

Stratford-on-Avon Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

Rep. No.	Policy/Topic	Representation
SNP01	H1	<p>I have been asked by Mr David Domoney of Hillside, Alveston Lane, Alveston, CV37 7QF to make representations to the Independent Examiner in respect of the Alveston Built up Area Boundary (BUAB) as currently proposed in the April 2017 submission version of the Stratford-upon-Avon Neighbourhood Development Plan (the NDP).</p> <p>The location of Hillside is shown on the location plan at Appendix A. The curtilage of the house is outlined in red. The land within the red line is domestic garden land used on a day to day basis by Mr Domoney and his family. Photographs of the garden are shown at Appendix B. These photographs illustrate the domestic uses of the land and the ornamental shrub and tree planting normally associated with domestic curtilage. The garden land does not have the appearance of a paddock or open countryside.</p> <p>The BUAB proposed for Alveston in the NDP is shown at Appendix C.</p> <p>Objection is made to the BUAB as drawn for Alveston in the NDP. The BUAB as currently proposed cuts through the middle of Mr Domoney's garden at Hillside. There is no rationale for drawing the boundary line in this position. The line is arbitrary.</p> <p>The Strategic Environmental Assessment (SEA) of the NDP dated March 2017 sets out (at page 30 point 3.5.4) the criteria the Stratford-upon-Avon Neighbourhood Plan Steering Group used to define the Alveston BUAB. The criteria includes, inter alia:</p> <ul style="list-style-type: none">• The advice and guidance relating to 'Defining Built up Area Boundaries' from Stratford on-Avon District Council (August 2016);• The presence of the River Avon Flood Plain to the north and east of the village.

The BUAB as proposed at Hillside is incorrectly defined for the following reasons:

1. The proposed BUAB does not comply with the Planning Guidance dated August 2016 issued by Stratford-on-Avon District Council in relation to defining BUABs. This guidance cross refers to Annexe 3 of the Local Plan Review adopted in July 2006 and states that included within the confines of a settlement are, inter alia: “areas of residential curtilage unless these areas are clearly paddocks more appropriately defined as ‘non-urban’”. The 2016 guidance states that “Neighbourhood Plan Steering Groups are advised to use these guidelines when defining BUABs in their plans”. A copy of the Council’s guidance is attached at Appendix D. The 2016 guidance reflects long established guidelines for defining BUABs used consistently over many years by Stratford-on-Avon District Council. These guidelines were used to define the BUABs for the Core Strategy Policies Maps for the Main Town of Stratford-upon-Avon and the Main Rural Centres.

2. The purpose of the BUAB is to prevent development encroaching into the open countryside. The garden to Hillside is not part of the open countryside and does not have the appearance of being part of the open countryside. The BUAB as currently drawn cuts across the garden to Hillside; the line does not follow any boundary on the ground. This is contrary to established practice. The BUAB should generally follow defined physical features such as roads, hedges, field boundaries and existing property lines. No other examples can be found of a BUAB dividing residential curtilage, either in the submission version of the NDP or the adopted Core Strategy. To leave the BUAB in the current position, splitting the garden of Hillside, would be inconsistent with the approach taken in the Core Strategy and NDP for Stratford-upon-Avon and Tiddington.

3. As stated on page 30 of the SEA Report, the Neighbourhood Plan Steering Group have used “the presence of the River Avon Flood Plain” as a criteria when defining the Alveston BUAB. This is plainly wrong. Any perceived constraints such as potential for flooding are clearly not a relevant consideration when defining a BUAB. Notwithstanding this, the arbitrary BUAB as drawn excludes garden land at Hillside which is in flood zone 1 (low probability of flooding). It is noted that two fields to the east of Hillside included within the BUAB are entirely within Flood Zone 3. In defining BUABs for the Core Strategy for the Main Town and the Main Rural Centres, the Council have not used environmental constraints such as flood risk as criteria for defining the BUABs.

		<p>Adopting current and long established guidelines of the District Council, the BUAB should include all of the residential curtilage of Hillside, as outlined in red on the location plan at Appendix A. Not to include all of the curtilage of Hillside within the BUAB would potentially unreasonably restrain or obstruct future small scale infill development, in conflict with the principle that Alveston as a Local Service Village is a suitable location for housing development. The BUAB as drawn therefore does not conform with the strategic policies for Alveston in the Core Strategy. The BUAB should be amended to include all of the residential curtilage of Hillside within the Alveston BUAB.</p>
SNP02	H1	<p>In am the homeowner of Hillside and I am contacting you with a request for you to kindly review the BUAB in regards to my property please and include all of my garden into the village plan. Currently it does not follow any boundary line and severs my garden from my house. The line crosses the middle of the garden of Hillside. There is no rationale for drawing the line in this position. The line is arbitrary.</p> <p>The Alveston neighbourhood plan includes my garden with my house (Please see Appendix 1). I have spoken to Mark Haselden a committee member of the Alveston Villagers Association who created and submitted the Alveston Neighbourhood plan and he confirms the Alveston Village Association backs Hillside to be included within the BUAB and the AVA committee stand by their original submission with all of Hillside's land included. The boundary line as currently drawn cuts across the garden to Hillside and does not follow any boundary on the ground. This is contrary to established practice.</p> <p>The purpose of the BUAB is to prevent development encroaching into the open countryside. My garden to Hillside is not part of the open countryside and it does not have the appearance of being part of the open countryside. My garden is like many other gardens in the village although bigger.</p> <p>My garden includes a variety of features including established planting, cut lawns, grow your own green house and raised beds, patios, garden buildings and fruit trees. It's far cry from open countryside. Please find attached a plan of the garden and pictures of what it looks like to give you a virtual tour. (Appendix 2) you will see the garden is not in part of the land it's all of the land.</p>

	E3	Tourism is of critical importance to the economy of both Stratford-upon-Avon and the district as a whole, and therefore we welcome and support this policy and it's wording. This importance is acknowledged in paragraph 7.9, along with the continuing need for reasonable growth and modernisation of visitor facilities, a matter which we also support.
	TC3	We support the redevelopment of Bell Court, and particularly the demolition of the multi-storey car park which is currently located on this site. The car park is not in-keeping with its surroundings, indeed for some it is an eyesore in the historic medieval town centre. However, if demolished, it is essential that the shortfall of car parking spaces is made up, to continue to allow the town centre to prosper from tourist linked trips to the area's many attractions.
	TC Project 1	We support the formation of a town centre partnership and request that should one be formed, a representative of the Falcon Hotel should form one of the key stakeholders, to reflect the hotels importance to the town. Also, a representative from the hotel would have a intimate knowledge in the measures required to improve visitor experience in the town, perception, footfall and spend, and therefore would be a positive member of the partnership.
	TC Project 7	We support this project and offer any help and liaison between the hotel operator, our coach operators and the Town Centre Strategic Partnership required to deliver the project.
	TC Project 9	We agree with the objectives of this project, as whilst some attractions have travel plans and many people travel by rail or coach to the town, the town will always need to support more localised car based trips by tourists and residents of the area.

BE4		<p>We would question the need for these panels, or how they are proposed to be funded, operated and managed. We equally question which professionals will sit on the panels, as with historic buildings, detailed knowledge of best practice is required, which local people may not have the experience of. Furthermore, Stratford-on-Avon District Council already has a statutory obligation to consider design matters, and with many heritage assets and conservation areas covering the urban area, where the professionally qualified conservation team and/or Historic England, are consulted on application proposals. We believe that having further design advice and comment from another body will significantly delay decision making could lead to conflicting advice being reviewed by applicants which ultimately leads to investment opportunities being lost in the District.</p> <p>If a Design Review Panel is to be formulated, full detail on how this is to be staffed, what formal qualifications they have, who will fund the function of the panel and how they will be effectively managed to ensure opportunity for pre-application and post-application consultation can occur effectively with the panels should be produced and consulted upon.</p>
BE6		<p>Whilst we agree that Design Quality and sustainability are important principles for all new development, we would question the requirement for BREEAM 'Excellent' standard across all new development of 40sqm. We believe this element of the policy and it's wording to be unduly onerous and does not take into account individual circumstances (such as viability and the historical integrity of a building or a site) which may lead to a below 'Excellent' BREEAM Accreditation. We would suggest this section of the policy is reworded as follows:</p> <p><i>All new residential and non-residential gross floor space (including extensions) over 40sqm shall should be designed to meet at least the BREEAM 'Excellent' standard, unless circumstances can be demonstrated that this would not be suitable for the development proposed. Exemptions could include: the historical integrity of a designated heritage asset, and / or viability considerations.</i></p>

