

# Sustainability Appraisal Addendum

To	Fiona Blundell, Stratford-on-Avon District Council
From	Sarah Smith, Lepus Consulting
Subject	Addendum to May 2014 Sustainability Appraisal of the Stratford-on-Avon Core Strategy
Code	LC-0005
Date	September 2014
CC	Sean Nicholson, Neil Davidson



## Summary

*This addendum has been produced to address consultation comments made on the SA/SEA Report that accompanied the Proposed Submission Core Strategy (hereafter referred to as the May 2014 Report). A number of comments suggested that the Report did not outline the rationale for selecting the preferred options in sufficient detail; the reasons why the rejected options were not taken forward and the justification for selecting the preferred approach. The Addendum also screens the proposed modifications and assesses one proposed new policy. It also provides detailed responses to other comments received on the May 2014 Report, not related to the assessment of reasonable alternatives. Where appropriate, this addendum presents planning information outside of the SA process, which has contributed to the preparation of the Core Strategy.*

## Introduction

1. National Planning Practice Guidance states:

*“The sustainability appraisal should **outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.** It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan.”*

Paragraph: 018 Reference ID: 11-018-20140306. Revision date 06 03 2014

2. It is acknowledged that whilst the SA/SEA Report did include a section on reasonable alternatives this was not always explicit in saying why options had been selected, rejected or taken forward. Recent Case Law confirms that Articles 4 and 8 of the SEA Directive require an environmental assessment to be carried out before the Plans adoption<sup>1</sup>. As SA/SEA is an iterative process up until adoption the District Council took the decision to produce this addendum to the May 2014 Report.
3. This addendum draws on information from previous documentation. It does not introduce any new arguments in relation to the identification, evaluation and selection of options.

<sup>1</sup> Cogent LLP v Rochford District Council, 21/09/2012

4. A further addendum (or if necessary a revised SA/SEA Report) will be produced following the Examination into the Core Strategy, prior to adoption of the Core Strategy, and can incorporate the text in this addendum together with any other changes required following receipt of the Inspector's Report.
5. This addendum includes an assessment of one proposed new policy (Appendix A). It also screens the proposed modifications for any other potential significant environmental effects and any significant impacts on European Sites (Appendix B). It also provides a response to detailed comments made on the May 2014 Report.

### **Structure**

6. Information on how the Core Strategy evolved and how options were considered is included in Section 1.8 of the May 2014 SA Report. Section 3 and supporting Appendices of the May 2014 Report set out the reasonable alternatives considered in chronological order. It is accepted that, whilst it was available from other published sources, full information on why rejected options were not taken forward and the reasons for selecting the preferred approach was not always clearly stated in the report. This addendum addresses that point and recaps the housing requirement considered during each of the iterations as this was also material to the options considered. The rejection and selection of alternatives is a Council decision. The reasons for reflecting and selecting alternatives include wider planning considerations and these have also been included in this report where appropriate.
7. A detailed response to comments made on the May 2014 Report is also provided at the end of this Addendum (Appendix C).

### **Part 1 Options SA Report - October 2011**

8. Section 3.2 of the May 2014 SA Report refers to this report. It included a review of the SA work which accompanied the earlier versions of the Consultation Draft Core Strategy in 2008 and 2010. It assessed the six initial spatial development options and included an assessment of the four housing development dispersal options set out in the Consultation Draft Core Strategy 2010.
9. The Consultation Draft Core Strategy considered how to accommodate an increase in housing requirement to 7,500 homes to 2021, and then by a further 2,500-3,000 to 2026 as put forward by the Panel of Inspectors in considering revisions to the Regional Spatial Strategy.
10. The six Initial Options included in this SA Report are reproduced below in Table A1. Comments on whether or not options were taken forward at that time and why are also included. The performance of the Options is summarised in Appendix B of the May 2014 Report.

**Table A1:** Initial Options

Option	Outcome
<b>Initial Option 1:</b> Concentrate development in and on the edge of Stratford-upon-Avon	Concentrating a considerable amount of development in Stratford-upon-Avon would be harmful to the character and setting of the town. There are also significant infrastructure constraints that would have to be overcome to the satisfaction of various agencies.
<b>Initial Option 2:</b> Concentrate development in and on the edge of larger rural towns and villages	Concentrating development on larger rural settlements would also be harmful to their character. There is insufficient capacity for achieving the required scale of development in these settlements in a satisfactory manner.
<b>Initial Option 3:</b> Spread development around most towns and villages throughout the district	Preferred option at the time. It was noted that the manner in which this approach was put into effect should reflect and be sensitive to the specific circumstances of each settlement. It should focus on settlements that can support local facilities (existing or potential) and/or have good access, preferably by modes other than the private car, to nearby settlements that have such facilities.
<b>Initial Option 4:</b> Focus development in the form of a new settlement or as a major expansion of an existing settlement	It is likely to come into the reckoning only if the housing requirement for Stratford District is increased significantly to the extent that the scale of growth could not be met satisfactorily in existing settlements.
<b>Initial Option 5:</b> Locate development along main public transport routes (existing or potential)	There are insufficient, high quality, public transport routes across the District to make this a viable approach in itself. The preferred option (Option 3) provides some scope to improve the linkages between villages and the larger settlements in the District.
<b>Initial Option 6:</b> Focus development on large brownfield (previously developed) sites in the countryside.	Raises concerns over whether such sites are in appropriate locations to achieve other important objectives. They tend to be some distance from existing services and facilities, would be heavily dependent on car-borne transport and not meet the needs of people and businesses in an effective manner.

11. In the February 2010 draft of the Core Strategy, Option 3 was proposed as the preferred approach because it was considered to be the most appropriate compared with all other reasonable options available. The dispersed approach had the following components:

- A significant amount of development within and on the edge of Stratford-upon-Avon;
- A significant amount of development in the larger rural towns and villages, but with a varying amount in each reflecting the specific constraints and opportunities that apply and the importance of retaining their individual character and distinctiveness;

- An allowance for some development in the smaller villages, to provide scope for the needs of these communities to be met and to help sustain the services that they support;
- Some scope for housing development to be provided on the large rural brownfield sites in the District.

### Part 2 Options SA Report – November 2011

12. Section 3.3 of the May 2014 Report discusses three housing requirement options to 2028. These were not taken forward because of new information becoming available later in the plan preparation process in accordance with the National Planning Policy Framework and the revocation of the West Midlands Regional Spatial Strategy.

### Part 3 Housing Development Options SA Report – January 2012

13. Section 3.4 of the May 2014 Report discusses this iteration. This is the third and final assessment of Housing Development Options (2011) and was produced in January 2012.
14. The report was prepared in the context of a figure of 8000 new dwellings during the period 2008-2028.
15. The options considered in the Part 3 SA Report and how they were taken forward are set out below in Table A2. Options A and B relate to the first two options identified at Issues and Options stage with indicative quantum of dwellings identified. Options C to F are permutations of Option C identified at Issues and Options stage.

**Table A2:** Options included in the 2012 Core Strategy

Option	Outcome
A: Focus on Stratford-upon-Avon	This option was only included in the February 2012 Core Strategy as one of the approaches considered in 2010.
B: Focus on Main Rural Centres	This option was only included in the February 2012 Core Strategy as one of the approaches considered in 2010.
C: Moderate Dispersal	This option was only included in the February 2012 Core Strategy as one of the approaches considered in 2010.
D: Extensive Dispersal	This option was only included in the February 2012 Core Strategy as one of the approaches considered in 2010.
E: Focus on Rural Settlements	Option E proposed that 55% of development would go to Local Service Villages and other rural settlements.
F: Wider Dispersal	Option F proposed that 40% of the development total was directed to the Local Service Villages and 10% to the other smaller rural settlements.

16. Option F was presented in the February 2012 Draft Core Strategy as the Preferred Option. Readers should note that Option F (called 'Wider Dispersal') in the February 2012 options assessment process is different to Option A (called 'Further Dispersal') in the January 2014 SA Report, Sustainability Appraisal of the Stratford-upon-Avon Alternative Strategic Options: Consultation Report. Option F (2012) concerned the delivery of 8,000 homes; Option A (2014) concerned the delivery of 10,800 homes.

### Potential Development Options SA Report – January 2013

17. Section 3.5 of the May 2014 Report relates to 84 broad locations that were identified in the Draft Core Strategy published in February 2012, with the SA Report published alongside it.
18. The report was prepared in the context of a requirement of 8000 new dwellings during the period 2008-2028.
19. The results of the assessment are set out in Appendix B of the May 2014 Report. A change of approach following publication of the February 2012 Core Strategy meant that the majority of these sites were not taken forward in subsequent versions of the Core Strategy. Alcester and Southam were the exceptions to this because, despite being two of the largest Main Rural Centres, supporting a wide range of services and facilities, they were experiencing relatively low levels of housing completions at that time. The decision was taken to identify strategic sites that would help redress this. All four sites identified have since received planning permission.

### Potential Strategic Allocations SA Report – June 2013

20. In February 2013 the District Council published a letter stating that the overall scale of housing development and the appropriate distribution and location of this development was under review and that fresh consideration was being given to the role of a new settlement in the District. The letter invited interested persons to bring sites to the attention of the Council.
21. The Intended Proposed Submission Core Strategy (July 2013) was not published for consultation purposes but set out the Council’s intention to increase the housing requirement to 9,500 dwellings for the period to 2028. The Plan made clear the Council’s intention to allocate specific ‘strategic’ development sites in the Core Strategy.
22. Table 3.2 of the May 2014 Report presents the recommendations for 14 of the alternative strategic options submitted following the invitation in February 2013, and considered as part of the preparation of the Core Strategy in June 2013. These options were selected because they could provide development around the required scale.
23. An updated table is provided below (Table A3) and in those instances where a site was not taken forward the reason for this has been added into the table.

**Table A3:** Recommendations for the Alternative Strategic Options

Option	Discussion of reasons behind rejection or progression
<b>Lighthorne Heath / Gaydon</b> <b>Site 1 &amp; 2</b>	Two sites in separate land ownership were considered at this time. The SA concluded that the site performed well against the assessment objectives and depending on the preferences of SDC, as well as the results of other studies, site feasibility and consultation feedback, it could be progressed.  Outcome: Site taken forward for consideration in later work.
<b>South East Stratford</b> <b>Site 3 &amp; 4</b>	Two sites in separate land ownership were considered at this time. The SA concluded that the site performed well against the assessment objectives and depending on the preferences of SDC, as well as the results of other studies, site feasibility and consultation feedback, it could be progressed.

	Outcome: Site taken forward for consideration in later work.
<b>Long Marston Airfield Site 5</b>	The SA concluded that the site performed well against the assessment objectives and depending on the preferences of SDC, as well as the results of other studies, site feasibility and consultation feedback, it could be progressed.  Outcome: Site taken forward for consideration in later work.
<b>Sutton Lane, Brailes Site 6</b>	The SA concluded that the site should be rejected due to its likely adverse effects on biodiversity and landscape. The site is located within the Cotswold AONB. This is also a remote, rural area.  Outcome: Site not taken forward
<b>East of Moreton in the Marsh Site 7</b>	The SA concluded that the site performs well in sustainability terms and it was considered likely that development at this location would have a strong relationship with Moreton-in-Marsh (in Cotswold District) for services and jobs. The potential to use established public transport networks was also identified.  Outcome: This option was not taken forward because the location is not well related to SDC's housing market.
<b>West of Alcester Site 8</b>	The SA concluded that the site performed well against the assessment objectives and depending on the preferences of SDC, as well as the results of other studies, site feasibility and consultation feedback, it could be progressed.  Outcome: This option was not taken forward. The option as presented was for 3000 dwellings. The site is situated in the Green Belt, the site's proximity dual carriageway presents issues around access and severance from Alcester town centre.
<b>North of Wootton Wawen Site 9</b>	The SA concluded that the site performed well against the assessment objectives and depending on the preferences of SDC, as well as the results of other studies, site feasibility as well as consultation feedback it could be progressed.  Outcome: This option was not taken forward. The option as presented was for 1,000 dwellings and a larger scale allocation was being sought at this time. This location is also adjacent to a relatively small settlement and in the Green Belt.
<b>Long Marston Estate Site 10</b>	The SA concluded that the site performed well against the assessment objectives and depending on the preferences of SDC, as well as the results of other studies, site feasibility and consultation feedback, it could be progressed.  Outcome: On 25 November 2013 the Council received an email confirmation from the site owners, St Modwen's, that the Council should only consider an option 1 for an additional 550 dwellings as part of the Council's assessment work. The Council considered that the proposal did not constitute a strategic option and was therefore not assessed further as one of the reasonable alternatives.
<b>Southam Cement Works Site 11</b>	The SA concluded that the site performed well against the assessment objectives and depending on the preferences of SDC, as well as the results of other studies, site feasibility and consultation feedback, it could be progressed.  Outcome: site taken forward for consideration in later work.
<b>Harbury Estate Site 12</b>	The SA concluded that the site performed well against the assessment objectives and depending on the preferences of SDC, as well as the results of other studies, site feasibility as well as consultation feedback it could be progressed.

