a	See overall response below.
FORSE		No	Not Specified	No	Lack of assessment of European protected species at the Gaydon/Lighthorne Heath (GLH) site. The implications of the presence on, and adjacent to the site, of ancient woodland, including the need for buffers to be provided, and the need to avoid significant deterioration in its quality, with reference to the National Planning Policy Framework (NPPF) para 118.	n/a	See response under Sustainability Appraisal.
St Modwen Developments Ltd	Barton Willmore llp	Not Specified	Not Specified	Not Specified	There is no evidence which demonstrates satisfactorily that the site at GLH will be deliverable during the plan period given the significant infrastructure works required to be carried out early in the development. Detailed comments on deliverability and various aspects of infrastructure made in accompanying report, in summary: - £22.73m of transport related infrastructure required by 2020 (a significant infrastructure bill for first 800 homes). - delivery and cost of education, health, police, water supply, flood risk, play space open space and green infrastructure.	Remove GLH and replace it with Meon Vale or at least include Meon Vale as well.	See overall response below.
Jaguar Land Rover Ltd	Gerald Eve LLP	Not Specified	Not Specified	No	Need to make it clear that it is land at the southern end of the proposed allocation that will be provided for the expansion of JLR.	Amend Proposal GLH accordingly.	Amend the policy for the avoidance of doubt.

Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	Remove reference to a Supplementary Planning Document from the policy into supporting text.	Amend Proposal GLH accordingly.	The Masterplan SPD is required to ensure that the requirements of Proposal GLH are incorporated in the new settlement.
Stagecoach Midlands		Not Specified	Not Specified	Yes	Stagecoach supports the principle of a new settlement at a site at Lighthorne Heath.	n/a	n/a
Aston Martin Lagonda Ltd	Stansgate Planning	Yes	Yes	No	GLH proposals do not make any provision for future expansion of Aston Martin Lagonda (AML)	AML needs should be recognised in the masterplan for the new settlement and Proposal GLH.	No comments were received from AML as a result of either the 'New Proposals' consultation in 2013 or the 'Focused' consultation in 2014. There is no provision within Proposal GLH to make available any general employment land that might be occupied by AML. Separate discussions will be instigated with AML to establish their needs and to identify potential solutions.
Coventry City Council - Planning Policy Manager		Not Specified	Not Specified	Not Specified	Should plan for 3,000 dwellings coming forward in the plan period, not 2,500.	Amend Proposal GLH accordingly.	See overall response below.
Ronald Dobson		Yes	Yes	No	Inappropriate use of a greenfield location, M40 source of noise and emissions. Location will not satisfactorily fulfil the housing demands of the district.	Replace GLH with Long Marston Airfield.	See overall response below.
Warwickshire Wildlife Trust		Not Specified	Not Specified	No	Insufficient evidence to justify the allocation of the land GLH. Limited up-to-date ecological information to determine the environmental impacts of the GLH scheme and other alternatives within the Core Strategy evidence base.	The ecological evidence base should be updated for all of the strategic options outlined in the 2014 Housing Requirement and Strategic Site Options Consultation.	See overall response below.
Cherwell District Council - Strategic Planning & the Economy		Not Specified	Not Specified	Not Specified	Support allocation and expansion of JLR, welcome transport retail and education proposals.	n/a	n/a
Mr John Morgan		Yes	Yes	No	The site is not a sustainable location and will lead to a car dominated development, contrary to paragraphs 109, 112 and 118 in NPPF. No evidence of permanency of the bus service. The District Council has failed to demonstrate or provide evidence that it has obtained commitment from the Highways Agency or the DfT that funding resources will be provided to allow the additional highway investment required to be delivered within the plan period.	Replace GLH with Long Marston Airfield.	See overall response below.
Michael Brockington		Not Specified	Not Specified	No	Site is not in a sustainable location, contrary to paragraphs 108, 109 and 112 of the NPPF.	Replace GLH (or substantially reduce it) with development at Long Marston Airfield	See overall response below.
Lynn Pearson		Not Specified	Not Specified	No	Scale and location of development and impact on roads. Dispersal option or alternative site preferred. There are no shopping or community facilities proposed until the final phase of building.	Replace GLH with Long Marston Airfield.	See overall response below.
Mrs Dee McGowan		Not Specified	Not Specified	No	The development at Gaydon/Lighthorne Heath is in totally the wrong place. The pollution from the M40 will make it a horribly unhealthy place to live. Leamington is already set to grow significantly as it is, so this development will add to all the pressures that will bring.	Replace GLH with Long Marston Airfield.	See overall response below.

One Property Group	Phase 2 Planning & Development Limited	Not Specified	Not Specified	No	The scale of development cannot be delivered. With an ultimate size of just 3,000 homes, it is questionable as to whether this will represent a sustainable development, and therefore whether the strategy is the most appropriate. Reliance on an SPD to manage land use and other key development management issues contravenes the 2012 Local Plan Regulations.	Scale of development deliverable within the Plan period should be adjusted to a more realistic 1,500 units. The shortfall in provision needs to be made up elsewhere in the District by increasing the yield from the Main Rural Centres and Local Service Villages. Proposal GLH requires clear targets for delivery. At the moment, the proposal states simply that 2,500 homes should be completed by 2031, but if monitoring of delivery is to be effective, there is a need to include earlier targets against which delivery can be measured, eg. date of approval of the SPD (or AAP), date of commencement of development, date of delivery of first homes, date of delivery of first 500 homes, date of delivery of first 1,000 homes. Only by regular monitoring targets will it be possible to take action in the event that the proposal is unable to deliver the full 2,500 in the Plan period. In order to comply with the 2012 Local Plan Regulations, either additional work is needed now to expand the scope of the Core Strategy to consider the key issues of land allocation and development management, or the Core Strategy should refer to the provision of an AAP, and the Council's LDS be amended accordingly.	See overall response below.
Overall Officer Response					<p>Five strategic options were assessed in considerable detail and each was considered capable of contributing to the achievement of sustainable development, subject to the implementation of measures to mitigate impacts. The district is judged to have a best fit with the Coventry and Warwickshire Housing Market Area, although it is acknowledged that a number of other market areas have an influence on the area. The overall approach involves a dispersal of the housing growth which reflects the need to have regard to these various influences.</p> <p>However, it is clearly reasonable that a new strategic choice should:</p> <ul style="list-style-type: none"> - reflect the principal housing market operating in the District; - reflect well established patterns of inward migration that are likely to continue and drive demand within the District; - complement, rather than compete with, other elements of housing supply in the District, thereby avoiding over concentration in one particular area that might impact on deliverability; - create a synergy between housing and economic growth, complementing the envisaged pattern of employment opportunity. <p>The NPPF encourages the use of previously developed land but it does not promote a sequential approach to land use. It stresses the importance of achieving sustainable development to meet identified needs. As such, it is legitimate to select a 'greenfield option' if that option is considered in overall terms to be the most sustainable.</p> <p>As things stand there is no reason to assume that Proposal GLH will not deliver 2,500 dwellings during the plan period. More detailed analysis is being undertaken to underpin the Masterplan SPD for the site. This will address issues of scale, timing, deliverability and sustainability. The Draft SPD is due to be reported to The Cabinet in October. Amendments are proposed relating to the delivery trajectory in response to comments to CS.16 Housing Development.</p> <p>In response to the representations by St Modwen, the claim that about £22.73m of transport related infrastructure being required by 2020 and tied to the first 800 homes is incorrect. Table 4.2 of the 'Viability and Deliverability of Strategic Sites Study' shows the infrastructure requirements associated with housing at GLH. In relation to foul water treatment, Severn Trent Water is actively planning to accommodate the development now it has been confirmed as the Preferred Option and it is aware of the delivery trajectory. Surface water flooding issues at the site relate to the southern end of the site (allocated for JLR) and will not impact on the housing trajectory. Costings for GLH have not included those relating to sports facilities, including parks, green space, provision for children and young people, allotments, community orchards and sports hall because they are not yet known and it is not clear whether they would be funded through CIL or S106. They could either be dual use, e.g. school and indoor sports or funded through CIL. PBA have advised that there is a decent buffer to accommodate provision through S106 if necessary.</p>		
Overall Officer Recommendation					<p>That the Inspector be requested to recommend that Proposal GLH is modified as follows:</p> <p>In 'What is to be delivered', in the first bullet point insert after "100 hectares" the words "at the southern end of the allocation"</p> <p>In 'When is it to be delivered' delete text and replace with: "JLR development: Phases 2-4 (2016/17 to 2030/31) and post 2031" "Housing and related development: Phase 2 (2016/17 - 2020/21) approx. 750 homes; Phase 3 (2021/22 - 2025/26) approx. 875 homes; Phase 4 (2026/27 - 2030/31) approx. 875 homes; Post 2031 approx. 500 homes"</p>		

Section 6 Area Strategies – 6.11 Countryside and Villages Policy AS.10

Number of Supports: 0 Number of Objections: 7 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
West Midlands HARP Planning Consortium	Tetlow King Planning	Yes	Yes	No	<p>Concerned that the policy seems to indicate that rural exception schemes are 'community-led' schemes. This is not appropriate, and not a sound approach to addressing local affordable housing needs.</p> <p>It is evident that in some localities, support for any development, irrespective of community need, may not be supported by the local community. The Council must indicate that it welcomes both community led schemes but also schemes from other applicants.</p> <p>The policy should encourage other applicants to facilitate the involvement of the local community.</p>	Amend policy accordingly.	See overall response below.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Have significant concerns about the implications of this policy and its relationship to the intended Site Allocations DPD. It is unclear whether the Site Allocations DPD will be prepared for all settlements in the settlement hierarchy set out in Policies CS.15 and CS.16, thus providing Built Up Area Boundaries for all such settlements.</p> <p>The restrictive nature of part (b), with the reference to undefined "small-scale" housing schemes, conflicts with the requirements in Policy CS.16 for new housing development to be provided over the plan period.</p> <p>It is unclear how the restrictive nature of the policy and its applicability to all areas of the district outside the Built Up Area Boundaries of Stratford on Avon and Main Rural Centres, is reconciled with the need to deliver new homes set out in the development strategy.</p>	None specified.	See overall response below.
Client - Upper Quinton c/o NGA	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	<p>The policy does not properly and reasonably set out the hierarchy of villages identified in Appendix 2 of the Core Strategy as a policy consideration.</p> <p>It cannot be appropriate and reasonable for a matter in the Appendix to identify growth for specific categories of village that are not identified within a proper policy of the Core Strategy.</p>	None specified.	See overall response below.
One Property Group	Phase 2 Planning & Development Limited	Not Specified	Not Specified	No	<p>Even though the Local Service Villages are a key component of the housing provision strategy, this is the only one of the Area Strategy policies that doesn't dovetail with the development strategy and housing requirements.</p> <p>Policies CS15 and CS16 provide for new housing allocations at the Local Service Villages in particular, but AS10 does not reflect this, and suggests that only development within the existing settlement boundaries or conversions/replacements will be allowed.</p>	Amend wording under the "residential" heading to cross refer to the provision of new housing outside existing Local Service Villages in accordance with Policies CS15 and CS16.	See overall response below.
Gladman Developments		Not Specified	Not Specified	No	<p>Approach is overly restrictive and will act to prevent otherwise appropriate and sustainable development which lies adjacent to, yet outside the Built Up Area Boundaries or confines of a LSV from coming forward.</p> <p>Need to have a positive policy approach to sustainable development in the countryside.</p>	Amend plan accordingly.	See overall response below.

Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	<p>Have significant concerns about the implications of this policy and its relationship to the intended Site Allocations DPD. It is unclear whether the Site Allocations DPD will be prepared for all settlements in the settlement hierarchy set out in Policies CS.15 and CS.16, thus providing Built Up Area Boundaries for all such settlements.</p> <p>The restrictive nature of part (b), with the reference to undefined "small-scale" housing schemes, conflicts with the requirements in Policy CS.16 for new housing development to be provided over the plan period.</p> <p>It is unclear how the restrictive nature of the policy and its applicability to all areas of the district outside the Built Up Area Boundaries of Stratford on Avon and Main Rural Centres, is reconciled with the need to deliver new homes set out in the development strategy.</p>	None specified.	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	<p>Have significant concerns about the implications of this policy and its relationship to the intended Site Allocations DPD. It is unclear whether the Site Allocations DPD will be prepared for all settlements in the settlement hierarchy set out in Policies CS.15 and CS.16, thus providing Built Up Area Boundaries for all such settlements.</p> <p>The restrictive nature of part (b), with the reference to undefined "small-scale" housing schemes, conflicts with the requirements in Policy CS.16 for new housing development to be provided over the plan period.</p> <p>It is unclear how the restrictive nature of the policy and its applicability to all areas of the district outside the Built Up Area Boundaries of Stratford on Avon and Main Rural Centres, is reconciled with the need to deliver new homes set out in the development strategy.</p>	None specified.	See overall response below.
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	<p>There is no reference to the recycling of brownfield sites within the rural area.</p> <p>It is important that this policy is not used negatively to restrict the redevelopment or change of brownfield sites in rural locations.</p>	Amend policy accordingly.	See overall response below.
Overall Officer Response		<p>In response to West Midlands HARP, it is expected that rural exception schemes will originate from within the community, but part (a) of the policy provides scope for other local evidence to be used to identify the need for affordable housing. However, the need for such housing must originate from within the community where a scheme is promoted and/or from people who have another form of connection to that community.</p> <p>In response to Rosconn Group, Gallagher Estates and Persimmon Homes, it is confirmed that the Site Allocations DPD is intended to cover all settlements in the hierarchy, ie. Stratford-upon-Avon, Main Rural Centres and Local Service Villages. The policy will be applied in order to help facilitate the provision of the amount of housing development identified in Policy CS.16, but for the avoidance of doubt it would be helpful to cross refer to this policy in part (b). The approach taken in this policy is not restrictive but is consistent with the overall development strategy and will be applied accordingly. Policies CS.15 and CS.16 identify the settlement hierarchy and the amount of housing development that should be provided in each category of settlement.</p> <p>In response to One Property Group, the policy is consistent with policies CS.15 and CS.16. The latter makes it clear that housing development should take place within the boundaries or confines of settlements. This policy also identifies circumstances where dwellings may be created outside settlements.</p> <p>In response Gladman Developments, it is entirely appropriate for this policy to facilitate new dwellings in accordance with the overall development strategy. The purpose of the Core Strategy and the Site Allocations DPD is to ensure that the District's overall housing requirement is met in the manner identified in the plan and not be flexible about other locations that are not consistent with the strategy. To do otherwise would negate the purpose of the plan-led system.</p> <p>In response to Nigel Gough Associates on behalf of a client, policies CS.15 and CS.16 identify the settlement hierarchy and the amount of housing development to be provided in each category of settlement so it is not the case that such matters have been established in an appendix to the plan.</p> <p>In response to Cope's of Earlswood, various provisions of the policy relate to the re-use and redevelopment of brownfield sites in the rural area and the fifth bullet point in the first part of the policy emphasises the importance of utilising such sites. Other policies in the Core Strategy also cover this matter, including CS.10 in relation to brownfield sites in the Green Belt.</p>					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy AS.10 be modified as follows:</p> <p>Amend part (b) to include a cross-reference to Policy CS.16 Housing Development at the end.</p>					

Section 6 Area Strategies – 6.12 Large Rural Brownfield Sites Policy AS.11

Number of Supports: 3 Number of Objections: 1 Number of Unspecified: 1

	Respondent	Agent	Legally compliant	Duty compliant	Sound	Positively Prepared	Justified	Effective	Consistent with National Policy	Reasons	Changes Sought	Officer Comment
	Cherwell District Council - Strategic Planning & the Economy		Not Specified	Not Specified	Not Specified	Not Specified	Not Specified	Not Specified	Not Specified	n/a	n/a	n/a
	CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	Not Specified	No	Not Specified	Not Specified	Not Specified	Not Specified	Support the principle of this policy but object to the omission of Long Marston Airfield as a sustainable location for a new settlement.	Amend plan accordingly	This matter is dealt with under the omission sites topic.
	Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	Yes	NA	NA	NA	NA	n/a	n/a	n/a
	English Heritage - West Midlands		Not Specified	Not Specified	Not Specified	Not Specified	Not Specified	Not Specified	Not Specified	Southam may be a potential site of a civil war skirmish. Whilst this may not be a registered Battlefield, as a non-designated heritage asset it requires careful consideration and an appropriate response.	None specified.	This point is noted and is covered by point (c) in Part 3 of the policy.
	Natural England - South Mercia Area		Yes	Yes	Yes	NA	NA	NA	NA	Policy should be amended as follows: Gaydon Site - point (d) should require the retention and enhancement of ecological features. Former Southam Cement Works - point (b) should include a requirement for biodiversity enhancement.	Amend policy accordingly.	These suggested changes are appropriate.
	Aston Martin Lagonda Ltd	Stansgate Planning	Yes	Yes	Yes	NA	NA	NA	NA	n/a	n/a	
Overall Officer Response												
Overall Officer Recommendation			<p>That the Inspector be requested to recommend that Policy AS.11 is modified as follows:</p> <p>Part 1. Gaydon Site (d) to read: "retain and enhance ecological and archaeological features on the site"</p> <p>Part 3. Former Southam Cement Works (b) to read: "...protect important habitats and species and secure biodiversity enhancement"</p>									

Section 6 Area Strategies – 6.12 Large Rural Brownfield Sites Policy AS.11 1. Gaydon Site

Number of Supports: 1 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Jaguar Land Rover Ltd	Gerald Eve LLP	Yes	Yes	No	<p>Leisure facilities and car parking are not specifically identified.</p> <p>Concern is expressed regarding the requirement for all proposals to take account of the need to provide comprehensive structural landscaping within the site.</p> <p>Significant concern is also expressed regarding the requirement for all proposals to assess the effects of the proposed development on the demand for housing and local services. Other policies within the Core Strategy seek to ensure that housing needs and the demands on local services are met.</p>	<p>Amend the policy to read as follows:</p> <p>1. Gaydon Site The following uses are appropriate in principle:</p> <ul style="list-style-type: none"> - research, design, testing and development of motor vehicles and ancillary activities; - other advanced engineering technologies and products; - low volume manufacturing and assembly operations; - offices; - automotive education, conference and training including ancillary accommodation; - leisure, promotional and marketing uses related to the existing uses at the site; - car storage; - ancillary new and replacement car parking provision; and - complementary and ancillary uses for employees and visitors. <p>Other uses will be acceptable if they are compatible with those specified above and satisfy the provisions of this policy.</p> <p>All development proposals on the site should take into account the need to:</p> <ul style="list-style-type: none"> (a) consider the views which have been expressed through ongoing engagement with local communities and statutory consultees; (b) address the impact on existing properties at Lighthorne Heath and on the surrounding rural area; (c) provide comprehensive structural landscaping around the perimeter; (d) minimise the impact of development on ecological and archaeological features within the site; (e) assess the impact of traffic arising from the proposed development on the local road network and the need for any off-site highway improvements or other appropriate mitigation measures. 	See overall response below.
Coventry & Warwickshire LEP (Planning Group)		Yes	Not Specified	Yes	n/a	n/a	n/a
Overall Officer Response		<p>All of the additional uses and activities that Jaguar Land Rover has asked to be identified in the policy, apart from car storage, are also proposed under the provisions of Proposal GLH. On that basis, it would be consistent to support the principle of them being appropriate on the existing Gaydon Site. With regard to car storage, the scale and impact of this would be too open-ended unless it was restricted to an ancillary function. It is agreed that reference to the potential resultant demand for housing and services is covered elsewhere in the Core Strategy and will also be addressed in a future review of it. While it is accepted that the provision of structural landscaping within the site may not be applicable to every scheme that is submitted, a reference to the matter being addressed in appropriate cases should be retained in the policy. A specific reference to Junction 12 on the M40 is not necessary, particularly given the improvements to it that are about to be implemented.</p>					

Overall Officer Recommendation	<p>That the Inspector be requested to recommend that Policy AS.11.1 is modified as follows:</p> <p>Insert the following uses as being appropriate in principle: “- automotive education, conference and training including ancillary accommodation. - leisure, promotional and marketing uses related to existing uses on the site. - ancillary new and replacement car parking - complementary and ancillary uses for staff and visitors. - ancillary car storage.”</p> <p>Amend criterion (c) to read: “provide comprehensive structural landscaping around the perimeter of the site, and within the site as appropriate.”</p> <p>Delete criterion (e)</p> <p>Amend criterion (f) to read: “assess the impact of traffic arising from the proposed development on the local road network and the need for any off-site highway improvements or other appropriate mitigation measures.”</p>
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Section 6 Area Strategies – 6.12 Large Rural Brownfield Sites Policy AS.11 2. Former Depot Long Marston

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	No	<p>Amend part 2 of the policy to read: The following uses are appropriate in principle:</p> <ul style="list-style-type: none"> - leisure-related activities and accommodation; - light industrial (Class B1c), research and development (Class B1b), light industrial (Class B1c), general industrial (Class B2) and storage and distribution (Class B8); - other forms of employment that make use of the rail connection to the site; - residential development of a form and scale that meets local needs or is justified in relation to other uses on the site. <p>Policy should be updated to recognise that planning permission has been granted for a mixed use development comprising leisure, residential and employment uses.</p> <p>In light of the submitted Masterplan, and proposed development being considered by the Council, the criteria (b) - (j) should be revisited.</p>	Amend policy accordingly.	See overall response below.
Overall Officer Response		It would be appropriate to extend the range of industrial uses that could, in principle, be provided on this site in order to provide flexibility and potentially a wider range of job opportunities. Also the caveat in the current wording about traffic impact can be deleted as this issue is covered under criterion (d) in any case. The provisions of the policy, including criteria (b) - (j) remain valid despite the planning permission for the site as they provide the basis for considering any further development proposals that come forward.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy AS.11.2 is modified as follows:</p> <p>Amend second bullet point to read: "employment uses within Classes B1, B2 and B8."</p>					

Section 6 Area Strategies – 6.12 Large Rural Brownfield Sites Policy AS.11 3. Former Southam Cement Works, Long Itchington

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Follett Property Holdings Ltd	Nigel Moor Planning	Not Specified	Not Specified	No	Given that quarrying is anticipated to take place until circa 2020, it should be made clear that redevelopment of this site is now unlikely until beyond that date and no contribution to housing can be made before then.	Amend policy accordingly.	See overall response below
Overall Officer Response		There may be scope for some development on this site, in accordance with the provisions of this policy, while quarrying operations continue.					
Overall Officer Recommendation		No change.					