	BE10	<p>We strongly support the broad provisions of this policy and the acknowledgement that the cultural heritage of Stratford-upon-Avon is worthy of conservation, and that proposals which enable the appropriate and sensitive restoration of listed buildings will be supported. However, we question the need for this policy as it simply duplicates provisions in Stratford-on-Avon District Core Strategy Policy CS8: Historic Environment. We therefore question the need for this policy in this lower tier Neighbourhood Development Plan as the duplication of policies is not in tandem with Government advice on this matter or best practice.</p> <p>We thank you for the opportunity to provide comments in regard to this NDP as a part of its formal consultation and examination. We look forward to being kept up-to-date on the evolution of the plan. If we can assist in any way, please do not hesitate to contact me at your earliest convenience.</p>
SNP04	General	<p>I appreciate the Council's main concern is tourism, jobs and housing, but I am very disappointed in the lack of any significant planning to improve living conditions for 24% of the community. The older population are obviously regarded as a costly encumbrance to the area? However, I should remind you that we still pay taxes and Community charges and deserve more than a couple of lines, which seem to indicate that indoor and outdoor bowling and a library visit will be all that is required for the future. My concern is not entirely with the elderly but also people with limited mobility for whatever reason. 17% in the last census were deemed to have a health problem.</p> <p>...</p> <p>It is the elderly people who need a 'Play area'. An interesting and varied garden area, where they can take a walk, sit and appreciate nature in some peace and quiet. They should also have outdoor recreational facilities that promotes social interaction and health...tables with games (draughts etc) can also be used for picnics with visiting family and friends. Perhaps a greenhouse, a shed with work benches, and small raised plots, where they can grow a few flowers, herbs etc. Boule, putting or quoits are simple games the residents could enjoy. Diminishing eyesight and mobility issues already make life difficult for older people. Their home and garden should be safe and enjoyable.</p>

	<p>11.28</p> <p>CLW Project 1</p>	<p>“The Neighbourhood Area is generally well supplied with sports facilities”. This is certainly not true when it comes to the needs of older people and those with disabilities. Where are Petanque/Boules terrains, Croquet courts, Putting Greens etc? If they are to retain the best physical and mental health possible, these people are as much in need of outdoor recreational facilities as children, who at least have School play grounds and fields, which are seldom used after school or in the holidays? If people have mobility problems, they are further handicapped when walking by the lack of seating. The so-called “Necklace Areas” on the edge of town are an admirable suggestion but the priority should be to enhance the green areas near to people’s homes.</p> <p>I am concerned this mixed tenure will be imposed on older people in the large housing developments. On a smaller scale, this has already been tried in Stratford and just seems to cause problems and distress for the elderly, especially those who bought their flats and have to put up with families, often renting or waiting for a Council house, who have little or no consideration for the neighbours. The garden areas become a neglected dumping ground for large, often rusting toys and a no-go area for the elderly. Corridors are permanently blocked with bikes or excess furniture.</p>
<p>SNP05</p>	<p>General</p>	<p>Stratford on Avon has a long history of flooding, and as recently as 2016, the Environment Agency deployed demountable flood defences to safeguard the town from flooding.</p> <p>We currently provide flood risk warnings for the River Avon at Stratford upon Avon including Warwick Road, Tiddington Road, Bridgefoot, Waterside and Shipston Road area, Avonside, Saffron Walk, Stratford Racecourse area and Luddington Road.</p> <p>Flooding can have a significant economic and social impact disrupting tourism, employment as well as flooding homes.</p> <p>The Neighbourhood plan area has large areas of land which is vulnerable to flooding, and there is a significant extent of floodplain from watercourses as well as from surface water flooding.</p>

	<p>3.9 – Future Development Issues</p> <p>4.1 – Stratford-upon-Avon Vision Statement</p>	<p>The Neighbourhood plan does not have a locally specific Flood Risk policy and therefore will be reliant on the policies contained within the Stratford on Avon District Local Plan. The Local Plan is worded to ensure that flood risk across the Local Council Area can be managed effectively, but offers little guidance or considers in detail the locally specific issues within Stratford on Avon.</p> <p>The Neighbourhood plan and the proposed developments will need to align and comply with the following Local Plan policies such as;</p> <ul style="list-style-type: none"> • Policy CS.4 – Water Environment and Flood Risk. • Development Management Consideration – Flood Risk and Surface Water Management. • Development Management Consideration – Waste Water Infrastructure. • Policy CS.5 – Landscape. • Policy CS.7 – Green Infrastructure. <p>In the absence of the specific flood risk policy within the Neighbourhood Plan, we have recommend the following additional text and amendment to the document.</p> <p>We would recommend that the following bullet point is included to highlight that flooding is a major issue within the plan area.</p> <p style="padding-left: 40px;">“Stratford on Avon is at risk of flooding, and development within the floodplain and any new development or works to the river should take action to reduce the frequency and consequences associated with this, taking into account climate change”.</p> <p>We would like the bullet point to be amended to include the following comments to emphasise the value of Green and Blue infrastructure.</p> <p style="padding-left: 40px;">“Stratford-upon-Avon will be greener with more soft landscaping, trees, open spaces and green corridors linking the town to the countryside, and ensure that blue infrastructure is developed to restore and enhance rivers, and sustainably manage water”</p>
--	---	---

	<p>5.0 – Development Strategy and Housing</p>	<p>In section 5.0- Development Strategy and Housing we would recommend that two additional bullet points are included</p> <p style="padding-left: 40px;">“There will not be any development within areas designated as Flood Zone 3 without a deliverable strategy to reduce flood risk to the development site and wider community”</p> <p style="padding-left: 40px;">“Land identified for future flood risk management will be safeguarded from future development”</p> <p>We would like to make you aware that we have a proposed flood risk management scheme to protect an area at risk of flooding along Racecourse Brook. As part of this scheme the proposals are to install two flood storage areas upstream of the head of Main River, North of Birmingham Road (A3400). As a result, we would want this land safeguarded from future development and any nearby development should provide a contribution towards the scheme.</p> <p>H1 We recommend the incorporation of the following wording in first paragraph as highlighted in bold text</p> <p style="padding-left: 40px;">“Proposals for new housing within these built up area boundaries will be supported in principle, subject to their conformity with planning policies included within the adopted Stratford Development Plan. All areas outside of the built up area boundaries are classed as Countryside. New housing within the Countryside will be strictly controlled and limited to dwellings for rural workers, Rural Exception Sites, and replacement dwellings.”</p> <p>H3 There are significant areas of flood risk within Tiddington and Alveston. We would recommend that consideration be given to rewording policy SSB3 to ensure that new development is not located within areas of floodplain, or within 8 metres of a main river.</p> <p>H4 We would welcome an additional bullet points to be added to Policy H4 - Use of Brownfield Land, in order to reduce flood risk around the development and surrounding areas.</p> <p style="padding-left: 40px;">“Development will reduce flood risk to the development site and surrounding area, and incorporate a minimum 8 metre easement from the top of bank from any watercourse”.</p>
--	---	---

H5	<p>We would welcome an additional bullet point to be added to Policy H5- Use of Garden Land in order to reduce flood risk around the surrounding areas.</p> <p>“There is no encroachment on the Environment Agency’s 8 metre easement requirement, or development within areas of floodplain”.</p>
E1	<p>We would welcome an additional bullet point to be added to Policy E1 – Protecting Existing Employment Sites.</p> <p>“There will not be any development within areas designated as Flood Zone 3 without a deliverable strategy to reduce flood risk to the development site and wider community”</p>
E4	<p>We would welcome an additional bullet point to be added to Policy E4 – Work/Live Units.</p> <p>“The conversion would incorporate any recommended flood resilience measure and not increase floor space or vulnerability of uses within areas of floodplain”.</p>
TC Project 1	<p>In TC Project 1- Town Centre Strategic Partnership we recommend the inclusion of the following bullet point:</p> <p>“Liaise with the Environment Agency to develop a Town Centre Strategy to support the deployment of emergency flood barriers, and develop a flood risk management strategy”.</p>
TC9	<p>We recommend that new development and conversions should be supported by a flood risk assessment that demonstrates that the proposal will not increase the risk of flooding to third parties, that appropriate flood resilience measures can be delivered, and that the change of use will be in accordance with the NPPF vulnerability classifications.</p>

TC Project 8

We consider that careful consideration will need to be taken to ensure that the structural integrity of the bridge is not compromised during any proposed works, and it is likely that an environmental permit will be required from the Environment Agency to ensure that the proposals do not increase the risk of flooding to third party land.

BE11

We request that the following information is included in Policy BE11 - **Replacement Dwellings**, as there have been numerous examples of applications for replacement dwellings due to a history of flooding within the Neighbourhood Plan Area.

“Applications for replacement dwellings must be supported by a Flood Risk assessment (FRA).

The FRA should demonstrate how flood risk will be reduced. The following points should be addressed and, where they cannot be met, justification provided as to why this is the case.

- **No intensification** (i.e. no additional planning units) of occupation of the site as this would not represent a ‘replacement’ dwelling. There should also be no increase to the level of risk to occupants.
- The **Sequential Approach**, which requires you to direct the most vulnerable aspects of the development to the parts of the site with the lowest flood risk, should be applied within the site as far as practicable. Opportunities to make space for water should be incorporated, including setting back development from defences or watercourses on or near to the site.
- Opportunities that exist for a **safe or improved access/evacuation route** should be incorporated in the redevelopment, where possible.
- Provision of **flood management and evacuation plan** by the applicant to the satisfaction of the Council.
- Raising the **finished floor level** above the 1 in 100 year return period flood level, including allowances for climate change and freeboard, where practical. If this is shown to be not to be appropriate (see below) designing buildings to incorporate **flood resilience and resistance measures** to these levels.