	Outcome: site not taken forward for consideration in later work. The option as presented was for 1,000 dwellings and a larger scale allocation was being sought at this time.
<b>South of Bidford-on-Avon</b> <b>Site 13 &amp; 14</b>	<p>The SA concluded that this is a very isolated site set in open countryside and not linked to any settlement. An area of flood risk runs down the length of the site. Some of the site has a significant risk of flooding. The SA did not recommend the site for progression.</p> <p>Outcome: This option was not taken forward because it is a relatively remote location that is not well related to SDC's housing market.</p>

24. Other sites that were submitted in response to the February 2013 invitation were considered too small for consideration as a strategic new settlement or as an urban extension and were rejected because of this. These other sites are set out in the table A4 below:

**Table A4:** Other sites submitted following the invitation in February 2013

Site	Reason for not taken site forward as a strategic location for growth
Green Lane, Studley	Capacity of 30 dwellings, not applicable to this exercise
Off Furze Hill Road, Shipton-on-Stour	Capacity of 210 dwellings, not applicable to this exercise, already registered in SHLAA
South of Daventry Rd Southam	Capacity of 400 dwellings, not applicable to this exercise, already registered in SHLAA
East of Alcester Rd, Studley	Capacity of 350 dwellings, not applicable to this exercise, already registered in SHLAA
East of Alcester Rd. Wooten Wawen	Capacity of 50 dwellings, not applicable to this exercise, already registered in SHLAA
Bearley	Capacity of 50 dwellings, not applicable to this exercise, already registered in SHLAA
North of Ettington	Capacity of 40 dwellings, not applicable to this exercise
South of Ettington	Capacity of 130 dwellings, not applicable to this exercise, already registered in SHLAA
East of Epwell Rd. Tysoe	Capacity of 50 dwellings, not applicable to this exercise, already registered in SHLAA
West of Ettington Rd Wellesbourne	Capacity of 450 dwellings, not applicable to this exercise, already registered in SHLAA
East of Ettington Rd Wellesbourne	Capacity of 350 dwellings, not applicable to this exercise
North of Evesham Rd, Salford Priors	Capacity of 30 dwellings, not applicable to this exercise
North of Tredington	Capacity of 30 dwellings, not applicable to this exercise
North of Captain's Hill, Alcester	Capacity of 150 dwellings, not applicable to this exercise, already registered in SHLAA
East of Birmingham Rd, Stratford-upon-Avon	Capacity of 100 dwellings, not applicable to this exercise, already registered in SHLAA
South of Daventry Rd Southam	Capacity of 690 dwellings, not applicable to this exercise, already registered in SHLAA
North of Evesham Rd Stratford-upon-Avon	Capacity of 220 dwellings, not applicable to this exercise
North of Stratford Rd Wellesbourne	Capacity of 150 dwellings, not applicable to this exercise, already registered in SHLAA
South of Brickyard Lane, Studley	Capacity of 50 dwellings, not applicable to this exercise, already registered in SHLAA

25. In February / March 2014 the Council consulted on Strategic Site Options and a change to the period covered by the plan to 2031. The provision of 10,800 homes in that period was also consulted on. Tables 3.3, 3.4 and 3.5 of the May 2014 Report relate to this version of the Core Strategy. The sites considered are set out in Table 3.3 (reproduced below at Table A5).

26. The options in Table A5 were shortlisted because they were considered to be capable of delivering the housing and employment requirements of the Core Strategy.

**Table A5:** Options contained within Alternative Strategic Options report

Options		Option details and/or site locations
A		Further Dispersal
B		Gaydon / Lighthorne Heath
C		Long Marston Airfield
D		South East Stratford
E	1	North of Southam
	2	West of Southam (Stoneythorpe)

27. Table 3.4 of the May 2014 Report set out the reasons for rejecting Option A 'Further Dispersal.' The text has been replaced below in Table A6, to address the point made by consultees that the SA/SEA did not provide sufficient explanation of why the Further Dispersal option was consolidated. Table A6 gives the final rationale for the selection of preferred options and rejection of others, including both sustainability appraisal and wider planning considerations.

**Table A6:** Reasons for rejection or progression of dispersal or new settlement

Option	Discussion of reason behind rejection or progression																								
<b>Further Dispersal Option A</b>	<p>The May 2014 report notes that Option A was rejected due to the likely adverse effects on existing settlements of incremental increases in housing numbers. It is still proposed to accommodate at least 8,000 homes through dispersal.</p> <p>The Focused Consultation: 2011-2031 Housing Requirement and Strategic Site Options document noted that this option is based on an extension of the strategy of dispersal of housing development across the District. Theoretically there are numerous permutations to how development could be dispersed across Stratford-on-Avon District.</p> <p>It noted that Option A would most likely result in the additional 2,500 homes being built at the following locations:</p> <table border="1"> <thead> <tr> <th></th> <th>Already Committed</th> <th>Additional</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Stratford-upon-Avon</td> <td>2,725</td> <td>650</td> <td>3,375</td> </tr> <tr> <td>Main Rural Centres</td> <td>2,630</td> <td>1,000</td> <td>3,630</td> </tr> <tr> <td>Local Service Villages</td> <td>1,800</td> <td>350</td> <td>2,150</td> </tr> <tr> <td>Rural Area</td> <td>1,150</td> <td>500</td> <td>1,650</td> </tr> <tr> <td></td> <td>8,305</td> <td>2,500</td> <td>10,805</td> </tr> </tbody> </table> <p>The Focused Consultation document provided a detailed explanation of the likely impacts of this option for different types of settlements and individual settlements. This is summarised below.</p> <p>Further Dispersal would necessitate building approximately an</p>		Already Committed	Additional	Total	Stratford-upon-Avon	2,725	650	3,375	Main Rural Centres	2,630	1,000	3,630	Local Service Villages	1,800	350	2,150	Rural Area	1,150	500	1,650		8,305	2,500	10,805
	Already Committed	Additional	Total																						
Stratford-upon-Avon	2,725	650	3,375																						
Main Rural Centres	2,630	1,000	3,630																						
Local Service Villages	1,800	350	2,150																						
Rural Area	1,150	500	1,650																						
	8,305	2,500	10,805																						

	<p>additional 650 homes at Stratford-upon-Avon town over the plan period. In all probability this could only reasonably be accommodated on 'greenfield' land on the periphery of the town. It would put more traffic on a highway system that is already under strain.</p> <p>Main Rural Centres would need to accommodate an additional 1,000 additional homes. Impact on individual Main Rural Centres was difficult to assess because if sufficient land cannot be readily identified in those that are more constrained (e.g. within the Green Belt, affected by areas of flood risk etc.) then others would need to accommodate the additional dwellings.</p> <p>The dispersal option would also result in an increase of some 350 homes across the Local Service Villages, in addition to the 1,800 homes already proposed. Reflecting the variety of settlement sizes and services available, the Intended Proposed Submission Core Strategy identified four categories across which approximately 1,800 homes would be distributed:</p> <p>Category 1: approximately 76 to 100 homes in each  Category 2: approximately 51 to 75 homes in each  Category 3: approximately 26 to 50 homes in each  Category 4: approximately 10 to 25 homes in each</p> <p>The total figure of 1,800 homes was based on the assumption that housing would be delivered at each Local Service Village at approximately the mid-point of the range, although in reality some villages would deliver at the higher end whilst others would only deliver towards the lower end of the range. An increase in provision can be achieved on the basis that each village will deliver at the higher end of the range. This would mean in total that the Local Service Villages could accommodate some 2,350 homes. On that basis, there is sufficient flexibility within the Local Service Villages to deliver 2,150 homes across the plan period without needing to increase the level of development in each village above the maximum of the range previously specified. However, it should be recognised that the further dispersal option is predicated on each Local Service Village delivering the higher quantum of housing.</p> <p>Implications for the Rural Area - Option A would require an additional 500 homes to be built across the rural area. It is considered inappropriate to build this quantum of homes in the rural villages and hamlets not categorised as Local Service Villages. Indeed, if they were sustainable locations for development, they would have been identified as Local Service Villages in the first place. This leaves the four Large Rural Brownfield Sites identified in the Intended Proposed Submission Core Strategy as potential locations for additional development. The four sites are: Jaguar Land Rover and Aston Martin at Gaydon; the Former Engineer Resources Depot at Long Marston; the Former Southam Cement Works, at Long Itchington (North of Southam); and the Former Harbury Cement Works at Bishop's Itchington.</p> <p>Of these four sites, there is no capacity for residential development within the existing brownfield site at Gaydon occupied by Jaguar Land Rover and Aston Martin. (Please note: the proposal at Gaydon/Lighthorne Heath included at Option B is for development on greenfield land to the east of the existing Jaguar Land Rover and Aston Martin site). At both the Bishops Itchington and Long Itchington former cement works sites, it is considered that the scale of development reasonably achievable on the brownfield land is limited, and certainly not high enough to sustain its own facilities. This is partly the reason why the Long Itchington site was considered for a greater scale of development under Option D (see section 4e), although this would entail both brownfield and</p>
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	greenfield development. A planning application has recently been submitted for 200 homes on the Bishops Itchington site, suggesting that the site promoters are seeking a more limited amount of development than previously sought. This leaves the former Engineer Resources Depot at Long Marston, just to the south of the Long Marston Airfield site. There is the potential here to build 500 homes in addition to the 500 homes, 300 holiday homes, and community and leisure facilities currently planned and partly under construction.
<b>New Settlement or Sustainable Urban Extension Options B-E</b>	<p>Progressed for the following reasons:</p> <p>Large scale development can be a sustainable way of meeting the challenges of delivering high levels of housing growth.</p> <p>A new settlement can effectively provide a range of new community, employment and leisure services and at the same time take the pressure off other areas, helping to retain their special character and qualities.</p> <p>Because of their scale, it is easier to plan and deliver, in a phased manner, the infrastructure necessary to serve a sustainable urban extension or new settlement; helping to ensure that a sustainable community is created.</p>

28. Table 3.5 sets out the recommendations for the individual strategic options in the May 2014 Report and has been expanded below to confirm why Option B was taken forward in favour of others (Table A7).