Section 6 Area Strategies – 6.12 Large Rural Brownfield Sites Policy AS.11 4. Former Harbury Cement Works, Bishops Itchington

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Follett Property Holdings Ltd	Nigel Moor Planning	Not Specified	Not Specified	No	<p>The policy is a welcome relaxation of the overly restrictive Policy CTY20 contained in the District Local Plan Review 1996 - 2011 but it is still drafted with the requirement that employment and residential development must be of a form and scale that meets local needs or is justified in relation to other uses on the site.</p> <p>Land at Deppers Bridge should be included within the policy area.</p>	<p>Amend part 4 of the policy as follows: The following uses are appropriate in principle:</p> <ul style="list-style-type: none"> - employment and residential development of a form and scale that meets the needs of the district. - leisure, tourism and recreation - The provision of specialised accommodation for the elderly and the need for this will be assessed on a District wide basis. <p>The criterion that new buildings should be restricted to the previously developed parts of the site should be omitted.</p> <p>For consistency at (a), the words “take into account the Masterplan” should be inserted instead of “comply with the Masterplan”.</p> <p>Amend policy boundary accordingly.</p>	See overall response below.
Overall Officer Response		<p>It would be contrary to the overall development strategy set out in the Plan to extend the scope of employment and residential development on this site beyond what is already specified. In any case, other policies in the Core Strategy set out how the required scale of development will be met in accordance with the provisions of Policy CS.15 Distribution of Development. Furthermore, to extend the scope of the policy to include the area between the railway and Deppers Bridge would be inappropriate as it is an extensive tract of greenfield land.</p> <p>The revised wording proposed by Follett Properties would be tantamount to allocating the site for housing development and is inappropriate as there is no need to identify this area for development in order to meet the proposed housing requirement for the District. The planning permission referred to relates to the specific circumstances of that case and should not be applied to the former Harbury Cement Works as a whole.</p> <p>It is accepted that the reference to the Masterplan should be amended to make it less prescriptive as it was adopted against the provisions of Policy CTY.20 in the District Local Plan Review.</p>					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy AS.11.4 is modified as follows:</p> <p>Amend criterion (a) to read: “take into account the Masterplan for the site...”</p>					

Section 6 Area Strategies – 6.13 Redditch Context

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Adrian Bedford-Smith		No	No	No	Land south of Redditch is more suitable for housing development than the area identified north of the sites as proposed in the Redditch District Local Plan.	Amend plan to identify land at The Griffon, north of Studley, for housing development.	See overall response below.
Redditch Borough Council - Development Plans		Not Specified	Not Specified	Not Specified	Regarding para. 6.13.4 it was understood that the District Council did not wish to pursue the potential of land along the A435 corridor. This may need to be clarified as its inclusion in an Allocations Plan may have implications for the implementation of development on adjacent land within Redditch which is included as a potential housing site in the Borough of Redditch Local Plan No.4, currently at Examination stage.	Amend text accordingly.	See overall response below.
Overall Officer Response		<p>Mr Bedford-Smith's representation relates to the suitability of land on the northern edge of Redditch identified in the submitted Bromsgrove District Local Plan and will be considered at the examination into that Plan. The relative merits of areas of land on the periphery of Redditch to meet its future housing requirements have been the subject of detailed assessment. As a result, land on the north side of the town was found to be the most appropriate option for large-scale development. The assessment concluded that accessibility to the south of Redditch is poor and that the A441 and Crabbs Cross roundabout are congested. Traffic links to the north would involve journeys through the town centre or via the A435 which is also congested. It did acknowledge that foul drainage would be easier than other options. However, the narrow section of Green Belt that maintains the separation of Studley and Redditch is both valuable and vulnerable. It concluded that even a minor incursion would have a major effect on maintaining this separation and that any extension of Redditch's development boundaries southwards would be harmful. As such, this area of Green Belt should remain.</p> <p>The issue raised by Redditch Borough Council does require clarification to make it clear that any housing development to the west of the A435 should be consistent with the scale of development identified in Policy CS.16 in relation to the role of Mappleborough Green as a Local Service Village.</p>					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that paragraph 6.13.4 is modified as follows:</p> <p>Insert in line 5 the words "...consistent with the scale of development identified in Policy CS.16 in relation to Mappleborough Green..."</p>					

Section 6 Area Strategies – 6.13 Redditch Proposal REDD.1 Winyates Green Triangle, Mappleborough Green

Number of Supports: 2 Number of Objections: 3 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Natural England - South Mercia Area		Yes	Yes	Yes	Suggest an additional reference to the need to protect priority habitats as identified through the Sustainability Appraisal.	Amend Proposal REDD.1 accordingly.	See overall response below.
Environment Agency		Not Specified	Not Specified	Not Specified	Add the following point to specific requirements: 'Deculvert and enhance the watercourse feature'	Amend Proposal REDD.1 accordingly.	See overall response below.
Earlswood & Forshaw Heath Residents Association		No	No	No	The District Council has not complied with either UK or EU legislation in the construction of this policy. It has not complied with its legal requirements to: (a) protect the Green Belt (NPPF para 9); or (b) undertake meaningful cross-boundary co-operation consultations (per NPPF paras 178 - 181). Deletion of this land from the Green Belt is contrary to para. 80 in the NPPF. Meeting the needs of Redditch is not an exceptional circumstance.	Delete Proposal REDD.1.	See overall response below.
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	Not Specified	Not Specified	No	A consistency of approach between the policies within Bromsgrove and Stratford should be maintained. The allocation within Bromsgrove does not require there to be a minimum provision of office/R & D uses. This will enable the development of the site to meet the needs of Redditch based upon the potential occupier requirements. Sympathetic to the desire of the Council to achieve a mixed use development but consider it inappropriate for specific percentage targets to be included as a policy requirement. An explanation of the aspiration for the mix of uses could be included within the supporting explanatory text. There is no clarity on the natural features that would be required to be protected. Retention of all the features within the site may impose sufficient constraint to prevent appropriate development and job creation and would be considered onerous. Appropriate flexibility and the ability to provide suitable compensation/mitigation for the potential loss of features should be provided for.	Amend Proposal REDD.1 accordingly.	See overall response below.
CPRE Warwickshire Branch		Not Specified	Not Specified	No	Site is not suitable for employment development as it is adjacent to existing housing. This location would be suitable for housing and should be allocated for housing as part of Stratford District's housing requirement. The claimed shortfall of employment land for Redditch is implausible and not justified.	Delete Proposal REDD.1.	See overall response below.

Redditch Borough Council - Development Plans		Yes	Yes	Yes	n/a	n/a	n/a
Overall Officer Response	<p>In response to Earlswood & Forshaw Heath Residents Association, this site is not in the Green Belt. With regard to the alleged failure by the District Council to fulfil its Duty to Co-operate obligations, there has been extensive collaboration with Redditch Borough Council and Bromsgrove District Council in producing the Core Strategy. The principle of the District Council having to consider releasing land to meet the housing and/or employment needs of Redditch has been long-established, including through the former Regional Spatial Strategy, and it has been addressed through the Duty to Co-operate process. The preparation of the respective development plans for the three local authorities has been a thorough and open process, and subject to public consultation at various stages.</p> <p>In response to the Homes and Communities Agency, there is an apparent inconsistency in arguing that this site and Proposal REDD.2 together represent a 'game changer' in terms of diversifying Redditch's economy but then seeking to avoid a commitment to provide some Class B1a and B1b floorspace. The justification for making land in Stratford District available for employment development to meet the needs of Redditch, particularly where it involves the removal of land from the Green Belt, is based on the scope it provides to diversify as well as expand its economy. This objective has been identified by various studies produced by Redditch Borough Council and on behalf of the North Worcestershire Economic Development & Regeneration body. On that basis, it is reasonable to expect there to be a commitment within both proposals to provide a certain amount of floorspace that will help to achieve this objective. It should be noted that Redditch Borough Council has not objected to this provision.</p> <p>It is also appropriate for an allocation to identify what physical features on the site should be taken into account in any development proposal. For this reason the requests by Natural England and the Environment Agency for additional site specific issues to be identified are reasonable.</p> <p>In response to the CPRE, the justification for additional land to be provided to meet the employment needs of Redditch and the choice of the two sites in Stratford District is founded on robust evidence including a thorough assessment commissioned by Redditch Borough Council of all the land on the periphery of the town. The need to take into account residential amenity is identified as a specific requirement.</p>						
Overall Officer Recommendation	<p>That the Inspector be requested to recommend that Proposal REDD.1 is modified as follows:</p> <p>Insert additional specific requirements to read: "deculvert and enhance the existing watercourse feature" and "protect priority habitats within the site"</p>						

Section 6 Area Strategies – 6.13 Redditch Proposal REDD.2 Gorcott Hill, Mappleborough Green

Number of Supports: 2 Number of Objections: 4 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CPRE Warwickshire Branch		Not Specified	Not Specified	No	<p>Site is located in the Green Belt and forms part of the rural setting of Redditch.</p> <p>It is not accessible from the town and a new road access would be needed on a dual carriageway where a new junction would be unsuitable and intrusive.</p> <p>It would be in an unsustainable location for the purpose of providing employment land, being inaccessible from residential areas except by car.</p> <p>The claimed shortfall of employment land for Redditch is implausible and not justified.</p> <p>No 'exceptional circumstances' have been demonstrated to remove this land from the Green Belt.</p>	Delete Proposal REDD.2.	See overall response below.
Natural England - South Mercia Area		Yes	Yes	Yes	<p>Suggest an additional reference to the need to protect priority habitats as identified through the Sustainability Appraisal.</p>	Amend proposal accordingly.	See overall response below.
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	Yes	Yes	No	<p>A consistency of approach between the policies within Bromsgrove and Stratford should be maintained. The allocation within Bromsgrove does not require there to be a minimum provision of office/R & D uses. This will enable the development of the site to meet the needs of Redditch based upon the potential occupier requirements.</p> <p>Sympathetic to the desire of the Council to achieve a mixed use development but consider it inappropriate for specific percentage targets to be included as a policy requirement.</p> <p>There is no clarity on which mature hedgerows and trees would be required to be protected. Retention of all the features within the site may impose sufficient constraint to prevent appropriate development and job creation and would be considered onerous.</p> <p>Appropriate flexibility and the ability to provide suitable compensation/mitigation for the potential loss of features should be provided for.</p>	Amend proposal accordingly.	See overall response below.
Earlswood & Forshaw Heath Residents Association		No	No	No	<p>The District Council has not complied with either UK or EU legislation in the construction of this policy. It has not complied with its legal requirements to:</p> <p>(a) protect the Green Belt (NPPF para 9); or</p> <p>(b) undertake meaningful cross-boundary co-operation consultations (per NPPF paras 178 - 181).</p> <p>Deletion of this land from the Green Belt is contrary to para. 80 in the NPPF.</p> <p>Meeting the needs of Redditch is not an exceptional circumstance.</p>	Delete Proposal REDD.2.	See overall response below.

Environment Agency		Not Specified	Not Specified	Not Specified	Add the following point to specific requirements: 'Protect and enhance the Pool and Blacksoils Brook and create upstream storage to reduce flows during flood conditions using sustainable techniques'.	Amend proposal accordingly.	See overall response below.
English Heritage - West Midlands		Not Specified	Not Specified	No	Concerned with this allocation affecting the Grade II* Gorcott Hall. The significance of the Hall and its associated designated heritage assets are at risk from the encroachment within their setting of a sizeable industrial complex. Insufficient evidence has been prepared to inform the principle and extent of development, the capacity of the allocation, and any strategic design mitigation conditions which may be required.	None specified.	See overall response below.
Redditch Borough Council - Development Plans		Yes	Yes	Yes	n/a	n/a	n/a
Overall Officer Response	<p>In response to Earlswood & Forshaw Heath Residents Association regarding the alleged failure by the District Council to fulfil its Duty to Co-operate obligations, there has been extensive collaboration with Redditch Borough Council and Bromsgrove District Council in producing the Core Strategy. The principle of the District Council having to consider releasing land to meet the housing and/or employment needs of Redditch has been long-established, including through the former Regional Spatial Strategy, and it has been addressed through the Duty to Co-operate process. The preparation of the respective development plans for the three local authorities has been a thorough and open process, and subject to public consultation at various stages. Gorcott Hill has been identified as being the most appropriate for employment development following an extensive assessment of land on the periphery of Redditch for this purpose, almost all of which is in the Green Belt. This is also the overarching exceptional circumstance that justifies the removal of this area of land from the Green Belt. The same argument is made in response to CPRE's representation.</p> <p>In response to the representations by Homes and Communities Agency, there is an apparent inconsistency in arguing that this site and Proposal REDD.1 together represent a 'game changer' in terms of diversifying Redditch's economy but then seeking to avoid a commitment to provide some Class B1a and B1b floorspace. The justification for making land in Stratford District available for employment development to meet the needs of Redditch, particularly where it involves the removal of land from the Green Belt, is based on the scope it provides to diversify as well as expand its economy. This objective has been identified by various studies produced by Redditch Borough Council and on behalf of the North Worcestershire Economic Development & Regeneration body. On that basis, it is reasonable to expect there to be a commitment within both proposals to provide a certain amount of floorspace that will help to achieve this objective. It should be noted that Redditch Borough Council has not objected to this provision.</p> <p>It is also appropriate for an allocation to identify what physical features on the site should be taken into account in any development proposal. For this reason the requests by Natural England and the Environment Agency for additional site specific issues to be identified are reasonable.</p> <p>In response to the concerns raised by English Heritage, a detailed assessment of the character and setting of Gorcott Hall is being produced by Bromsgrove District Council. Its findings, and the response from English Heritage to it, will be taken fully into account when considering the extent and nature of development on this site. This issue is already identified in the specific requirements of the proposal.</p>						
Overall Officer Recommendation	<p>That the Inspector be requested to recommend that Proposal REDD.2 is modified as follows:</p> <p>Insert additional specific requirements to read: "protect and enhance the pool and Blacksoils Brook" and "protect priority habitats within the site"</p>						

Section 7 Infrastructure – 7.1 Healthy Communities Policy CS.24

Number of Supports: 1 Number of Objections: 3 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	Yes	n/a	n/a	n/a
Warwickshire County Council		Not Specified	Not Specified	Not Specified	The policy states that developer contributions will be spent on built recreation facilities where justified by an increase in population. More information here would be useful as clarification on a threshold/trigger for an increase in local population is not clear within the core strategy.	Amend policy accordingly.	More information is provided in the updated Open Space, Sport and Recreation Assessment 2014.
Warwickshire and West Mercia Police		Yes	Yes	No	<p>The second paragraph of part A of the policy does not reference the police service. Provision of policing services will be vital as communities cannot be healthy and inclusive if they are not at the same time safe and secure.</p> <p>Two of the criteria are ineffective as currently drafted when applied to the police and other emergency services. (b) is not applicable to the emergency services. The services they provide are founded on the basis of primary legislation enacted by Government. No other organisation of any kind is permitted by law to undertake them. Also re-use of such buildings is difficult with associated high costs of doing so. (c) before deciding whether to close an existing building or facility, each of the emergency services must carry out its own assessment to demonstrate robustly that services to the public would not be affected detrimentally by its loss. Therefore, at best, the criterion duplicates work that is already being done. It is also unacceptably vague as it does not give any information as to how precisely the wishes or intent of the local community will be assessed and the material weight to be given to them. It therefore raises the very real prospect of emergency services projects, which significantly benefit the majority, being delayed or cancelled.</p>	Amend part A as follows: ...'The provision of new and enhanced community, police, cultural, sport and leisure facilities will be encouraged as a way of promoting healthy, inclusive, safe and secure communities... In all instances, when applying the above criteria to specific proposals, the Council will have regard to the specific characteristics, needs, service priorities and objectives of the service and/ or organisation concerned. The Council will also consider the potential to mitigate the loss of a community facility, alongside consideration for any proposal for development on the site of the existing facility.'	<p>The reference to community facilities in the second paragraph of part A of the policy is a general one that includes emergency services.</p> <p>When considering the retention of a community facility, only one of the given criteria needs to be satisfied.</p> <p>Criterion a) as drafted is relevant to the police service.</p>
Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	<p>The Council has based its open space provisions on the Open Space Audit carried out in 2011 (with a minor update in 2012), however this document is now some three years old and is considered out of date.</p> <p>In the absence of any update survey, we therefore suggest that POS will need to be dealt with on a site by site basis and detail specifics contained within a future updated Open Space SPD.</p>	Delete part B of the policy.	The Council has refreshed its Open Space, Sport and Recreation Assessment in 2014 and proposes additional wording in the Explanation to clarify this (see recommendations below).
Wilmcote Parish Council	Tyler-Parkes Partnership	Not Specified	Not Specified	No	The policy proposes the encouragement of healthy communities based on the development of open spaces and recreation, including to 'protect and enhance public rights of way and access'. This does not recognise the impact this would have on families living in the area. It is not consistent with the principles in the Framework, Government Guidance and Government statements.	None specified.	There is no intention to override the legal or other interests of residents in implementing this policy. (See also CS.7 Green Infrastructure).
Overall Officer Response		The policy is considered sufficient in relation to emergency services. It is recommended that a reference to the updated Open Space, Sport and Recreation Assessment be added to the Explanation.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy CS.24 is modified as follows:</p> <p>Explanation - Para 7.1.10: additional wording to be added to end of first sentence 'and updated in 2014'.</p> <p>Para 7.1.11 first sentence: add the words 'of 2011' after the first phrase: 'The main audit report'....</p>					

Section 7 Infrastructure – 7.1 Healthy Communities Policy CS.24 A. Infrastructure, Services and Community Facilities

Number of Supports: 1 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
The Campaign for Real Ale CAMRA		Not Specified	Not Specified	Yes	n/a	n/a	n/a
Overall Officer Response		Only one representation submitted on this topic which is supportive.					
Overall Officer Recommendation		No change.					

Section 7 Infrastructure – 7.1 Healthy Communities Policy CS.24 B. Open Space and Recreation

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Sport England		Not Specified	Not Specified	No	<p>The current playing pitch strategy is nearing the end of its life and while the District Council is undertaking a refresh, the method is not sound and compliant with the NPPF.</p> <p>Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Therefore the use of national data from the Fields in Trust and the like would fail the tests set out above as the emphasis is on local provision.</p>	<p>The omission of all references to national standards and to focus on local standards as required by the NPPF. Also the evidence base needs to be refreshed using sound recognised methodology. The level of proposed housing needs should be addressed for both the indoor and outdoor sports facilities in formulating the revised strategies.</p>	<p>The Council has refreshed its Open Space, Sport and Recreation Assessment in 2014. The Playing Pitch Strategy was completed in 2011 and will be updated in 2015. The 2011 Playing Pitch Strategy was based on detailed surveys and assessments of needs at the local level.</p> <p>Any changes that emerge from the update in 2015 will be fed into the IDP which is a working document subject to change over the life of the Core Strategy.</p>
Overall Officer Response		<p>The Council has refreshed its Open Space, Sport and Recreation Assessment in 2014 and an additional reference to this effect is proposed in the Explanation. The Playing Pitch Strategy was completed in 2011 and will be updated in 2015. The 2011 Playing Pitch Strategy was based on detailed surveys and assessments of needs at the local level. Any changes that emerge from the update in 2015 will be fed into the IDP which is a working document subject to change over the life of the Core Strategy.</p>					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy CS.24 is modified as follows:</p> <p>Explanation - Para 7.1.10: additional wording to be added to end of first sentence 'and updated in 2014'.</p> <p>Para 7.1.11 first sentence: add the words 'of 2011' after the first phrase: 'The main audit report'....</p>					

Section 7 Infrastructure – 7.1 Healthy Communities Policy CS.24 Development Management Considerations

Number of Supports: 1 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
The Campaign for Real Ale CAMRA		Not Specified	Not Specified	Yes	n/a	n/a	n/a
Overall Officer Response		Only representation submitted on this topic is one of support.					
Overall Officer Recommendation		No change.					

Section 7 Infrastructure – 7.1 Healthy Communities Policy CS.24 Implementation and Monitoring

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire County Council		Not Specified	Not Specified	Not Specified	n/a	n/a	n/a
Overall Officer Response		Only representation submitted on this topic is one of support.					
Overall Officer Recommendation		No change.					

Section 7 Infrastructure – 7.2 Transport and Communications Policy CS.25

Number of Supports: 1 Number of Objections: 2 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Stagecoach Midlands		Not Specified	No	No	<p>We are disappointed that the submission Core Strategy and supporting evidence base makes little or no provision for infrastructure to support the delivery of high quality bus services. Without this, the Plan's development proposals will greatly increase pressure on the highway network within the District and beyond.</p> <p>In this respect, the Plan additionally fails to have sufficient due regard for its cross-boundary impacts. The Plan acknowledges it attempts to fulfil the Statutory Duty to Co-operate with neighbouring authorities and agencies, but has made little attempt to do so with regard to these transport issues. Thus the Plan does not fully meet this statutory duty.</p>	None specified.	The sole proposal of strategic cross boundary significance is the new settlement at Gaydon/Lighthorne Heath, incorporating both residential and employment related uses. The Council has engaged fully with the relevant adjoining authorities and the transport agencies to ensure this proposal acknowledges the need for sustainable transport options. It is noted that Stagecoach has expressed support for this proposal. See overall response below.
Commercial Estates and Bird Group	Nexus Planning Limited	Yes	Yes	Yes	n/a	n/a	n/a
Highways Agency		Not Specified	Not Specified	Not Specified	The policy should acknowledge the key role of the Highways Agency in facilitating new development in the District and the commitment of the parties concerned to partnership working.	Amend policy accordingly.	Agreed.
English Heritage - West Midlands		Not Specified	Not Specified	No	The policy should reflect the need to ensure the conservation of the historic environment is a key concern where transport/highway/public realm initiatives are proposed. Without an explicit reference, due consideration may well be overlooked.	Amend policy accordingly.	There is no need to repeat the provisions of Policy CS.8 as they will be taken into account as a matter of course.
Overall Officer Response		There is always a balance to be struck in deciding which development strategy to pursue. There is a considerable amount of committed and allocated development that is identified in locations that are well served by public transport. Only a relatively small proportion of the overall housing requirement for the plan period will take place in smaller settlements in order to support the nature of these communities, and many of these have a bus or train service. The District Council has co-operated closely with Warwickshire County Council, which is the public transport authority, throughout the preparation of the Core Strategy.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy CS.25 is modified as follows:</p> <p>Amend first paragraph to read: '...Warwickshire County Council and, where appropriate, the Highways Agency will work together...'</p>					

Section 7 Infrastructure – 7.2 Transport and Communications Policy CS.25 B. Transport and New Development

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Highways Agency		Not Specified	Not Specified	Not Specified	Part B in relation to Travel Plans does not accord with Government policy set out in the NPPF (para 36) and DfT Circular O2/2013, which require the submission of a Travel Plan for all proposals which are likely to have significant traffic impacts.	Policy should be amended to require all new proposals, including residential developments, to be accompanied by a Travel Plan where there is expected to be a material traffic impact on the Strategic Road Network (SRN).	It would be appropriate to make this point in DMC(2).
Overall Officer Response							
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that DMC(2) relating to Policy CS.25 is modified as follows:</p> <p>Insert in the first sentence the words 'including all proposals where there is expected to be a material impact on the Strategic Road Network'</p>					

Section 7 Infrastructure – 7.2 Transport and Communications Policy CS.25 D. Transport Schemes

Number of Supports: 0 Number of Objections: 10 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Ronald Dobson		Yes	Yes	No	<p>Safeguarding the route by implication means the Council also supports the reinstatement and as such the policy should be more positively worded to reflect this.</p> <p>As this is an infrastructure project, by definition, it should also be included in the Infrastructure Delivery Plan.</p> <p>The Council has failed to positively reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study.</p> <p>Overall, the results of the economic appraisal indicated that “the line is a promising candidate for reinstatement” and this should be reflected in the policy as the study forms part of the evidence base.</p> <p>There would be important economic benefits arising from additional tourist spend.</p> <p>Proposals to reinstate the line south of Stratford on Avon are acknowledged in both the Warwickshire and Worcestershire Local Transport Plans. The benefits of reinstatement are also recognised in the Network Rail Great Western and West Midlands Route Utilisation Strategies.</p>	<p>Policy needs to be strengthened and reworded more positively and (i) formally supported by Stratford District Council in addition to route safeguarding and (ii) included in the Infrastructure Delivery Plan.</p>	<p>See overall response below.</p>
Avon Rail Link		Yes	Yes	No	<p>Safeguarding the route by implication means the Council also supports the reinstatement and as such the policy should be more positively worded to reflect this.</p> <p>As this is an infrastructure project, by definition, it should also be included in the Infrastructure Delivery Plan.</p> <p>The Council has failed to positively reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study.</p> <p>Overall, the results of the economic appraisal indicated that “the line is a promising candidate for reinstatement” and this should be reflected in the policy as the study forms part of the evidence base.</p> <p>There would be important economic benefits arising from additional tourist spend.</p> <p>Proposals to reinstate the line south of Stratford on Avon are acknowledged in both the Warwickshire and Worcestershire Local Transport Plans. The benefits of reinstatement are also recognised in the Network Rail Great Western and West Midlands Route Utilisation Strategies.</p>	<p>Policy needs to be strengthened and reworded more positively and (i) formally supported by Stratford District Council in addition to route safeguarding and (ii) included in the Infrastructure Delivery Plan.</p>	<p>See overall response below.</p>