- Ideally there should be **refuge**. This should be above the 1 in 1000 year return period flood level including climate change and freeboard allowances.
- If the replacement building is on a single storey with no refuge above, the floor levels should ideally be set above the 1 in 1000 year return period level including allowances for climate change and freeboard.
- The building must be capable of withstanding the expected pressures and weight of water acting upon the building. This is vital if the building is required to sustain a refuge area for residents during a flood event.”

This approach is in line with adopted Local Plan Strategy Policy CS.20 Existing Housing Stock and Buildings, which identifies flood risk as a material consideration.

NE2

We recommend that Policy NE2 - **River Avon Biodiversity Corridor** is reworded as below to provide further clarity:

“Proposals within the Floodplain of the River Avon will be required to show that they will not damage the river’s role as a biodiversity corridor or linkages between the river and other important biodiversity sites, or increase flood risk.

Proposals which would adversely affect the environmental quality of the corridor will not be supported. Proposals which positively enhance or contribute to the environmental quality of these areas will be supported.

Explanation

9.7 All development should aim to support and enhance the biodiversity value of the River Avon corridor and recognise the importance of river meadows in flood management. Water compatible uses within Flood Zones 2 & 3 may be acceptable in certain circumstances but other forms of development will be strictly resisted”.

new development, enabling sufficient growth to take place to meet the development needs for the area and assist local planning authorities in delivering full objectively assessed needs (OAN) for housing. Policies that are not clearly worded or intended to place an unjustified constraint on further sustainable development are not consistent with the requirements of national policy or the basic conditions.

Further, the SANP should not seek to include policies in the Neighbourhood Plan that have no planning basis, lack supporting technical evidence or are inconsistent with the provisions required by national and local policy. Proposals should be appropriately justified by the finding of a supporting evidence base and must be sufficiently clear to be capable of being interpreted by applications and decision makers alike.

Of concern to Gladman is the absence of sufficient flexibility in the Regulation 16 version of the SANP. In addition, a number of policies the plan seeks to adopt appear to be more akin to aspirations of the Plan rather than land use planning policies. These issues will be discussed in greater detail below.

...

The Framework seeks to promote sustainable development. The SANP should therefore seek to promote these interests to ensure that it supports the delivery of sustainable development within the Plan area.

Indeed, the Core Strategy identifies Stratford-upon-Avon as the principal settlement in the district and as such is the main focus for housing and business development. Stratford-upon-Avon provides a critical role for its community members and serving the wider authority area. Accordingly, the SANP should seek to support additional growth opportunities that come forward which can help maintain the Town's role and provide for opportunities to make the aspirational objectives that the Plan seeks to deliver.

Indeed, paragraph 5.1.8 of the Core Strategy states that 'Over the plan period as a whole, opportunities for development are provided within and on the edge of town. Whilst this will continue to put pressure on some elements of infrastructure, it is evidence that the development can be accommodated either within the capacity provided by the existing infrastructure or through improvements that can reasonably be delivered'. Accordingly, the SANP should view development proposals on the edge of Stratford positively so that they

		<p>can contribute to the overall strategic approach of the Core Strategy.</p> <p>...</p> <p>Site Submission</p> <p>Land off Evesham Road, Shottery</p> <p>The Town Council will be aware of Gladman’s land interests in Shottery, at land at Evesham Road (see appendix 2 for a location plan). The development of this site represents a logical and sustainable extension of Shottery to meet market and affordable housing needs together with wider objectives.</p> <p>The site is located to the west of Shottery, which itself forms the south west part of Stratford-upon-Avon . The site is clearly defined and contained to the south of Evesham Road, existing residential development resides along the northern boundary of Evesham Road forming the western and south eastern boundaries.</p> <p>The site is bounded by an existing footpath to the north leading east/west into Stratford-upon-Avon surrounded by mature trees and hedgerows. The proposal will provide new homes which will help sustain the vitality and viability of local services and facilities for future facilities resulting in real benefits to the existing local community.</p> <p>Despite the inspector’s decision, we highlight that the decision saw no site specific impediment to the site’s development for housing in landscape, traffic or heritage terms and was merely concerned to see it follow from the development of the wider West Shottery scheme. As such, there is no reason why the SANP should seek to delay the delivery of this scheme, once delivery commences at West Shottery, given that it would be sustainable on all three grounds.</p>
--	--	---

	Consultation Statement	<p>The principles of fair consultation proceedings have been set out for many years and recently confirmed by the Supreme Court in R(Mosley) v LB Haringey [2014] UKSC 56. In this instance, the Supreme Court endorses the Sedley principles which state that in order for a consultation to be fair, a public body must ensure:</p> <ol style="list-style-type: none">1. That the consultation must be at a time when proposals are still at a formative stage;2. That the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response;3. That adequate time is given for consideration and response; and4. <u>That the product of consultation is conscientiously taken into account when finalising the decision.</u> <p>The fourth Sedley requirement is pertinent to this current consultation as the supporting consultation statement does not take into consideration the representations to Gladman’s previous submissions (attached as appendix)</p> <p>In response to the Regulation 14 consultation, the consultation statement states:</p> <p>‘Gladmans’ representation to the Neighbourhood Plan have been submitted via email to enquiries@ourtstratford.org.uk. The alleged email was not received.</p> <p>Given the acknowledgment that the representation to the Regulation 14 was submitted via email, this would indicate that the Town Council was well aware of our previous submission and have therefore not responded to the issues raised. It is therefore unclear as to whether Gladman’s response to the Regulation 14 consultation was lost or has just been ignored. In any event, these representations have not been considered or taken into account. This is a fundamental breach of the fourth Sedley requirement set out above (as followed in R(Silus Investments SA) v LB Hounslow [2015] EWHC 358 (Admin), [57]) and a breach of the PPG requirements under 41-047, 41-048 and 41-080 which collectively make clear that all representations must be taken into account.</p>
--	------------------------	--

H1	<p>This policy defines the built up area boundaries at Stratford-upon-Avon, Tiddington and Alverston. Development beyond these boundaries is limited to dwellings for rural workers, rural exception sites and replacement dwellings.</p> <p>Gladman object to Policy H1 in its current form and the use of built up area boundaries as currently proposed as these would act to preclude the delivery of otherwise sustainable development proposals from coming forward. The Framework is clear that development that is sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. The use of a settlement limit to arbitrarily restricts suitable development from coming forward does not accord with the positive approach to sustainable growth required by the Framework.</p> <p>Indeed, the PPG makes clear that all settlements can play a role in delivering sustainable development, so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. As a tier 1 settlement and a focus of future growth the Neighbourhood Plan should not seek to limit the ability of future sustainable growth opportunities being delivered on the edge of the town. Accordingly, it is advised that the Town Council take a more flexible stance on development adjacent to the existing settlement and the following wording is put forward for the Town Council's consideration:</p> <p><i>'When considering development proposals, the Stratford-upon-Avon Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Stratford-upon-Avon Neighbourhood Plan will be supported particularly where:</i></p> <ul style="list-style-type: none">- <i>Providing new homes including market and affordable housing; or</i>- <i>Opportunities for new business facilities through new or expanded premises; or</i>- <i>Infrastructure to ensure the continued vitality and viability of the neighbourhood area.</i> <p>Development adjacent to the existing settlement will be permitted provided that any adverse <i>impacts do not significantly and demonstrably outweigh the benefits of development.'</i></p>
----	--

H2

Policy H2 defines strategic gaps to preserve the setting and character of the settlements listed under this policy.

Gladman submit that the identification of a Local Gap is a strategic policy that should only be confirmed in an adopted Local Plan. As such, it must be borne in mind that Policy CS.13 of the adopted Core Strategy allows for large scale development in an 'area of restraint' where a scheme 'would have demonstrable community benefits and contribute significantly to meeting an objective of the Core Strategy.

Gladman consider that policy H2 takes a more restrictive approach than that contained in the adopted Core Strategy and is therefore contrary to basic condition (a) and (d).

H3

This policy seeks to support windfall development within the built up area boundaries of Tiddington and Alveston.

Gladman is concerned with the supporting text at paragraph 5.19 which states that the Core Strategy limits development in Tiddington to approximately 113 dwellings with no minimum. In this regard, the use of minimum housing targets has previously been considered in examiner's reports for 'made' neighbourhood plans. For example, the examiner's report to the Billesdon Neighbourhood Plan stated that:

“Core Strategy Policy CS2 refers to the overall housing provision for the District as a minimum, using the wording 'at least' I recommend that reference to a target of 45 dwellings in Policy BP2 be stated as a minimum...”