**Table A7:** Consideration of Alternative Strategic Options

Option	Discussion of reason behind rejection or progression
Gaydon / Lighthorne Heath Option B	<p>The SA concluded that Option B and Option D perform at a similar level of sustainability. Depending on preferences of SDC, as well as the results of other studies, the site's feasibility, and consultation feedback, it was recommended that either could be progressed.</p> <p>In selecting Option B the Council took account of the following factors:</p> <ul style="list-style-type: none"> <li>• The NPPF encourages the use of previously developed land but does not require a sequential approach, other factors may make a greenfield site sustainable;</li> <li>• Judgement about the most effective approach to meeting housing need within the identified housing market area (HMA);</li> <li>• This District was judged to have a 'best fit' with the Coventry and Warwickshire HMA, although it was acknowledged that a number of other market areas had an influence on the area;</li> <li>• The overall approach involving a dispersal of the housing growth reflected the need to have regard to these various influences;</li> <li>• Strategic choice should reflect the principal housing market operating in the District. It should preferably be well linked to other parts of the market area;</li> <li>• The well-established patterns of inward migration that</li> </ul>

Option	Discussion of reason behind rejection or progression
	<p>were likely to continue and would drive demand within the District should be considered, as should the way in which the strategic choice would complement rather than compete with other elements of housing supply in the District;</p> <ul style="list-style-type: none"> <li>• The synergies between housing provision and economic growth suggest that the preferred option should complement the envisaged pattern of employment opportunity, both locally and across the wider sub-region; and,</li> <li>• The relative challenges regarding infrastructure provision, particularly any such provision that could inhibit the early delivery of development.</li> </ul> <p>Option B was considered to perform best against these factors when considered against the other alternatives considered.</p>
<p>Long Marston Airfield Option C</p>	<p>The May 2014 SA Report noted that the current proposed route of the relief road bisects Racecourse Meadow SSSI, a local wildlife site and a proposed local wildlife site. The proposal would therefore have significant adverse impacts on biodiversity unless the impacts could be mitigated for or avoided.</p> <p>The consultation undertaken in February/March 2014 did not reveal any evidence that, should the Council identify Long Marston Airfield as its preferred strategic development location, and subject to the mitigation of transport impacts, the development cannot be achieved in a sustainable manner consistent with the overall purpose of the planning system.</p> <p>Whilst the updated Water Cycle Study flagged an issue concerning waste water disposal, there was no reason to believe that a technical solution to the problem could not be identified and this was already being actively pursued by the site promoters at the time the options were being considered.</p> <p>There were divided views about the extent to which this option provided a sustainable solution in transport terms. Whilst there is the possibility of some sort of transport link being restored along the route of the Greenway, the development is not promoted on the basis that this must happen. It allows for, but does not secure, a reinstatement of the heavy rail link from Stratford-upon-Avon to the south. It also includes an investigation into the potential for a light transport link. The site is currently difficult to access from the strategic transport network. The proposals present an option to construct a relief road to the south and west of Stratford-upon-Avon, linking to the A46 at Wildmoor via the permitted but yet to be constructed road across land west of Shottery. The delivery of this road remains uncertain, as do the environmental impacts of providing a southern link between Shipston Road and Evesham Road (at Bordon Hill). The transport evidence is that the delivery of such a link road is essential to mitigate traffic impacts on the town.</p> <p>As with other options, various responses expressed a note of caution about the detailed impacts and identify</p>

Option	Discussion of reason behind rejection or progression
	<p>that further work is required to understand the details of the mitigation that would be put in place to offset those impacts.</p> <p>With an eventual capacity of around 3,500 homes and having regard to other committed development in the vicinity, there is the potential for a new secondary school to be provided on-site. This is the only strategic option where such on-site provision is viewed as likely and achievable.</p> <p>A new settlement in this location would be in close proximity to the villages of Long Marston and Quinton. There is considered to be adequate scope to ensure that the integrity of these villages is protected through an appropriate approach to green infrastructure provision, including strategic landscaping.</p> <p>Option C was not judged to perform as well as Option B in relation to the factors set out above in Option B. This conclusion, combined with the uncertainties in relation to the deliverability and environmental effects of the relief road meant that Option C was not carried forward into the Core Strategy.</p>
<p>South East Stratford Option D</p>	<p>The consultation did not reveal any evidence that, should the Council identify Southeast Stratford-upon-Avon as its preferred strategic development location, and subject to the resolution of issues concerning traffic impact and secondary school places, the development cannot be achieved in a sustainable manner consistent with the overall purpose of the planning system.</p> <p>A key question mark in relation to this proposal is the deliverability of an Eastern Relief Road linking Banbury Road (A422) to Warwick Road (A439) in the vicinity of Ingon Lane. This would require the new road to cross the River Avon and floodplain between Tiddington and Alveston. The funding sources to secure this link are uncertain.</p> <p>The development would be expected to deliver up to 2,750 homes, insufficient in itself to justify the provision of a new secondary school on-site. However, development on this scale at Stratford-upon-Avon would create a demand for secondary school places that cannot be met on existing school sites and it would thus be necessary to identify a suitable site for a new school. No site has been identified at present.</p> <p>It would involve the loss of relatively high grade agricultural land.</p> <p>A main issue raised in the public feedback is the impact of further development at Stratford during the current plan period, given the significant commitments that already exist and the support for the redevelopment of brownfield land within the town boundary.</p> <p>Option D was not judged to perform as well as Option B in relation to the factors set out above in Option B. This conclusion, combined with the factors above meant that Option D was not carried forward into the Core Strategy.</p>
<p>Southam Option E</p>	<p>North of Southam (Option E.1) is affected by areas of high ecological value. Stoneythorpe (Option E.2) is affected by the High Speed Two proposals and is too small to incorporate the same level of facilities and services as the other sites. Option E is therefore a less</p>

Option	Discussion of reason behind rejection or progression
	<p>preferable alternative option.</p> <p>The consultation did not reveal any evidence that, should the Council identify Southam/Stoneythorpe as its preferred strategic development location, the development cannot be achieved in a sustainable manner consistent with the overall purpose of the planning system.</p> <p>The separate proposals raise different issues regarding the integrity of existing settlements. The proposals for the North of Southam site were criticised as essentially joining together the town of Southam and the village of Long Itchington. At its northern end the site would abut the existing village, whilst to the west it also wraps around the small group of dwellings at Model Village.</p> <p>The land at Stoneythorpe is physically and visually detached from Southam. Its development would create a small satellite village.</p> <p>Each development would provide on-site primary schooling, but there were no proposals to provide on-site secondary schooling. It was envisaged that sufficient scope exists to secure an expansion of the existing Southam College.</p> <p>Option E was not judged to perform as well as Option B in relation to the factors set out above in Option B. This conclusion, combined with the factors above meant that Option E was not carried forward into the Core Strategy.</p>

### Omission Sites

29. The SA is required to consider 'reasonable alternatives.' New strategic sites submitted around the time of the Further Focussed Consultation in February / March 2014 are considered below. Legal Advice was taken by the Council on how these should be considered and this discussion is relevant to whether or not these constitute reasonable alternatives within the meaning of the SEA Directive. Omission sites submitted in response to the Proposed Submission Core Strategy are then considered.
30. The following were deemed to be new strategic sites submitted for the first time in the Core Strategy process around the time of the Further Focussed Consultation in February / March 2014:
- West of Wellesbourne (Airfield) – approximately 95 hectares for residential development (c.1,600 dwellings) plus a primary school, local centre, playing fields, potential secondary school;
  - Dallas Burston Polo Grounds, north of Leamington Road, Southam – approximately 30 hectares for residential development (c.700 dwellings) plus a primary school, local centre, Continuing Care Retirement Community, recreation facilities, open space; and
  - Land at Lower Clopton, Stratford-upon-Avon – approximately 34 hectares for residential development (c.750 dwellings) with proposed direct from the A46. The site is within the Green Belt.
31. It was not possible to subject these proposals to the sort of scrutiny that has taken place in respect of those submitted in response to the 2013 'Call for Sites', and thereafter subject to technical assessment and public consultation.
32. Legal Advice received on this matter in March 2014 confirmed that it would be sufficient for these sites to be promoted through the Core Strategy Examination

process. If they were brought into the plan process earlier than this it would hold up the whole process, for example they would need to be included in the SA/SEA, included in previous technical studies, e.g. on viability and deliverability and also consulted on.

33. In summary it was evident that, to be brought forward so late in the process despite the lack of detailed scrutiny, a new site would have to be so demonstrably better than anything else previously considered that it would be unreasonable to ignore it, despite its belated submission. The site at Lower Clopton is in the Green Belt and should not be considered further at this time. The Stoneythorpe site did not seem to offer anything significantly different to that offered by previously promoted locations. The Wellesbourne site could be a more serious option for strategic development, but many issues concerning this proposal are unanswerable in the short term, including the loss of the airfield and related activities. It was difficult to conceive of this site being 'demonstrably better' than other options, already assessed, in particular the preferred option of a new settlement at Gaydon/Lighthorne Heath.
34. It was therefore concluded that these were not reasonable alternatives and the SA/SEA did not need to consider them.
35. A number of omission sites have been promoted in response to the Proposed Submission Core Strategy. The vast majority of these sites have been registered and assessed previously and/or are not strategic.
36. It is appropriate to consider these sites 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. In taking this approved District Council position into account. The treatment of these sites can be broken down into various categories:
37. The sites in Table A8 below 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:

**Table A8:** Larger Omission Sites (Note: Those shown with an asterisk are located in the Green Belt.)

Land at Long Marston Airfield	Land north of Bishopton Lane, Stratford
Land to east and west of Ettington Road, Wellesbourne	Land east of Southam Bypass
Land south of Daventry Road, Southam	Land north of Salford Road, Bidford
Land at former Harbury Cement Works	Land north of Campden Road, Shipston
Land at Alcester Road, Studley *	Land at Wellesbourne Airfield
Land at Stoneythorpe (north of A435), west of Southam	Land east of Banbury Road, Southam
Land north of New Road, Henley *	Land west of Waterloo Road, Bidford
Land at former Long Marston Depot	Land south of Trinity Way, Stratford
Land south of A46, Stratford *	Land at Stoneythorpe (south of A435), west

	of Southam
Land north of Captains Hill, Alcester *	Land to west of Wellesbourne
Land south-east of Stratford-upon-Avon	Land east of Tiddington
Land north of Bordon Hill, Stratford	Land north and south of Loxley Road, Stratford

38. There is no need to identify any of the above 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.

39. The sites in Table A9 below 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. The following sites are therefore not considered to be reasonable alternatives for inclusion in the Core Strategy because they are not strategic in nature and they therefore do not need to be considered further as part of the SA/SEA, although it is worth noting that some of them will have been included in earlier iterations of the assessment:

**Table A9:** Smaller Omission Sites (Note: Those shown with an asterisk are located in the Green Belt.)

Land at Tailors Lane, Upper Quinton	Land north of Banbury Road, Kineton
Land along the A435 corridor, Mappleborough Green	Land west of Holywell Road, Southam
Land at Wood End Lane, Wood End *	Land south of Kineton Road, Gaydon
Land at Alcester Road, Wootton Wawen *	Land north of Stockton Road, Long Itchington
Land at The Slough, Studley *	Land west of Tuckwell Close, Stockton
Land at Alcester Road, Stratford	Land west of Knights Lane, Tiddington
Land south of Alcester Road, Stratford	Land north of Millers Close, Welford
Land east of Weston House, Welford	Land east of Shipston Road, Alderminster

40. In response to the remaining omission sites:

- Land at Atherstone Airfield can be considered against the provisions of Policy CS.21 and Policy AS.10 Countryside and Villages.
- Land south of Campden Road, Shipston now has planning permission.
- Land at Juggins Lane, Forshaw Heath can be considered against the provisions of Policy AS.10 Countryside and Villages.

## New Policy

41. An additional policy has been proposed to be included in the Core Strategy following Policy CS.16 in Section 5 (Development Strategy). In order to ensure that the sustainability appraisal is consistent and transparent, the new policy has been assessed according to the methodology presented in Chapter 4 of the May 2014 Report. The results of this assessment are detailed below. The corresponding Detailed Assessment Matrix (Appendix 1) details how appropriate mitigation measures can help to ensure that this new policy has an overall positive impact on sustainability.