Mr Michael Revell		Yes	Yes	No	<p>Safeguarding the route by implication means the Council also supports the reinstatement and as such the policy should be more positively worded to reflect this.</p> <p>As this is an infrastructure project, by definition, it should also be included in the Infrastructure Delivery Plan.</p> <p>The Council has failed to positively reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study.</p> <p>Overall, the results of the economic appraisal indicated that "the line is a promising candidate for reinstatement" and this should be reflected in the policy as the study forms part of the evidence base.</p> <p>There would be important economic benefits arising from additional tourist spend.</p> <p>Proposals to reinstate the line south of Stratford on Avon are acknowledged in both the Warwickshire and Worcestershire Local Transport Plans. The benefits of reinstatement are also recognised in the Network Rail Great Western and West Midlands Route Utilisation Strategies.</p> <p>A western alignment for a track deviation parallel to the business park south of Station Road, Long Marston should be formally protected.</p>	<p>Policy needs to be strengthened and reworded more positively and (i) formally supported by Stratford District Council in addition to route safeguarding and (ii) included in the Infrastructure Delivery Plan.</p>	<p>See overall response below.</p>
Avon Rail Link Group		Not Specified	Not Specified	No	<p>Safeguarding the route by implication means the Council also supports the reinstatement and as such the policy should be more positively worded to reflect this.</p> <p>As this is an infrastructure project, by definition, it should also be included in the Infrastructure Delivery Plan.</p> <p>The Council has failed to positively reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study.</p> <p>Overall, the results of the economic appraisal indicated that "the line is a promising candidate for reinstatement" and this should be reflected in the policy as the study forms part of the evidence base.</p> <p>There would be important economic benefits arising from additional tourist spend.</p> <p>Proposals to reinstate the line south of Stratford on Avon are acknowledged in both the Warwickshire and Worcestershire Local Transport Plans. The benefits of reinstatement are also recognised in the Network Rail Great Western and West Midlands Route Utilisation Strategies.</p> <p>A western alignment for a track deviation parallel to the business park south of Station Road, Long Marston should be formally protected.</p>	<p>Policy needs to be strengthened and reworded more positively and (i) formally supported by Stratford District Council in addition to route safeguarding and (ii) included in the Infrastructure Delivery Plan.</p>	<p>See overall response below.</p>

A Dennis		Not Specified	Not Specified	No	<p>Safeguarding the route by implication means the Council also supports the reinstatement and as such the policy should be more positively worded to reflect this.</p> <p>As this is an infrastructure project, by definition, it should also be included in the Infrastructure Delivery Plan.</p> <p>The Council has failed to positively reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study.</p> <p>Overall, the results of the economic appraisal indicated that "the line is a promising candidate for reinstatement" and this should be reflected in the policy as the study forms part of the evidence base.</p> <p>There would be important economic benefits arising from additional tourist spend.</p> <p>Proposals to reinstate the line south of Stratford on Avon are acknowledged in both the Warwickshire and Worcestershire Local Transport Plans. The benefits of reinstatement are also recognised in the Network Rail Great Western and West Midlands Route Utilisation Strategies.</p>	<p>Policy needs to be strengthened and reworded more positively and (i) formally supported by Stratford District Council in addition to route safeguarding and (ii) included in the Infrastructure Delivery Plan.</p>	<p>See overall response below.</p>
Steven W Price		Not Specified	Not Specified	No	<p>Safeguarding the route by implication means the Council also supports the reinstatement and as such the policy should be more positively worded to reflect this.</p> <p>As this is an infrastructure project, by definition, it should also be included in the Infrastructure Delivery Plan.</p> <p>The Council has failed to positively reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study.</p> <p>Overall, the results of the economic appraisal indicated that "the line is a promising candidate for reinstatement" and this should be reflected in the policy as the study forms part of the evidence base.</p> <p>There would be important economic benefits arising from additional tourist spend.</p> <p>The new line would also contribute to improved network resilience, particularly in view on ongoing climate change issues.</p>	<p>Policy needs to be strengthened and reworded more positively and (i) formally supported by Stratford District Council in addition to route safeguarding and (ii) included in the Infrastructure Delivery Plan.</p>	<p>See overall response below.</p>
Michael Brockington		Not Specified	Not Specified	No	<p>Fully support the safeguarding of land for the reinstatement of the railway line but consider this needs to be expanded.</p> <p>Business Case Study concluded that the scheme would be technically feasible, would be viable and that revenue would exceed operating costs, giving a benefit cost ratio of 2.03, that is the service would be profitable from day one for a capital investment of £60 million.</p> <p>The reopening of the line is included in both Network Rail's Route Utilisation Strategies for the West Midlands and Chilterns (May 2011) and the Great Western (March 2010).</p>	<p>The policy needs to be reworded along the following lines: 'The Council will safeguard the land needed for the reinstatement of the railway line southwards from Stratford-upon-Avon Town railway station to Long Marston.'</p>	<p>See overall response below.</p>

Stratford Rail Transport Group		Yes	Yes	No	<p>Safeguarding the route by implication means the Council also supports the reinstatement and as such the policy should be more positively worded to reflect this.</p> <p>As this is an infrastructure project, by definition, it should also be included in the Infrastructure Delivery Plan.</p> <p>The Council has failed to positively reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study.</p> <p>Overall, the results of the economic appraisal indicated that "the line is a promising candidate for reinstatement" and this should be reflected in the policy as the study forms part of the evidence base.</p> <p>There would be important economic benefits arising from additional tourist spend.</p> <p>The new line would also contribute to improved network resilience, particularly in view on ongoing climate change issues.</p>	<p>Policy needs to be strengthened and reworded more positively and (i) formally supported by Stratford District Council in addition to route safeguarding and (ii) included in the Infrastructure Delivery Plan.</p>	<p>See overall response below.</p>
Mr John Morgan		Yes	Yes	No	<p>Safeguarding the route by implication means the Council also supports the reinstatement and as such the policy should be more positively worded to reflect this.</p> <p>As this is an infrastructure project, by definition, it should also be included in the Infrastructure Delivery Plan.</p> <p>The Council has failed to positively reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study.</p> <p>Overall, the results of the economic appraisal indicated that "the line is a promising candidate for reinstatement" and this should be reflected in the policy as the study forms part of the evidence base.</p> <p>There would be important economic benefits arising from additional tourist spend.</p> <p>The new line would also contribute to improved network resilience, particularly in view on ongoing climate change issues.</p>	<p>Policy needs to be strengthened and reworded more positively and (i) formally supported by Stratford District Council in addition to route safeguarding and (ii) included in the Infrastructure Delivery Plan.</p>	<p>See overall response below.</p>
David Bowie		Not Specified	Not Specified	No	<p>Support the continued policy of safeguarding the route.</p> <p>What is missing is a positive statement of support for the reinstatement; surely this should follow from the intention to safeguard.</p> <p>The report by Arup sets out a positive feasibility assessment, and a positive business case, along with suggested service patterns.</p> <p>What should exercise the District Council's thinking is the worsening problem of road congestion and the need to offer much better and more direct public transport links.</p> <p>There is obvious potential benefit to the town and district of restored rail links to Oxford and Worcester, as well as being able to serve future housing developments at Long Marston.</p> <p>The reinstatement of the line is consistent with the emerging strategies of neighbouring authorities in Worcestershire and Gloucestershire, and is recognised as a potential benefit in Network Rail route utilisation strategies.</p>	<p>The policy should indicate clear support for re-instating the railway line.</p>	<p>See overall response below.</p>

Overall Officer Response	The Business Case Study showed that, based on a high level assessment, there is a prospect of the rail link between Stratford and Honeybourne being reinstated at some point in the future. However, the technical and engineering solution identified in the Study as being the only achievable option is extremely expensive. This means that the revenue return from the services that would operate on the line would have to be substantial to make the project economically viable. It is evident that further assessment will need to be undertaken to refine the work carried out by this Study in order to substantiate whether the project is a viable and realistic proposition. This will, in large part, be dependent on strategic factors such as growth in rail patronage, commitment to investment in the rail network and future patterns of development and activities within and outside the District which would benefit from rail access. While an initial assessment of environmental issues has been carried out in the Study, a much more rigorous appraisal would be required should the project be pursued to identify the level of impact on features such as flood risk, ecology, property and residential amenity. The effect on the Greenway of reinstating the railway is also an important consideration. At this stage, due to the significant issues that the Study has identified, the District Council is not in a position to be confident that the railway is capable of being constructed and operated in a manner that would not have a significant impact on matters of local importance and value. It should be noted that it is intended to continue to safeguard an alignment to the west of the industrial estate south of Station Road, Long Marston, as shown on the District Local Plan Review Proposals Map (Inset Map 5.1).
Overall Officer Recommendation	No change.

Section 7 Infrastructure – 7.2 Transport and Communications Policy CS.25 E. Aviation

Number of Supports: 0 Number of Objections: 2 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Wellesbourne Matters	SLR Consulting	Yes	Not Specified	No	<p>Policy fails to take into account the positive effects that encouragement of aviation interests can have within the District.</p> <p>Implied support for the airfield could be further enhanced with regards to its (and other airfields) role within the District and should be acknowledged In Part E of the policy.</p>	Amend the policy to acknowledge and secure a more positive approach to the use of airfields within the District.	See overall response below.
Gladman Developments		Not Specified	Not Specified	Not Specified	As site promoter for Wellesbourne Airfield it is confirmed that the site will not be available for aviation purposes. All references made to the airfield at Wellesbourne should be removed from the policy.	Delete reference to Wellesbourne Airfield.	See overall response below.
CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	Not Specified	No	<p>There is no strategy set out in the Policy to address any respective roles of each of the airfields, or indeed is there any evidence of the need for all three airfields.</p> <p>Circular 01/3003 states that non-official safeguarding has always been a responsibility of the operator and the safeguarding for most General Aviation aerodromes remains a matter for reasonable agreement with planning authorities. The operator at Long Marston Airfield is the landowner jointly proposing the redevelopment of the airfield.</p>	Policy should set out that aviation activity should be consolidated at Wellesbourne (with Snitterfield as a secondary airfield for light aircraft activity).	See overall response below.
Overall Officer Response		These representations reflect the intentions of the owners or users of Long Marston and Wellesbourne Airfields. At this point in time, the Core Strategy makes no provision for the development of either airfield and it would be premature to assume this situation will change. On that basis, it is reasonable to assume that the airfields will continue to function as such. While it is not the purpose of this policy to promote the extension of existing activities at the existing airfields, and the merits and impacts of any such proposals can be assessed against the provisions of the plan, it would be appropriate to make it more supportive of aviation activities in principle.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy CS.25.E is modified as follows:</p> <p>'General aviation activity within the District will be supported at the existing airfields of Long Marston, Snitterfield and Wellesbourne. Proposals for development associated with aviation activity requiring planning permission will be permitted within the established limits of an existing airfield subject to them not having an unacceptable effect on the environment of adjacent areas and on local residents and businesses.'</p>					

Section 7 Infrastructure – 7.2 Transport and Communications Policy CS.25 F. Information and Communication Technologies

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire County Council		Yes	Yes	No	<p>With regards to the second paragraph of Section F, what will the sustainability criteria be? It is one thing to put infrastructure in place, it is quite another to ensure that it will be maintained and upgraded and still operating in 5,10 or more years' time There should be wording about sustainability and resilience of the network.</p> <p>The current minimum requirement is for 24Mbps, and 30Mbps by 2020. As these are minimums there should be an expectation that the network will be capable of upgrade in the future to faster speeds.</p> <p>Ideally the network should be provided on a wholesale basis so as to allow a range of ISPs to provide services. This will ensure choice for the end user, competition that will drive down prices, and will help to ensure that there is adequate future investment in the network.</p>	Amend policy accordingly. Precise wording suggested in email of 27.08.14.	See overall response below.
Overall Officer Response		SDC would support an amendment in relation to the need for provision to be able to be upgraded in future and for there to be a new DMC in relation to the assessment of Connectivity Statements. The reference to a community led local access network could be amended to an existing local access network as there may be appropriate commercial networks available. The reference to local broadband groups could be deleted.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Policy CS.25F is modified as follows:</p> <p>Bullet point 2: Change 'a community led local access network' to 'an existing local access network'.</p> <p>Final paragraph of policy, delete the words 'or community owned local access networks' (second sentence) and 'or local broadband groups' (third sentence).</p> <p>Add new DMC: '(7) Any proposals for broadband infrastructure under Part F of the policy should be assessed to ensure that they are fit for purpose and capable of being upgraded and/or expanded in future as appropriate. Provision should ideally be provided on a wholesale basis to allow a range of ISPs to provide services. CSW Broadband Project and its successors will provide assistance in assessing Connectivity Statements and will provide information on local access points and the development of the strategic network.'</p>					

Section 7 Infrastructure – 7.3 Developer Contributions Policy CS.26

Number of Supports: 0 Number of Objections: 6 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire County Council		No	Yes	No	It is crucial that developers contribute towards education infrastructure to mitigate the direct consequences of new development. Funding from the Council budgets cannot be relied on to expand schools. The capital allocations received from central government are only provided to meet statutory responsibilities in respect to additional pupil places arising from increased birth rates.	Add the following wording to Policy CS.26: "All developments that generate a need for school places will be required to make payments to accommodate pupils from the developments." In first line of penultimate paragraph replace "should" with "will".	Contributions for school places will be made from the Council's CIL receipts unless otherwise indicated on the R123 List. The word 'should' is in recognition of the fact that planning policy cannot always dictate the provision of infrastructure by third parties.
Warwickshire and West Mercia Police		Yes	Yes	No	Concerned that Appendix 1 is not directly referenced in Policy CS.26. The lack of reference means that the Infrastructure Delivery Plan (IDP) in the Core Strategy does not presently have unequivocal policy backing. This in turn seriously undermines support for the delivery of the infrastructure projects identified in the IDP. Primary concern is to ensure that development of the scale proposed by the Core Strategy makes adequate provision for the future policing services needs it will generate. Like some other public services our primary funding is insufficient to be able to add infrastructures to support new development when and wherever this occurs. Further, there are no bespoke capital funding regimes to provide capital for investment in our facilities.	Replace third paragraph in policy with: "Delivery of infrastructure will be concurrent with, or in advance of, development in accordance with Appendix 1 (Infrastructure Delivery Plan) and have regard to Part D of Policy CS.16 Housing Development."	As stated in Appendix 1, the IDP is a working document that will be kept up to date as infrastructure planning progresses. The policies as drafted are considered sufficient to underpin the relationship with the IPD. The Explanation to policy CS.26 refers to both the IDP and the Regulation 123 List.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	The policy sets out that the Council will introduce a Community Infrastructure Levy (CIL) and yet still requires contributions for off site works which are needed to mitigate the impact of the development. This is contrary to the principle of CIL. The purpose of CIL is that it breaks the liability between development and off site infrastructure provision. S106 Agreements cannot be used for such provision and is contrary to the CIL Regulations. The policy also refers to a Development Requirements Supplementary Planning Document for further detail. Infrastructure provision cannot be orchestrated through SPDs anymore.	Amend policy accordingly.	The policy as drafted is in accordance with the CIL Regulations. The policy basis for infrastructure provision in this Core Strategy is adequate. Further detail will be provided in an SPD.
Steve Routly		No	Not Specified	Not Specified	The policy does not mention that self-build housing is exempt from CIL, which is government policy.	Insert a statement to this effect.	This is a level of detail that is unnecessary to include in a strategic policy. The policy does not need to repeat government policy.
Sport England		Not Specified	Not Specified	No	Concerned that part of the evidence base which will be used for CIL or S106 is based on out of date information, namely PPG17 Audit and Playing Pitch Strategy. This assessment was prepared some years ago and does not reflect the current anticipated growth within the district.	Evidence base needs to be refreshed using sound recognised methodology.	The Open Space, Sport and Recreation Assessment has been updated in 2014. The accompanying Playing Pitch Strategy will be updated in 2015 and the IDP will be updated accordingly. The policy, as drafted, allows for updates in the evidence base over the life of the Core Strategy.
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	No	The policy includes a reference to a Supplementary Planning Document that has not been through a statutory process and therefore has a lesser status than the Core Strategy. By referring to it in the policy a greater weighting of significance is implied which is inappropriate.	Delete reference in policy to the SPD and place in explanatory text.	The policy as drafted makes it clear that the SPD (which is solely to provide further detail) has yet to be drafted.
Highways Agency		Not Specified	Not Specified	Not Specified	Policy refers to CIL and Section 106 Agreements providing a mechanism for securing any requisite infrastructure to mitigate the impacts of new development. This reference should be expanded to also refer to the use of planning conditions, and Section 278 Agreements to secure this outcome.	Amend policy accordingly.	Section 278 agreements are already referred to. Conditions will be placed on a planning permission as appropriate.

Overall Officer Response	The policy is considered appropriate as drafted.
Overall Officer Recommendation	No change.

Section 8 - Policies Map 8.1 Proposed Changes to the Local Plan Proposals Map

Number of Supports: 1 Number of Objections: 2 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CPRE Warwickshire Branch		Not Specified	Not Specified	No	The maps of the SLAs which are adjacent to the Cotswolds AONB should include the extent of the AONB (by a different notation) for clarity and to show how the SLAs act as part of the setting of the AONB. This notation should also include the extent of the AONB in adjacent areas, eg. Gloucestershire.	Amend Policies Map accordingly.	The Policies Map already shows the extent of the AONB. It is not appropriate to show features outside the District on the Policies Map.
The Bird Group of Companies	Framptons	Yes	No	No	Amend Policies Map to identify south of A46 Stratford-upon-Avon for development.	Amend Policies Map accordingly	It is not proposed to allocate the site in the Core Strategy.
Bloor Homes and Hallam Land Management	Boyer Planning	Not Specified	Not Specified	Not Specified	The Proposals (Policies) Map should include the annotation of the West of Shottery proposal in order to give a proper representation of the proposed site allocation: Proposal SUA.2.	Amend Policies Map accordingly.	See overall response below.
High Speed Two (HS2) Ltd		Yes	Yes	Yes	n/a	n/a	n/a
Overall Officer Response		<p>It would be helpful to provide an additional set of maps showing proposed amendments to the Green Belt boundary and to list these in section 8.1.</p> <p>As a result of representations made on Policy CS.15, the wording of the third bullet point under paragraph 8.1.4 should be revised to clarify the proposed process of establishing the built-up area boundaries.</p> <p>It would assist the interpretation of the Policies Map to illustrate recent commitments and developments that are not shown on the Ordnance Survey base map. Where these sites are on the edges of Stratford-upon-Avon and the Main Rural Centres, the Built Up Area Boundaries should be amended to incorporate them. However, it should be borne in mind that this can only be done at a point in time and the situation could continue to change over time.</p>					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that the Core Strategy is modified as follows:</p> <ol style="list-style-type: none"> 1. Insert the following text in Section 8.1 A. Green Belt: The following boundaries of the Green Belt are proposed to be amended in accordance with Policy CS.10: <ul style="list-style-type: none"> - Land east of Birmingham Road, Stratford-upon-Avon - Land north of Arden Road, Alcester - Land at Gorcott Hill, Mappleborough Green 2. The amendment to the boundary of the Green Belt at Gorcott Hill should also include land at Gorcott Hall. 3. The second sentence at bullet point 3 of paragraph 8.1.4 to read: "Sites at existing settlements that are confirmed as allocations upon adoption of the Core Strategy will be included within the BUAB." 4. Amend the Policies Map to indicate recent commitments and developments as appropriate. 					

Section 8 - Policies Map 8.1 A. Special Landscape Areas - Arden

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Homes and Communities Agency, Gorcott Estate Settlement and Stoford Developments Ltd.	Savills - Birmingham	Not Specified	Not Specified	Not Specified	It is unclear whether the Arden SLA is the same area as the Forest of Arden referred to in Policy CS.5. If so, the same name should be applied in both policies.	Amend plan if necessary.	See overall response below.
Overall Officer Response		The two are not the same. The Arden SLA is a landscape designation for which a boundary is defined, whereas there is no specific boundary for the historic Forest of Arden.					
Overall Officer Recommendation		No change. However, it should be noted that if Proposal REDD.2 and/or Proposal ALC.3 are confirmed, the land involved should be deleted from the Arden SLA.					

Section 8 - Policies Map 8.1 A. Special Landscape Areas - Cotswold

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CPRE Warwickshire Branch		Not Specified	Not Specified	No	Cotswold Fringe SLA should include Barcheston and Willington and should be continuous around the base of Brailes Hill. Brailes Hill itself is within the AONB.	Amend Policies Map accordingly.	The base of Brailes Hill is also within the AONB.
Overall Officer Response							
Overall Officer Recommendation		No change					

Section 8 - Policies Map 8.1 A. Special Landscape Areas - Feldon

Number of Supports: 0 Number of Objections: 10 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Wendy Bolton		Yes	Yes	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.
Sharon Feeney		Not Specified	Not Specified	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.
Suzane Miller		Not Specified	Not Specified	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.
Mr Ian Roberts		Not Specified	Not Specified	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.
Barbara Prideaux		Not Specified	Not Specified	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.
Mr John Morgan		Not Specified	Not Specified	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.
R & M Wilkins		Not Specified	Not Specified	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.
Denise Breakell		Not Specified	Not Specified	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.

Wellesbourne and Walton Parish Council		Not Specified	Not Specified	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.
David Breakell		Not Specified	Not Specified	No	The boundary of the Feldon Parkland SLA should be modified to include land south of Dovehouse Estate, Wellesbourne. The Landscape Sensitivity Study classifies this area as "High/Medium" landscape sensitivity where housing development is considered inappropriate.	Amend Policies Map accordingly.	See overall response below.
Overall Officer Response		The same consultants produced the Special Landscape Area Study and the Landscape Sensitivity Study. Despite the sensitivity of the area to development, they did not come to the view that it should be included in the Feldon Parklands SLA. This is because it does not form part of that landscape feature lying as it does below the scarp slopes that define this edge of the Feldon Parklands. The sensitivity of the area to development should be taken fully into account when development proposals are being considered.					
Overall Officer Recommendation		No change.					

Section 8 - Policies Map 8.1 A. Special Landscape Areas - Ironstone

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CPRE Warwickshire Branch		Not Specified	Not Specified	No	<p>Ironstone Hills SLA should include Warmington village.</p> <p>Ironstone Hills SLA boundary should not be the loop of the Oxford Canal at Wormleighton but should extend north to Ladbroke, with the western boundary being the A423 as far north as Ladbroke and then a line northeastwards to Napton-on-the-Hill. Among other features, the canal loop is itself an interesting and unusual feature in the landscape. Its setting should be protected by including a wider area in the SLA.</p>	Amend Policies Map accordingly.	See overall response below.
Overall Officer Response		<p>Warmington village lies within the Cotswold AONB and it would be inappropriate and unnecessary to also include it within the SLA.</p> <p>The area extending up to Ladbroke is an extensive tract of land that has not been identified in the SLA Study. It portrays significantly different landscape characteristics to the Ironstone Uplands due to its underlying geology.</p>					
Overall Officer Recommendation		No change.					

Section 8 - Policies Map 8.1 B. Areas of Restraint - Southam

Number of Supports: 0 Number of Objections: 2 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	No	Suggest that the area covered by the AoR is amended so as the built form of Southam is not extended significantly further south than it already is by existing development on Holywell Road.	Amend Policies Map accordingly.	See overall response below.
Sally Hunt		Not Specified	Not Specified	No	The Area of Restraint Map does not clearly show the exact line of the boundary to enable us to determine where it affects our property.	None specified.	This matter will be clarified with the landowner.
Overall Officer Response		The extent of the Area of Restraint is appropriate and is intended to restrict further incursion of development into the relatively steeply sloping valley sides which make an important contribution to the character and setting of this part of the town.					
Overall Officer Recommendation		No change.					

Section 8 - Policies Map 8.1 C. Retail Development and Main Centres – Bidford-on-Avon

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Antony Aspbury Associates Ltd		Not Specified	Not Specified	Not Specified	The Warner's Budgen supermarket lies on the edge of the village centre, is well-related to, and effectively anchors it economically. Thus, its inclusion within the village centre boundary would protect the integrity of the centre and counteract pressure from out-of-centre retail development.	Amend Policies Map accordingly.	See overall response below.
Overall Officer Response		It is acknowledged that the supermarket plays an important role in the functioning of the village centre. However, it is physically separate from the centre and including it would be contrived. The original permission for the store was based on it being outside the retail and commercial area of the village but close enough to it to be accessible for linked trips.					
Overall Officer Recommendation		No change.					