Accordingly, Gladman consider that it would be prudent to take a more positive stance that housing policies contained in the SANP, as a whole, will be seen as a 'minimum' in order to allow for sufficient flexibility and have regard to the direction contained in the adopted Core Strategy which seeks to deliver 'at least 14,600 dwellings to meet objectively assessed housing needs.

	<p>H4</p> <p>H6</p>	<p>Gladman is concerned that the Plan is seeking to limit the creation of sustainable communities through ‘prioritising’ new housing developments in areas of previously developed land (PDL) by virtue of several references to this fact made throughout the Plan. The Framework makes clear that planning policies should ‘encourage’ the effective use of land that has been previously developed, it does not seek to prioritise it in any sequential way. A key objective of the Framework is to significantly boost the supply of housing, it also details the presumption in favour of sustainable development, neither of which restricts greenfield development in favour of or as a priority over land that has been previously developed. It should be noted that there may be Gladman Developments Ltd. Stratford-upon-Avon Neighbourhood Plan: Submission Version brownfield land which at present is not suitable for redevelopment and therefore should not be given priority over the delivery of sustainable greenfield development opportunities.</p> <p>Notwithstanding the above, Gladman support the inclusion of ‘proposals for development on greenfield land outside the built up area boundaries as defined on figure 2 must clearly demonstrate specific and relevant circumstances to justify development before proposals will be looked upon favourably’. However, we feel that this policy should go further to ensure that development proposals that are sustainable will also be considered favourably. In addition, it would be more appropriate if this element of the policy was instead included in the policy wording under policy H1.</p> <p>Whilst supporting the intentions of this policy to secure specific needs of the neighbourhood area, housing mix will inevitably change over time and this policy as currently proposed may result in housing delivery being stalled due to development viability. Accordingly, Gladman recommend that the Plan should instead rely on Policy CS.19 of the adopted Core Strategy which allows for a range of housing mix on a site by site basis to ensure the most efficient use of land is used.</p> <p>Also, whilst recognising the ambition of the Plan to ensure that community members with a local connection to the town are prioritised, this is not a land use policy and does not need to be included in the main SANP document. It is a statement of intent which would be better suited to an appendix to the document which contained other such non-land use policies. In addition, there needs to be an additional criterion introduced to state what would happen should no person fulfilling the local connection criteria be found.</p>
--	---------------------	--

	BE9	<p>Gladman is concerned that the requirements of this policy may jeopardise the delivery and viability of sustainable development opportunities in the Neighbourhood Plan area if they are subject to the requirements relating to BREEAM and Lifetime Homes Standards.</p> <p>The Written Ministerial Statement (march 2015) confirms that “From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings”</p> <p>Further, paragraph 173 of the Framework is clear that ‘Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened</p> <p>Gladman question whether this policy has been subject to any viability testing as advised by the PPG6 . Further, this policy requires development proposals to incorporate principles of design guidance which are non-statutory in nature. As such, it is recommend that the wording of this policy is modified substantially to that of ‘support’ rather than a requirement.</p> <p>The Framework defines SPDs as ‘documents which add further detail to policies contained in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as designs. SPDs are capable of being a material consideration in planning decisions but are not part of the development plan.</p> <p>It is clear that SPDs and other supplementary guidance documents are only intended to provide guidance only, the SANP should not set out policy requirements to the documents listed in this regard.</p>
--	-----	--

	CLW 3	<p>This policy seeks to designate land as Local Green Space (LGS) and other areas of open space that the Town Council considers worthy of protection.</p> <p>With regards to the designation of LGS, the Framework makes clear at paragraph 76 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development. It states that:</p> <p><i><u>'Local Communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.'</u></i> (Our emphasis)</p> <p>Further guidance is provided at paragraph 77 which sets out three tests that must be met for the designation of LGS and states that:</p> <p><i><u>'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</u></i></p> <ul style="list-style-type: none">- <i><u>Where the green space is in reasonably close proximity to the community it serves;</u></i>- <i><u>Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including a playing field), tranquillity or richness of its wildlife; and</u></i>- <i><u>Where the green area concerned is local in character and is not an extensive tract of land</u></i> (Our emphasis)
--	-------	--

4.4.29 The requirements of the Framework have now been supplemented by advice and guidance contained in the PPG. Gladman note paragraph 007 of the PPG7 which states, *'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the local Green Space designation should not be used in a way that undermines this aim of plan making.'* (Our emphasis)

Gladman further note paragraph 015 of the PPG (ID37-015) which states, 'Paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to achieve what would amount to a new area of Green Belt by another name (our emphasis). Designation of LGS should not be used as a mechanism to designate new areas of Green Belt (or similar), as the designation of Green Belt is inherently different and must meet a set of stringent tests for its allocation (paragraphs 82 to 85 of the Framework).

The issue of whether LGS meets the criteria for designation has been explored in a number of Examiner's Reports across the country and we highlight the following decisions:

- The Seldlescombe Neighbourhood Plan Examiner's Report recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.
- The Oakley and Deane Neighbourhood Plan Examiner's Report recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation.
- The Alrewas Neighbourhood Plan Examiner's Report identifies that both sites proposed as LGS in the Neighbourhood Plan to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.

		<ul style="list-style-type: none">- The Freshford and Limpley Neighbourhood Plan Examiner's Report identified that the six LGS proposed did not meet the criteria required by the framework either collectively or individually. Indeed, the Examiner identified that the combination of sites comprised of an extensive tract of land. The Examiner also considered that the protection of fields to 'prevent agglomeration between the settlement areas...is not the purpose of Local Green Space designation'.- The Eastington Neighbourhood Plan Examiner's Report recommended the deletion of three LGS (<u>16ha</u> and <u>2ha</u>) considered to be extensive tracts of land. The third proposed LGS was deleted due to the lack of evidence demonstrating its importance and significance to the local community.- The Tattenhill and Rangemore Neighbourhood Plan Examiner's Report recommended the deletion of 2 LGS comprising of <u>4.3ha</u> and <u>9.4ha</u>.- The Borley Examiner's Report identified a total of 13 parcels of land to be designated as LGS. The Examiner recommended at 4.98 that the 'identification of these extensive tracts of agricultural land was contrary to NPPF policy' and recommended that the policy should be deleted. The proposed LGS measured in the range of <u>1ha</u> – <u>4.3ha</u>.- The Malpas and Overton Neighbourhood Plan Examiner's Report recommended the deletion of policy LC4 which included a total 42 LGS. The Examiner identified that 'a number of identified sites do not meet one or all of these requirements.' With regard to the third criteria, the Examiner recommended that sites 16, 17 and 40 be deleted as they are 'relatively extensive tracts of countryside'. The size of these sites ranged from <u>3.4ha</u> – <u>16ha</u>. In this instance the Examiner also highlighted the importance of contacting landowners at an early stage about proposals to designate land as LGS. The Examiner was unable to identify any evidence of a targeted consultation with landowners. <p>Whilst information has been prepared by SATC to justify the proposed LGS designations we are concerned that some designations proposed in the context of the above decisions do not meet the specific policy requirements for designation.</p>
--	--	--

	<p>CLW 7</p> <p>Strategic Environmental Assessment / Sustainability Appraisal</p>	<p>Whilst recognising the importance of providing allotment provision, Gladman question the justification behind the requirement that at least 40sqm for new 2 bedroom houses and 60sqm for new 3+ bedroom houses must be provided to facilitate homeowners the opportunity to grow their own food. This may have an adverse effect on the best use of land available and may not respect the immediate surrounds of similar properties in the vicinity of a site. In addition, this specific requirement would not be in accordance with paragraph 59 of the Framework which makes clear that design policies should avoid unnecessary prescription.</p> <p>Gladman recommend that specific reference to size thresholds are deleted from the SANP.</p> <p>The preparation of Neighbourhood Plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan’s proposals would be likely to have significant environmental effects.</p> <p>The SEA is a systematic process that should be undertaken at each stage of a Plan’s preparation. It should assess the effects of a neighbourhood plan’s proposals and whether they would be likely to have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.</p> <p>Both the SEA Directive and Neighbourhood Planning PPG make expressly clear that an SEA Screening Assessment should be undertaken at the earliest opportunity“. Gladman approve of the Town Council’s decision to undertake an SEA to support the Regulation 16 consultation.</p> <p>The Environmental Assessment of Plans and Programmes states at 12(2) that:</p> <p><u>“The report shall identify, describe and evaluate the likely significant effects on the environment of -</u> (A) Implementing the plan or programme; and (B) <u>Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.</u></p> <p>The PPG makes clear that proposals in a draft Neighbourhood Plan should be assessed to identify the likely significant effects of the available options and states that:</p>
--	---	---

“Proposals in a draft Neighbourhood Plan, and the reasonable alternatives should be assessed to identify the likely significant effects of the available options (Stage C). Forecasting and evaluation of the significant effects should help to develop and refine the proposals in the Neighbourhood Plan.”

Reasonable alternatives should be identified and considered at an early stage in the plan making process as the assessment of these should inform the preferred approach.