## New policy Accommodating Housing Need Arising from Outside Stratford-on-Avon District

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
History, Cultural Heritage	Landscape	Biodiversity	Flood Risk	Climate Change Mitigation	Climate Change Adaptation	Natural Resource	Pollution	Waste	Transport	Rural Barriers	Countryside	Affordable Housing	Health, Wellbeing	Economy
+/-	+/-	+/-	0	-	+/-	-	-	-	-	+/-	+/-	++	+/-	+/-
A Detailed Assessment Matrix has been created for this policy. Please see <a href="#">Appendix A</a>														

42. This policy is based on the duty to cooperate as it considers a potential need to provide land for housing within Stratford-on-Avon District in order to fulfill housing needs of neighbouring authorities.
43. This policy is expected to have a strong positive effect on SA Objective 13 as it will ensure that an appropriate level and mix of housing is achieved for the District itself and the wider region.
44. Uncertain effects have been identified in relation to SA Objectives 1, 2, 6, 11 and 12 as the effect of development on these objectives will depend on the location of development. Impacts are likely to be lower if development is proposed on brownfield or urban sites, as surrounding and previous development will have set a precedent for development in the area.
45. This policy is identified as having uncertain effects for SA Objective 14 highlighting the need to ensure that any further growth is matched by an increase in infrastructure (including health and education facilities).
46. Uncertain effects have also been identified for SA Objective 15 highlighting the need to ensure that any further housing provision is matched by an appropriate level of growth in employment. On the other hand, an increased population in Stratford-on-Avon could lead to a greater amount of spending in the District, thereby boosting the local economy.
47. Uncertain effects have been identified for SA Objective 3. As policy CS 6 requires that development secures a net gain in biodiversity and avoids any designated nature sites, development is not expected to lead to a direct loss of biodiversity. Indirect negative impacts may arise related to an increase in development-related negative impacts on biodiversity due to disturbance of wildlife both on the development site and further afield due to recreational activities and an increased presence of pets, such as cats and dogs.
48. Increased levels of housing development, may lead to a local increase in the area of impermeable surfaces, but this is not expected to impact flood risk due to the fact that policy CS 4 does not allow developmental design that will increase flood risk (SA Objective 4).
49. An increased population, associated with housing development, is likely to lead to an increase in waste generation (SA Objective 9). Building new homes will require building materials and may restrict sites available for future mineral extraction or other resources, such as agricultural land (SA Objective 7).

50. Negative effects have been identified against SA Objective 5, 8 and 10. This is due to the possibility that this policy could result in mis-matched distributions of residents and employment opportunities and/or key services and facilities, including healthcare and recreation. This could increase the need for residents to travel to access these services. There could also be an increase in out-commuting for work if appropriate employment opportunities are only available in neighbouring authority areas. This may lead to an increase in private car use in the District, which is associated with air pollution, such as NO<sub>x</sub> and particulates, as well as greenhouse gas emissions.

#### **Screening Modifications**

51. A table of modifications, incorporating identification of need for any further SA/SEA and HRA, has been included in Appendix B.

#### **Detailed Responses to Other Comments on the SA**

52. A detailed response to other comments received on the May 2014 report is provided at Appendix C. It is considered that the main text of this addendum, combined with the detailed responses at Appendix C addresses the matters raised in the representations.

#### **Next Steps**

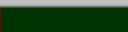
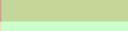
53. This addendum forms part of the submission documents and will be subject to examination. There will be further opportunity to consult on the SA/SEA process prior to adoption of the Core Strategy at the time that any proposed main modifications are consulted on.

**Appendix A: Detailed Assessment Matrix for the New Policy: Accommodating Housing Need Arising from Outside Stratford-on-Avon District**

No.	SA Objective	Description of predicted effect	Duration			Frequency	Reversibility	Geographic significance	Magnitude	Level of certainty (probability)	Overall Effect	Mitigation or other action required?	Supporting comments / Proposed mitigation	Best Case Scenario Effect
			Short term	Medium term	Long term									
1	Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	At this level of detail it is not possible to tell whether accommodating additional housing would have an impact on cultural heritage features as this is site-dependent	+/-	+/-	+/-	ongoing	permanent	Local, potentially national	Moderate	Low	+/-	yes	Development should take place away from known historic and cultural features. Investigation into potential archaeological assets should be undertaken on any previously uninvestigated site before construction takes place. Listed buildings should be renovated and reused and the setting of heritage assets should be improved where possible	++
2	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.	If development takes place on less sensitive urban sites, or reusing existing buildings there are likely to be no or minimal landscape impacts. If additional housing is built in open countryside or more sensitive urban locations this policy may lead to negative landscape impacts	+/-	+/-	+/-	ongoing	permanent	Local	Moderate	Low	+/-	yes	Landscape and visual receptors are sensitive to the magnitude of impact associated with development as well as the overall residual level of change at a particular location. Places with a strong sense of identity and distinctive character are vulnerable to change unless new development is carefully designed and planned, usually in the style of the prevailing local character. Places which are less distinctive, transitional in nature or disused industrial locations may be better suited to accommodate new housing or employment sites.	+
3	Protect, enhance and manage biodiversity and geodiversity.	An increase in residents may lead to an increase in disturbance of wildlife both due to recreational activities and an increased presence of pets, such as cats and dogs, although policy CS 6 requires a net biodiversity gain	+/-	+/-	+/-	ongoing	Reversible	Local	Minor	Moderate	+/-	yes	Human disturbance to wildlife sites can be reduced through provision of suitable accessible natural green space (SANGs), which can be used for recreation, rather than sites which may be more sensitive in terms of wildlife. Any negative impacts could be mitigated through on-site habitat creation and enhancement of surrounding habitats. Furthermore policy CS 6 requires developments to ensure a net gain in overall biodiversity	+
4	Reduce the risk of flooding.					ongoing	permanent	Local	Moderate	Medium	0	no		0
5	Minimise the district's contribution to climate change.	This policy could lead to a mismatched distribution of residents with employment sites and key services. This may result in an increase in private car use to access employment and services, leading to an increase in associated greenhouse gas emissions	-	-	-	ongoing	Reversible	Local	Moderate	Medium	-	yes	Ensuring that residents can access employment, education and services via sustainable modes of transport is key to reducing the District's contribution to climate change. This can be done either by providing suitable bus services and public rights of way, or ensuring development of key infrastructure takes place in line with housing development. New development could also incorporate opportunities for renewable energy provision, such as incorporation of solar panels and ground source heat pumps	++
6	Plan for the anticipated levels of climate change.	Effects of this policy on climate change adaptation depend on the location and design of housing development. Developing on lower quality land, away from floodplains and with sustainably designed buildings will have a low impact	+/-	+/-	+/-	ongoing	permanent	Local	Minor	Low	+/-	yes	Development should be located in flood zone 1, where possible. Development should also incorporate green infrastructure, which links with existing green corridors in the District. Other adaptations to climate change could be incorporated into building design, such as incorporation of green roofs, which would insulate the building, compensate for land-take on greenfield sites and slow rain runoff	++
7	Protect and conserve natural resources.	Building additional new homes will require building materials and may restrict sites in the District available for future mineral extraction or other resources, such as agricultural land	-	-	-	ongoing	permanent	Local	Moderate	High	-	yes	Construction materials should be sustainably sourced. Development should aim to minimise resource use, such as building on low quality land and incorporating energy and water efficiency measures. Policy CS 2 will contribute to sustainable construction by minimising impacts on the environment	+
8	Reduce air, soil and water pollution.	This policy could lead to a mismatched distribution of residents with employment sites and key services. This may result in an increase in private car use to access employment and services, leading to an increase in associated pollutants. There may also be additional pressure on waste infrastructure, such as sewers and waste collection, which may not have capacity for additional residents	-	-	-	ongoing	Reversible	Local	Moderate	Medium	-	yes	Ensuring that residents can access employment, education and services via sustainable modes of transport will help to minimise pollution in the District. This can be done by providing suitable bus services and public rights of way and ensuring development of key infrastructure takes place in line with housing development. Development should not be located near areas of existing pollution issues, such as AQMAs	+

9	Reduce waste generation and disposal, and achieve the sustainable management of waste.	An increased local population will lead to an increase in waste generation.	-	-	-	ongoing	permanent	Local	Moderate	High	-	yes	Construction should use recycled materials where possible. Development should incorporate facilities for residents to recycle	+
10	Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	This policy could lead to a mis-matched distribution of residents with employment sites and key services. This is likely to lead to an increase in private car travel to access these, particularly as travel may be between districts	-	-	-	ongoing	Reversible	Local	Moderate	Medium	-	yes	Development should ensure that residents can access employment, education and services via sustainable modes of transport. This can be done either by providing suitable bus services and public rights of way, or ensuring development of key infrastructure takes place in line with housing development	+
11	Reduce barriers for those living in rural areas.	The extent to which this policy may reduce barriers for those in rural locations depends if the development is in an urban or rural setting and whether additional infrastructure will be created as part of the development	+/-	+/-	+/-	ongoing	Reversible	Local	Minor	Low	+/-	yes	Development should be situated in or next to existing settlements. Developments should incorporate high quality, accessible facilities and amenities for use by residents and the wider population	++
12	Protect the integrity of the district's countryside.	The effect of this policy on the countryside will depend on the location of development.	+/-	+/-	+/-	ongoing	permanent	Local	Minor	Low	+/-	yes	Where possible, development should take place on brownfield sites within or next to existing settlements. Development in the open countryside should be avoided	+
13	Provide affordable, environmentally sound and good quality housing for all.	This policy allows provision of a suitable level and mix of housing to be provided for both Stratford-on-Avon District and surrounding districts	++	++	++	ongoing	permanent	Local	Moderate	Low	++	no		++
14	Safeguard and improve community health, safety and well being.	This policy could lead to a potential mis-matched distribution of residents and healthcare services. This has the potential to result in oversubscribed healthcare facilities, meaning that residents must travel to receive the care they need	+/-	+/-	+/-	ongoing	Reversible	Local	Moderate	Low	+/-	yes	Ensuring that residents can access education and health services via sustainable modes of transport is key. This can be done either by providing suitable bus services and public rights of way, or ensuring improvement of existing, development of new education and healthcare facilities takes place in line with housing development. Policy CS 25 states that development will only be permitted where suitable mitigation is provided against any unacceptable transport impacts. This should include both the volume of traffic, ability of existing road infrastructure to accommodate this and the accessibility and suitability of sustainable modes of transport	++
15	Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Economic growth may be restricted if the distribution of residents and their skills are not matched to the distribution of employment opportunities. On the other hand, an increased population in Stratford-on-Avon could lead to a greater amount of spending in the District, thereby boosting the local economy	+/-	+/-	+/-	ongoing	Reversible	Local	Moderate	Low	+/-	yes	Development should be situated to ensure that there are a suitable amount and variety of employment opportunities that are accessible from the development site. This could involve ensuring the development has transport links to employment opportunities, incorporates employment land or is located near to employment opportunities.	+
Overall Effect		This policy is expected to have primarily negative and uncertain effects in the absence of mitigation. Uncertain assessments relate to lack of information on the exact location and design of any additional housing in the District. Negative effects relate to the fact that there may not be sufficient access to services or work, leisure and education opportunities for additional residents.												
Proposed Mitigation		The policy is expected to have positive effects on sustainability if appropriate mitigation measures are applied. The mitigation measures presented encourage additional development to be located away from valuable historical, environmental and material assets. Sustainable design should be implemented in any construction and new properties should have good sustainable transport links. Supporting infrastructure should be developed alongside housing development where current infrastructure is not sufficient to accommodate new residents.												