Section 8 - Policies Map 8.1 D. Proposed Site Allocations Maps – SUA.1 Canal Quarter, Stratford-upon-Avon

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
CPRE Warwickshire Branch		Not Specified	Not Specified	No	Morrisons supermarket and car park should be included in the Canal Quarter	Amend Policies Map accordingly.	There is no evidence that the Morrisons site is available for redevelopment to housing.
Overall Officer Response							
Overall Officer Recommendation		No change.					

Section 8 - Policies Map 8.1 D. Proposed Site Allocations Maps – ALC.3 Arden Road, Alcester

Number of Support: 0 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Alcester Estates Ltd	Stansgate Planning	Yes	Not Specified	No	Extent of allocation and area removed from the Green Belt should be amended as follows: - inclusion of a small piece of land to the north east to allow the provision of a secondary access to the site which is considered to be desirable. - inclusion of land to the north to ensure there is sufficient space for the provision of landscaping and ensure the developable area is of sufficient size. - inclusion of land to the west to ensure there is sufficient space for flood mitigation and ecological enhancement.	Amend Policies Map accordingly.	See overall response below.
Overall Officer Response		It is not evident that a secondary access will be required. If it is, there should be other means of providing one through the existing industrial estate. It is understood that the proposed northern and western extensions are within the same ownership as the site itself. That being the case, there will be scope to provide the required landscaping and other mitigation which can be secured through the planning application process. These measures are not inappropriate forms of development in the Green Belt in themselves so it is unnecessary to extend the allocation or increase the amount of land to be removed from the Green Belt.					
Overall Officer Recommendation		No change.					

Section 8 - Policies Map 8.1 D. Proposed Site Allocations Maps – GLH Gaydon/Lighthorne Heath

Number of Supports: 1 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Wellesbourne Matters	SLR Consulting	Not Specified	Not Specified	Yes	Supports GLH	n/a	n/a
Woodland Trust		Not Specified	Not Specified	No	Need to recognise the threat to Chesterton Wood and Gaydon Coppice.	<p>Ideally, the settlement boundaries should be redrawn to (a) stop at least 100m from Chesterton Wood and (b) exclude Gaydon Wood.</p> <p>At the very least, the proposal should be substantially amended to:</p> <ul style="list-style-type: none"> (a) clearly set out the biodiversity threat effects to the two ancient woodlands from this development by way of an Ecological Survey. (b) depending on the Ecological Survey findings, provide specific mitigation measures (including buffers of up to 100m) to comply with the Core Strategy's own proposed Policy CS.5: 'Due to the quality of ancient semi-natural woodland and aged/veteran trees, particularly in the Forest of Arden, and their relative scarcity elsewhere in the District, no development will be permitted that would lead to their loss or damage'. (c) conduct a specific assessment of the potential for European protected species in the two ancient woodlands. 	See overall response below.
Overall Officer Response		The presence of the ancient woodlands is acknowledged. Whilst this will clearly need to be reflected when the development proposals move to a more detailed stage, there is no reason at this point to amend the site allocation boundary.					
Overall Officer Recommendation		No change					

Section 8 - Policies Map 8.1 D. Proposed Site Allocations Maps – REDD.2 Gorcott Hill, Mappleborough Green

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Alison Foxon	Stansgate Planning	Yes	Yes	No	<p>If the land at Gorcott Hill is to be removed from the Green Belt then the boundary should be amended to exclude the whole of the triangle formed by the Coventry Highway (A4023), A435 and the District boundary.</p> <p>The line of the A435 represents the most clearly defined, recognisable and permanent feature.</p> <p>Such a revision would mean that the whole of the area of land within Stratford District to the west of the A435 at Gorcott Hill is outside of the Green Belt, a situation which would be clearly defined and understood.</p> <p>With the employment development which is planned to take place adjacent and in proximity to Gorcott Hall the character of the area will change and it is considered the land would serve no Green Belt function.</p> <p>The exclusion of the small area of additional land would not prejudice the purposes of including land in the Green Belt as set down in paragraph 80 of the NPPF for the same reasons given by the Council in its justification for the removal of the other land at Gorcott Hill.</p>	Amend Policies Map accordingly.	See overall response below.
Overall Officer Response		<p>The deletion of this additional area around Gorcott Hall is reasonable as it involves a small nib of land that would otherwise serve little purpose by remaining within the Green Belt, particularly as there is an extensive range of buildings present on the land in any case.</p> <p>For the avoidance of doubt, it is not proposed that the land should be included in Proposal REDD.2 as it clearly should not form part of the proposed development area given the listed building within it.</p>					
Overall Officer Recommendation		<p>No change to the extent of Proposal REDD.2</p> <p>See associated recommendation at 8.1 regarding the Green Belt boundary.</p>					

Appendix 1. Infrastructure Delivery Plan

Number of Supports: 1 Number of Objections: 3 Number of Unspecified: 4

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire County Council		Not Specified	Not Specified	Not Specified	Stratford's Household Waste Recycling Centres (HWRCs) will need capital investment to deal with the additional waste generated by the increased population.	IDP should include an estimate of £1,045,070 for capital investment at Wellesbourne and Stockton HWRCs.	We would support that an indicative figure of £1 million be indicated in the IDP Schedule and a new section 7.5 be written.
Mr Michael Revell		Not Specified	Not Specified	Not Specified	The Council is inconsistent in safeguarding the trackbed for reinstatement of the Stratford - Honeybourne railway while excluding it from the Infrastructure Delivery Plan. The scheme needs to be reinstated in the IDP as per the draft Core Strategy 2012 and to facilitate developer contributions towards the scheme.	Include the reinstatement of the Stratford - Honeybourne railway line in the IDP.	This is not a committed project at the present time but this is not considered inconsistent with the policy position of safeguarding the alignment for a possible project in the future.
David Bowie		Not Specified	Not Specified	Not Specified	The Council is inconsistent in safeguarding the trackbed for reinstatement of the Stratford - Honeybourne railway while excluding it from the Infrastructure Delivery Plan. The scheme needs to be reinstated in the IDP as per the draft Core Strategy 2012 and to facilitate developer contributions towards the scheme.	Include the reinstatement of the Stratford - Honeybourne railway line in the IDP.	This is not a committed project at the present time but this is not considered inconsistent with the policy position of safeguarding the alignment for a possible project in the future.
Steven W Price		Not Specified	Not Specified	Not Specified	The Council is inconsistent in safeguarding the trackbed for reinstatement of the Stratford - Honeybourne railway while excluding it from the Infrastructure Delivery Plan. The scheme needs to be reinstated in the IDP as per the draft Core Strategy 2012 and to facilitate developer contributions towards the scheme.	Include the reinstatement of the Stratford - Honeybourne railway line in the IDP.	This is not a committed project at the present time but this is not considered inconsistent with the policy position of safeguarding the alignment for a possible project in the future.
Warwickshire and West Mercia Police		Yes	Yes	Yes	<p>Appendix 1 of the Core Strategy took account of the information we provided to the Council on 11 March 2014, in response to the 'Focused Consultation: 2011-2031 Housing Requirement and Strategic Site Options' (February/March 2014). As the Core Strategy has changed since then, the most up-to-date information on police infrastructure requirements in the District is enclosed in Appendix 1 to these representations. We request that the information in Appendix 1 of the Core Strategy is updated to take this new information from us into account.</p> <p>The Council should also be aware that in conjunction with our retained consultants, WYG, we intend to prepare a Strategic Infrastructure Assessment (SIA), which will look at police infrastructure requirements in further detail. Further information about this is enclosed in Appendix 2 to these representations.</p>	The IDP should show £504,000 from CIL towards custody provision, £433,000 towards equipment including ICT and surveillance costs and vehicles, and £451,000 for a new premises at GLH. The equipment and vehicles should be funded through S106 rather than CIL.	The Council will await the findings of the Strategic Infrastructure Assessment before agreeing to commit further funds towards police costs. SDC considers CIL to be a more appropriate mechanism than S106 for funding equipment and vehicles. No changes are recommended at the present time.

SWCCG Public Patient Participation Sub-group		Yes	No	Yes	<p>The SWCCG Patient Participation sub-group is concerned that the Core Strategy does not adequately reflect the primary care needs of the District.</p> <p>The Arden, Herefordshire and Worcestershire Area Team on behalf of NHS England made a submission entitled Primary Health Care IDP. As this body does not have a primary health care strategy the veracity of this document is questionable. Also, it dealt simply with patient numbers and did not take account of the transfer of care from secondary to the primary and social sectors or the impact on capacity of an ageing population.</p> <p>Public Health Warwickshire (PHW) has commissioned a Health Impact Assessment (HIA) of the plan, the absence of which undermines the credibility of the core strategy.</p> <p>Warwickshire Health and Wellbeing Board has just run a training session for local authorities on reflecting Healthier Communities in the planning process. The timing of this undermines the credibility of the Core Strategy proposals.</p> <p>There has been a failure of consultation with neither SDC nor NHS England consulting the GPs.</p> <p>Cross boundary issues have not been adequately dealt with meaning non compliance with the Duty to Cooperate. A number of practices (Eg. Meon Medical Centre, Quinton) serve areas that span district, county, CCG and LAT boundaries. This has not been given adequate consideration in the Core Strategy.</p> <p>The NHS Alliance is on record stating that the primary care sector is not fit for purpose. The CS fails to address the challenge.</p>	There needs to be a Primary Health Care Strategy and a Health Impact Assessment of the Core Strategy. This should be prepared in consultation with GPs, patient groups and representative organisations and include appropriate consideration of cross boundary issues.	<p>Work is ongoing with NHS England and NHS Property to refine the work underpinning the IDP on capacity and development needs in the primary health sector. This is consistent with the status of the IDP is a working document that will be kept up to date over the life of the Core Strategy.</p> <p>Notwithstanding that, we consider the plan puts the necessary policy framework in place to secure funding for new and expanded primary health provision.</p> <p>PHW has commissioned a HIA for the Gaydon Lighthorne Heath new settlement as part of the Master Planning process (not the whole Core Strategy). This will influence the SPD for the new settlement.</p> <p>SDC has discharged its duties to consult NHS England and the SWCCG and will continue to do so to ensure that needs are reflected in the IDP (and on the Council's Regulation 123 List).</p>
Mr Mervyn Longford		Not Specified	Not Specified	No	The need for a new bridge crossing the river to the north of Stratford is undeniable and should be incorporated into any plan for the District.	Include a new river crossing in the IDP.	The development strategy and transport proposals in the IDP are based on extensive modelling of the impacts of potential developments on the highway network by WCC.
Barratt and David Wilson Homes (Mercia) Ltd	RCA Regeneration Ltd	Not Specified	Not Specified	No	<p>To be effective the Plan must be deliverable, viable and underpinned by sound infrastructure planning. There is no percentage breakdown on the identified infrastructure costs between developer contributions and public funding. Furthermore, no timeframe is envisaged for when public funding will be available. contribute to the overall funding. There is no certainty that such funding will be successful and ultimately the Plan needs to include flexibility in case critical infrastructure in certain areas cannot be delivered.</p> <p>Currently the IDP merely indicates anticipated time windows when different aspects of the infrastructure will be achieved. Due to the stage of progression of the Core Strategy, it would be expected that such information should be available in order to have certainty over the plan's deliverability. Given that there is no identified mechanism in place or certainty of grant funding, it is considered that the plan data is provided as to what the percentage breakdown is of developer contributions against public/private investment. In this regard the evidence base is still unaccounted for insofar as the viability of these infrastructure projects remains questionable.</p>	Seeking alternative allocations at Studley and Wootton Wawen.	The strategic sites proposed have been tested for deliverability and viability (see evidence base). Detailed infrastructure trajectories are provided at Tables 2 and 3 of the IDP Schedule of Infrastructure Projects.
Overall Officer Response					<p>We would support a new section 7.5 Waste to be added to Appendix 1 IDP, together with a figure of around £1m for household waste in the Schedule of Infrastructure Projects.</p> <p>Work will continue with NHS England, NHS Property and SWCCG to help ensure that primary health needs are met. No changes are recommended at this stage.</p>		

Overall Officer Recommendation	<p>That the Inspector be requested to recommend that a new Section 7.5 Waste be added as follows:</p> <p>'7.5 Waste Stratford has four Household Waste Recycling Centres: Shipston; Wellesbourne; Stockton and Burton Farm. WCC own three out of the four sites. Burton Farm is leased for 25 years, starting in 2001. An additional 10,800 properties will result in an estimated increase in vehicle movements to the recycling centres of in the region of 1,200 movements per week (62,400 per year). It will therefore be necessary to make significant investment in at least one of these sites to support the extra demand. Based on standard unit costs, this is estimated to cost around £1 million over the Core Strategy period.'</p>
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Appendix 1. Infrastructure Delivery Plan 6.2 Fire and Rescue and 6.3 Ambulance Services

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 2

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire Fire & Rescue Service - Risk Management		Not Specified	Not Specified	Not Specified	<p>Provision of water supplies for firefighting – at the appropriate planning stage when design of road infrastructure is known the Service would like opportunity to comment as part of the planning process to ensure there is adequate provision for firefighting.</p> <p>Domestic fire sprinklers - the Service would like to discuss the provision of domestic sprinklers as part of the early design features within this development - this may be an opportunity for consideration of a relaxation of some traditional requirements from Fire & Rescue in order to make this suggestion more financially viable. In addition this representation sets out the business case for the provision of domestic sprinklers in residential development.</p>	No specific policy recommendations made.	No policy amendments required.
West Midlands Ambulance Service		Not Specified	Not Specified	Not Specified	This representation sets out planned changes to the delivery of urgent and emergency medical services.	None	None
Overall Officer Response		Comments noted.					
Overall Officer Recommendation		No change.					

Appendix 1. Schedule of Infrastructure Projects - Table 1. Main Schedule

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Avon Rail Link		Not Specified	Not Specified	Not Specified	The Council is being inconsistent in safeguarding the trackbed for reinstatement of the Stratford to Honeybourne railway while excluding it from the Infrastructure Delivery Plan. The scheme should be reinstated in the IDP (as formerly in the draft Core Strategy 2012) and to facilitate developer contributions towards the scheme.	The railway's reinstatement should feature in the IDP.	The Council is committed to safeguarding this route for a potential future project but it does not have the status of a project for the IDP at the current time.
Overall Officer Response		The reinstatement of the Stratford to Honeybourne Railway should not feature in the IDP at the present time.					
Overall Officer Recommendation		<p>No change in relation to this response.</p> <p>However, it is recommended that the Inspector be requested to recommend some revisions to Appendix 1 Schedule of Infrastructure Projects Tables 1-3 (see attached set of tables in Appendix 1. of this Schedule). It is also recommended that the reference to CIL funding under the item 'Strategic Flood Risk Assessment' be deleted from Table 1.</p>					

Appendix 1. Schedule of Infrastructure Projects - Table 1. Main Schedule - 1. Transport and Highways

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 4

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
South Worcestershire Councils		Not Specified	Not Specified	Not Specified	It is noted that the Stratford-Honeybourne railway route is continued in Policy CS.25 and this is consistent with the safeguarding of the route set out in SWDP4: Moving Around South Worcestershire, as well as the inclusion of the line in Worcestershire Local Transport Plan 3 (Policy SW21). However the accompanying Infrastructure Delivery Plan (IDP) does not include reference to safeguarding the line or its eventual reinstatement and the SDC are requested to specifically name the line in the IDP.	SDC are requested to specifically name the line in the IDP.	See overall response below.
Mr John Morgan		Not Specified	Not Specified	Not Specified	Stratford — Honeybourne railway line reinstatement — While the continued route safeguarding for reinstatement of the railway is supported and the Policy is considered to be 'Justified', 'Effective' and 'Consistent with National Policy', it is not considered to be 'Positively Prepared' in the context of the tests of soundness, as detailed in NPPF, paragraph 182. The Council is being inconsistent in safeguarding the trackbed for reinstatement of the railway while excluding it from the Infrastructure Delivery Plan. The scheme needs to be reinstated in the IDP as per the draft Core Strategy 2012 and to facilitate developer contributions towards the scheme.	Reinstatement of the line should be listed as a project in the IDP.	See overall response below.
Stratford Rail Transport Group		Not Specified	Not Specified	Not Specified	Stratford — Honeybourne railway line reinstatement — While the continued route safeguarding for reinstatement of the railway is supported and the Policy is considered to be 'Justified', 'Effective' and 'Consistent with National Policy', it is not considered to be 'Positively Prepared' in the context of the tests of soundness, as detailed in NPPF, paragraph 182. The Council is being inconsistent in safeguarding the trackbed for reinstatement of the railway while excluding it from the Infrastructure Delivery Plan. The scheme needs to be reinstated in the IDP as per the draft Core Strategy 2012 and to facilitate developer contributions towards the scheme.	Reinstatement of the line should be listed as a project in the IDP.	See overall response below.
A Dennis		Not Specified	Not Specified	Not Specified	Stratford — Honeybourne railway line reinstatement — While the continued route safeguarding for reinstatement of the railway is supported and the Policy is considered to be 'Justified', 'Effective' and 'Consistent with National Policy', it is not considered to be 'Positively Prepared' in the context of the tests of soundness, as detailed in NPPF, paragraph 182. The Council is being inconsistent in safeguarding the trackbed for reinstatement of the railway while excluding it from the Infrastructure Delivery Plan. The scheme needs to be reinstated in the IDP as per the draft Core Strategy 2012 and to facilitate developer contributions towards the scheme.	Reinstatement of the line should be listed as a project in the IDP.	See overall response below.
Overall Officer Response		Whilst the Council is committed to safeguarding the route for a potential future project, the reinstatement of the line is not a committed project for the IDP. It is also not a committed project in Warwickshire's Local Transport Plan 3.					
Overall Officer Recommendation		That the Inspector be requested to recommend a number of minor transport changes on the Schedule of Infrastructure Projects (as detailed on the attached Appendix1. Tables 1-3).					

Appendix 1. Schedule of Infrastructure Projects - Table 1. Main Schedule - 2. Education

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
St Modwen Developments Ltd	Barton Willmore llp	Not Specified	Not Specified	Not Specified	<p>New Primary School</p> <p>A three form entry primary school and new nursery is proposed at a cost of £3.5m however the delivery of this is not triggered until 2021/2022 when a potential 970 dwellings will be completed on site at LH. Such an integral part of the development of a sustainable community should not be left so late in the project, and in our view, curtails the potential for walking to school by new children within the scheme, and simply encourages car based journeys. The figure of £3.5m does also not correlate to the figure of £6.3m that is listed for the same project on page 242 of the CS.</p> <p>Contribution to Kineton Secondary School</p> <p>Table 2 of the CS (Appendix 5) suggests two payments of £6.5m each towards secondary school improvements, albeit page 243 of the CS, this figure is only listed once, and as £6.7m. Clarity is sought, however the principle concern relates to the funding being earmarked for 2019/2020. Is this perhaps reflective of when pupils from completed dwellings might be on site, and thus require school places? This in our view adds further weight to our assessment that concludes that delivery of housing at LH isn't realistically going to start in the early phases as proposed, and secondly will not be in a position to deliver 750 dwellings by 2021.</p>	The respondent is seeking an alternative allocation.	<p>GLH Primary Education: It is requested that both Appendix 1 Tables 1 and 2 now show a primary school payment of £6.0 million with some provision by 2018/19. The primary school at GLH is now understood to be a 2FE and this change (from 3FE) is also requested. Table 1 should also clarify that the figures quoted relate to 2500 dwellings rather than the full 3000.</p> <p>GLH Secondary Education: It is requested that both Appendix 1 Tables 1 and 2 now show a secondary school investment of £5.7 million with some provision by 2019/20. In accordance with the draft R123 List this is to be paid for by CIL. It is requested that this is indicated in Appendix 1 Table 1. Table 1 should also clarify that the figures quoted relate to 2500 dwellings rather than the full 3000.</p>
Overall Officer Response		There were some discrepancies in GLH education costs between Appendix 1 Tables 1 and 2. Modifications are put to the inspector to rectify this and reflect the most recent cost estimates.					
Overall Officer Recommendation		That the Inspector be requested to recommend a number of minor education changes on the Schedule of Infrastructure Projects (as detailed on the attached Appendix 1. Tables 1-3).					

Appendix 1. Schedule of Infrastructure Projects - Table 1. Main Schedule - 3. Primary and Acute & Community Health Services' Infrastructure

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
David Gosling		Not Specified	Not Specified	No	There is a clear acceptance that local medical facilities are inadequate to meet the demands from the GLH development but no firm plan to rectify the inadequacy.	The wording should be revised to: "The requirement for this strategic site is therefore for new premises to accommodate the equivalent of a 4 GP surgery to provide services to its residents. This must be one of the first elements of the development." This would enable appropriate services to evolve in line with the build up of the population whilst also reinstating a local service to the existing residents of Lighthorne.	The IDP (Table 1) shows a 4 GP facility to be provided through a S106 payment as a critical project. The IDP (Table 2) shows this facility is required by 2020/21. A minor change is requested to show 2.3 million in both tables. (IDP Table 1 currently shows 2.2 million).
Overall Officer Response		No substantive change is required but see below regarding the estimated cost of the 4 GP facility.					
Overall Officer Recommendation		That the Inspector be requested to recommend that a figure of £2.3 million be indicated for the 4 GP facility at GLH in both IDP Table 1 and IDP Table 2. (IDP Table 1 currently shows 2.2 million). This is indicated on the attached Appendix1. IDP Schedule of Infrastructure Projects (Table 1) .					

Appendix 1. Schedule of Infrastructure Projects - Table 1. Main Schedule - 6. Water and Utility Services

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire County Council		Not Specified	Not Specified	Not Specified	Further information provided by WCC regarding waste.	Inclusion of capital investment in the District's Household Waste Recycling Centres (HWRCs) in the IDP.	A new item is requested for the IDP to show £1.0 m for investment in HWRCs.
Overall Officer Response		It is proposed that an item be added to the IDP for Household Waste Recycling Centres (HWRCs).					
Overall Officer Recommendation		That the Inspector be requested to recommend that a new item is added to the IDP Schedule of Infrastructure Projects Table 1 for investment in HWRCs (£1.0 m). This is indicated on the attached Appendix 1. IDP Schedule of Infrastructure Projects (Table 1) .					

Appendix 1. Schedule of Infrastructure Projects - Table 2. Infrastructure Trajectory for GLH New Settlement and JLR Employment

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
St Modwen Developments Ltd	Barton Willmore llp	Not Specified	Not Specified	Not Specified	<p>New Primary School</p> <p>A three form entry primary school and new nursery is proposed at a cost of £3.5m however the delivery of this is not triggered until 2021/2022 when a potential 970 dwellings will be completed on site at LH. Such an integral part of the development of a sustainable community should not be left so late in the project, and in our view, curtails the potential for walking to school by new children within the scheme, and simply encourages car based journeys. The figure of £3.5m does also not correlate to the figure of £6.3m that is listed for the same project on page 242 of the CS.</p> <p>Contribution to Kineton Secondary School</p> <p>Table 2 of the CS (Appendix 5) suggests two payments of £6.5m each towards secondary school improvements, albeit page 243 of the CS, this figure is only listed once, and as £6.7m. Clarity is sought, however the principle concern relates to the funding being earmarked for 2019/2020. Is this perhaps reflective of when pupils from completed dwellings might be on site, and thus require school places? This in our view adds further weight to our assessment that concludes that delivery of housing at LH isn't realistically going to start in the early phases as proposed, and secondly will not be in a position to deliver 750 dwellings by 2021.</p>	The respondent is seeking an alternative allocation.	<p>GLH Primary Education: It is proposed that both Appendix 1 Tables 1 and 2 now show a primary school payment of £6.0 million with some provision by 2018/19. The primary school at GLH is now understood to be a 2FE and this change (from 3FE) is also proposed. Table 1 also now clarifies that the figures quoted relate to 2500 dwellings rather than the full 3000.</p> <p>GLH Secondary Education: It is proposed that both Appendix 1 Tables 1 and 2 now show a secondary school investment of £5.7 million with some provision by 2019/20. In accordance with the draft R123 List this is to be paid for by CIL. It is proposed that this is indicated in Appendix 1 Table 1. Table 1 also now clarifies that the figures quoted relate to 2500 dwellings rather than the full 3000.</p>
Overall Officer Response		There were some discrepancies between Appendix 1 Tables 1 and 2. Modifications are put to the inspector to rectify this and reflect the most recent cost estimates.					
Overall Officer Recommendation		That the Inspector be requested to recommend a number of minor education changes on the Schedule of Infrastructure Projects (as detailed on the attached Appendix1. Tables 1-3).					