This stage should also involve considering ways of mitigating any adverse effects, maximising beneficial effects and ways of monitoring likely significant effects.

Paragraph 038 of the PPG further states that:

The strategic environmental assessment needs to compare the alternatives including the preferred approach, and assess these against the baseline environmental characteristics of the area and the likely situation if the Neighbourhood Plan were not to be made. The strategic environmental assessment should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.

The strategic environmental assessment should identify, describe and evaluate the likely significant effects on environmental factors using the evidence base. Criteria for determining the likely significance of effects on the environment are set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004.

The strategic environmental assessment should identify any likely significant adverse effects and measures envisaged to prevent, reduce, and, as fully as possible, offset them. Reasonable alternatives must be considered and assessed in the same level of detail as the preferred approach intended to be taken forward in the Neighbourhood Plan (the preferred approach). Reasonable alternatives are the different realistic options considered while developing the policies in the draft plan. They must be sufficiently distinct to highlight the different environmental implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

The strategic environmental assessment 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 environmental impact of the different alternatives, including those selected as the preferred approach in the Neighbourhood Plan. Any assumptions used in assessing the significance of effects of the Neighbourhood Plan should be documented.

The development and appraisal of proposals in the Neighbourhood Plan should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of the preferred approach for consultation.”

Stonegate Judgment

Gladman wish to take this opportunity to draw the Town Council’s attention to the recent judgment in the High Court. This is a significant decision and applicable to the present case in Stratford- upon-Avon and identifies that:

1. It is incumbent on plan makers, the independent Examiner and the making authority that the Plan is compliant with EU legislation.
2. The plan maker is required to undertake an objective assessment of the policies of the plan when discharging the duty above.
3. That alternatives need to be accurately presented in order for the SA/SEA of a Plan to comply with European legislation.
4. All key policies of the plan need to be assessed against reasonable alternatives to have a EU law compliant SA/SEA.

Gladman reiterate the concerns made in response to the SEA consultation undertaken by the District Council in November 2016 and contend that the second part of the claim is of particular relevance to the SANP, this states that “The defendant had failed to consider any alternatives to the BUAB as established by the Henfield Neighbourhood Plan, and in particular, the alternative of permitting development on the western side of Henfield.” This claim was allowed on all four grounds.

Following the SEA consultation in November 2016, Gladman welcome the decision to assess reasonable alternatives in relation to the built up area boundary for the Local Service Centres within the neighbourhood area. However, we question why no reasonable alternatives have been considered with regards to Stratford-upon-Avon, the principle location for future growth. Furthermore, we question why no further consideration was given to sustainable growth options on the edge of Stratford-upon-Avon, such as land off Evesham Road, as reasonable alternatives which should have been considered through the SEA process given that consideration as reasonable alternatives were given to the Local Service Centres.

5.2.4 Through the preparation of the SANP, the Town Council should have ensured that the results of the SEA/SA clearly justify its policy choices. In meeting development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives.

5.2.5 The Town Council's decision making and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often SEA flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.

Gladman consider that the SEA in its current form is flawed given that it fails to test further development on the edge of Stratford and fails to provide any consideration of reasonable alternative to increase the size of the built up area boundary to include additional growth opportunities.

Haddenham Neighbourhood Plan

The issue of adequate SEA testing was also considered in the recent decision by Aylesbury Vale District Council to no longer contest a legal challenge made by Lightwood Strategic in response to the housing policies contained in the Haddenham Neighbourhood Plan, due to inaccurate scoring being applied to individual housing sites. This subsequently led to the quashing of the housing and development chapter of

		<p>the Haddenham Neighbourhood Plan.</p> <p>In light of the Examiner’s Report, high court order and subsequent appeal decision by the Secretary of State in the Haddenham case, without undertaking an assessment of reasonable alternatives for sites to be allocated within the Plan we question how the Town Council can be seen to positively provide for future housing growth and the delivery of sustainable development when it merely relies on extant permissions/commitments from the adopted Core Strategy.</p>
SNP07	General	<p>Thank you for forwarding details of the consultation for the Submission Version of the Stratford-upon-Avon Neighbourhood Development Plan (NDP). Highways England is responsible for the operation and maintenance of the strategic road network (SRN) in England. The network includes all major motorways and trunk roads. The A46 runs through the Stratford-upon-Avon Neighbourhood Area, and as the A46 is part of the SRN, the potential impacts on this road need to be considered.</p> <p>It is noted that the NDP broadly aligns with the Stratford-on-Avon Core Strategy which was adopted in July 2016, and it is recommended that there is consistency between the NDP and the emerging Stratford-upon-Avon Transport Strategy (which underwent a consultation period in March 2017).</p> <p>It is recommended that Highways England is consulted on any schemes (including development, park and ride sites, and transport and access improvements) within the town centre which may impact upon the operation of the A46. This includes Policy SSB1 (Canal Quarter Regeneration Zone) and objective E, TC Project 5 (access and movement improvements within the town centre).</p> <p>The development of the Land South of Alcester Road employment allocation is being progressed. Highways England is currently in discussions with Warwickshire County Council, Stratford-on-Avon District Council and the developer, and welcomes this continued dialogue to ensure that the access proposals for a new roundabout access on the A46 do not impact negatively on the SRN, with regards to safety, capacity and future aspirations.</p>

		The NDP recognises the scale of new development in areas outside of the Stratford Neighbourhood area, including Long Marston Airfield (and Wellesbourne Aerodrome should this site come forward), and the effect this site will have on the town centre. This site is also likely to have an impact on the SRN, particularly the A46 and Wildmoor Roundabout, which is located within the NDP area.
SNP08	General	<p>We are pleased to note that our suggestions at Regulation 14 stage have been taken into account. Our previous substantive Regulation 14 comments remain entirely relevant, that is:</p> <p><i>“Overall Historic England considers that the Plan takes a positive approach to the historic environment and is a well-considered, concise and fit for purpose document.</i></p> <p><i>Historic England is supportive of the content of the document and we applaud the comprehensive approach taken to the historic and natural environment and the wide range of well justified policies that are clearly focused upon “constructive conservation”. We are particularly pleased to see the emphasis on local distinctiveness including non-designated heritage assets and upon the importance of design- whether relating to shop fronts or new build development, where requirements for master planning and the use of “Building for Life 12”, Design Codes and a Design Review Panel are highly commendable”.</i></p>
SNP09	General	We have reviewed the document and have no comments to make on the policies proposed.
SNP10	CLW3	<p>The actual drawing of this area has incorporated our private garden, which is located adjacent to our house at 34 Shottery Village, into the ‘green space’ area comprising Shottery Fields and the playing fields of both Shottery Girls Grammar School, Stratford School and The Willows primary school. <i>Enclosed is a copy of your map showing our garden.</i> We assume this has been included in error and would be obliged if you could arrange for the map to be corrected.</p> <p>There is an eight foot high hedge between this land and our garden thus separating that space from our property.</p>

		<p>We note that no other private gardens have been designated as ‘green space’ and see no reason why ours should be either. We further note that significant areas of ‘open space’ to the north-west of Shottery are not so designated – although they two are privately owned.</p>
SNP11	TC Project 3	<p>I note that the above policy has a proposed scheme to create a pedestrian/cycle link over the currently unused railway bridge over the canal.</p> <p>it is my understanding that this railway bridge and the land running northwards from it is the property of Network Rail and classified as “operational railway”. This area of land, including the bridge, is part of the wider scheme for the provision of a Steam Railway Centre, adjoining as it does land owned by Birmingham Railway Museum. The provision of siding space and steam servicing facilities, including a turntable on adjacent land, watering facilities etc., is integral to any adjoining land’s rail use and, therefore, a pedestrian/cycling facility over the disused railway bridge and along Network Rail land is incompatible with a future operational railway. Therefore, I object strongly to proposal TC Project 3 Use of the Land and Bridge.</p>
SNP12	H1	<p>Paragraphs 6.1.30 of the Core Strategy states: <i>“Policy CS.16 also indicates that Reserve Sites may need to be identified in the town through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.”</i></p> <p>There are two points to note here.</p> <p>Firstly, the Neighbourhood Plan does not propose any greater level of housing at Stratford-upon-Avon than is identified in Core Strategy, although it clearly could have done so without conflicting with the Core Strategy. It has simply chosen not to.</p> <p>Secondly, the issue of Reserve Sites does not feature in the Neighbourhood Plan in any explicit or implied manner. There is an opaque reference in Policy H1 to the possibility of the different strategic housing requirement for the town but this is a long way short to an open acknowledgement of additional housing land being identified for the plan period at Stratford-upon-Avon.</p>

In this regard, Policy H1 states that the strategic housing allocation for the Neighbourhood Area could increase and prescribes locational characteristics referring to *“making the best use of existing or planned infrastructure including easy access to public transport and the highways network”*. The reality is that the operation of Policy CS.15 and CS.16 will give rise to additional housing at Stratford-upon-Avon given its pre-eminent role and function within the District. In this circumstance, a range of considerations will need to be taken in to account, including environmental and policy matters in addition to those in Policy H1. For example, the Green Belt which extends north from the town, the areas of flood risk and green infrastructure that form a central corridor through the town, and landscape sensitivity which identifies areas of high landscape sensitivity and areas capable of accommodating development.