Key

The 'Duration' column is noted as:	Major negative effect	--	Magnitude of significance is illustrated as:	Adverse	Severe			Superior	Beneficial
	Negative effect	-		Major			Major		
	Positive effect	+		Moderate			Moderate		
	Major positive effect	++		Minor			Minor		
	Neutral environmental effect			Negligible			Negligible		

**Appendix B: Schedule of Proposed Modifications and implications for SA and HRA**

Section	Policy	Proposed Modification	Further SA work?	Further HRA work?
1.3	n/a	At the end of paragraph 1.3.8, insert "(see Policy CS.xx)".	N	N
1.3	n/a	At the end of paragraph 1.3.9, insert "(see Policy CS.16)".	N	N
1.4	Vision Overall	In paragraph 6, line 3 insert "safe" before the word "high".	N	N
1.4	Vision Wellesbourne	Insert the following text between sentences 2 and 3 in the Wellesbourne vision: "The aviation related functions at Wellesbourne Airfield will have been retained and enhanced."	N	N
1.4	Strategic Objective 4	Reword the first sentence 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."	N	N
1.4	Strategic Objective 6	Reword the second sentence as follows: "The risk of flooding will be managed effectively by taking a whole catchment approach to implement sustainable flood management schemes."	N	N
1.4	Strategic Objective 8	In line 3, before the word "health", insert "safety,"	N	N
1.4	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	N	N

		dispersed settlement pattern of the District. Where justified by the available evidence, the District Council will 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."		
1.4	Strategic Objective 15	Insert at the beginning: "A mix of sizes, types and tenures of housing will have been built by a range of developers, housing associations and other providers."	N	N
2.1	Sustainability Appraisal	An addendum to the May 2014 Report should be produced more clearly setting out the reasons for selecting/rejecting those options considered by the Council as 'reasonable alternatives'. This should include all relevant planning considerations, not just those associated with the SEA/SA. This should be submitted alongside the Submission Core Strategy. The addendum should also consider the main modifications proposed to the Core Strategy as a result of the Regulation 19/20 process and whether or not they would give rise to significant environmental effects.	Y - SDC have prepared information on reasonable alternatives that is included in this addendum  Lepus have considered modifications to the Core Strategy as a result of Regulation 19/20 in this Appendix	N
2.2	CS.1 Explanation	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,"	Y - add positive assessment for SA Objective 12	N
3.1	CS.2 Part B	Delete the paragraph headed "Residential Development". Under Non-Residential Development, delete "Code for Sustainable Homes and" in line 1 of paragraph 2. Amend the heading "Extensions and Major Refurbishments" to read "Extensions and the Re-	Y - reword assessment text in paragraph 5.3.6 to: "Section B of the policy refers to sustainability standards in buildings and includes	N

		Use of Buildings” and delete the second paragraph.	requirements for non-residential development to be compliant with Building Research Establishment Environmental Assessment Method (BREEAM) ‘good’ standards. Ensuring buildings are efficient helps protect natural resources (SA Objective 7) and reduce waste (SA Objective 9).”	
3.1	CS.2 Explanation	<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 alternative standards provided by BREEAM to demonstrate the energy and water performance.”</p> <p>In paragraph 3.1.11, delete the last sentence.</p> <p>In paragraph 3.1.12, delete first and last sentences.</p>	Y - reword 5.3.7 to read: “In March 2014 the UK Government published a written ministerial statement setting out the results of the housing standards review, which was launched in October 2012. The review has resulted in the intention to produce a simplified national framework for sustainable building standards, centred on the Building Regulations. The aim of this is to reduce the current sustainable housing requirements and guidelines, which often overlap, and consolidate the key factors into one document. The Core Strategy should keep up to date with these changes and be	N

			altered as necessary when relevant regulations change.”	
3.1	CS.2 Monitoring	Delete first bullet point.	N	N
3.2	CS.3 Policy	In Part A paragraph 2, delete the second sentence and insert “All proposals involving commercial development providing 1000sqm or more floorspace or residential development providing 100 or more dwellings shall assess the feasibility of incorporating decentralised energy provision.”	N	N
3.3	CS.4 Policy	<p>Part A ‘Flood Risk Areas’: Delete the second sentence. 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.” In the fourth sentence insert “, ecological” after “landscape”. 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</p>	N	N

		<p>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 &amp; 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</p>		
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		<p>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>		
3.3	CS.4 Explanation	<p>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>	N	N
3.3	CS.4 DMCs	<p>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,</p>	N	N

		including through the use of woody debris upstream, to ensure that flood management solutions are consistent with biodiversity needs.”		
3.4	CS.5 Policy	<p>In Part B, ‘Visual Impacts’, in line 3 of the first paragraph delete “must be accompanied by” and insert “may require”.</p> <p>In Part C, ‘Trees, Woodland and Hedges’, in the fourth paragraph, after the word “woodlands”, insert “, to develop flood risk reduction measures through the planting of woodlands, trees and undergrowth”.</p> <p>Note: also add Map to Core Strategy showing landscape designations and character areas, e.g. Forest of Arden.</p>	N	N
3.4	CS.5 Explanation	In paragraph 3.4.5, delete the words “set out in ‘Countryside Character Volume 5: West Midlands, published by the former Countryside Agency, and a” and insert “described in the”	N	N
3.4	CS.5 DMCs	Delete DMC (4) and replace with the following: “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.”	N	N
3.5	CS.6 Policy	In Part A ‘Biodiversity’, insert the words “and enhancing” after the word “Safeguarding” at 1 and replace the second sentence under	N	N

		<p>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."  In paragraph (c), delete all wording after "site" at the end of line 3.  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>		
3.5	CS.6 Explanation	<p>In paragraph 3.5.6, delete the reference to RIGS.  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."  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>	N	N

3.6	CS.7 Policy	In Part A 'Green Infrastructure Network', delete the final paragraph. In Part B 'Provision of Green Infrastructure', in the paragraph commencing "Access to Green Infrastructure features ....", insert ", for example," between the words "through" and "local" in line 2.	N	N
3.7	CS.8 DMCs	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."	N	N
3.7	CS.8 Policy	In Part B 'Proposals Affecting the Significance of a Heritage Asset', delete all existing text and insert: "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."  In Part C 'Appreciation, Design and Management', delete the third sentence.	N	N

3.8	CS.9 Policy	In Part B, replace all words in the first paragraph with the following: "High quality design will be achieved by ensuring that all development is:"	N	N
3.8	CS.9 Explanation	In paragraph 3.8.2, in line 7 delete "(ACPO 2004)" and insert "(ACPO), Biodiversity by Design (TCPA, 2004), Climate Change Adaptation by Design (TCPA, 2007),"	N	N
3.8	CS.9 DMCs and Monitoring	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.  In current DMC(3) and the Implementation and Monitoring Table (Responsible Agencies) replace "Police Architectural Liaison Officers" with "Crime Prevention Design Advisors".	N	N
4.1	CS.10 Policy	At point 3, delete "7" and insert "9".	N	N
4.1	CS.10 Explanation	At paragraph 4.1.6, in section 3, delete "7" and insert "9".  At paragraph 4.1.7, delete second sentence and insert "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."	N	N
5.1	CS.15 Policy	Under Part 1 'Main Town: Stratford-upon-Avon', add at the end of the first sentence "and as such is a main focus for housing and business development".	N	N

		In the final paragraph of section 7 of the policy, insert after "process" the words "where such a plan is under active preparation,"		
5.1	CS.15 Explanation	In the settlements listed at 5.1.10, move Long Marston from Category 4 to Category 3 and move Stockton from Category 3 to Category 2.	N	N
5.2	CS.16 Policy	<p>Part A 'Housing Requirement':</p> <p>In the first sentence, delete "around" and replace with "at least"</p> <p>Revise the bullet point list as follows:</p> <p>SUA: approximately 2,690 homes</p> <p>MRC: approximately 2,900 homes</p> <p>GLH: approximately 2,500 homes (delete "approximately 3,000 homes of which 2,500 will be built within the plan period")</p> <p>LRBS: delete bullet point (Note: add the supply of homes from this source to the supply from "Other Rural Locations"</p> <p>ORLs: approximately 1,290 homes</p> <p>In Part B 'Strategic Allocations':</p> <p>In the first bullet point, after "homes", insert "within the plan period from a total of approximately 1,010 homes".</p> <p>In the sixth bullet point, after "homes", insert "within the plan period from a total of approximately 3,000 homes".</p> <p>In Part D 'Phasing and Delivery':</p> <p>At the end of the first paragraph add:</p> <p>"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."</p> <p>Add at the end:</p> <p>"If evidence demonstrates that significant</p>	N	N

		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.”		
5.2	CS.16 Explanation	<p>In paragraph 5.2.6, delete the final sentence and insert:</p> <p>“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 other 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.”</p> <p>In para. 5.2.6, in the sentence beginning</p>	N	N

		<p>“Notwithstanding ...” insert “for” after the word “appropriate”</p> <p>Replace “assisted living” with “extra care”</p> <p>Renumber existing paragraph 5.2.7 as paragraph 5.2.8.</p> <p>Delete existing paragraph 5.2.8 and replace with the following text as new paragraph 5.2.7:  “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.”</p> <p>Insert new paragraph 5.2.14:  “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</p>		
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		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.”		
5.2	CS.16 DMCs	Add new DMC(5): “For the avoidance of doubt, ‘extra care’ and other 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.  Replace “assisted living” with “extra care”	N	N
5.2	CS.16 Figure 1	Update Figure 1 in the following respects: <ul style="list-style-type: none"> <li>• Up-dated figures as of March 2014</li> <li>• Additional permissions to June 2014</li> <li>• Apportion large windfall allowance in MRCs and SUA to allocations</li> <li>• Identify Canal Quarter and Shottery as separate commitments</li> <li>• Include Large Rural Brownfield Sites within Other Rural locations</li> <li>• Include District-wide C2 provision</li> </ul> (see revised Figure 1)  Note: For clarification, phasing schedules for Gaydon/Lighthorne Heath and the Canal Quarter Regeneration Zone are included in Proposals GLH and SUA.1 respectively.	N	N
After 5.2	New Policy	Insert new Policy CS.xx to follow Policy CS.16 in	Y - Lepus has assessed the new	N

		<p>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> <ol style="list-style-type: none"> <li>a. prepare and maintain a joint evidence base including housing need and housing land availability;</li> <li>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</li> <li>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.</li> </ol> <p>Explanation 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</p>	<p>Policy (see above)</p>	
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		<p>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.</p> <p>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. 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.</p> <p>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"> <li>• 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.</li> <li>• 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.</li> <li>• 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-</li> </ul>		
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		<p>regional and local sites to meet these requirements.</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <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.</p> <p>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>		
5.3	CS.17 Policy	Part A: Rename as "Requirement and Thresholds"	Y - Lepus to revise 5.5.12 to read "This policy will help meet future requirement for	N

		<p>In lines 3/4, delete "a minimum of"</p> <p>Part B: Rename as "On-site Provision"  In line 1, delete "between 5 and 9" and insert "fewer than 10"  Insert new fourth paragraph:  "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."</p> <p>Part C: 'Affordability and Tenure'  Delete last sentence of second paragraph beginning "The expectation is..." and replace with "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."</p> <p>Part D: Rename as "On-site Integration"  Delete first sentence.  Delete second paragraph.</p> <p>Part E: 'Delivery'  Reword as follows: "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</p>	<p>affordable housing in Stratford-on Avon and the main rural centres as identified in SDC Development Viability Assessment (2009) and the Strategic Housing Market Assessment: Market Review (2009). The assessment shows that the policy is likely to provide strong positive effects with regard to SA Objective 13. The policy states that all new residential development of 0.2 hectares or more with 5 or more houses will be required to provide 35% affordable housing (SA Objective 13). On all schemes proposing fewer than 10 homes, a contribution to off-site affordable housing provision in the District will be provided; on schemes proposing 10 or more homes, affordable housing will be provided on-site. Proposals with more than 35% will also be supported. Affordable housing is required irrespective of the viability of public subsidy. The policy focuses primarily upon the provision of affordable housing and makes no specific reference to other sustainability themes."</p>	
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		<p>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."</p> <p>In Part E line 7 insert "housing" after "affordable"</p>		
5.3	CS.17 Explanation	<p>In paragraph 5.3.6, insert new last sentence: "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."</p>	N	N
5.4	CS.18 Policy	<p>Part B: 'General Needs Housing Mix' Reword first paragraph as follows: "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." Reword last paragraph as follows: "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)."</p> <p>Typographical error: Part B Table - delete "fix</p>	N	N