Appendix 1. Schedule of Infrastructure Projects - Table 3. Infrastructure Trajectory for Canal Quarter (SUA.1) and Employment Sites (SUA.2 and SUA.3)

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire County Council		Not Specified	Not Specified	Not Specified	There are a number of referencing errors in the notes under Appendix 1 Table 3: Infrastructure Trajectory for Canal Quarter (SUA 1) and Related Employment Sites (SUA 2 and 3). The costs for the various transport schemes also appear to be substantially lower than those provided by WCC on 01/05/14.	Appendix 1. Table 3 to be updated.	<p>Table 3 has been scrutinised following this representation. It was agreed with the WCC during the assessment of deliverability and viability of the Canal Quarter that the assessment of this area should include an apportionment of costs in the Stratford Transport Package (STP) rather than the whole amount (c£60m). It was also considered that a number of the STP schemes could potentially be funded through S106/278, rather than CIL, owing to the direct impact of the CQ regeneration on these roads/junctions and the potential availability of other funding sources to cover the remaining share of the overall costs (i.e. Highways Agency funding and LEP Growth Fund).</p> <p>We therefore continue to support the figures in Table 3 as submitted for consultation, but to amend references to funding sources and explain why the costs are below the total costs for the transport schemes listed, as presented in Table 1.</p> <p>As a result some references to CIL in Table 1 should be modified to read "CIL or S106/278".</p> <p>The references below Table 3 should be modified.</p>
Overall Officer Response		Appendix 1 Table 3 should be modified to show correct referencing and funding sources and to explain why the Table 3 transportation costs are lower than in Table 1.					
Overall Officer Recommendation		<p>That the Inspector be requested to recommend that Appendix 1. Table 3 be modified to show correct referencing and funding sources (nb. some additional modifications to the planning obligations/CIL split also requested to reflect work on the R123 List and further viability/CIL testing, PBA June 2014) and to explain why the Table 3 transportation costs are lower than in Table 1. (See Appendix 1. of this schedule.)</p> <p>A modification to Table 1 is requested to show the possible use of planning obligations to fund a number of the STP schemes (provided other sources of funding are available).</p>					

Appendix 2. Local Service Villages Methodology – 2.1 Background

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Tanworth-in-Arden Parish Council		Not Specified	Not Specified	No	<p>Methodology makes no allowance for the fact that national policy and guidance, as set out in the NPPF and elsewhere, makes a clear distinction between land in general and land that is in Green Belt.</p> <p>Fear it will be used to justify up to 450 houses in 10 LSVs by providing planning officers with the very special circumstances needed to justify granting individual applications in Green Belt which might otherwise not be granted.</p> <p>According to the NPPF, regardless of the general presumption in favour of sustainable development, there is still a separate presumption against development in Green Belt unless there are very special circumstances or specific exceptions.</p> <p>Fear that the District Council is proposing to use its Local Plan to override these safeguards regardless of any other circumstances.</p> <p>The spirit of Green Belt protection is that each application to build in it must be judged on its individual merits.</p> <p>There will inevitably be pressure to draw boundaries round the LSVs. This can only result in the eventual wholesale removal of these LSVs from Green Belt. This would represent alteration of Green Belt boundaries by guile and subterfuge and would be achieved without a properly held Green Belt review within a formal Local Plan process.</p>	<p>LSV methodology should introduce factors such as the openness of the Green Belt and Conservation Area status to allow mathematical deductions from the overall score of each LSV.</p>	<p>See overall response below.</p>
Overall Officer Response		<p>The final paragraph of Appendix 2 makes it clear that environmental designations will be taken into account when considering the capacity of villages and specific sites. However, there is no overriding reason to suppose that the scale of development proposed for each LSV situated in the Green Belt cannot be achieved through small allocations, infill schemes and the redevelopment/re-use of brownfield sites. For certain villages it may be that dwelling provision at the lower end of the range identified in Policy CS.16 is appropriate due to certain environmental or capacity constraints.</p>					
Overall Officer Recommendation		<p>No change.</p>					

Appendix 2. Local Service Villages Methodology – 2.1 Background

Number of Supports: 0 Number of Objections: 3 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
H.G. Hodges & Sons Ltd.	Stansgate Planning	Yes	Not Specified	No	<p>The designation of Long Marston as a category 4 LSV is based on a flawed assessment and it should be elevated to a category 3.</p> <p>The settlement should score 2 for its public transport giving a total of 5 points and thus elevating the settlement to category 3.</p>	Amend scoring and categorisation of Long Marston accordingly.	See overall response below.
Gladman Developments		Not Specified	Not Specified	No	<p>Methodology sets out a crude scoring system to split the settlements into the various categories and focuses only on four key elements.</p> <p>It is too simplistic and could potentially result in the illogical categorisation of some settlements. The role and function of the local service centres and how they reflect the components of a sustainable community should also be considered.</p> <p>There is no clear rationale for how the scale of growth allocated to each of these categories has been determined. These appear to be arbitrary figures, which do not reflect a thorough assessment of the LSVs and are not evidentially based.</p>	Amend methodology accordingly.	See overall response below.
Tanworth-in-Arden Residents Association		No	Not Specified	No	<p>Methodology makes no allowance for whether or not each LSV is or is not in Green Belt.</p> <p>The Council has not taken any account of the fact that the NPPF draws a clear distinction between the general presumption in favour of sustainable development and the need to protect the Green Belt.</p> <p>Methodology is not consistent with the NPPF because it makes no mention of Green Belt or the special status that should be afforded to it.</p> <p>Any review of Green Belt should only be done within the formulation of a Local Plan and this has not been done in this case.</p>	LSV methodology should recognise the special status of the 10 LSVs in Green Belt. This could be achieved by de-categorising all 10 LSVs and the shortfall of 450 houses could be met from the normal organic development expected in future and from sites suggested by each parish in the preparation of their Neighbourhood Development Plans.	See overall response below.
Overall Officer Response					<p>In response to Gladman Developments, whatever methodology is used to identify which settlements are suitable for housing development and the scale involved, it would require some form of scoring system to be devised based on criteria that reflect the characteristics of the area involved. The approach taken in the Core Strategy reflects the wide range of villages in the District and it has been applied on a consistent basis.</p> <p>In response to Tanworth-in-Arden Parish Council, it is clear from the NPPF that it is for the local authority to determine the detailed boundaries of the Green Belt through their plan-making function. Para. 85 states that they should “ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.” As such, it is appropriate for the treatment of Green Belt boundaries reflect and achieve the District Council’s preferred development strategy rather than the other way round. A separate Site Allocations Development Plan Document (DPD) is to be produced by the District Council. It is through this plan that the definition of boundaries to LSVs, including those in the Green Belt, will be addressed and appropriate sites for development identified. For now, the Green Belt will continue to ‘wash over’ those LSVs affected and that may continue to be the case depending on the approach to this matter taken in the Site Allocations Plan.</p> <p>In response to H.G. Hodges & Sons, it is highly unlikely that a modest increase in the number of dwellings in Long Marston will, in itself, be sufficient to support an improved bus service through the village. The provisions of Policy CS.15 allow for any improvements in services to be taken into account in the potential change to the category of an individual LSV. However, it would be inappropriate to apply this before such an improvement is made. However, it is apparent that the bus service through the village is better than when originally assessed and merits two points. On that basis, Long Marston should be given an overall score of 5 and now be treated as a category 3 Local Service Village.</p> <p>Although the categorisation of individual Local Service Villages can vary over time, as stated in Policy CS.15, and the scale of housing development for that village may change as a result in accordance with Policy CS.16, it would be appropriate to update Appendix 2 and Policy CS.16 where necessary, to reflect any recent changes in circumstance.</p>		
Overall Officer Recommendation					That the Inspector be requested to recommend that Appendix 2 and Policy CS.15 are modified to identify Long Marston as a category 3 Local Service Village.		

Appendix 2. Local Service Villages Methodology – 2.2 Evidence Base

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Tiddington Village Residents Association		Not Specified	Not Specified	No	<p>The Local Service Village methodology has disadvantaged the village of Tiddington and has not been fairly applied across the district. We feel that some local villages were consulted at a much earlier date than our village.</p> <p>The points system for deciding on Local Service Villages is arbitrary and too generalised; not taking into account important finer points:</p> <ul style="list-style-type: none"> - Tiddington scored highly but has (at present) only just over 600 houses, so scored a 3 (villages with 999 houses also scored a 3). - village is unique due to its proximity to Stratford. There are already massive traffic problems with lengthy queues to get into town a lot of the time. To add a significant number of houses to Tiddington will only add to this. - although Tiddington has a primary school, it is nearly full, with no plans for expansion, so would be unable to accommodate the extra children. 	<p>LSV criteria need to be objectively assessed Residents need to be consulted with sufficient time to respond appropriately.</p> <p>Facts need to be provided to back up the choices made regarding the LSV housing allocations and/or the criteria used for allocating points.</p> <p>A reasonable alternative to the LSV housing allocations is needed.</p> <p>A full sustainability appraisal should be conducted.</p> <p>An infrastructure plan to support the LSV housing allocation should be provided.</p>	See overall response below.
Overall Officer Response		Whatever methodology is used to identify which settlements are suitable for housing development and the scale involved, it would require some form of scoring system to be devised based on criteria that reflect the characteristics of the area involved. The approach taken in the Core Strategy reflects the wide range of villages in the District and it has been applied on a consistent basis. The preparation of the Core Strategy has incorporated a rigorous Sustainability Appraisal process to inform the choice of preferred development strategy as and also an assessment of service and infrastructure capacity. Thorough consultation has taken place at various stages in the production of the Core Strategy. This has included notification of consultation arrangements in public notices placed in local newspapers. The District Council has only recently been notified of the formation of the Tiddington Village Association so direct communication with them has not been possible during the preparation of the Plan.					
Overall Officer Recommendation		No change.					

Appendix 2. Local Service Villages Methodology – 2.2 Evidence Base

Number of Supports: 0 Number of Objections: 6 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Shipston-on-Stour and Stratford League of Friends	Carter Jonas - Oxford	Not Specified	Not Specified	No	<p>Halford was designated as a category 4 Local Service Village in the third Draft Core Strategy 2012, allowing for development of up to 10 to 25 homes over the Plan period. This designation was removed without appropriate justification.</p> <p>The District Council has concluded that the shop within the petrol filling station does not constitute a 'General Store' and Halford should not therefore be scored as having this service. It is open from 7:00am to 9:00pm Monday to Saturday (with reduced opening times on Sunday), and sells newspapers and day-to-day groceries (including bread, milk, fruit, vegetables and other staple items).</p>	Reinstate Halford as a category 4 Local Service Village.	See overall response below.
John Horner		Not Specified	Not Specified	No	<p>Under the NPPF the Green Belt is to be protected and development is only allowed under very special circumstances. The LSV methodology has selected a number of villages washed over by the Green Belt for green field development and has not provided any very special circumstances to promote what is under the NPPF inappropriate development.</p> <p>There must be uncertainty in the deliverability of the housing numbers relying on inappropriate development in the Green Belt.</p>	Add alteration to the Green Belt Boundary as a restriction in the LSV methodology.	See overall response below.
Ilmington Parish Council		Not Specified	Not Specified	No	<p>The LSV methodology is simplistic and flawed principally because:</p> <p>a) it takes into account too few "key" services and facilities, and fails to take into account, for example, access to secondary schools, medical services, banking/post office services and places of employment. It is only by also taking into account these additional key services or facilities, and whether a primary school, if present, would be capable of taking a sufficient number of additional children, that a proper assessment of sustainability or otherwise can be made;</p> <p>b) it allocates points for size (based on the current number of dwellings) when "size" per se does not afford a service or facility;</p> <p>c) the points allocation system is statistically flawed and not weighted;</p> <p>d) points are not, but should be, deducted for villages that are in the Cotswolds AONB or are largely covered by conservation area designations; and</p> <p>e) the ranges of proposed new housing numbers for each LSV Category (10-25, 26-50 etc) do not take into account deliverable site availability, infrastructure issues etc.</p> <p>As a result, an excessive number of new houses is proposed for, in particular, most Category 3 and 4 LSVs which are, in fact, relatively unsustainable locations in which only a much more modest amount of development than is proposed would be appropriate.</p>	The LSV Methodology should be thoroughly revised and refined, and the proposed number of new houses in the Category 3 and 4 LSVs, including in Ilmington, should be significantly reduced, with the resulting shortfall being defrayed across locations that are sustainable such as, for example, the Main Rural Centres and the Category 1 and 2 LSVs.	See overall response below.
Tiddington Village Residents Association		Not Specified	Not Specified	No	<p>The Local Service Village scoring system has failed to take various important factors into account for Tiddington. Although the village has a primary school, this is almost full to capacity. The road system is already gridlocked and any extra traffic will make this worse.</p> <p>No other village is as close to Stratford town so circumstances are different with residents needing to get into town to access services.</p> <p>It is unacceptable that the total number of houses suggested for Tiddington is 75 - 100. This is an increase of around 15% on its present size.</p>	Amend Plan accordingly.	See overall response below.

A E Cox FRICS Chartered Surveyors		Not Specified	Not Specified	Not Specified	Stockton should be a category 1 village not category 3. It has two general stores, one of which incorporates a Post Office. The General Stores is now open 84 hours a week. From Monday to Friday Stockton has an hourly bus service throughout the main part of the day to both Leamington and Rugby. Therefore Stockton should score three for shops and three for transport, making a total of 10 points.	Amend Plan accordingly.	See overall response below.
Earlswood & Forshaw Heath Residents Association		No	No	No	<p>The methodology requires LSVs to take 18.05% of the future housing proposed under Policy CS.16 and, of the 1,950, 475 will be located in the Green Belt. That's 24.36% of all LSV sub-policy housing will be located in the Green Belt. This is not limited infilling in Green Belt villages and consequently the Core Strategy is outside the law as laid out in the NPPF.</p> <p>Approach is indicative of the District Council's desire to remove the Green Belt LSVs from the Green Belt and offends against both current planning law and the Government's intentions to protect the Green Belt.</p> <p>The LSV methodology is both flawed and discriminatory. The source information that determines the points allocation has not been correctly researched. For example Earlswood has a post office / shop for which it is allocated 2 points. However, one of the other Green Belt LSVs, which also has a post office (which opens for more hours than Earlswood) is awarded 0 points and is completely omitted without any explanation.</p> <p>Do not understand the arbitrary choice of 500 metres as the defined distance criterion to public transport. This is not a distance that is regularly used in professional surveys of individuals' walking distance limits in order to use public transport. There has been little research done by on public transport apart from looking at timetables to calculate the frequency of busses and trains in each LSV. This is insufficient research as a number of the railway stations are, for example, request halts and it is difficult to calculate how many trains actually stop.</p> <p>Another important factor in allocating new housing to a village is infrastructure. The District Council has not conducted any research on how 50 new houses proposed for Earlswood will affect the sewerage system which cannot cope with the existing situation.</p>	None specified.	See overall response below.
John Horner		Not Specified	Not Specified	No	<p>The methodology for selecting Local Service Villages does not conform to the criteria and practice required in the NPPF/NPPG for assessing sustainable development.</p> <p>It is at odds with the methodology used to assess the new settlement and which conforms more to the requirements of the NPPF.</p> <p>The methodology says a village with a single form entry school that is operating at capacity and has no headroom is more capable of taking new houses than a village where the school is half full.</p> <p>In the methodology there is no indication as to the distance from market towns, numbers of population potentially supported or the viable size of a service settlement.</p> <p>Many LSVs are in close proximity with other LSVs, particularly in the Green Belt.</p>	The approach requires a different analysis. The optimum model for providing services to new house occupants should be developed and adopted. This might be that all new homes are concentrated on Stratford upon Avon and the market towns. Building a few houses in villages increases the cost to serve and does not provide sufficient mass to provide additional facilities and infrastructure for the people. One example might be that only conurbations with super fast broadband may have new housing.	See overall response below.

Overall Officer Response	<p>In response to Earlswood & Forshaw Heath Residents Association and John Horner, it is clear from the NPPF that it is for the local authority to determine the detailed boundaries of the Green Belt through their plan-making function. Para. 85 states that they should 'ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.' As such, it is appropriate for the treatment of Green Belt boundaries reflect and achieve the District Council's preferred development strategy rather than the other way round. A separate Site Allocations Development Plan Document (DPD) is to be produced by the District Council. It is through this plan that the definition of boundaries to LSVs, including those in the Green Belt, will be addressed and appropriate sites for development identified. For now, the Green Belt will continue to 'wash over' those LSVs affected and that may continue to be the case depending on the approach to this matter taken in the Site Allocations Plan. The approach to identifying LSVs and the scale of housing development in them is based on the delivery of the District Council's proposed development strategy which includes the provision of a modest proportion of the overall dwelling requirement in these villages to help sustain their social and community characteristics.</p> <p>In response to Ilmington Parish Council, whatever methodology is used to identify which settlements are suitable for housing development and the scale involved, it would require some form of scoring system to be devised based on criteria that reflect the characteristics of the area involved. The approach taken in the Core Strategy reflects the wide range of villages in the District and it has been applied on a consistent basis. A wider range of criteria could have been taken into account but these would not have led to a significantly different outcome. For example, none of the LSVs have secondary schools, industrial estates or medical facilities, and most of them have churches, pubs and community halls.</p> <p>In response to representations about the categorisation of specific settlements:</p> <p>Claverdon - it is not evident that the scale of housing development proposed for the village over the plan period could not be accommodated by its primary school.</p> <p>Earlswood - the methodology does not give a score solely for the presence of a post office as this is a very limited service on its own. It is acknowledged that 500 metres is further than most people would be prepared to walk to reach a public transport service. However, in rural terms it is a relatively short distance to travel by other means to get to it. In this case, there is a regular train service available to get to Birmingham, Stratford and elsewhere for work, education, shopping and other purposes. The Water Cycle Study has not identified a capacity constraint at the Water Treatment Works.</p> <p>Halford - although the petrol filling station has long opening hours the retail outlet associated with it offers a very limited range of goods even when compared with those village shops that have been awarded one point. On that basis, the scoring for the village should not be changed under current circumstances.</p> <p>Stockton - it is apparent that the opening hours of one of the general stores have increased and merits an additional point. The methodology does not provide for a further point to be awarded due to there being two shops in the village. It should also be given an additional point for the frequency of its bus service. Together, this means that Stockton has 9 points and should be treated as a category 2 LSV.</p> <p>Tiddington - it has been treated as a separate settlement from Stratford town for planning purposes for at least the past twenty years or so. Given the range of shops and services available, its identification as a category 1 LSV is appropriate. The scale of housing development proposed over the plan period will not have a significant additional impact on traffic congestion or be harmful to its character.</p>
Overall Officer Recommendation	That the Inspector be requested to recommend that Appendix 2 and Policy CS.16 are modified to identify Stockton as a category 2 Local Service Village.

Appendix 2. Local Service Villages Methodology – 2.3 Categories

Number of Supports: 0 Number of Objections: 1 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Urban Renaissance Villages (URV) and Helical Bar	Barton Willmore	Yes	Yes	No	<p>The table provided within Appendix 2 which ranks LSVs based on their individual score contains an error. It ranks Great Alne as a settlement of between 100-250 dwellings. However, 187 extra care dwellings have been consented at Maudslay Park. Once completed, the overall size of Great Alne will fall within a medium sized development with 250-600 dwellings. This improves the score of Great Alne by 1.</p> <p>The table states that Great Alne does not have a shop. However the consented development at Maudslay Park includes a local shop which local residents will also have access to. It is anticipated to be completed shortly and will be a small/medium shop with long opening hours, resulting in a score of 2 (based on the assessment criteria set out within Appendix 2).</p> <p>This raises the score of Great Alne from 6 to 9. A Local Service Village with a score of 8 - 9 falls within Category 2.</p>	Amend methodology and categorisation of Great Alne accordingly.	See overall response below.
Claverdon Parish Council		Not Specified	Not Specified	Not Specified	<p>The methodology wrongly identifies a great number of villages as falling in to the LSV category, or at the very least rates them too highly, resulting in far too many new houses being loaded on to them.</p> <p>Specifically in the case of Claverdon, there are issues with the weight given to three aspects of its qualifying as an LSV:</p> <ul style="list-style-type: none"> - the school is currently at full capacity and an excessive number of additional houses will not be sustainable in this respect. - public transport is minimal, with infrequent train and bus services, to limited destinations, and mostly at the wrong time of the day. - the community shop is, by its nature, reliant on volunteers to function and cannot be expected to be an 'open all hours' operation. <p>Over recent years there has been a number of new houses built (or at least planning permission granted) in the village and these should be considered as contributing to the overall requirements.</p>	Amend methodology and categorisation of Claverdon accordingly.	See overall response below.
Overall Officer Response		<p>In response to Urban Renaissance Villages & Helical Bar, the provision of additional dwellings at the Maudslay site once built, and a shop once opened, will result in the score for Great Alne increasing to the extent that it could then be become a category 2 LSV. However, these dwellings will also be treated as contributing to, and indeed meeting the dwelling requirements for the village even in those circumstances.</p> <p>In response to Claverdon Parish Council, whatever methodology is used to identify which settlements are suitable for housing development and the scale involved, it would require some form of scoring system to be devised based on criteria that reflect the characteristics of the area involved. The approach taken in the Core Strategy reflects the wide range of villages in the District and it has been applied on a consistent basis. Regarding the categorisation of Claverdon, it is not evident that the scale of housing development proposed for the village over the plan period could not be accommodated by its primary school. It has not been given any points for public transport in any case. It would not be appropriate to differentiate between stores run by the community and those operating as a commercial enterprise. If anything, community shops may have a more certain future as they are not dependent on making a profit.</p>					
Overall Officer Recommendation		No change.					

Appendix 3. Relationship between Core Strategy Policies and Local Plan Review 2006 'Saved' Policies

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 1

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Bloor Homes and Hallam Land Management	Boyer Planning	Not Specified	Not Specified	Not Specified	Whilst Policy STR2.A of the Local Plan is to be replaced by Policy CS.16, there is no reference to the treatment of Proposal SUA.W. Given its pivotal contribution to meeting the future housing requirement of 10,800 new homes, the Core Strategy should clarify that Proposal SUA.W is similarly included with Policy CS.16.	Amend Appendix 3 accordingly.	See overall response below.
Overall Officer Response		It is evident from the Housing Trajectory table in Policy CS.16 that the West of Shotton permission is accounted for in the housing supply over the plan period.					
Overall Officer Recommendation		No change.					

Omission Sites

Number of Supports: 1 Number of Objections: 24 Number of Unspecified: 19

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	44. Land east of Shipston Road, Alderminster should be identified for housing development (approx 5 hectares).	Amend plan accordingly.	See overall response below.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	43. Land north and south of Loxley Road, Stratford should be identified for housing development (approx 36 hectares).	Amend plan accordingly.	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	42. Land north of Millers Close, Welford should be identified for housing development (approx 1 hectare).	Amend plan accordingly.	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	41. Land west of Knights Lane, Tiddington should be identified for housing development (approx 4 hectares)	Amend plan accordingly.	See overall response below.
Gallagher Estates	Pegasus Planning Group	Not Specified	Not Specified	No	40. Land east of Tiddington should be identified for housing development (approx 15 hectares).	Amend plan accordingly.	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	39. Land west of Tuckwell Close, Stockton should be identified for housing development (approx 4 hectares).	Amend plan accordingly.	See overall response below.
Rosconn Group	Pegasus Planning Group	Not Specified	Not Specified	No	38. Land north of Stockton Road, Long Itchington should be identified for housing development (approx 4.5 hectares).	Amend plan accordingly.	See overall response below.
University of Warwick	Turley Associates	Not Specified	Not Specified	Not Specified	37. Land to west of Wellesbourne should be identified for housing development (amount not specified).	Amend plan accordingly.	See overall response below.
Jim Darling	Cerda Planning	Not Specified	Not Specified	No	36. Land at Stoneythorpe (south of A435), west of Southam should be identified for a new settlement (approx 800 dwellings).	Amend plan accordingly.	See overall response below.
Hallam Land Management	Marrons Planning	Not Specified	Not Specified	Not Specified	35. Land south of Trinity Way, Stratford should be identified for housing development (approx 300 dwellings).	Amend plan accordingly.	See overall response below.