HLM are promoting development South of Trinity Way and accompanying these representations are submissions which demonstrate why this site is suitable for development in the terms expressed by Policy H1 and other relevant environmental and policy considerations. Given that the Neighbourhood Plan has chosen not to engage with the need to allocate additional housing land and has deferred this to the Site Allocations DPD, it will be through that forum that the site will be promoted. But in the event the Neighbourhood Plan does indeed choose to address this issue, these accompanying submissions are germane to any such consideration.

Whilst Policy H1 permits windfall development within the Built-up Area Boundaries, this is already anticipated in the Core Strategy’s housing trajectory and contributes towards its existing requirement of 3,500 new homes.

Tiddington and Alveston are both Local Service Centres in the Core Strategy. Tiddington is a Category 1 settlement and could accommodate up to 113 new homes. Alveston is a Category 4 settlement and is accommodating a small proportion of new housing – each individual settlement in this category should not provide more than 32 new homes. Any new housing that comes forward in these two settlements therefore contributes to the Local Service Centre allocations and not the Stratford-upon-Avon component of housing land supply.

It is evident therefore that the Neighbourhood Plan has chosen not to propose any greater level of housing at Stratford-upon-Avon than is identified in Core Strategy despite this housing requirement being a minimum

	H6 and H7	<p>figure. In this regard, the Neighbourhood Plan does not respond to the Core Strategy. It only meets the basic condition that requires conformity with the Core Strategy by not precluding additional housing being identified through the Site Allocations DPD. This does not represent a positive approach to meeting housing needs.</p> <p>Policies H6 and H7 prescribe the affordable and market housing mix which will be provided on new development within the Neighbourhood Plan Area. In the case of the former this has applied an interpretation of the range set out in Policy CS.19 of the Core Strategy; taking the high end of the range for 1 bed properties, a mid-point for 2 and 3 bedroom properties and the bottom of the range for +4 bed properties. What emerges from this are very specific percentages and a prescription. Therefore, the policy lacks any flexibility to take in to account circumstances associated with an individual site or scheme or changing circumstances over the life of the Plan. Without diminishing what the policy is seeking to achieve, but to provide an appropriate degree of flexibility required by the NPPF, we propose that the words general accordance be added to the Policy as follows:</p> <p><i>“in order to meet the specific needs of the Neighbourhood Area, affordable housing will be provided in general accordance with the following stock mix:”</i></p> <p>The same point arises in respect of the prescription of market housing mix and we propose a similar amendment to Policy H7:</p> <p><i>“In order to meet the specific needs of the Neighbourhood Area, market housing will generally accord with the following mix unless evidence indicates otherwise:”</i></p>
	NE1	<p>Policy NE1 proposes a Local Nature Reserve at Bridgetown Woodland and Meadows on the area of land shown on Figure 11.</p> <p>DCLG Guidance on setting up and managing Local Nature Reserves (LNR) indicates that Local Authorities can create local nature reserves where they control the LNR land either through ownership or lease or an agreement with the owner. As a manager of a LNR the Council will need to care for, and protect, its natural features and must make the land accessible for any visitors.</p>

		<p>Not all of the land proposed on Figure 11 is controlled by the Council and is not publicly accessible and cannot meet these above requirements. The ability to designate all of the land is therefore constrained.</p> <p>The areas concerned do not have intrinsic ecological value. The habitats are only of local value and the grassland is species poor. There is no evidence of any recent management and the access points are heavily overgrown. The land concerned is only important therefore as an amenity and recreation feature and this is limited only to those parcels that benefit from public access.</p> <p>Accordingly, for these reasons, the areas of the proposed Local Nature Reserve should be reduced.</p>
	CLW3	<p>Policy CLW3 – Local Green Spaces proposes that land at Bridgetown Woodland and Meadows and north of Trinity Way is designated as a Local Green Space. Development that would harm the openness or special character of a Local Green Space or its significance and value to the local community will not be permitted unless there are very special circumstances which outweigh the harm to the Local Green Space.</p> <p>The NPPF establishes three tests for Local Green Spaces, recognising that this designation will not be appropriate for most areas of open space. This designation should only be used in the following circumstances:</p> <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; <u>and</u> • Where the green area concerned is local in character <u>and</u> is not an extensive tract of land. (emphasis added)

National Planning Policy Guidance also refers to this designation, stating:

- Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities;
- any such designation will need to be consistent with local planning for sustainable development in the area and should not be used in a way that undermines this aim of plan making;
- local green spaces may be designated where those spaces are demonstrably special to the local community.

The area shown on Figure 12a is an extensive tract of land, measuring in excess of 34 hectares in size. On this basis alone, the designation does not accord with the NPPF criteria.

The published assessment defines the importance of the land concerned in the following terms:

“The special qualities of the site include its recreational value, scenic beauty, tranquillity, high quality environment for wildlife habitats and ease of access for the community to enjoy. The site is locally significant because it is well used and valued by local residents as an area of open space which is well connected to the town. It is closely related to the community”.

In essence, the assessment illustrates that this is an area of land which primarily has ecological value and is used for recreational purposes by the local community. This reflects in part the planning obligations entered into in conjunction with the Trinity Mead development for an area of ecological mitigation to be provided. These are attributes that have led to the site being proposed as a Local Nature Reserve in the first instance under Policy NE1.

However, the areas concerned do not have intrinsic ecological value. The habitats are only of local value and the grassland is species poor. There is no evidence of any recent management and the access points are heavily overgrown. The land concerned is only important therefore as an amenity and recreation feature and this is limited only to those parcels that benefit from public access.

It should be noted that three Category 4 LSV have already gone beyond the 8% limit. The remaining 17 LSV would therefore need to deliver between 5 & 7 units each to meet the requirement in the Core Strategy. However, three of these remaining villages have so far contributed nothing to net supply. And a further five villages have completions and commitments totalling only 13 units. Furthermore, five of the remaining LSV in category 4 are also within the Green Belt.

In response to representations submitted to the Draft Stratford Neighbourhood Plan 2015, the Town Council considered the Core Strategy need not provide a minimum number of dwellings for Alveston. This is a stance which appears to have carried through in the submission plan. This approach is then reliant on other Category 4 LSV providing dwellings. As set out above, based on the evidence available, there is no certainty that sufficient dwellings will be come forward elsewhere. For those Category 4 LSV that are the subject of the Neighbourhood Plans, none are at as advanced a stage as Alveston.

Furthermore in Stratford District Council's response to the Draft Neighbourhood Plan, it suggested that a reserve site or fall-back position should be provided for Alveston if windfalls are delivered at the rate anticipated by the plan. This approach has not been carried forward in the submission plan.

Finally, it should be recognised that policy CS.16 Housing requirement provides for "at least 14,600", which suggests this is a minimum number for the plan and its constituent allocations.

It is not appropriate for the Stratford Neighbourhood Plan to rely on the likelihood of further windfalls in Alveston given the robust policies in the Core Strategy and elsewhere in this proposed plan which place limits on infill development.

In this context, there is a requirement on this Neighbourhood Plan to ensure Alveston positively contributes towards its requirement as a Category 4 village by making a proportionate and small allocation.

A substantial portion of the land to the north of the village is within Flood Zones 2 and 3 which in part explains the lack of suitable sites identified in SOADC SHLAA. However, land at Church Lane, Alveston to the south is suitable for development and could contribute to housing supply in the Neighbourhood Plan and ensure

	<p>INF5 and INF Project 8</p> <p>SSB1</p>	<p>...</p> <p>Developments within the neighbourhood area should be accompanied by a TS/TA which includes consideration of the impact of proposals upon level crossings with mitigation implemented as required. We would encourage the Council / neighbourhood forum to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and funded by the developer(s). We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and funded by the developer(s).</p> <p>TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail.</p> <p>Within Transport Assessment's there is a review of local needs regarding public transport; this usually focuses on buses. However, Transport Assessments should also take into account their impact upon footfall at railway stations. Developers are encouraged to consider including within Transport Assessments trip generation data at railway stations. Location of the proposal, accessibility and density of the development should be considered in relation to the relevant railway station in the area.</p> <p>Where proposals are likely to increase footfall at railway stations the Local Planning Authority should consider a developer contribution (either via CIL, S106 or unilateral undertaking) to provide funding for enhancements as stations as a result of increased numbers of customers.</p> <p>Enhancements to Stratford-Upon-Avon Railway Station as a consequence of increased footfall from developments must be fully funded by developer contributions, and agreed with Network Rail and the train operating company, London Midland.</p> <p>Page 151 refers to the "Canal Quarter Regeneration Zone" and the plan for this shows a proposed tunnel/bridge across railway line.</p>
--	---	--