		<p>table re market and affordable dwelling types" in first cell.</p> <p>Part C: 'Specialised Accommodation'  Reword first paragraph as follows:  "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:"</p> <p>Replace "assisted living" with "extra care"</p>		
5.4	CS.18 DMCs	<p>Insert new DMC(3) and renumber subsequent DMCs:  "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."</p> <p>DMC(2): Reword the first sentence as follows:  "Part B of this policy does not apply to schemes providing specialised accommodation in accordance with Part C."</p> <p>Insert the following words at the end of (4):  "Extra Care accommodation is defined in the Glossary of Technical Terms."</p>	N	N
5.5	CS.19 Policy	<p>Part A 'Conversions and Changes of Use'  In the second paragraph, line 3, insert "safe" between "satisfactory" and "living".</p>	N	N
5.6	CS.20	In line 2 delete the words "supported where all	N	N

	Policy	<p>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>		
5.6	CS.20 Explanation	<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>	N	N
5.9	CS.23 Policy	<p>In the third paragraph, after the word “District,” insert: “unless established through other provisions of the Plan such as Policy AS.11 Large Rural Brownfield Sites,”</p> <p>In the seventh paragraph: Add at the end of the first sentence “,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</p>	N	N

		environment.” In line 4, delete the words “and where they will not” and insert “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”.		
6.1	AS.1 Policy	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.”	N	N
6.1	Proposal SUA.1	Amend the ‘Specific requirements’ text to read as follows: “Production of a Framework Masterplan Supplementary Planning Document (SPD) to guide developers and the local planning authority in respect of environmental, social, design and economic objectives as they seek to create a new community in the Canal Quarter. The SPD will set out broad principles to show how the policy requirements, together with other policy requirements in this Core Strategy, should be delivered on the site. The SPD will also incorporate a Delivery Strategy in conjunction with Proposal SUA.2 and Proposal SUA.3. The development will: <ul style="list-style-type: none"> <li>• secure environmental, ecological and recreational enhancement of the canal corridor</li> <li>• provide pedestrian and cycle links through the area and with adjacent parts of the town and a vehicular crossing over the canal linking development off Masons Road and Timothy’s Bridge Road</li> <li>• deliver traffic management measures</li> <li>• improve links to Stratford railway station</li> <li>• ensure implementation of the Steam Railway Centre is not prejudiced</li> <li>• secure appropriate treatment of any contamination</li> </ul>	N	N

		<ul style="list-style-type: none"> <li>de-culvert watercourses”</li> </ul>		
6.1	SUA.1	<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> <p>Replace “some” with “up to”</p>	N	N
6.1	SUA.3 Proposal	Insert an additional 'Specific Requirement' to read: 'deculvert the watercourse through the site and restore a natural sinuous channel.'	N	N
6.2	ALC.3 Proposal	<p>In the second bullet point in specific requirements, add the words “and enhance the” after the word “protect”.</p> <p>Insert additional specific requirement to read: “the form of development should cause no harm to the setting of Coughton Court”</p>	N	N
6.4	AS.4 Policy	Insert an additional bullet point in Part A to read: “Investigate the removal of weirs and/or the provision of fish passes on the River Alne through the town.”	N	N
6.5	AS.5 Policy	Insert an additional bullet point in Part A to read: “Investigate the removal of weirs and/or the provision of fish passes on the River Dene.”	N	N
6.6	AS.6 Policy	<p>In Part A Environmental:  Add at end of first bullet point “, ensuring that land that may be required for flood alleviation measures is kept free from development”  Add at end of fifth bullet point “, possibly</p>		

		<p>through the provision of a wetland area in association with measures aimed at managing flood risk upstream of the town"</p> <p>Add an additional bullet points to read "Investigate the scope to utilise land to the east of the town for flood alleviation and biodiversity purposes."</p> <p>In Part B Social: Replace the third bullet point: "Improve leisure facilities in the town, both built and open spaces, including the refurbishment of Townsend Hall." Replace the fifth bullet point as follows: "Improve the public rights of way network, in particular access to open countryside".</p>		
6.7	AS.7 Context	Delete the words 'police station' from para. 6.7.4.	N	N
6.7	AS.7 Policy	<p>Insert additional bullet points in Part A to read: "Create flood storage upstream of Southam to alleviate flooding in the town." "Investigate river restoration opportunities at the confluence of the River Stowe with the River Itchen to promote fish passage and improve migratory opportunities."</p> <p>Insert an additional bullet point in Part B to read: "Investigate the scope to designate additional land along the Stowe valley to the west of the town as public open space."</p>	N	N
6.7	SOU.2 Proposal	Insert a note to state that this site was granted detailed planning permission on 6 August 2014 subject to the completion of a section 106 Agreement.	N	N
6.8	AS.8 Policy	Insert additional bullet point in Part A to read: "Investigate river restoration opportunities to promote fish passage and improve migratory opportunities."	N	N

6.9	AS.9 Policy	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.”	N	N
6.10	Proposal GLH	In 'What is to be delivered', in the first bullet point insert after “100 hectares” the words “at the southern end of the allocation”  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	N	N
6.10	Proposal GLH Vision	Replace the wording of paragraph 6.10.13 as follows: “It is important that the overall vision is clearly established to help develop the community's own identity. To this end, the Council will facilitate the production of a Framework Masterplan Supplementary Planning Document (SPD) with input from the existing local communities alongside the promoters/developers of the new community and Jaguar Land Rover. The SPD will provide a guide as to how the policy requirements of the Core Strategy can be incorporated into the new community in order to attain environmental, social, design and economic objectives in relation to the development. The SPD will need to be approved before the Council grants any planning permissions for the new development, unless exceptional circumstances arise. Planning applications will need to generally accord with the broad objectives of the SPD. Planning	N	N

		applications will need to be accompanied by a detailed masterplan or similar document clearly demonstrating how the SPD's objectives can be attained in an integrated way. As regards Jaguar Land Rover, the proposals will reflect the evolving business requirements of the company."		
6.10	Proposal GLH Policy	<p>Amend the 'What is to be delivered' text to read as follows:</p> <ul style="list-style-type: none"> <li>• Land comprising approximately 100 hectares at the southern end of the allocation to enable the expansion of Jaguar Land Rover (JLR) to meet the business needs for uses that can include: <ul style="list-style-type: none"> <li>○ Research, design, testing and development of motor vehicles and ancillary related activities.</li> <li>○ Other advanced engineering technologies and products.</li> <li>○ Offices.</li> <li>○ Low volume manufacturing and assembly operations.</li> <li>○ Development of associated publicly accessible event, hospitality, display, leisure and conference facilities and marketing infrastructure.</li> <li>○ Automotive education and training including ancillary accommodation.</li> </ul> </li> <li>• Housing - approximately 3,000 dwellings (2,500 dwellings by 2031) to include (alongside private sector housing): <ul style="list-style-type: none"> <li>○ extra care for the elderly;</li> <li>○ private sector rental;</li> </ul> </li> </ul>	N	N

		<ul style="list-style-type: none"> <li>○ opportunities for self- build residential accommodation; and</li> <li>○ the delivery of 35% affordable housing in accordance with Policy CS.17</li> </ul> <ul style="list-style-type: none"> <li>• One main village centre to be delivered within the defined first phase of development. The main village centre shall be appropriately located to serve both the existing residents of Lighthorne Heath and the existing and proposed workforce communities. The main village centre shall incorporate: <ul style="list-style-type: none"> <li>○ a range of shops and services to support the existing and new communities; and</li> <li>○ a community hub to include meeting space, health and leisure facilities; and</li> <li>○ a three form entry primary school, all as identified within the Infrastructure Delivery Plan.</li> </ul> </li> <li>• A contribution to support off-site provision for secondary (including sixth form) schooling.</li> <li>• A comprehensive green infrastructure strategy incorporating: <ul style="list-style-type: none"> <li>○ Structural landscaping and open space, both alongside the M40 and to establish and/or reinforce visual and functional buffers to maintain the separate identity and integrity of the existing villages of Lighthorne and Gaydon.</li> <li>○ A managed ecological reserve at</li> </ul> </li> </ul>		
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		<p>Lighthorne Quarry, linking to managed networks within and adjacent to the development.</p> <ul style="list-style-type: none"> <li>○ A network of open space to include provision for children’s play, formal sports, allotments and community woodland. The open space within the site will provide for ecological mitigation as part of the wider biodiversity strategy and the use of Sustainable Urban Drainage Systems (SUDS) and will relate to wider countryside accessibility.</li> <li>• A comprehensive pedestrian and cycle network to provide links to the surrounding countryside, villages and employment areas.</li> <li>• The phased delivery of utilities infrastructure to include: <ul style="list-style-type: none"> <li>○ New primary substation</li> <li>○ New main gas pipeline</li> <li>○ Upgrade work to the foul sewer infrastructure</li> <li>○ Superfast fibre optic broadband</li> </ul> </li> <li>• The phased delivery of highway and transport infrastructure as set out in the Infrastructure Delivery Plan, but also to include any further specific schemes that may be identified as necessary to mitigate more local impacts.</li> <li>• Frequent, express bus services to Warwick/Leamington and Banbury, including railway stations.</li> </ul>		
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6.10	Proposal GLH Policy	<p>Amend the 'Specific requirements' text to read as follows:</p> <p>"Production of a Framework Masterplan Supplementary Planning Document (SPD) to guide developers and the local planning authority in respect of environmental, social, design and economic objectives as they seek to create a new community at Gaydon/Lighthorne Heath. The SPD will set out broad principles to show how the above policy requirements, together with other policy requirements in this Core Strategy, should be delivered on the site. It will need to accord with the following specific requirements:</p> <ul style="list-style-type: none"> <li>• All elements of the proposal, including both the new housing and related facilities and the expansion of the Jaguar Land Rover facility, will be considered comprehensively in order to promote an integrated approach to the overall development as far as this is practicable.</li> <li>• The proposed new housing and expansion of the Jaguar Land Rover facility will properly integrate with, complement and where appropriate deliver related enhancements to the existing employment land at the Gaydon Site and the existing urban fabric at Lighthorne Heath.</li> <li>• The expansion of the Jaguar Land Rover facility will be considered within the context of the wider long term aspirations for the existing Jaguar Land Rover operations on the Gaydon Site.</li> <li>• Whilst respecting the operational requirements in both existing and proposed employment areas, land uses within the site and beyond should integrate both physically through the provision of public routes and</li> </ul>	N	N
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		visually through urban design principles.”		
6.11	AS.10 Policy	In Part (b), add at end “and Policy CS.16 Housing Development.”	N	N
6.12	AS.11 Policy	In Part 1 (Gaydon Site), delete existing bullet points and 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. Also in Part 1, amend (d) to read: “retain and enhance ecological and archaeological features on the site”	N	N
6.12	AS.11 Policy	In Part 2 (Former Engineer Resources Depot), amend second bullet point to read: “employment uses within Classes B1, B2 and B8.”	N	N
6.12	AS.11 Policy	In Part 3 (Former Southam Cement Works), add at the end of (b) “and secure biodiversity enhancement”	N	N
6.12	AS.11 Policy	In Part 4 (Former Harbury Cement Works), in criterion (a) delete “comply with” and insert “take into account”	N	N
6.13	Redditch Context	In line 5 of paragraph 6.13.4, after the word “capacity,” insert: “consistent with the scale of development identified in Policy CS.16,”	N	N
6.13	REDD.1 Proposal	Insert additional specific requirements to read: “deculvert and enhance the existing watercourse	N	N

		feature” and “protect priority habitats within the site”		
6.13	REDD.2 Proposal	Insert additional specific requirements to read: “protect and enhance the Pool and Blacksoils Brook” and “protect priority habitats within the site”	N	N
7.1	CS.24 Explanation	In paragraph 7.1.10, add at the end of the first sentence: “and updated in 2014”. In line 1 of paragraph 7.1.11, after “report” insert “of 2011”	N	N
7.2	CS.25 Policy	In Part A line 3, delete “and Warwickshire County Council” and insert “, Warwickshire County Council and, where appropriate, the Highways Agency”.  In Part E, substitute the following: “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.”  In Part F, ‘Information and Communication Technologies’: In the second bullet point delete “a community led” and insert “an existing”. In the final paragraph, delete the words “or community owned local access networks” in line 2 and “or local broadband groups” in line 3.	N	N