Ainscough Strategic Land	Pegasus Planning Group	Not Specified	Not Specified	No	34. Land north of Campden Road, Shipston should be identified for housing development and foodstore (approx 7.5 hectares).	Amend plan accordingly.	See overall response below.
Hayward Developments Ltd	Stansgate Planning	Yes	Yes	No	33. Land south of Kineton Road, Gaydon should be identified for housing development (approx 25 dwellings).	Amend plan accordingly.	See overall response below.
Peter and Helen Pires	North Rae Sanders	Not Specified	Not Specified	Not Specified	32. Land south of Daventry Road, Southam should be identified for housing development (approx 20 hectares). Also see site 6.	Amend plan accordingly.	See overall response below.
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	Not Specified	31. Land at Juggins Lane, Forshaw Heath should be identified for housing development (approx 2 hectares).	Amend plan accordingly.	See overall response below.
Miller Homes	RPS Group	Not Specified	Not Specified	Not Specified	30. Land west of Waterloo Road, Bidford should be identified for housing development (approx. 200 dwellings).	Amend plan accordingly.	See overall response below.
Gallagher Estates Ltd	Framptons	Not Specified	Not Specified	Not Specified	29. Land east of Banbury Road, Southam should be identified for housing development (approx. 200 dwellings).	Amend plan accordingly.	See overall response below.
Gladman Developments		Not Specified	Not Specified	Not Specified	28. Land at Wellesbourne Airfield should be identified for housing development (approx. 1,600 dwellings).	Amend plan accordingly.	See overall response below.
Redrow Homes South Midlands	Barton Willmore	Not Specified	Not Specified	Not Specified	27. Land west of Holywell Road, Southam should be identified for housing development (approx 3 hectares).	Amend plan accordingly.	See overall response below.
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	Yes	26. Land north of Salford Road, Bidford should be identified for housing development (approx 150 dwellings).	Amend plan accordingly.	See overall response below.
Sharba Homes	Barton Willmore llp	Not Specified	Not Specified	No	25. Land north of Banbury Road, Kineton should be identified for housing development (approx. 75 dwellings).	Amend plan accordingly.	See overall response below.
K P Brooks and the Stearn Children's Settlement Trust & The Edith and Jack Griffiths Charitable Trust & Carey Pension Trustees Ltd	Stansgate Planning	Yes	Not Specified	No	24. Land east of Southam Bypass should be identified for housing development (approx 270 dwellings).	Amend plan accordingly.	See overall response below.

B and M Glanfield	Framptons	Not Specified	Not Specified	Not Specified	23. Land east of Weston House, Welford should be identified for housing development (approx 17 dwellings).	Amend plan accordingly.	See overall response below.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	No	22. Land north of Bishopton Lane, Stratford should be identified for housing development (approx 450 dwellings).	Amend plan accordingly.	See overall response below.
CALA Homes (Midlands) Ltd	Stansgate Planning	Not Specified	Not Specified	No	21. Land south of Campden Road, Shipston should be identified for housing development (approx. 2.5 hectares).	Amend plan accordingly.	See overall response below.
Gladman Developments		Not Specified	Not Specified	Not Specified	20. Land north of Bordon Hill, Stratford should be identified for housing development (approx 6 hectares).	Amend plan accordingly.	See overall response below.
Mixed Farms Ltd	Savills - Reading	Not Specified	Not Specified	Not Specified	19. Land south-east of Stratford-upon-Avon should be identified for a sustainable urban extension (amount not specified).	Amend plan accordingly.	See overall response below.
Alscot Estate	Jones Lang Lasalle	Not Specified	Not Specified	No	18. Land at Atherstone Airfield should be identified for employment uses (amount not specified).	Amend plan accordingly.	See overall response below.
Taylor Wimpey UK Ltd	Barton Willmore	Not Specified	Not Specified	Not Specified	17. Land south of Alcester Road, Stratford should be identified for housing development (approx. 3 hectares).	Amend plan accordingly.	See overall response below.
Grevayne Properties Ltd	Cerda Planning	Not Specified	Not Specified	No	16. Land off Alcester Road, Stratford should be identified for housing development (approx 3 hectares).	Amend plan accordingly.	See overall response below.
Quintessential Inns	Barton Willmore	Not Specified	Not Specified	Not Specified	15. Land north of Captains Hill, Alcester should be identified for housing development (approx 8 hectares).	Amend plan accordingly.	See overall response below.
The Bird Group of Companies	Framptons	Not Specified	Not Specified	Not Specified	14. Land south of A46, Stratford should be identified for housing development (approx 750 dwellings)	Amend plan accordingly.	See overall response below.
St Modwen Developments Ltd	Barton Willmore llp	Not Specified	Not Specified	No	13. Land at former Long Marston Depot should be identified for housing development (approx. 550 dwellings).	Amend plan accordingly.	See overall response below.
Jack McKelvie	Richard Cobb	Not Specified	Not Specified	No	12. Land at The Slough, Studley should be identified for housing development (approx 2 hectares).	Amend plan accordingly.	See overall response below.

HIA Developments LLP	Framptons	Not Specified	Not Specified	No	11. Land north of New Road, Henley should be identified for housing development (approx 9 hectares).	Amend plan accordingly.	See overall response below.
Dallas Burston	Framptons	No	No	No	10. Land at Stoneythorpe (north of A435), west of Southam should be identified for housing development (approx 700 dwellings).	Amend plan accordingly.	See overall response below.
Barratt and David Wilson Homes (Mercia) Ltd	RCA Regeneration Ltd	Not Specified	Not Specified	No	9. Land at Alcester Road, Wootton Waven should be identified for housing development (amount not specified).	Amend plan accordingly.	See overall response below.
Barratt and David Wilson Homes (Mercia) Ltd	RCA Regeneration Ltd	Not Specified	Not Specified	No	8. Land at Alcester Road, Studley should be identified for housing development (amount not specified).	Amend plan accordingly.	See overall response below.
Follett Property Holdings Ltd	Nigel Moor Planning	Not Specified	Not Specified	No	7. Land at former Harbury Cement Works should be identified for housing development (approx 500 dwellings).	Amend plan accordingly.	See overall response below.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	6. Land south of Daventry Road, Southam should be identified for housing development (approx 20 hectares). Also see site 32.	Amend plan accordingly.	See overall response below.
Persimmon Homes (South Midlands) Ltd	Pegasus Planning Group	Not Specified	Not Specified	Not Specified	5. Land to east and west of Ettington Road, Wellesbourne should be identified for housing development (approx 27 hectares).	Amend plan accordingly.	See overall response below.
Parkinson Estates	Framptons	Not Specified	Not Specified	No	4. Land at Wood End Lane, Wood End should be identified for housing development (approx 24 dwellings).	Amend plan accordingly.	See overall response below.
Homes and Communities Agency (HCA)	Lambert Smith Hampton	Not Specified	Not Specified	Not Specified	3. Land west of A435, Mappleborough Green should be identified for housing development (amount not specified).	Amend plan accordingly.	See overall response below.
CALA Homes (Midlands) Ltd	Nathaniel Lichfield & Partners - London	Not Specified	Not Specified	Not Specified	2. Land at Long Marston Airfield should be identified for a new settlement (approx 3,500 dwellings and 18 hectares of commercial uses).	Amend plan accordingly.	See overall response below.
Client - Upper Quinton c/o NGA	Nigel Gough Associates Ltd	Not Specified	Not Specified	Not Specified	1. Land at Tailor's Lane, Upper Quinton should be identified for housing development (approx 2 hectares).	Amend plan accordingly.	See overall response below.

Overall Officer Response	<p>A wide range of omission sites have been promoted at this stage. It is appropriate to consider these in the context of the overall strategy for the distribution of development as proposed in Policy CS.15 and the proposed scale and location of housing development identified in Policy CS.16, and other specific policies where relevant.</p> <p>In taking this approved District Council position into account, the treatment of these sites can be broken down into various categories:</p> <p>The following sites can reasonably be treated as being strategic given the scale of development proposed which is comparable to the allocations in the Proposed Submission Core Strategy, although small parts of those sites adjacent to Stratford-upon-Avon or a Main Rural Centre may be appropriate for consideration through the preparation of the Site Allocations DPD.</p> <ol style="list-style-type: none"> 2. Land at Long Marston Airfield 5. Land to east and west of Ettington Road, Wellesbourne 6 & 32. Land south of Daventry Road, Southam 7. Land at former Harbury Cement Works 8. Land at Alcester Road, Studley * 10. Land at Stoneythorpe (north of A435), west of Southam 11. Land north of New Road, Henley-in-Arden * 13. Land at former Long Marston Depot 14. Land south of A46, Stratford-upon-Avon * 15. Land north of Captains Hill, Alcester * 19. Land south-east of Stratford-upon-Avon 20. Land north of Bordon Hill, Stratford-upon-Avon 22. Land north of Bishopton Lane, Stratford-upon-Avon 24. Land east of Southam Bypass 26. Land north of Salford Road, Bidford-on-Avon 28. Land at Wellesbourne Airfield 29. Land east of Banbury Road, Southam 30. Land west of Waterloo Road, Bidford-on-Avon 34. Land north of Campden Road, Shipston-on-Stour 35. Land south of Trinity Way, Stratford-upon-Avon 36. Land at Stoneythorpe (south of A435), west of Southam 37. Land to west of Wellesbourne 40. Land east of Tiddington 43. Land north and south of Loxley Road, Stratford-upon-Avon <p>Those shown with an asterisk are located in the Green Belt.</p> <p>There is no need to identify any of these sites for development in order to meet the proposed housing requirement. Para. 47 in the NPPF does not require specific sites to be identified for years 11-15. That being the case, additional strategic sites can be identified in a future review of the plan to reflect the scale of need identified at that time.</p> <p>The following sites are of a size and at a location whereby they could reasonably be considered (in full or in part), through the preparation of the Site Allocations Development Plan Document, although the scale of any development should be consistent with the provisions of Policy CS.16 Housing Development. For Stratford-upon-Avon and the Main Rural Centres this is in relation to meeting the scale of windfall development identified in the Housing Trajectory Table on page 89 of the Proposed Submission Core Strategy. For Local Service Villages the scale of development should be consistent with the categorisation of the settlement involved.</p> <ol style="list-style-type: none"> 1. Land at Tailor's Lane, Upper Quinton 3. Land west of A435, Mappleborough Green 4. Land at Wood End Lane, Wood End * 9. Land at Alcester Road, Wootton Wawen * 12. Land at The Slough, Studley * 16. Land at Alcester Road, Stratford-upon-Avon 17. Land south of Alcester Road, Stratford-upon-Avon 23. Land east of Weston House, Welford-on-Avon 25. Land north of Banbury Road, Kineton 27. Land west of Holywell Road, Southam 33. Land south of Kineton Road, Gaydon 38. Land north of Stockton Road, Long Itchington 39. Land west of Tuckwell Close, Stockton 41. Land west of Knights Lane, Tiddington 42. Land north of Millers Close, Welford-on-Avon 44. Land east of Shipston Road, Alderminster <p>Those shown with an asterisk are located in the Green Belt.</p> <p>In response to the remaining sites:</p> <ol style="list-style-type: none"> 18. Land at Atherstone Airfield can be considered against the provisions of Policy CS.21 and Policy AS.10 Countryside and Villages. 21. Land south of Campden Road, Shipston-on-Stour now has planning permission. 31. Land at Juggins Lane, Forshaw Heath can be considered against the provisions of Policy AS.10 Countryside and Villages.
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Omission Policies

Number of Supports: 0 Number of Objections: 2 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire and West Mercia Police		Yes	Yes	No	The evening and night-time economy should be the subject of a specific policy in the Core Strategy	Insert a policy on this topic.	See overall response below.
Cope's of Earlswood Ltd	Nigel Gough Associates Ltd	Not Specified	Not Specified	No	Policy AS.11 does not consider the situation of small rural brownfield. There must, as a corollary, be an appropriate policy in similar form allowing for the proper development, redevelopment and change of these sites and which is consistent with the other policies of the Plan, including policy CS.10.	Insert a policy on this topic.	See overall response below.
Overall Officer Response		<p>While the concerns raised by Warwickshire and West Mercia Police are important, they are mostly of an operational nature and not appropriate for inclusion in the Core Strategy. Specific issues can be addressed through the consideration of specific planning applications or other procedures, eg. licensing. Part 7 of Policy CS.9 Design and Distinctiveness identifies the need to ensure that proposals would achieve safe forms of development.</p> <p>Small rural brownfield sites are already covered sufficiently and appropriately in various policies in the Core Strategy, including CS.10 Green Belt, CS.15 Distribution of Development, CS.21 Economic Development and AS.10 Countryside and Villages.</p>					
Overall Officer Recommendation		No change.					

Overall Officer Recommendation	No change.
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Supporting Documents – Sustainability Appraisal of the Core Strategy

Number of Supports: 1 Number of Objections: 9 Number of Unspecified: 5

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Welbeck Strategic Land	McLoughlin Planning Ltd	Not Specified	Not Specified	Not Specified	Concern about the assessment of potential development sites around Bidford-on-Avon, in particular, Welbeck's site BID3. BID3 performance against SA objective 7 (loss of agricultural land) assessed as double negative is questioned. Appeal decision for the site concluded that the presence of such land had to be taken into context of the wider availability of such land. This site is landlocked by playing fields on three sites and unsuitable for the use of modern agricultural machinery. BID3 SA objective 8 findings are questioned when compared to other sites. SA Objective 12 is disputed - as it contradicts the Landscape Assessment findings for the BID3 site. It should not be a double negative.	Revise scoring for site in the SA.	See overall officer response and response in relation to omission sites.
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	Not Specified	SA is considered to have failed on number of points to comply with the SEA Directive * assessment of alternatives have not been carried out adequately including no site specific appraisal of alternatives of Stratford-upon-Avon sites, in particular the Canal Regeneration Zone, no explanation for selecting or rejecting sites. No reason has been identified for not including the site in the current plan. "Letter contains detailed and comprehensive site assessment for land at Bishopton Lane. Suggests in RPS Appendix 8 that the SEA Directive has not been followed for the assessment of this site." SA for Land at Bishopton Lane submitted.	Land at Bishopton Lane should have been assessed as a reasonable alternative.	See overall officer response and response in relation to omission sites.
Gallagher Estates Ltd	Framptons	Not Specified	Not Specified	No	Concern expressed about failure of the SA to meet the requirements of the SEA Directive on a number of grounds, particularly in not clearly highlighting the reason why dispersal option was not taken forward. SDC SA has not provided any cogent evidence to explain why the further dispersal option was rejected. 1. Failure to consult on the final and interim SA which clearly presents and assesses the options for consideration. 2. Failure to comply with Stage B of the SEA Process - developing strategic alternatives 3. Failure to comply with Annex I (h) of the Directive which requires that the Environmental Report outlines the reasons for selecting the alternatives dealt with.	Stratford-upon-Avon and the Main Rural Centres should continue to be the focus for more development. Site proposed to the east of Banbury Rd, Southam.	See overall officer response and response in relation to omission sites.
Gladman Developments		Not Specified	Not Specified	Not Specified	Gladman has produced its own SA to accompany its Wellesbourne proposal which shows that GLH is not the most sustainable option, being outperformed by Wellesbourne and S.E Stratford (Option D). The latter being the most sustainable option.	Wellesbourne West should have been assessed as a reasonable alternative.	See overall officer response and response in relation to omission sites.
Gladman Developments		Not Specified	Not Specified	No	The SA process has not considered in a comparable manner all the reasonable alternatives.	No action specifically requested.	See overall officer response.

Gladman Developments		Yes	Yes	No	<p>The 'Further Dispersal' option has been inadequately assessed by the SA.</p> <p>Gladman disagrees with the SA general conclusion that the further dispersal option would mean new houses are less likely to be concentrated in areas with good access to services, amenities and public transport links or are of sufficient size to warrant new facilities. SA further states that broader spread of development would result in an increase in car usage.</p> <p>Gladman contend that a further dispersal approach, combined with a number of strategic sites, considered in the context of the need for a significantly higher housing requirement ... would be a sustainable approach to development across the District.</p> <p>No SA work carried out on the reasonable alternatives in terms of housing requirements presented within the SHMA, ranging between 9500 and 15,500.</p> <p>No assessment has been undertaken of the amendment to the plan period. There could be significant issues with unmet housing need, resulting in social pressures on affordability and inward commuting by residents due to inadequate supply.</p> <p>SA process dictates that before strategic sites locations are addressed, the OAN should be considered in detail by the appraisal, in the form of reasonable alternatives, detailing how to deliver the need in sustainable locations.</p> <p>Concern about the GLH SA employment performance scoring as JLR have criticised the proposal's capacity to constrain their future business expansion plans, which would result in JLR relocating outside the district and a loss of employment to the district. Gladman raises significant concern over the Council's SA process to date. The plan has not appropriately considered or explained the strategic alternatives to the preferred approach.</p> <p>The sustainability of the sites has been assessed, but there is a lack of explanation as to how the information has been used to select Option B GLH as its preferred approach. If a comparative exercise has been undertaken, it is not clear in the SA or in the Core Strategy.</p>	No action specifically requested.	See overall officer response.
B and M Glanfield	Framptons	Yes	Yes	No	<p>Various comments that the SA fails to meet the requirements of the SEA Directive on a number of grounds, particularly in not clearly highlighting the reason why dispersal option was not taken forward.</p> <p>A statement about legal requirement to prepare a SA and SEA together and Environmental Report in the SA process as the main output. Refers to ODPM guidance 2005.</p> <ol style="list-style-type: none"> 1. Failure to consult on the final and interim SA which clearly presents and assesses the options for consideration. 2. Failure to comply with Stage B of the SEA Process - developing strategic alternatives 3. Failure to comply with Annex I (h) of the Directive which requires that the Environmental Report outlines the reasons for selecting the alternatives dealt with. 	Promoting site to the east of Banbury Rd Southam.	2005 Guidance on SA of RSS's and LDD's produced by ODPM has been replaced. See overall comments in relation to assessment of options and the dispersal option. Site is dealt with under omission sites.
St Modwen Developments Ltd	Barton Willmore llp	Not Specified	Not Specified	No	<p>Failure to consider Meon Vale is considered to indicate that the Sustainability Appraisal is flawed and the Council's Evidence Base is not positively prepared.</p>	Further consideration should be given to Meon Vale in the SA	See overall officer response.

St Modwen Developments Ltd	Barton Willmore llp	Yes	Yes	No	<p>Consider that the Detailed assessment of Policy CS.15 significantly undervalues the impact of GLH, assessing its sustainability performance as no higher than uncertain. For example, protection and conservation of natural resources should score negative as the proposal is greenfield and in open countryside.</p> <p>The findings for SA Objective 14 are also questioned. It is contested that the findings for SA Objective 12 for Policies 16 and 15. Both should be scored as negative in terms of protecting the integrity of the district's countryside.</p>	Include Meon Vale in the Core Strategy.	See overall officer response.
St Modwen Developments Ltd	Barton Willmore llp	Not Specified	Not Specified	Not Specified	Disagree with the SA scoring of AS.11 and in particular Meon Vale which should score far more positively.	Include Meon Vale in the Core Strategy.	See overall officer response.
St Modwen Developments Ltd	Barton Willmore llp	Not Specified	Not Specified	No	No explanation why the Long Marston Estate is ruled out by the Council as an alternative location for development.	Explain why Long Marston excluded as an option.	See overall officer response.
SWCCG Public Patient Participation Sub-group		Not Specified	Not Specified	Not Specified	Query about why a Health Impact Assessment (HIA) has not been carried out on the Core Strategy	HIA to be produced	Implications on the health of the district as a result of the Core Strategy has been assessed as part of the Sustainability Appraisal which accompanies the document
FORSE		No	Not Specified	No	<p>Numerous errors and omissions on the face of the SEA scoring process. No reference to 1995 Inspectors Report which considered a proposal for 500 dwellings at this location. Inadequate consideration of further dispersal option.</p> <p>SEA fails to grapple with affordable housing. Submission includes a detailed response on the SA for GLH, the assessment of alternative sites and the dispersal option (Appendix 2) and issues in relation to notable and protected species at GLH (Appendix 3).</p>	Section 6.10 should be deleted.	See overall officer response.
Natural England - South Mercia Area		No	Not Specified	Not Specified	SA's lack of explanation about the decision to allocate Option B 'Gaydon/Lighthorne Heath over 'Option D 'South East Stratford.	LPA should satisfy itself that there is a sound reasoning for the selection of Option B Gaydon/Lighthorne Heath	See overall officer response.
Warwickshire Wildlife Trust		Not Specified	Not Specified	Not Specified	<p>Concern is expressed about limited up-to-date ecological data used in the SA to provide a robust assessment of the reasonable alternatives.</p> <p>The Core Strategy has no additional Habitat Assessment evidence base work since 2010 has been carried out to inform the strategic options. Habitat Biodiversity Audit (HBA) for Warwickshire, Coventry and Solihull (2012/13) shows that data for Local Wildlife Sites, potential Local Wildlife Sites and some habitats in strategic options are incomplete or not up-to-date.</p>	To seek further information on the Local Wildlife Sites (LWS) , potential LWS and priority habitats and species for each strategic option previously consulted on., to ensure decision making is based on up-to-date information. This should be used to inform the SA. The conclusions of the SA should be reviewed in light of the additional and updated ecological information, to ensure the SA conclusions are robust. and can provide the necessary justification for the preferred option over other alternatives, and outcome should inform the strategic site allocation in Policy CS.15	See overall officer response.
High Speed Two (HS2) Ltd		Not Specified	Not Specified	Yes	HS2 Ltd support the identification of the North of Southam and Stoneythorpe site (Option E) as being a less preferable alternative option (Sustainability Appraisal, Table 3.5), due to the limits of land the HS2 project could potentially acquire in that location.	n/a	n/a