		<p>The location for the proposed bridge or underpass appears to be at:</p> <p>419193 / 255769 Our ref: HAS 9.0673</p> <p>The council would need to confirm who they propose would own and maintain the bridge or underpass once constructed.</p> <p>Any proposed structure over or under the railway would need to be:</p> <ul style="list-style-type: none"> • Agreed with Network Rail • Fully funded by developer contributions, CIL, S106 • Be subject to asset protection agreements • Easements rights • Agreement on ownership and maintenance regimes and agreements
SNP16	Housing - General	<p>It is recognised that the Neighbourhood Development Plan seeks to meet the strategic aims of the Core Strategy Policies CS.15 and CS.16 as well as supporting the provision of new homes on appropriate windfall sites this is dealt with in Section 5 of the NDP.</p> <p>Section 5 sets out a number of headers, <i>namely 'How many homes are required?' 'Where should new homes be located?' and 'What type of housing is required to meet the needs of Stratford's future population?'</i></p> <p>Paragraph 5.4 provides commentary in relation to the first question of how many homes will be required. It is set out that the Core Strategy allocates approximately 3,500 new homes for the town of Stratford-upon-Avon (excluding Tiddington and Alveston) during the period 2011-2031 and that Site Allocations contained in the Neighbourhood Development Plan are consistent with this level of development. It goes on to state that since 2011 approximately 2,400 dwellings have been committed with the shortfall of approximately 1,100 to be provided through the Core Strategy allocations.</p>

In relation to the header *'Where should new housing be located'*? it is set out in the Neighbourhood Development Plan that policies are proposed which discourage future residential development in a piecemeal and uncoordinated manner on the outskirts of the town focusing new development in sustainable locations on brownfield as opposed to greenfield sites. New development is to be focused on the most sustainable locations which are defined by the built-up boundaries set out on the Proposals Map (Figure 2) and specific site allocations set out in Section 12.

Paragraph 5.11 sets out that the provision of new high quality homes on allocated sites within the Neighbourhood Area is necessary to meet the strategic aims of Core Strategy Policies CS.15 and CS.16. It goes on to set out that additionally, the provision of new homes on appropriate windfall sites will be supported where they are in accordance with other policies in this Plan. Recognition should also be given to the role that the existing housing commitments have in meeting the housing needs of Stratford.

There is no mention within Section 5 or attendant policies of the need for the Neighbourhood Development Plan to identify Reserve Housing Sites to provide flexibility in the housing supply. Part (D) of Core Strategy Policy CS.16, sets out that Site Allocations Plan will identify Reserve Housing Sites to provide flexibility to ensure the District can meet its full agreed housing requirement. These Reserve Sites which will have the capacity to deliver up to 20% of the total housing requirement to 2031 and will only be released: to rectify any identified shortfall in housing delivery in order to maintain a 5 year supply of housing land in the District; to contribute to meeting any identified additional need for housing in relation to net growth in jobs at JLR; to contribute towards meeting any identified shortfall in housing across the Coventry and Warwickshire HMA and; to contribute towards meeting any housing needs arising outside the Coventry and Warwickshire HMA that is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District. The failure to identify Reserve Housing Sites is a fundamental failing of the Neighbourhood Plan.

Part (C) of Policy CS.16 encourages Parish Council's to prepare Neighbourhood Plans that identify sites to meet or exceed the housing requirements set out in CS.16. Given this and the need for the District to identify suitable Reserve Housing Sites, the Neighbourhood Development Plan must deal with this issue now and identify new housing land within sustainable locations adjacent to the existing Built-up Area boundaries.

Gallagher Estates Land to the south of Tiddington Fields is a suitable housing site to come forward as either an additional allocation or a Reserve Housing Site.

...

The clear intent of national guidance is that emerging Local Plans and Neighbourhood Plans would have a synergy and be mutually compatible of strategic planning issues. This is not being achieved with this Submission Neighbourhood Development Plan as detailed within these representations and a fundamental redraft of a number of the policies is required in order for the Neighbourhood Plan to progress successfully.

Gallagher Estates considers that the committed residential development at Tiddington Fields (namely Land off Oak Road, Phase 1) under draft Policy SSB3 should be shown clearly as a proposed housing allocation within the wording of the Policy and within the accompanying Figure 16.

Gallagher Estates object to the proposed allocation of Tiddington Fields Green Space. This site is privately owned land and there is no intention for the site to come forward as public open space. Land to the south of Tiddington Fields represents a sustainable and suitable Reserve Housing Site which could deliver up to 60 dwellings is a logical extension to the committed Phase 1 development.

Gallagher Estates has welcomed the opportunity to comment on the Stratford-upon-Avon Neighbourhood Development Plan Submission document and would welcome the opportunity to discuss the Land to the south of Tiddington Fields further with the Town Council and local community.

H1

This policy allows for new housing within the defined Built-up Area Boundaries of Stratford-upon-Avon (Figure 2); Tiddington (Figure 16) and Alveston (Figure 17). New housing outside of the Built-up Area Boundaries is designated as Open Countryside where new housing will be strictly controlled. It is noted that the Built-up Area Boundaries for Stratford as shown on Figure 2 is in line with the Stratford on Avon Inset plan contained within the adopted Core Strategy. Figure 2 of the NDP takes account of a number of existing commitments. Figure 2 shows the existing housing commitment on **Land at Arden Heath Farm** which has outline planning permission for up to 270 dwellings (Gallagher Estates), this is welcomed. The inclusion of this site within the Built-up Area

boundary which is cognisant with the site having the benefit of an outline planning permission is also welcomed.

Figure 2 does not however take into account committed housing developments. This is the case for the existing commitment on **Land off Oak Road, Tiddington** which has outline consent for up to 60 dwellings as well as the Home Guard site to the north which has outline planning consent for up to 32 dwellings. Whilst these sites are shown as existing housing commitments within Figure 16 (Tiddington inset) they should also be included and shown as commitments on the Figure 2 plan as Figure 2 shows the entire Stratford-upon-Avon Neighbourhood Area.

Policy H1 supports proposals for new housing to come forward within the built-up boundaries of Stratford-upon-Avon (figure 2); Tiddington (Figure 16) and Alveston (Figure 17) which is consistent with the adopted policies in the Core Strategy and is endorsed.

Policy H1 also sets out that *“In the event that during the plan period the strategic housing allocation for the Neighbourhood Area increases, all development should be located to make the best use of existing or planned infrastructure including east access to public transport and the highway network”*. Whilst this is welcomed the Neighbourhood Development Plan needs to be suitably flexible in the event that allocated sites in the NDP area do not come forward as envisaged and there is a shortfall in the five year housing land supply. There is the opportunity for the Neighbourhood Development Plan to influence where homes are built and accordingly the Plan should look favourably on the allocation of suitable additional housing sites now that could be released in a planned and co-ordinated manner in the event that they are required to come forward if any of the above arises. As such there is an opportunity now for the Neighbourhood Development Plan to identify and allocate sites that exceed the housing requirements (as set out in adopted Core Strategy Policy CS.16) and influence the allocation of Reserve Housing Sites which will be identified by the District in the emerging Site Allocations Plan.

H2

Objections were made within the representations to the Pre-Submission Neighbourhood Development Plan to proposed Strategic Gap policy which seeks to protect land from development between the edge of Stratford and Tiddington. The land in question has no special designations (i.e. Green Belt, Special Landscape Area, Area

of Restraint or affected by SSSI or a Scheduled Ancient Monument) within the adopted Core Strategy and as such the protection of the land through the proposed Strategic Gap policy is not in general conformity with the Development Plan.

Gallagher Estates land interests at **Land at Arden Heath Farm, Stratford** was previously shown within the proposed Strategic Gap in the Pre-Submission Consultation (May 2015) version of the Neighbourhood Development Plan. This site is now shown as an existing housing commitment and has been excluded from the land affected by the proposed Strategic Gap which is welcomed. We do however retain objections to the principle of the Policy H2.

H3

Whilst it is acknowledged that there are specific sites identified in Section 12 as proposed housing sites for consistency these proposed allocations should also be listed and included in Policy H3. In particular, mention should be given within Policy H3 to Gallagher Estates land interests at Oak Road, Tiddington (Phase 1), known as Tiddington Fields which is proposed to be allocated within Policy SSB3 (Section 12) for up to 60 dwellings and is an existing housing commitment.

As has been set out in response to draft Policy H1, the Neighbourhood Development Plan should also be mindful of the need for flexibility in the supply of housing and the need to identify Reserve Housing Sites. Accordingly, Policy H3 should be suitably worded to allow for other sites to come forward if required. For this to take place in a planned approach, suitable additional housing sites should be allocated within the Neighbourhood Development Plan in Tiddington now which could be released for development in the event that a difficulty emerges with the District's 5 year housing land supply or any of the other matters should arise which would trigger the need for Reserve Housing Sites to be released as set out in Core Strategy Policy CS.16.