7.2	CS.25 DMCs	<p>In (2), insert after “movement” in the line 1 as follows:  “; including all proposals where there is expected to be a material impact on the Strategic Road Network,”.</p> <p>Add new DMC(6):  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>	N	N
8.1	Policies Map	<p>Insert the following text in Section 8.1 immediately prior to the SLA heading:  Green Belt  The following boundaries of the Green Belt are proposed to be amended in accordance with Policy CS.10</p> <ul style="list-style-type: none"> <li>* Land east of Birmingham Road, Stratford-upon-Avon</li> <li>* Land north of Arden Road, Alcester</li> <li>* Land at Gorcott Hill, Mappleborough Green</li> </ul> <p>Paragraph 8.1.4 - Revise second sentence at bullet point 3 to say:  “Sites at existing settlements that are confirmed as allocations upon adoption of the Core Strategy will be included within the BUAB.”</p>	N	N
App 1	IDP Text	<p>Add new section as follows:  “7.5 Waste  Stratford-on-Avon has four Household Waste Recycling Centres at Shipston-on-Stour, Wellesbourne, Stockton and Burton Farm, Stratford-upon-Avon. WCC owns three out of</p>	N	N

		<p>the four sites. Burton Farm is leased for 25 years, starting in 2001.</p> <p>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>		
App 1	Schedule of Infrastructure Projects	Update Tables 1, 2 and 3 to provide clarification and reflect the latest available information (see separate document)	N	N
App 2	LSV Methodology	<p>Long Marston scores 2 points for public transport, 5 points in total, and moves to Category 3.</p> <p>Stockton scores 2 points for general store and 3 points for public transport, 9 points in total, and moves to Category 2.</p>	N	N

**Appendix C: Detailed responses to other comments on the SA**

1.1.1.1 Comment	1.1.1.2 Response
<p>1.1.1.3 Welbeck Strategic Land (McLoughlin Planning)</p> <p>1.1.1.4 Concern about the assessment of potential development sites around Bidford-on-Avon, in particular, Welbeck's site BID3 performance against SA objective 7 (loss of agricultural land) which was 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.</p>	<p>1.1.1.5 The site at Salford Road (BID.3) has been assessed as part of the Strategic Housing Land Availability Assessment Review 2012 (SHLAA).The Council's decision to follow a more balanced dispersed approach, which seeks to spread more development in the LSVs to sustain these settlements, resulted in less growth/sites in the MRCs. It was also considered that in light of recent planning permissions granted in Bidford-on-Avon, including Friday Furlong, the settlement would be unable to accommodate strategic sites for the future growth in the Core Strategy.</p> <p>1.1.1.6 The site also had unresolved access issues which further prevented its inclusion as potential site in the Core Strategy.</p> <p>1.1.1.7 The site has been submitted as an outline application (13/003323/OUT) for a proposed 150 dwellings with associated access.</p>

<p>1.1.1.8 Miller Homes and Taylor Wimpey Homes (RPS Group)</p> <p>1.1.1.9 SA is considered to have failed on number of points to comply with the SEA Directive.</p> <p>1.1.1.10 1. The 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.</p> <p>1.1.1.11 2. 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.</p>	<p>1.1.1.12 1. Given the character and nature of the Canal Regeneration Zone proposal, it was considered that there were no comparable sites that could be included a reasonable alternative within or on the edge of Stratford-upon-Avon. This site has been dealt with in the Omission Sites in the addendum.</p> <p>1.1.1.13 2. The land at Bishopton Lane, Stratford was not identified as a strategic site to be included in the Core Strategy. It was considered that it was of an insufficient size to accommodate the level of strategic growth required in comparison to other alternative site. It has been assessed as part of the Strategic Housing Land Availability Assessment Review 2012 (SHLAA). s. The site has been dealt with in the Omission Sites in the addendum.</p>
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<p>1.1.1.14 Gallagher Estates Ltd (Framptons)</p> <p>1.1.1.15 1.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.</p> <p>1.1.1.16 SDC SA has not provided any cogent evidence to explain why the further dispersal option was rejected.</p> <p>1.1.1.17 1. Failure to consult on the final and interim SA which clearly presents and assesses the options for consideration.</p> <p>1.1.1.18 2. Failure to comply with Stage B of the SEA Process - developing strategic alternatives</p> <p>1.1.1.19 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.</p>	<p>1.1.1.20 1. This representation has been addressed in the addendum to the SA Report.</p>
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<p>1.1.1.21 Gladman Estates ( Wellesbourne Airfield Proposal)</p> <p>1.1.1.22 1. 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.</p> <p>1.1.1.23 2. The SA process has not considered in a comparable manner all the reasonable alternatives.</p> <p>1.1.1.24 3. They contend that the 'Further Dispersal' option has been inadequately assessed by the SA. 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. 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>1.1.1.25 4. No SA work carried out on the reasonable alternatives in terms of housing</p>	<p>1.1.1.30 1. This representation has been addressed in the addendum to the SA Report.</p> <p>1.1.1.31 2. This representation has been addressed in the addendum to the SA Report.</p> <p>1.1.1.32 3. This representation has been addressed in the addendum to the SA Report.</p> <p>1.1.1.33 4. A response to the Proposed Submission Core Strategy argued that an assessment should have been carried out on the reasonable alternatives in terms of housing requirements presented within the SHMA, ranging between 9,500 and 15,500. These are simply a range of projections illustrating the implications of a range of assumptions and do not represent reasonable alternatives that need to be assessed through the SA/SEA process.</p> <p>1.1.1.34 5. A response to the Proposed Submission Core Strategy argued that an assessment should have been undertaken of the amendment to the plan</p>
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<p>requirements presented within the SHMA, ranging between 9500 and 15,500.</p> <p>1.1.1.26 5. 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>1.1.1.27 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>1.1.1.28 6. 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>period. It suggested 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>1.1.1.35 The SHMA 2011-2031 took into account any unmet need and this is included in the housing provision. There is therefore no need to assess the amendment to the plan period.</p> <p>6. Jaguar Land Rover's earlier concern about the GLH proposal's potential capacity to constrain its long term business expansion aspirations have been addressed by amending the GLH proposal accordingly. The new settlement proposal for Gaydon Lighthorne Heath, as set out the Council's Proposed Submission Version (June 2014), includes land comprising approximately 100 hectares to enable the expansion of Jaguar Land Rover (JLR) to meet the business needs for uses that include;</p> <ul style="list-style-type: none"> <li>• Research, design, testing and development of motor vehicles and ancillary related activities.</li> <li>• Other advanced engineering technologies and products.</li> <li>• Offices</li> <li>• Low volume manufacturing and assembly operations.</li> <li>• Development of associated publicly accessible event, hospitality, display, leisure and conference facilities and marketing infrastructure.</li> <li>• Automotive education and training including ancillary accommodation</li> </ul> <p>1.1.1.36 7. This representation has been addressed in the addendum to the SA Report.</p>
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<p>1.1.1.29 7. 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>	

<p>1.1.1.37 B and M Glanfield (Framptons)</p> <p>1.1.1.38 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>1.1.1.39 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> <p>1.1.1.40 1. Failure to consult on the final and interim SA which clearly presents and assesses the options for consideration.</p> <p>1.1.1.41 2. Failure to comply with Stage B of the SEA Process - developing strategic alternatives</p> <p>1.1.1.42 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.</p>	<p>1.1.1.43 This representation has been addressed in the Addendum to the SA Report.</p> <p>1.1.1.44 It should be noted that 2005 Guidance on SA of RSS's and LDD's produced by ODPM has been replaced.</p>
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<p>1.1.1.45 St Modwen - (Barton Wilmore)</p> <p>1.1.1.46 1. No explanation why the Long Marston Estate is ruled out by the Council as an alternative location for development. It is considered that the 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> <p>1.1.1.47 2. St Modwen's consider that the detailed assessment matrix 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>1.1.1.48 3. The findings for SA Objective 14 are also questioned. It suggested that the policy would have an 'outright positive effect on the SA Objective 14 'to safeguard and improve community, safety and wellbeing. This is the basis that the anticipated impact of GLH on the existing villages of Gaydon and Lighthorne Heath, which the new settlement will essentially be an extension of.'</p>	<p>1.1.1.50 1. The site was submitted in response to a call for sites by the Council in February 2013. Long Marston Depot was subsequently one of the 15 strategic sites which were assessed in the Sustainability Appraisal of Potential Strategic Options (June 2013. On 25 November 2013 the Council received an email confirmation from the site owners, St Modwen's, that the Council should only consider an option 1 for an additional 550 dwellings as part of the Council's assessment work. The Council considered that the proposal did not constitute a strategic option and was therefore not assessed further as one of the reasonable alternatives.</p> <p>1.1.1.51 The site is also dealt with in the addendum to the May 2014 Report.</p> <p>1.1.1.52 2. Appendix 2 to the May Report provides clear and transparent criteria for individual scoring.</p> <p>1.1.1.53 3. The scoring of the CS.16 as SA Objective 12 'protects the integrity of the district's countryside as 'negative' is consistent with the findings for SA Objective 12 for the GLH proposal as double negative. The findings for CS.15 under SA Objective 12 perform positively and reflect the policy provisions to protect the character of the settlement and its setting.</p>
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<p>1.1.1.49 It is also contested that the effect of CS.15 as SA Objective 12 'protects the integrity of the district's countryside as 'positive' contrasts with the negative performance of CS.16 SA Objective 12 which performs as a 'negative effect'. It is contended that therefore the CS.16 performs as negative, rather than the ascribed positive performance in the SA.</p>	
<p>1.1.1.54 South Warwickshire Clinical Commissioning Group Public Patient Participation Sub-Group</p> <p>1.1.1.55 Query about why a Health Impact Assessment (HIA) has not been carried out on the Core Strategy</p>	<p>1.1.1.56 The Core Strategy's implications on the health of the district has been assessed as part of the iterative process of the Sustainability Appraisal.</p>