Overall Officer Response	<p>The SA/SEA has been undertaken as an iterative process by an independent and impartial consultancy with significant experience in the SA/SEA field. The same consultancy has been engaged throughout the process, helping to provide continuity. The statutory consultees have not raised any fundamental concerns in relation to the SA/SEA process. Natural England have highlighted that the SA/SEA does not explain the decision to allocate 'Option B: Gaydon/Lighthorne Heath' over 'Option D: South East Stratford'.</p> <p>The May 2014 SA/SEA Report provides a thorough review of the assessment work undertaken to date and Tables 3.1, 3.2, 3.3, 3.4 and 3.5 provide a summary of the options considered throughout the process. Appendix B and D of the Report provides a summary of the results for previous iterations of the SA/SEA. This includes details of how dispersal was treated within the SA/SEA and plan making process. It is acknowledged that the May 2014 Report does not always provide a clear statement on why a particular option was included or rejected, particularly in relation to the alternative strategic sites (Table 3.5). Recent High Court Rulings, including Save Historic Newmarket Limited and other v Forest Heath District Council suggest that the reasons for rejecting alternatives should be identified in the SA/SEA Report and this is reflected in DCLG's Planning Practice Guidance. The lack of consistency in confirming why options were taken forward or rejected in the May 2014 Report does not affect the results of the SA/SEA and can be rectified prior to the SA/SEA Report being submitted to the Secretary of State.</p> <p>The assessment of options was in no way biased towards any one particular option. The May 2014 report includes at Appendix C a copy of the SA Framework which includes 'assessment protocols for sites.' These protocols were specifically developed to help ensure that the assessment of site options was undertaken on a consistent and transparent basis. Options have been assessed on a comparative basis at the same level of detail at different points in the SA process.</p> <p>The approach to the assessment of potential significant effects associated with site options, including Gaydon/Lighthorne Heath is considered appropriate to a Core Strategy. Appendix 2 of FORCE's representation introduces numerical scoring into the SA process - this is not an accepted approach. The SA/SEA does acknowledge the ancient woodland and other features on or near the site and recognises the potential for European protected species to be present at the site. The assessment of individual sites against particular objectives has been questioned in some instances. It is not considered appropriate or necessary to re-open the assessment of sites because if the assessment for one site changes there may be a knock on effect with the assessment of other sites.</p> <p>A number of omission sites have been submitted and it is argued by some of the promoters of the sites that they should be assessed as reasonable alternatives in the SA/SEA. Legal opinion was taken on how the omission sites should be treated and was reported to The Cabinet in April 2014. The majority of sites have been registered previously or are not strategic. West of Wellesbourne, Dallas Burston Polo Grounds and Land at Lower Clopton were new strategic sites submitted for the first time in the Core Strategy process. It is considered that these sites were not promoted at a sufficiently early stage in the process to make them 'reasonable alternatives.'</p>
Overall Officer Recommendation	<p>An addendum to the May 2014 Report should be produced clearly setting out the reasons for selecting/rejecting relevant options in those instances where this was not done in the May 2014 SA/SEA Report. This should include all relevant planning considerations, not just those associated with the SEA/SA. This would be submitted alongside the Submission Core Strategy. The addendum should also include a table showing how the omission sites have been considered, why they have been rejected or are not considered to be reasonable alternatives. The addendum should also consider the main modifications proposed to the Core Strategy and whether or not they would give rise to significant environmental effects.</p>

Supporting Documents - Draft Statement of Compliance with the Duty to Co-Operate

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 10

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Avon Rail Link Group		Not Specified	Not Specified	Not Specified	The Statement needs to be reworded to more positively and accurately reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study by Arup.	Amend Duty to Co-operate Statement accordingly.	See overall response below.
Avon Rail Link Group		Not Specified	Not Specified	Not Specified	The Duty to Co-operate statement needs to be rewarded in a more positive light, as the Arup Rail Study has established a positive business case for reinstatement of the railway.	Amend Duty to Co-operate Statement accordingly.	See overall response below.
Steven W Price		Not Specified	Not Specified	Not Specified	The Statement needs to be reworded to more positively and accurately reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study by Arup.	Amend Duty to Co-operate Statement accordingly.	See overall response below.
Stratford Rail Transport Group		Not Specified	Not Specified	Not Specified	The Duty to Co-operate statement needs to be rewarded in a more positive light, as the Arup Rail Study has established a positive business case for reinstatement of the railway.	Amend Duty to Co-operate Statement accordingly.	See overall response below.
Mr John Morgan		Not Specified	Not Specified	Not Specified	The Duty to Co-operate statement needs to be rewarded in a more positive light, as the Arup Rail Study has established a positive business case for reinstatement of the railway.	Amend Duty to Co-operate Statement accordingly.	See overall response below.
Steven W Price		Not Specified	Not Specified	Not Specified	The Duty to Co-operate statement needs to be rewarded in a more positive light, as the Arup Rail Study has established a positive business case for reinstatement of the railway.	Amend Duty to Co-operate Statement accordingly.	See overall response below.
Stratford Rail Transport Group		Not Specified	Not Specified	Not Specified	The Duty to Co-operate statement needs to be rewarded in a more positive light, as the Arup Rail Study has established a positive business case for reinstatement of the railway.	Amend Duty to Co-operate Statement accordingly.	See overall response below.
A Dennis		Not Specified	Not Specified	Not Specified	The Duty to Co-operate statement needs to be rewarded in a more positive light, as the Arup Rail Study has established a positive business case for reinstatement of the railway.	Amend Duty to Co-operate Statement accordingly.	See overall response below.
Mr John Morgan		Not Specified	Not Specified	Not Specified	The Statement needs to be reworded to more positively and accurately reflect the findings of the Stratford-Honeybourne Railway Reinstatement Business Case Study by Arup.	Amend Duty to Co-operate Statement accordingly.	See overall response below.
Avon Rail Link		Not Specified	Not Specified	Not Specified	The Duty to Co-operate statement needs to be rewarded in a more positive light, as the Arup Rail Study has established a positive business case for reinstatement of the railway.	Amend Duty to Co-operate Statement accordingly.	See overall response below.

Overall Officer Response	The form of wording used in section 5.8 of the Duty to Co-operate is appropriate given the District Council's position of continuing to safeguard the line and not to actively support such a proposal at this time.
Overall Officer Recommendation	No change.

Supporting Documents – Habitat Regulations Assessment of the Core Strategy

Number of Supports: 1 Number of Objections: 0 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Natural England - South Mercia Area		Yes	Yes	Yes	n/a	n/a	n/a
Overall Officer Response		Natural England is satisfied with the conclusion that the Core Strategy will not result in likely significant effects on the European Sites is appropriate.					
Overall Officer Recommendation		No changes required to the Core Strategy or evidence base.					

Evidence Documents – Viability and Deliverability of Strategic Sites

Number of Supports: 0 Number of Objections: 0 Number of Unspecified: 3

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Miller Homes and Taylor Wimpey Homes	RPS Group	Not Specified	Not Specified	Not Specified	The sale revenue assumption is the same for all five strategic sites at £3,250 per square metre. An annual completions figure of 170 dwellings per annum is assumed for GLH. This does not allow for any downturn in the market. An uplift of 10% on BCIS data has been used. Some other studies undertaken by PBA have used 15%.	Assumptions about sales revenues should reflect housing market sub areas. Make an allowance for two slow down periods in the plan period. Use 15% uplift on BCIS data.	PBA have advised officers that a common value was used because the strategic sites would be offering a similar product. There may be small variations but not sufficient to warrant a different approach. The values are considered appropriate for GLH. Anticipated completions reflected the views of promoters. PBA consider that they are on the low side and it could be considered that an allowance for fluctuations is inherent in them. This is not explicitly set out in the report. An uplift of 10% on BCIS data has been used because more detailed work has been done on costs, see the 'other' development costs package.
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	Not Specified	There is also a concern that any changes made to the house type or tenure mix as proposed by a future SPD will not have been viability tested as part of the plan making process.	n/a -	Any significant changes to house type or tenure mix at GLH would need to be subjected to viability.
Home Builders Federation Ltd	Chartered Town Planner	Not Specified	Not Specified	Not Specified	Need to be clear on the relationship between gross and net site areas especially if the benchmark land value is based on a price per gross hectare and the residual land value is a figure for the net developable area as the cost of the land in the comparison will have been underestimated. There is also a concern that any changes made to the house type or tenure mix as proposed by a future SPD will not have been viability tested as part of the plan making process.	n/a - seeking clarification on the approach taken in the viability work	PBA have confirmed that gross and net areas are shown as separate figures in Appendix A Viability Assumptions of the report on the Viability and Deliverability of Strategic Sites. A non-linear relationship is applied, so that the amount of gross to net increases as the sites get bigger up to a point where the net area is no less than half the gross area. The exception is in the named strategic sites where PBA applied the gross and net area figures supplied by the land promoters/developers they consulted with. Any significant changes to house type or tenure mix at GLH would need to be subjected to viability testing.
Overall Officer Response		The comments in relation to assumptions used in the viability assessment work have been adequately addressed.					
Overall Officer Recommendation		No changes required to the Core Strategy or evidence base.					

Appendix 1. Schedule of Infrastructure Projects

Note: Phase 1:2011/12 – 2015/16; Phase 2: 2016/17 -2020/21; Phase 3: 2021/22 – 2025/26; Phase 4: 2026/27 – 2030/31

Table 1 – Main Schedule

Costs are indicative only as schemes are not yet defined in detail

1 - Transport & Highways						
Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
Stratford Transport Package						
(01) Tiddington Road/Banbury Road/ Shipston Road 'Alveston Manor' junction including improvements to Banbury Road/Shipston Road roundabout – traffic signalisation to co-ordinate with the Bridgeway Gyratory scheme			Phase 1 or 2	£1.03 m	CIL, other	Critical
(02) Bridgefoot/Bridgeway Gyratory – further co-ordinated traffic signalisation of Bridgeway/Bridgefoot and Bridge Street entry arms			Phase 1 or 2	£0.83 m	CIL, other	Critical
Schemes (01) and (02) now being promoted as a single project						
(03) Evesham Road/Evesham Place roundabout – reconfiguration to a traffic signalised junction	WCC	Developers, SDC	Phase 3	£0.8 m	CIL or S106/278, other	Critical
(04) and (05) deleted as not viable						
(06) Improvements to Shipston Road/ Clifford Lane Roundabout	WCC	Developers, SDC	Phases 3 & 4	£0.55 m	CIL	Critical
(07) Improvements to Shipston Road/Severn Meadows Road/ Trinity Way Roundabout	WCC	Developers, SDC	Phases 3 & 4	£0.55 m	CIL	Critical
Schemes (06) and (07) now being promoted as a single project						

(08) Birmingham Road widening between Regal Road and Hamlet Way	WCC	Developers, SDC	Phase 3 or 4	£1.7 m	CIL or S106/278, other	Critical
Birmingham Road Study Schemes						
Short Term (next 5 years)						
(a) Inbound slip lane into Tesco car park (developer funded)						
(b) Improvements to strategic signing – approx. £50,000						
(c) Pedestrian and cycle route improvements (not covered by SRZ)						
(d) Birmingham Road/Justins Avenue junction improvements - approx. £50,000						
(e) CCTV to improve operation of traffic signals on Birmingham Road corridor – approx. £85,000						
Medium Term (5-10 years subject to further feasibility assessment)						
(a) Maybird Shopping Park access improvements – scheme yet to be developed						
(09) Improvements to Birmingham Road/A46 'Bishopton Roundabout'	Highways Agency	WCC, Developers, SDC	Phases 3 & 4	£2.50 m	CIL or S106/278, Highways Agency	Critical
(10) Improvements to Alcester Road/A46 'Wildmoor Roundabout'	Highways Agency	WCC, Developers, SDC	Phases 3 & 4	£ 2.50 m	CIL or S106/278, Highways Agency	Critical
(11) Shakespeare Street/Mulberry Street one-way	WCC	Developers, SDC	Phase 3 or 4	£0.20 m	CIL	Critical
(12) Guild Street/Great William Street traffic signals	WCC	Developers, SDC	Phase 3 or 4	£0.20 m	CIL	Critical
Schemes (11) and (12) being promoted as a single project						
(13) Improvements to Warwick Road/A46 'Marraway Roundabout'	Highways Agency	WCC, Developers, SDC	Phase 3 or 4	£0.40 m	CIL, Highways Agency	Critical

(14) Bridgeway/Warwick Road traffic signals	WCC	Developers, SDC	Phase 3 or 4	£0.20 m	CIL	Critical
Warwick Road Dynamic Signage Strategy	WCC	Highways Agency, Developers, SDC	Phase 2 or 3	£1.0 m	CIL, Highways Agency	Critical
On and off road pedestrian and cycle projects, including: (a) minor cycle infrastructure improvements contributing towards delivery of the Cycle Strategy within Local Transport Plan 2011-2026; (b) other projects to facilitate walking and cycling across the district	WCC or landowner/developer	SDC, Sustrans, WCC, landowner/developer	Lifetime of Core Strategy	(a) £30,000 (b) n/a	CIL (cumulative impacts and completing strategic routes); S106/ part of development (S278/ S38) where related to specific sites	Some critical
Canal Quarter Regeneration Zone localised mitigation package, including: (a) Enhanced pedestrian and cycle link on Birmingham Road & Alcester Road including spurs to Masons Road and town railway station (section to the south of the canal falls within the site and so is part of the development package); (b) Pedestrian/ cycle bridge across the canal (c) Road/junction improvements	Developers	WCC, SDC	Phases 3 & 4	(a) + (b) pedestrian/ cycle links (incl canal bridge) estimated at £0.8 m (c) n/a	S106/ part of development (S278/ S38)	Critical
Stratford Western Relief Road (Evesham Road to Alcester Road)	Developer	WCC	Phases 2-4	£8.0 m	Part of development (S278/38)	Critical

<p>Transport and highways infrastructure for proposed new settlement at Gaydon/Lighthorne Heath:</p> <p><u>A. Strategic Highways Infrastructure</u> See separate schedule at Table 2 (Infrastructure Trajectory for Gaydon/Lighthorne Heath and JLR Employment)</p> <p><u>B. Localised traffic mitigation/management measures</u> Contingency sum of £1,000 per dwelling allowed for schemes yet to be identified</p> <p><u>C. Public Transport</u> TBC – likely to include Park & Ride and express bus service</p> <p><u>D. Pedestrian and Cycle Links</u> TBC – likely to include at least the following schemes</p> <p>i) Priority: Link to Leamington via B4100 / Chesterton / Whitnash: approx £800k - 1m Link north from site over M40 via existing bridleways / new bridge: approx £500k</p> <p>ii) Other: Other minor improvements to road network to provide connections to existing leisure routes / local destinations: approx £500k</p>	<p>A. Developers</p> <p>B. Developer</p> <p>C. Developer</p> <p>D. Developer</p>	<p>A. Highways Agency, WCC, SDC</p> <p>B. Highways Agency, WCC, SDC</p> <p>C. Bus Operator, WCC</p> <p>D. WCC, Highways Agency, SDC, other</p>	<p>A. Phase 2</p> <p>B. Phase 2</p> <p>C. TBC</p> <p>D. TBC</p>	<p>A. £20.75 m including some costs to be shared with Warwick District Council Local Plan</p> <p>B. £2.5 m</p> <p>C. n/a</p> <p>D. £1.8 m</p>	<p>A. – D. Developer (S278/38 and S106); Highways Agency</p> <p>B. Developer (S278/38 and S106); Highways Agency</p> <p>C. Developer/ other</p> <p>D. Developer/ other</p>	<p>A. - D. Most provision critical</p>
<p>Widening of M42 north of Junction 3A Highways Agency has retained this route protection as widening may be required in future</p>	<p>Highways Agency</p>		<p>Possible Phase 3 or 4 (or longer term)</p>	<p>n/a</p>	<p>Highways Agency</p>	

Improving the A46(T) between Alcester and Stratford-upon-Avon (long term aspiration in LTP3)	Highways Agency	WCC	Possible Phase 3 or 4 (or longer term)	n/a	Highways Agency	
Improving M40 Junction 12 Includes capacity for an additional 5,000 jobs at JLR/Aston Martin (excludes further improvements associated with a new settlement at Gaydon/Lighthorne Heath)	Highways Agency/WCC	Land owner/ JLR	Phase 2 (due for completion 2015)	£12 m	Highways Agency, WCC, Regional Growth Fund, Local Pinch Point Funding	Critical
Stratford Parkway Station	Network Rail	WCC, SDC, private contractor	Completed and opened 2013	£8.8 m	UK Government's Local Sustainable Transport Fund, WCC, other	

2 - Education

Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
Primary Schools Investment likely to be needed to increase capacity at the following: <ul style="list-style-type: none"> • Stratford primary schools (new schools and investment in existing provision) • Southam primary schools • St Nicholas CE Primary, Alcester • Bidford Primary • Ettington Primary • Temple Herdewycke Primary • The Dasset CE Primary, Fenny Compton • Quinton Primary • Shipston Primary 	Various	WCC, other education providers, SDC, private sector	Lifetime of Core Strategy	£12.2m (excl cost of pre-school provision)	CIL, other Government	Critical
New settlement at Gaydon/Lighthorne Heath (2500 dwellings): <ul style="list-style-type: none"> • new primary school (3 FE) with co-located nursery 	Developer	WCC, other education providers	Phases 2-3 (some provision by 2018)	£ 6.0 m	S106	Critical

Secondary Schools Investment may be needed to increase capacity at the following: <ul style="list-style-type: none"> Stratford (expansion of existing provision or possible new school) Southam College Henley High Kineton High (with possible upgrade in facilities) Alcester Academy Grammar schools and Catholic High Schools Shipston High Academy (6th Form provision) New settlement at Gaydon/Lighthorne Heath (2500 dwellings): <ul style="list-style-type: none"> Upgrading and expansion of Kineton High School 	Various	WCC, Academy, Foundation and other Schools, SDC, private sector	Lifetime of Core Strategy	£27.8 m	CIL, S106, Academy Funding, other	Critical
	Developer	WCC	Phases 2-4 (some provision by 2019/20)	£5.7 m	CIL	Critical
Special Needs Provision (primary and secondary)	WCC	Other education providers, developers	Lifetime of Core Strategy	£380,000	S106	Critical

3 – Primary and Acute & Community Health Services' Infrastructure

Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
Primary Health Care						
a) Stratford-upon-Avon: approx. 2 clinical rooms and associated infrastructure	South Warwickshire Core Commissioning Group (CCG)	Developers, Public Health Warks, NHS England, NHS Property Services, GPs and other private sector, SDC	Lifetime of Core Strategy	a) £61,000 +	a) S106 and/or CIL	Critical
b) LSVs and other rural: approx. 2 clinical rooms and associated infrastructure				b) £61,000 +	b) S106 and/or CIL	Critical
c) New 4GP practice facilities at Gaydon/Lighthorne Heath				c) £2.2 m (gross)	c) S106	Critical

<p>Community and Acute Hospital Services' Infrastructure</p> <p>a) A new ward block at the Warwick Hospital site - the main acute hospital services site</p> <p>b) A new hospital at the Stratford Hospital site including outpatient, diagnostic, treatment and inpatient facilities and a hub for community healthcare teams</p>	<p>South Warwickshire NHS Foundation Trust</p>	<p>WCC, SDC, primary health organisations</p>	<p>Lifetime of Core Strategy</p>	<p>a) £24m of which some £17m sought from CIL or S106</p> <p>b) £44m of which some £18.7m sought from CIL or S106</p>	<p>Private borrowing, charitable donations, S106, CIL</p>	<p>Critical</p>
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4 –Green Infrastructure, Open Space and Sports Provision						
Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
<p>Green Infrastructure (biodiversity aspects)</p> <p>The Coventry Solihull and Warwickshire Biodiversity Action Plan for Stratford-upon-Avon District. Projects to be identified on an on-going basis; including on-site and off-site measures by developers; agri-environment schemes; local projects identified by Town and Parish Councils in Neighbourhood Development Plans and Parish Plans etc.</p>	<p>Various</p>	<p>WCC, SDC, Parish and Town Councils, land owners, others</p>	<p>Lifetime of Core Strategy</p>	<p>Biodiversity Action Plan estimated to cost £792 per annum in Stratford District</p>	<ul style="list-style-type: none"> • Grants (landfill tax, HLF etc. • Developers/ land owners with on-site green infrastructure; • Biodiversity offsetting; • CIL; • Agri-environment schemes; • Environment Agency; • Voluntary sources; • Town & Parish Councils (CIL monies) 	<p>Some provision critical</p>

Open Space and Sports Provision (Details in Open Space Needs Assessment)						
Stratford-upon-Avon <ul style="list-style-type: none"> • Parks, Gardens and Amenity Greenspace (PGA) • Provision for Children and Young People (CYP) • Accessible Natural/Semi Natural Greenspace (ANG) • Allotments/Community Orchards (ACO) <p>Includes provision at West of Shotton, Canal Quarter Linear Park and upgrading of Stratford Leisure Centre</p>	Developer	SDC, Town Council, other	Phase 1 to 4	n/a	<ul style="list-style-type: none"> • Shotton and Canal Quarter S106 (on-site provision or financial payment for off-site provision or enhancement of existing facilities) • Elsewhere S106/CIL 	Some provision critical
Gaydon/Lighthorne Heath New Settlement <ul style="list-style-type: none"> • PGA • CYP • ANG • ACO <p>Also</p> <ul style="list-style-type: none"> • Outdoor and Indoor Sports (OIS), including provision of a community sports facility including a swimming pool and sports hall, to serve this and surrounding villages, on or off-site 	Developer	SDC, Parish Council, other	Phase 2 to 4	n/a	<ul style="list-style-type: none"> • S106 (on-site provision) <p>S106/CIL/Other</p>	Critical
Main Rural Centres <p>Various requirements across the MRCs (details in Needs Assessment) including all the following typologies in at least one centre:</p> <ul style="list-style-type: none"> • PGA • CYP • ANG • ACO • OIS 	Developers	Town and Parish Councils	Phase 1 to 4	n/a	<ul style="list-style-type: none"> • S106/CIL • Town & Parish Councils 	Some provision critical
Local Service Villages <p>Various requirements across the LSVs (details in Needs Assessment):</p> <ul style="list-style-type: none"> • PGA (especially in category 1 LSVs) • CYP • ACO (especially in categories 2, 3 and 4 LSVs) 	Developers	Parish Councils	Phase 1 to 4	n/a	<ul style="list-style-type: none"> • S106/CIL • Parish Councils 	Some provision critical

Indicative Projects (to meet future needs [using CIL/S106] and address shortfalls/other objectives [using other sources of funding])						
a) Improvement to pathways, new signage and seating at the Recreation Ground and ground reinstatement to redevelop existing surfaces at North Recreation Ground and Bancroft Gardens (PGA)	SDC	Public Health Warwickshire	Lifetime of Core Strategy	£550,000	<ul style="list-style-type: none"> • Lottery Funds • CIL/S106 • Capital/ Revenue Budgets 	
b) Tree planting on all existing sites to mitigate climate change through provision of greater shade and tree species suited to changing weather patterns (PGA)	SDC	Public Health Warwickshire, WCC Ecology	Lifetime of Core Strategy	£31,000	<ul style="list-style-type: none"> • The Landscape Group Carbon Offsetting • The Tree Council • Landfill Tax Credits 	
c) 3 Outdoor Gyms to be installed in Stratford Town and the main rural centres across the District (PGA/CYP)	SDC or Town/ Parish Council	SDC or Town/ Parish Councils, Public Health Warwickshire	Lifetime of Core Strategy	£15k per facility	<ul style="list-style-type: none"> • CIL/S106 • External play space related grants • Town & Parish Councils 	
d) Creation of pathways and some signage and seating at Shottery Fields and Bridgetown Meadowlands (ANG)	SDC	Public Health Warwickshire	Lifetime of Core Strategy	£50,000	<ul style="list-style-type: none"> • S106/CIL • Capital and Revenue Budgets 	
e) Enhancement and development of the Warwick Road Lands, Stratford-upon-Avon, to include pathway improvements, information boards to improve accessibility to nature and education on the site (ANG)	SDC	Public Health Warwickshire, WCC Ecology	Lifetime of Core Strategy	£100,000	<ul style="list-style-type: none"> • Landfill Tax Credits • Lottery Funds • CIL/S106 	
f) Creation of landscaped wildflower meadow within Stratford-on-Avon (ANG)	SDC or Town/ Parish Council	Public Health Warwickshire, WCC Ecology, Parish/Town Councils	Lifetime of Core Strategy	£20,000	<ul style="list-style-type: none"> • Town & Parish Councils • Prince Charles fund • CIL/S106 	
g) 7 Multi Use Games Areas (MUGA's) to be installed in Stratford Town and the Main Rural Centres across the District (CYP)	SDC or Town/ Parish Councils	Public Health Warwickshire	Lifetime of Core Strategy	£100k per facility	<ul style="list-style-type: none"> • CIL/S106 • External health related grants • Town & Parish Councils 	

h) 5 Measured Miles (400 metre loop) and improved signage (Rural & urban) to be installed in Stratford Town and the Main Rural Centres across the District	SDC or Town/ Parish Council	SDC or Town/ Parish Councils, Public Health Warwickshire	Lifetime of Core Strategy	Rural £50k per facility £10k Urban signage	<ul style="list-style-type: none"> • CIL/S106 • External health related grants • Town & Parish Councils
i) Enhancement of destination play spaces – recreation ground and skate park (play equipment) (CYP)	SDC or Stratford Town Council	Town/ Parish Councils, Public Health Warwickshire	Lifetime of Core Strategy	£1m per facility	<ul style="list-style-type: none"> • CIL • SDC Capital /Revenue Budgets • External health related grants
j) Enhancement of local play spaces arising from greater use linked to the new development. To include play equipment and landscaping to create contours ('lumps and bumps') to promote increased and different usage (CYP)	SDC or Town/ Parish Council	SDC or Town/ Parish Council, Public Health Warwickshire	Lifetime of Core Strategy	£20k per facility	<ul style="list-style-type: none"> • S106 • SDC Capital Revenue Budgets • External health related grants
k) Enhancement of the 3 District Council leisure centres outside of Stratford Town (including possible provision of a sports hall at Shipston to serve the town and surrounding villages including Brailes, Treddington and Long Compton) (OIS).	SDC or WCC or Town & Parish Councils	Public Health Warwickshire	Lifetime of Core Strategy	£150k per facility (more if incl new sports hall)	<ul style="list-style-type: none"> • CIL • SDC Capital/ Revenue Budgets • External health related grants
l) Creation of new allotments/community orchards across the District (ACO)	Town & Parish Councils	Public Health Warwickshire SDC	Lifetime of Core Strategy	£50,000	<ul style="list-style-type: none"> • CIL/S106 • Town & Parish Councils • Lottery Funds • Capital / Revenue Budgets • The Tree Council • Natural England • Landfill Tax Credits • DEFRA