<p>1.1.1.57 FORSE</p> <p>1.1.1.58 It is noted that FORSE has produced its own sustainability appraisal of the proposed Gaydon Lighthorne Heath.</p> <p>1.1.1.59 The Representations submitted by FORSE include a number of concerns</p> <p>1.1.1.60 1. The SA is unfairly 'skewed' in favour of a predetermined preferred option of Gaydon Lighthorne Heath proposed settlement.</p> <p>1.1.1.61 2. Letter explains that new evidence is available and should be considered by the SA.</p> <p>1.1.1.62 3. FORSE wishes to see a re-examination of the dispersal option.</p> <p>1.1.1.63 4. Letter raises issue of CALA homes Masterplan providing a range of services compared to GLH.</p> <p>1.1.1.64 5. Raise issues of changed assessment following the June 2013 consultation. Para 7.5 comments that assessment details have changed (as a result of a different scope of assessment being prepared.) The same authors would wish to suggest that the assessment would again change according</p>	<p>1.1.1.68 1, 2,3. 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 consultants have 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.</p> <p>1.1.1.69 4. The GLH Proposal would provide both additional and improvements to existing infrastructure which would serve the local and broader infrastructure needs of the district on a comparable scale to those proposed in the CALA Homes Masterplan.</p> <p>1.1.1.70 5. Changes were made to the assessment of GLH following the SA June 2013 and incorporated into the subsequent SA Report. They reflect greater level of information made available to the SA team by the Council. This also reflects the iterative nature of sustainability appraisal where options are refined through the course of the assessment.</p> <p>1.1.1.71 6. Sustainability Appraisals are by nature strategic,</p>
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<p>to their own assessment (see tables on page 22 and 23 of the letter)</p> <p>1.1.1.65 6. The letter notes several times that statements of sustainability cannot be made without further detail, for example a master plan or ecological/acoustic assessment</p> <p>1.1.1.66 7. The letter raises various matters of detail concerning how they believe the assessment results would differ according to their interpretation. The selection of a new settlement is based on a Sustainability Appraisal in line with the NPPF requirements and yet the evidence on which the SA is based ins badly flawed in the case of at least three of the sites under consideration for a new settlement.</p> <p>1.1.1.67 8. Concern that the SA findings for each of the three leading sites under consideration from three earlier SA reports are at odds with the evidence and each other.</p>	<p>and therefore they are not required to assess reasonable alternatives at a detailed level. In terms of the GLH proposal, the developers of the site, in conjunction with the District Council are currently preparing a Supplementary Planning Document (SPD) to provide further planning guidance. The SPD will be accompanied by SA which will provide a more detailed assessment.</p> <p>1.1.1.72 7. The role of SA is to inform plan making, not to determine the direction of the plan. The SA is only one of a suite of evidence base documents which are taken into consideration, when deciding which options will be taken forward and which are rejected.</p> <p>1.1.1.73 8. SA is an iterative process and is expected to produce different results as different versions of the plan are passed to and from the SA team and the Council.</p>
<p>1.1.1.74 FORSE has submitted a number of specific comments related to the findings for individual SA objectives.</p>	<p>1.1.1.81 Para 5.6.112 of the May Report 2014 refers to the presence of the Bronze Age round barrow.</p>

<p>1.1.1.75 <u>SA Objective 1: Protect, enhance and manage sites, features and areas of archaeological, historic and cultural heritage importance;</u></p> <p>1.1.1.76</p> <p>1.1.1.77 There is little mention in the Lepus Report of the Bronze Age round barrow within the GLH proposal.</p> <p>1.1.1.78 Concern was expressed that the proposed mitigation for the impact of construction traffic is not possible.</p> <p>1.1.1.79 Concern was raised that proposed mitigation to implement to screen the effect of the development on listed buildings was not possible. The setting of Chesterton Windmill would be compromised and this is not reflected in the objective findings.</p> <p>1.1.1.80</p>	<p>Warwickshire County Council (WCC) (SDC13CC029) has granted planning permission for a scheme to improve the junction 12 of M40, which includes the construction of a dual carriageway. The part of the dual carriageway route goes through the Bronze Age round barrow site. Planning permission was granted subject to archaeological survey prior to development.</p> <p>1.1.1.82 <sup>2</sup></p> <p>1.1.1.83 The SA states that ‘effects associated with construction may be capable’ of mitigation. The SA is a high level strategic document. As with any major development, detailed construction matters would be dealt with by the requirement to produce a Construction and Environmental Management Plan (CEMP).</p> <p>1.1.1.84</p> <p>1.1.1.85 Para.5.6.11 recognises the effect on listed buildings and states that any development will need to be consider the issue in more detail. Detailed matters such as this would be covered in the SPD SA, which is currently being prepared.</p> <p>1.1.1.86 English Heritage has raised no objections.</p>
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<https://democratic.warwickshire.gov.uk/cm5/CalendarofMeetings/tabid/128/ctl/ViewMeetingPublic/mid/645/Meeting/2730/Committee/462/Default.aspx>

<p>1.1.1.87 SA Objective 3: Protect, enhance and manage biodiversity and geodiversity.</p> <p>1.1.1.88 The letter raises concerns about lack of reference to important relevant biodiversity assets in the May 2014 Report and its statement that ‘there should be no net loss of biodiversity’.</p> <p>1.1.1.89 SA does not mention that all broad leafed trees in Lighthorne Heath have TPOs or that the ancient broad leafed trees and mature hedgerows along the B4100.</p>	<p>1.1.1.90 FORSE has produced a study (Bioscan) which assessed one of the SA topics (biodiversity) in a great level of detail than is usually associated with a SEA/SA of a strategic planning document and associated options. The SA of the GLH SPD will assess this issue in a greater level of detail. Natural England has provided guidance on appropriate buffer zones to be implemented on the GLH site and will be included in the SPD.</p> <p>1.1.1.91 Natural England has raises no objections.</p> <p>1.1.1.92 Policy CS.6 of the Submission Core Strategy requires that ‘proposals will be expected to secure a net gain in biodiversity’, whilst paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by; ...’ minimising impacts on biodiversity and providing net gains in biodiversity where possible..’</p> <p>1.1.1.93 May 2014 Report notes the existence of mature hedgerows and recommends that these should be retained. It also recognises the presence of important protected species (5.6.116).</p>
<p>1.1.1.94 <u>SA Objective 5: Minimise the district’s contribution to climate change</u></p> <p>1.1.1.95 Objects the Climate change objective findings.</p> <p>1.1.1.96 FORSE states that ‘there is no reason to suppose that population will move into a</p>	<p>1.1.1.97 Although there is no guarantee people moving into the new settlement will chose to work for the motor industry, the presence of a large employer in a settlement is likely to provide some job opportunities for those living there and the wider surrounding area. The proposal includes provision for more sustainable</p>

<p>new settlement' (and) ... it is 'wishful thinking' to imagine all motor industry employees will move into the new settlement in order to reduce carbon emissions. It recommends transport effects are downgraded to negative effect.</p>	<p>modes of transport such as a frequent, express bus services to Warwick/ Leamington and Banbury, including railway stations.</p>
<p>1.1.1.98 <u>SA Objective 7: Protect and conserve natural resources</u></p> <p>1.1.1.99 It is suggested that the proposed mitigation states that ' demand for agricultural land needs to be assessed. It is recommended that it should be downgraded to major negative effect".</p>	<p>1.1.1.100 This assessment would not take place as part of the SA. The reason this is not a strong negative is because 3a is considered good quality land to preserve and 3b is considered acceptable to build on. Therefore the weight of this argument depends on whether the land is a or b.</p>
<p>1.1.1.101 <u>SA Objective 8: Reduce air, soil and water pollution</u></p> <p>1.1.1.102 Concern expressed at the apparent lack of reference to wastewater capacity for Gaydon Lighthorne Heath</p>	<p>1.1.1.103 The SA has reflected the findings of the Water Cycle Study 2013 which reviewed the impact on the water infrastructure from the proposed level of growth, including the Gaydon Lighthorne Heath new settlement proposal. The study identified that there was some capacity issues around wastewater treatment, although this was not considered to be an overall constraint to development of the site as it will require significant upgrading. Under the provisions of the Flood and Water Act 2010, water companies are required to provide infrastructure and services where it is required. The SA reflects detailed discussions undertaken with Severn Trent Water company and the developers to resolve wastewater capacity issues. The need to upgrade the foul drainage network is also referenced under Water Supply and Waste Water Treatment heading on page 249 of the IDP in the Core Strategy Submission Version.</p>
<p>1.1.1.104 <u>SA Objective 10: Improve the efficiency transport networks by increasing the</u></p>	

<p><u>proportion of travel by sustainable modes and by policies promoting which reduce the need to travel.</u></p> <p>1.1.1.105 The letter considers that the site is 'cut off' from existing settlements both physically and in terms of services. There are no alternatives to private car use. It suggests that GLH performance against SA objective for transport should be downgraded to 'negative' and that Long Marston Airfield performance against the same SA objective to 'positive'.</p>	<p>1.1.1.106 A new settlement will incorporate necessary facilities and services, as well as providing the opportunity to plan connected, high quality sustainable transport routes, even if these are not currently present.</p>
<p>1.1.1.107 <u>SA Objective 11: Reduce the barriers to those living in rural areas</u></p> <p>1.1.1.108</p> <p>1.1.1.109 The letter objects to the findings on the basis that other than the JLR expansion, there would be no additional employment development beyond a few local shops in the proposed new village. There is no provision for a secular building to serve the new village and wider community.</p> <p>1.1.1.110 There is no costing/ viability assessment of the proposed open space requirements for the proposal.</p>	<p>1.1.1.111 The GLH proposal provides for small business units and allows for the increased take up of home working in the district's employment profile.</p> <p>1.1.1.112 The JLR expansion scheme includes the following additional employment</p> <p>1.1.1.113 Uses</p> <ul style="list-style-type: none"> <li>• Low volume manufacturing and assembly operations.</li> <li>• Development of associated publicly accessible event, hospitality, display, leisure and conference facilities and marketing infrastructure.</li> <li>• Automotive education and training including ancillary accommodation</li> </ul> <p>1.1.1.114 It also includes a main village centre to serve the development and the existing residents and workforce communities, comprising a range of shops and services to support these existing and new communities and to include community, health and</p>

	<p>leisure facilities and a 3 entry primary school. It also includes a contribution to support off-site provision of secondary (including sixth form) schooling. Provision will also be made for a comprehensive green infrastructure strategy, to comprise</p> <ul style="list-style-type: none"> <li>• Structural landscaping and open space, both alongside the M40 and to establish and/or reinforce visual and functional buffers to maintain the separate identity and integrity of the existing villages of Lighthorne and Gaydon.</li> <li>• A network of open spaces to include provision for children’s play, formal sports, allotments and community woodland.</li> </ul> <p>1.1.1.115 The GLH SPD will set out further details of the above provision and it will be assessed by the accompanying SPD.</p> <p>1.1.1.116 The PPG17 Open Space Update Addendum 2014 provides further evidence for open space requirements.</p>
<p>1.1.1.117 <u>SA Objective 13: Provide affordable environmentally sound and good quality housing for all</u></p> <p>1.1.1.118 The letter objects to the findings because it is suggested that affordable homes is not required or desired, given the number of council homes at Lighthorne Heath.</p> <p>1.1.1.119 Para 3.10.3 objects that there is no planned allowance in Schedule of Infrastructure Projects (IDP) for integration of the proposal and JLR expansion with the existing employment land at Gaydon site and existing urban fabric of Lighthorne</p>	<p>1.1.1.120 The proposal would include provision for affordable homes which would contribute towards meeting the overall district’s requirement.</p> <p>1.1.1.121 There is no requirement for the IDP to include this type of information.</p>

Heath.	
<p>1.1.1.122 <u>SA Objective 14: Safeguard and improve community health, safety and wellbeing</u></p> <p>1.1.1.123 Objection to the change in findings January 2014 to May 2014 findings from '-and ++'.</p>	<p>1.1.1.124 The changes reflect the inclusion of health facilities for the GLH site, which would serve the overall development and existing residents. Discussions have been held with NHS, as part of preparing the IDP and demonstrating the Duty to Cooperate.</p>
<p>1.1.1.125 Natural England</p> <p>1.1.1.126 SA's lack of explanation about the decision to allocate Option B 'Gaydon/Lighthorne Heath over 'Option D 'South East Stratford.</p> <p>1.1.1.127 LPA should satisfy itself that there is a sound reasoning for the selection of Option B Gaydon/Lighthorne Heath</p>	<p>1.1.1.128 This response is addressed by the Addendum to the SA Report.</p>
<p>1.1.1.129 Warwickshire Wildlife Trust (WWT)</p> <p>1.1.1.130 WWT expressed concern that the SA was undertaken with limited up-to date ecological information in the assessment of the Gaydon Lighthorne Heath (GLH) proposal.</p>	<p>1.1.1.131 The proposal was assessed with the information that was available at the time. SA team contacted WWT for information on wild life sites. The SA makes a strong case for protecting ecological features and creating new ones at GLH. The SPD has carried out further work into this area.</p>