5 - Emergency Services						
Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
Police						
a) Custody provision : additional cells	Warwickshire Police	Developers, WCC, SDC	Lifetime of Core Strategy	TBC	CIL, other sources	
b) Other police equipment and costs including vehicles, communications technology and surveillance equipment	Warwickshire Police	Developers, WCC, SDC	Lifetime of Core Strategy	£0.5 m	CIL	
c) A Safer Neighbourhoods Unit is likely to be required at the new settlement at Gaydon/Lighthorne Health	Warwickshire Police	Developers, WCC, SDC	Phase 3	£450,000	S106	Critical
Ambulance Service						
The service has recently implemented a premises review. There are no further requirements known during the plan period.	West Midlands Ambulance Service	n/a	n/a	n/a	n/a	
Fire & Rescue						
Proposed new service delivery point at Jaguar Land Rover	Warwickshire Fire & Rescue Service (WRFS)	Jaguar Land Rover	Phase 1	£0.5 m	CLG Transformation Funding Application	Critical to proposed response model
Provision of hydrants	Developers	WFRC	Lifetime of Core Strategy	n/a	S106/development costs	Some critical
Possible future project for Low Water Areas	WFRS	Private sector, WCC, SDC	TBC	n/a	CIL, other sources	

6 – Water and Utility Services						
Infrastructure	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
<p>Water Supply and Waste Water Treatment</p> <p>1. Water Supply – development of a new settlement at Gaydon/ Lighthorne Heath will require upgrading of the water supply infrastructure.</p> <p>2. Waste Water The following Waste Water Treatment Works are likely to need upgrading:</p> <ul style="list-style-type: none"> • Wellesborne • Cherington • Gaydon • Priors Marston • Tysoe <p>This list derives from the Council's Water Cycle Study Update 2014 which assessed the capacity of the District's WwTWs to accommodate the Core Strategy's proposed level and distribution of growth. There may be additional WwTWs that require further work over the plan period but these were not identified in that study.</p> <p>Certain areas of the foul drainage network will also need upgrading, especially in relation to the proposed new settlement at Gaydon/ Lighthorne Heath.</p>	Severn Trent Water	Private developers, Environment Agency, SDC	Phases 2- 4	n/a	Severn Trent Water (private developers for on-site works and local connections)	Critical
Strategic Flood Risk Assessment (SFRA)	SDC	WCC, other districts and boroughs, Environment Agency	Every 5 years during lifetime of Core Strategy	£8,000 per SFRA; 3 further FRAs are likely to be needed by 2031	Revenue Reserves, CIL	Critical
Flood Alleviation and Defences	Environment Agency	Defra, WCC, SDC, STW, landowners/ developers,	Phases 2-3	£2.0 - £2.9 m	Environment Agency (FDGiA, Local Levy), commercial	Critical

<p>alleviate flood risk on the Birmingham Road and at the Maybird Centre. This scheme will require partnership funding to secure delivery.)</p> <p>The 2014 SFRA identified potential further works to flood defences at Snitterfield, Southam, Cherington and Fenny Compton but these will not generally be related directly to new growth (use of SuDS and water recycling measures will ensure no developments increase flood risk). CIL/S106 may be sought where the works will facilitate further growth. S106 may also be required to deal with on-site or downstream flooding on large developments (e.g. to deal with surface water flooding at Gaydon as part of the new settlement proposals).</p> <p>Improvements to the Alveston Manor Junction may provide an opportunity to alleviate flood risk along the Shipston Road and should be investigated as part of these works</p> <p>School re-development or expansion may provide opportunities to install SuDS features to mitigate against loss of green areas. SuDS features such as ponds can provide educational benefit.</p>	<p>Environment Agency</p> <p>Environment Agency</p> <p>Various</p>	<p>Town and Parish Councils</p> <p>Defra, WCC, SDC, landowners/ developers, Town and Parish Councils</p> <p>WCC/ Highways Agency/ Local Community</p> <p>WCC (education)/ Academy schools/ EA</p>	<p>Phases 3-4</p> <p>Phase 2</p> <p>Lifetime of Core Strategy</p>	<p>n/a</p> <p>n/a</p> <p>n/a</p>	<p>contributions, STW at Racecourse Brook</p> <p>Environment Agency (FDGiA, Local Levy), STW, commercial contributions, S106/CIL</p> <p>Food Defence Grant in Aid Funding from EA</p> <p>EA, WCC, S106/CIL</p>	
Surface Water Management Plan and Local Flood Risk Management Strategy	WCC	EA, SDC, landowners/ developers, Town and Parish Councils	Lifetime of Core Strategy	n/a	WCC	Critical
Gas and Electricity	National Grid	Western Power Distribution, private developers, SDC	Lifetime of Core Strategy	n/a	Utility (power) companies and developers	Critical
Renewable/Low Carbon Energy Projects	Various	Various	Lifetime of Core Strategy	n/a	Allowable solutions fund, CIL, other	

<p>Improving Telecommunications Stratford-on-Avon District Local Broadband Plan (part of the Coventry, Solihull and Warwickshire Superfast Broadband Project)</p> <p>Further development of strategic network after completion of the Coventry, Solihull and Warwickshire Superfast Broadband Project</p> <p>Connections to the strategic network (or ducting to the public highway/other suitable location) to be made by developers of all new premises.</p>	<p>Coventry Solihull and Warwickshire Broadband Partnership (CSWBP) and private contractor (British Telecom)</p> <p>Various</p> <p>Developers</p>	<p>SDC, LEP, Parish and Town Councils, Coventry University, DEFRA, European Commission</p> <p>Private contractors of telecom services, SDC, Town & Parish Councils</p> <p>Various</p>	<p>Government funds to be spent by 2015; Overall plan to be complete by 2018.</p> <p>Lifetime of Core Strategy</p> <p>Lifetime of Core Strategy</p>	<p>£14.47 million across the CSW partnership area</p> <p>n/a</p> <p>n/a</p>	<p>Central government; CSWBP, European Regional Development Fund (ERDF), Lottery Funds, DEFRA, CIL, British Telecom</p> <p>Government Grants, CIL, Town and Parish Councils, commercial sources, other</p> <p>Part of normal development costs</p>	
<p>Waste Capital investment to deal with additional household waste at the Household Waste Recycling Centres.</p>	<p>WCC</p>	<p>SDC, other</p>	<p>Lifetime of Core Strategy</p>	<p>£1.0 m</p>	<p>CIL, other</p>	

7 – Other Social Infrastructure

Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
<p>Libraries a) support to library service including community libraries (stock purchase and E-services)</p>	<p>a) WCC or Town & Parish Councils</p>	<p>a) SDC, WCC/Town & Parish Councils</p>	<p>a) Lifetime of Core Strategy</p>	<p>a) 115,000</p>	<p>a) CIL, Town & Parish Councils</p>	

b) new library and community meeting space at Gaydon/Lighthorne Heath new settlement	b) developer	b) WCC, SDC, PC	b) Phase 3	b) £1.9 m	b) S106	
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Table 2: Infrastructure Trajectory for Gaydon/Lighthorne Heath New Settlement and JLR Employment

SCENARIO 2 - JLR extant plus Gaydon Lighthorne Heath housing and JLR employment	Phasing	0	0	120	170	170	170	170	170	170	170	170	170	170	170	170	170	170
	Cum Total	0	0	120	290	460	630	800	970	1140	1310	1480	1650	1820	1990	2160	2330	2500
Scheme Reference/Infrastructure Requirement	Cost (£ m)	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
Transport																		
1. M40 Junction 12 northbound on-slip lane	3.00					3.00												
2. Extended right turn lane at Gaydon junction (< 100m)	0.10							0.10										
3. B4100 widening (Heritage Motor Centre to M40 Junction 12) (extra lane s'bound)	1.00							1.00										
4. M40 capacity enhancements - lane gains/lane drops between Jn 12 and 13	5.00							5.00										
5. Signalisation of M40 Junction 13 northbound off-slip	0.30							0.30										
6. Widening of Fosse Way/Southam Road roundabout	0.50							0.50										
7. Contingency for localised traffic impacts in villages only	2.50							2.50										
8. Fosse Way/Chesterton Road/Harbury Lane junction improvements	0.40							0.40										
9. Right turn bay into Meadow Close/Spinney Close off B4100 Chesterton Hill	0.10				0.10													
10. Signalisation of Greys Mallory	0.15							0.15										
11. Dualling of A452 Europa Way corridor	8.50							8.50										
12. Widening of A452 Europa Way/Harbury Lane Roundabout	0.75							0.75										
13. A452 Banbury Road/Gallows Hill northbound flare/Warwick Tech Park roundabt	0.45							0.45										
14. A425 Myton Road/Banbury Road signals	0.50							0.50										
Other Infrastructure																		
15. New primary school (3 FE) with co-located nursery	6.0					6.0												
16. Contribution to Kineton Secondary School (via CIL)	5.7						5.7											
17. New 4 GP Facility (646 sqm)	2.30							2.30										
18. Safer Neighbour Team Premise (potentially co-located)	0.45									0.45								

19. Provision of public open space, children's play space and leisure.	0.00																	
20. Provision or improvement of libraries and community facilities	1.90										1.9							
Total S106/278 costs including items shared with WDC Local Plan	39.6	0	0	0	0.1	9.0	5.7	22.45	0	0	2.35	0	0	0	0	0	0	0

Notes:-

(a) Schemes 10-14 also funded by WDC Local Plan

(b) JLR extant planning permission assumed to be fully built-out by 2015/16

(c) The transport estimates of when mitigation would be required are based on a high-level assessment of predicted highway network conditions in relation to the proposed housing trajectory

(d) Assuming (b) no more than 500 houses could be accommodated without Scheme 1

(e) Scheme 9 would be required with 200 - 500 dwellings

(f) It is assumed that all JLR employment would be built-out before 2021 - the full mitigation package would therefore be required by 2021 and may be required prior to this depending on the actual employment trajectory

(g) Scheme 7 provides a contingency sum for schemes yet to be identified and is based on a rate of £1,000 per dwelling as adopted at the former Rugby Radio Station Site

(h) Costs related solely to the new settlement and not the expansion of JLR ('Scenario 1') are reported in the report: Viability and Delivery of Strategic Sites, Peter Brett Associates, April 2014

Table 3: Infrastructure Trajectory for Canal Quarter (SUA 1) and Related Employment Sites (SUA 2 and SUA 3)

		Phasing	0	0	0	0	40	55	55	55	55	55	55	55	55	55	55	55	55
Scheme Reference/Infrastructure Requirement		Cum Total	0	0	0	0	40	95	150	205	260	315	370	425	480	535	590	645	700
Canal Quarter SUA 1	CIL or S106/S278	Cost (£ m)	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
1. A4390/B493 Evesham Place Roundabout	CIL or S106/S278 and other sources	0.23										0.23							
2. A3400 Birmingham Road		0.49																0.49	
3. A46/A3400 Bishopton Roundabout		0.73										0.73							
4. A46/A422 Wildmoor Roundabout		0.73											0.73						
5. Extension/modernisation of existing health premises	CIL	0.06											0.06						
6. Improvements to Community Centre and Library Provision	CIL	0.35											0.35						
7. New 1 FE primary provision (off site)	CIL	2.25													2.25				
8. Secondary School Place contributions	CIL	1.50													1.5				
Stratford Transport Package (+ contingency)																			
9. A3400 Alveston Manor and Shipston Rd/A422 Banbury Rd Roundabt	CIL	0.30																	
10. A3400 Bridgefoot/Bridgeway Gyratory	CIL	0.24																	
11. A3400 Shipston Road/B4632 Clifford Lane Roundabout	CIL	0.32																	
12. A3400 Shipston Road/A4390 Seven Meadows Road Roundabout																			
13. Strategic Signing Improvements	CIL	0.29																	
14. Shakespeare Street/Mulberry Street one-way	CIL	0.06																	
15. Guild Street/Gt. William Street traffic signals	CIL	0.06																	
16. A46/A4239 Marraway Roundabout	CIL	0.04																	
17. A3400 Bridgeway/A439 Warwick Road	CIL	0.04																	
18. Contingency for unforeseen traffic impacts	CIL	0.70																	
Total Cost (S106/278 + potential CIL funded items)		8.39	0	0	0	0	0	0	0	0	0	0.96	1.14	0	3.75	0	0	0.49	0

Employment sites SUA 2 and SUA 3																			
20. A46/A3400 Bishopton Roundabout	S106/S278	0.4										0.4							
21. A46/A422 Wildmoor Roundabout	S106/S278	0.4										0.4							
Total Cost SUA 2 and SUA 3 (S106/278)		0.8	0	0	0	0	0	0	0	0	0	0.4	0.4	0	0	0	0	0	0

Notes:-

NB. This schedule includes details of transportation (highways) infrastructure, health, education and other community facilities. Additional S106 may be sought in relation to provision and maintenance of open space and other aspects. The Stratford Transport Package is shown as CIL funded as while critical to the delivery of the Canal Quarter, this is also required to deal with growth elsewhere in the District. CIL may also be spent on mitigating other cumulative impacts besides those transportation items listed.

- (a) The estimates of when mitigation would be required are based on a high-level assessment of predicted highway network conditions in relation to the proposed housing trajectory.
- (b) **Scheme 9** would be required with 250 - 500 dwellings.
- (c) **Scheme 10** would be required with 500 - 1,000 dwellings.
- (d) **Scheme 1** is also required to accommodate the effects of change in traffic movements at this junction following the delivery of the Stratford Western Relief Road (SWRR) which will exacerbate issues which are likely to occur as a result of the overall growth within the area.
- (e) **Schemes 11 and 12** are intrinsically linked and should be delivered as a single scheme. Implementation would need to follow the capacity improvements provided by Schemes **1, 9 and 10**.
- (f) **Scheme 2** is required to accommodate the additional vehicle demands released onto the network by Schemes 1 to 5.
- (g) **Schemes 3 and 4** should be considered for early implementation due to the strategic nature of the trips that are affected by development impact coupled with the need to ensure the operation of the A46 Strategic Road Network is maintained throughout the Core Strategy period.
- (h) **Scheme 13** would encourage traffic to use the A439 Warwick Road for inbound trips as an alternative to A3400 Birmingham Road where capacity is constrained.
- (i) **Scheme 18** provides a contingency sum for schemes yet to be identified and is based on a rate of £1,000 per dwelling as adopted at the former Rugby Radio Station site.

Schemes 1 to 4 and 9 to 18 are apportioned costs of larger infrastructure projects (for total costs see Table 1). The amounts presented here (Table 3) relate to estimates of direct mitigation costs and could be paid as S.106/278 with the remainder coming from other sources. Alternatively the whole projects could be funded through CIL from this and other projects.

Appendix 2. Assessment of land parcels on the edge of Stratford-upon-Avon for their availability and suitability for employment development

This assessment compares the site identified as Proposal SUA.3 in the Proposed Submission Core Strategy with other areas of land on the periphery of the town. The main purpose of this assessment is to help justify the allocation of this site and its removal from the Green Belt.

Site Ref.	Current use	Current status	Designations	Landscape	Significant constraints	Availability for employment	Conclusion
1	Agriculture	n/a	Green Belt Proposed Special Landscape Area	Rising Mature hedges Visible	Access off A46	Not known	Reject - landscape impact and no suitable access
2	Agricultural Commercial Unused	n/a	Green Belt Proposed Special Landscape Area	Flat Mature hedges Enclosed	None	Yes	Support – but mitigate landscape impact
3	Agricultural	n/a	Green Belt	Flat Mature hedges Visible	None	Not known	Reject – landscape and visual impact
4	Landfill and refuse tip	n/a	Green Belt	Flat Visible	Landfill	No	Reject - not available and contaminated
5	Agricultural	n/a	Green Belt	Undulating Mature hedges Visible	Access off A46 or Ridgeway	Not known	Reject - landscape and visual impact and no suitable access
6	Agricultural	n/a	None	Flat/rising Mature hedges Visible	Access off A46 or Bishopton Lane	No – being promoted for housing development	Reject – not available, visual impact and no suitable access
7	Agricultural	n/a	Green Belt	Flat Visible	Access off A46	Not known	Reject – landscape and visual impact, no suitable access
8	Agricultural	n/a	None	Flat Mature hedges Visible	None	Yes	Support – but mitigate landscape and visual impact

Site Ref.	Current use	Current status	Designations	Landscape	Significant constraints	Availability for employment	Conclusion
9	Agriculture	n/a	None	Rising Mature hedges Visible	None	Yes	Reject – landscape and visual impact, and too small
10	Agriculture	Planning permission granted for housing development (part of West of Shottery scheme)	None	Rising Mature hedges	None	No	Reject – not available
11	Agriculture	Planning permission granted for open space (part of West of Shottery scheme)	None	Rising Mature hedges	Setting of Shottery Conservation Area/Anne Hathaway's Cottage	No	Reject – not available
12	Agriculture	Planning permission granted for housing development (part of West of Shottery scheme)	None	Flat	None	No	Reject – not available
13	Agriculture	n/a	None	Rising Visible	Access off Bordon Hill	No – being promoted for housing development	Reject – not available, landscape and visual impact and no suitable access
14	Agriculture	n/a	None	Rising Visible	Access off Bordon Hill	Not known	Reject – landscape and visual impact and no suitable access

Site Ref.	Current use	Current status	Designations	Landscape	Significant constraints	Availability for employment	Conclusion
15	Agriculture	n/a	SSSI (part) Area of Restraint	Flat Visible	Flood risk Access	Not known	Reject – landscape and visual impact, risk of flooding, ecological impact and no suitable access
16	Racecourse	n/a	Area of Restraint	Flat Visible	Flood risk Access	No	Reject – not available, landscape and visual impact, risk of flooding and no suitable access
17	Agriculture	n/a	Area of Restraint	Flat Mature hedges	Flood risk	Not known	Reject – visual impact, risk of flooding
18	Agriculture	Planning permission granted for marina	Area of Restraint	Flat/rising Visible	None	Not known	Reject – landscape and visual impact and located south of river*
19	Agriculture	n/a	Conservation Area Area of Restraint	Flat Visible	Flood risk	Not known	Reject – risk of flooding, landscape and visual impact, impact on Conservation Area and setting of town and located south of river*
20	Public open space	n/a	Conservation Area Area of Restraint	Flat visible	Flood risk Access	No	Reject – not available, risk of flooding, no suitable access, landscape and visual impact, impact on Conservation Area and

Site Ref.	Current use	Current status	Designations	Landscape	Significant constraints	Availability for employment	Conclusion
							setting of town and located south of river*
21	Agriculture	n/a	None	Flat Visible	None	Not known	Reject – visual impact and located south of river*
22	Open space	n/a	Community Woodland & Meadowland	Undulating Mature hedges Visible	None	No	Reject – landscape and visual impact, not available and located south of river*
23	Open space	n/a	Community Woodland & Meadowland	Flat Mature hedges Visible	None	No	Reject – not available, landscape and visual impact, not available, too small and located south of river*
24	Agriculture	n/a	None	Undulating Mature hedges Visible	None	No – being promoted for housing development	Reject – landscape and visual impact and located south of river*
25	Agriculture	n/a	None	Undulating Mature hedges Visible	None	Yes – as part of South East Stratford Urban Extension	Reject – landscape and visual impact and located south of river* NB. unless Urban Extension with associated Eastern Relief Road is implemented
26	Agriculture	n/a	None	Undulating Mature hedges	Access	No – being promoted for	Reject – landscape and visual impact, no

Site Ref.	Current use	Current status	Designations	Landscape	Significant constraints	Availability for employment	Conclusion
						housing development	suitable access and located south of river*
27	Agriculture	n/a	None	Rising Mature hedges Visible	Access/traffic	No – being promoted for housing development	Reject – not available, landscape and visual impact, no suitable access and located south of river*
28	Agriculture	n/a	None	Flat Visible	Access/traffic	No – being promoted for housing development	Reject – not available, landscape and visual impact, no suitable access and located south of river*
29	Agriculture	n/a	None	Flat Visible	Access/traffic	No - being promoted for housing development	Reject – landscape and visual impact, no suitable access and located south of river*
30	Agriculture Allotments	n/a	None	Flat Visible	Access/traffic	No - being promoted for housing development	Reject – landscape and visual impact, traffic impact and located south of river *
31	Agriculture Sports pitches	n/a	None	Flat Visible	Access/traffic	No - being promoted for housing development	Reject – landscape and visual impact, traffic impact, loss of pitches and located south of river *
32	Golf course	n/a	None	Flat	Access/traffic	Not known	Reject – not available, landscape

Site Ref.	Current use	Current status	Designations	Landscape	Significant constraints	Availability for employment	Conclusion
							and visual impact, loss of golf course, no suitable access and located south of river *
33	Agriculture Caravan site	n/a	Ancient Monument (part)	Flat Mature hedges Visible	Flood risk	Not known	Reject – landscape and visual impact, traffic impact, archaeological impact, risk of flooding and located south of the river *
34	Unused Previous landfill	n/a	Area of Restraint Local Wildlife Site	Flat Mature hedges Visible	Flood risk Landfill	Not known	Reject – landscape and visual impact, risk of flooding, ecological impact, visual impact and risk of contamination
35	Unused	n/a	Area of Restraint	Flat Mature hedges Visible	Flood risk	Not known	Reject – landscape and visual impact and risk of flooding
36	Agriculture	n/a	Green Belt Proposed Special Landscape Area	Rising Mature hedges Visible	None	Not known	Reject – landscape and visual impact
37	Golf course	n/a	Green Belt	Undulating Visible	None	No	Reject – visual impact and not available
38	Public open space	n/a	Proposed Special Landscape Area	Flat	Access/traffic	Not known	Reject – landscape and visual impact, no suitable access, traffic impact and too small

Site Ref.	Current use	Current status	Designations	Landscape	Significant constraints	Availability for employment	Conclusion
39	Agriculture	n/a	Green Belt Proposed Special Landscape Area	Rising Mature hedges Visible	Access/traffic	Not known	Reject – landscape and visual impact, no suitable access, traffic impact, landscape and visual impact
40	Agriculture	n/a	Green Belt Proposed Special Landscape Area	Rising Mature hedges Visible	Access off A46	Not known	Reject – landscape and visual impact, no suitable access, landscape and visual impact
41	Agriculture	Planning permission granted for housing	None	Flat Mature hedges Visible	None	No	Reject – landscape and visual impact, and not available
42	Housing development	Under construction	None	n/a	n/a	No	Reject – not available
43	Park-and-ride facility	n/a	None	n/a	n/a	No	Reject – not available
44	Residential, guest house	n/a	Listed buildings	Enclosed	Access	Not known	Reject – impact on listed buildings, no suitable access and too small

* Businesses generally find locations south of the river unattractive due to poorer accessibility to the strategic road network. This is evident from the lack of take-up of plots on the Stratford Business and Technology Park on Banbury Road. It should be noted that this argument was made by the owner in support of developing the remainder of the site for housing, which was accepted by the District Planning Authority.



Stratford-upon-Avon