Land to the south of Tiddington Fields represents a suitable site that can come forward for development which would be a logical extension of the existing committed Phase 1 development. The emerging proposals for the site illustrate how the site could deliver up to 60 dwellings as summarised in Section 6 of these representations.

	H4	<p>This policy has changes since the wording set out in the Pre-Submission Neighbourhood Plan. The removal of the presumption against greenfield development within the wording of Policy H4 is welcomed. The explanation of the policy contained at paragraph 5.21 sets out that the policy is designed to encourage and promote the reuse of brownfield land in preference to greenfield land. This wording remains inconsistent with the Core Planning Principles set out at paragraph 17 of the NPPF which does not place any presumption in favour of previously developed land and accordingly fails to meet the Basic Conditions. The explanation at paragraph 5.21 should be revised accordingly in line with the NPPF.</p>
	H6	<p>This draft policy sets a requirement for the thresholds and tenures for affordable housing to be provided in accordance with Policy CS.18 of the Core Strategy which is welcomed.</p> <p>The policy goes further in seeking to set out specific needs of the Neighbourhood Area through ranges of dwelling sizes which do not fully accord with the ranges contained within Policy CS.19 of the Core Strategy. Policy CS.19 provides a greater level of flexibility for all of the dwelling types. Draft Policy H6 is not consistent with CS.19 and should either be deleted or revised to accord with the ranges specified for each of the dwelling types otherwise it fails to meet the Basic Conditions. In addition, reference, should be given to the final mix achieved on any site being informed by the up to date position set out in the Development Requirement SPD, taking account of any relevant site specific issues and evidence of local circumstances.</p>
	H7	<p>The draft policy sets a requirement for market mix of dwellings to be provided on sites over 10 dwellings which does not accord with adopted Core Strategy Policy CS.19. The range (percentage) specified for each of the dwelling sizes does not reflect the more flexible range contained in Policy CS.19. It is set out within the Explanation to Policy H7 that there are specific needs of the Neighbourhood Area which justify the need to maximise the delivery of 1 bed housing.</p> <p>The issue of market housing mix was considered in detail at the Core Strategy Examination. Following comments from the Inspector dealing with the Examination the District Council introduced a percentage range to each of the dwelling sizes at the Further Proposed Modifications Stage (August 2015) to align with the Inspectors requests that Policy CS.19 (previously CS.18) needed to be more flexible. It is considered that the specified ranges in draft Policy H6 are overly prescriptive, could stifle new developments and accordingly</p>

	<p>Built Environment and Design – General</p> <p>BE4</p>	<p>should be revised to align with the more flexible market mix range set out in Policy CS.19, otherwise it will fail to meet the Basic Conditions.</p> <p>There is a requirement in draft policy H6 for developments of 20 or more homes to provide at least 10% of the total number as bungalows, this is also contrary to adopted Core Strategy Policy CS.19. The explanatory paragraphs to Policy CS.19 acknowledge that the District is expected to have an ageing population and as such housing stock should be sufficiently flexible and easily adapted for changing lifestyles and needs. This is achieved through part (D) of CS.19 which sets out a requirement that all residential development should be designed and built to encourage sustainable and flexible living as well as part (C) of Policy CS.19 which deals with the provision of specialised accommodation such as ‘extra care’ housing accommodation.</p> <p>The requirement for 10% provision of bungalows is not consistent with the NPPF or the adopted Core Strategy, would again be overly prescriptive and restrictive on developments coming forward and should be deleted. The provisions contained within part (D) of Core Strategy CS.19 provide appropriate suitable requirements for new developments to be flexibly designed such that they can be adopted to meet the needs of the elderly or others.</p> <p>Section 8 of the Neighbourhood Development Plan relates to providing high quality design, preserving and enhancing the historic environment and promoting urban renewal and regeneration through a number of draft policies. These representations relate specifically to the design policies proposed in the Neighbourhood Development Plan.</p> <p>The inclusion of policies which seek to deliver high quality design is consistent with the NPPF. Paragraph 56 of the NPPF notes how the Government attached great importance to the design of the built environment stating that: “Good design is a key aspect of sustainable development”. Some of the draft design policies are consistent with that approach however the aspects that are not are set out below.</p> <p>This draft policy sets out that developments of a significant or sensitive nature will be expected to go through a local design review process once a Design Review Panel has been established. This Design Review Panel is set out as comprising of members with experience in architecture, conservation and planning principles, with the</p>
--	--	---

formation, monitoring and membership of the Design Review Panel being under the stewardship of the Town Council in consultation with the District Council. Paragraph 62 of the NPPF refers to Local Planning Authorities having local design review arrangements in place to provide assessment and support to ensure high standards of design. The existing Local Design Review Panel provides independent, objective and expert advice on the design of proposed developments and as such it is not clear why there is a need for a further or different Design Review Panel than that already in place.

Although Policy BE4 specifically refers to *'developments of a significant or sensitive nature'* the explanatory paragraph 8.22 sets out that the threshold for large scale developments is 10 or more dwellings or 1,000sqm or more of nonresidential floorspace whilst sensitivities are cited as being sites in Conservation Areas, with Listed Buildings, in sensitive landscapes or exposed edge of settlement locations, prominent locations with public views/vistas and sites sensitive to nature. This covers an expanse of possible developments and is more onerous than the existing requirements set out in the adopted Core Strategy Policy CS.9 which sets out that the District Council encourages the use, where appropriate of the Local Design Review Panel process. The adopted Core Strategy sets out that the Local Design Review process should be used for all significant development projects and those where design issues have been raised as a key concern. The requirements set out in draft Policy BE4 are overly prescriptive in requiring all developments of over 10 dwellings to be subject to a Design Review, this will be an additional unreasonable cost to development proposals which would inhibit delivery and lead to a greater degree of uncertainty for developers. The wording of the policy should be amended to accord with Core Strategy Policy CS.9 which encourages the use for significant development projects, but does not insist on the use of Local Design Review Panels.

BE6

This draft policy relates to use of design measures to deal with climate change. The wording of this policy has changed to remove reference to the Code for Sustainable Homes which is welcomed.

Policy BE6 as drafted seeks to set a requirement for all new residential and nonresidential developments over 40sqm to be designed to meet at least the BREEAM 'Excellent' standard. It should be noted that these requirements are over and above those set out in the adopted Core Strategy through Policy CS.2. Indeed, the use of BREEAM standards is sought on non-residential developments where there is a requirement for developments to meet the 'Good' standard until such time that this is superseded by the equivalent in Building

	<p data-bbox="259 906 315 930">BE9</p> <p data-bbox="259 1222 331 1246">BE10</p>	<p data-bbox="539 201 1989 308">Regulations. A requirement for residential development to achieve an ‘Excellent’ standard is in excess of national standards, places an onerous requirement on developers which has not been subject to any viability testing.</p> <p data-bbox="539 360 1989 544">The draft policy also sets a requirement for at least 25% of all residential properties in schemes of over 10 dwellings to be built in accordance with Lifetime Homes Standard 2010, with this increasing to all dwellings meeting the Lifetime Homes Standard from 2020. It should be noted that these requirements which are not mandatory are also over and above those set out in the adopted Core Strategy Policy CS.2. The need for dwellings to be flexibly designed is also suitably dealt with in Core Strategy Policy CS.19.</p> <p data-bbox="539 596 1989 855">National targets for energy efficiency and the progression towards zero carbon development are now being taken forward through tightening of Buildings Regulation, accordingly local planning authorities no longer have the power to request energy efficiency requirements over and above the Building Regulations. It is therefore necessary for the Neighbourhood Development Plan to allow the Building Regulations to define the policy framework for development proposals. 3.9 It is considered that Policy BE6 does not comply with national policy or guidance and therefore does not meet the Basic Conditions required and should not proceed to referendum as currently worded.</p> <p data-bbox="539 908 1989 1166">This draft policy lists a number of documents, and their successors in title, which should be considered when determining relevant development proposals in the Neighbourhood Plan. The policy however sets out that such Supplementary Guidance should be given substantial material weight in decision making. Supplementary Guidance are not subject to the same level of scrutiny as Development Plans. Whilst consideration should be given to guidance contained within adopted Supplementary Guidance, attaching substantial weight to such guidance is at odds with the NPPF. Policy BE9 should be reworded with paragraph 8.39 deleted in its entirety.</p> <p data-bbox="539 1219 1989 1286">The change that has been incorporated to this draft policy as a response to previously submitted representations is noted.</p>
--	--	---

allocated for around 60 homes' to the revised wording 'Land east of Townsend Road and Oak Road and south of St Margaret's Court, known as Tiddington Fields, has a commitment for 60 homes with outline planning permission on the northern part'. The explanation at paragraph 12.17 sets out that the Neighbourhood Development Plan proposes to allocate the site in part for future housing needs. It should be clear within the wording of the policy that the part of Tiddington Fields which is a housing commitment and within the Tiddington Built up Area Boundary is proposed to be allocated for up to 60 dwellings as previously worded for consistency.

It is noted that Tiddington Fields (Figure 16) which was previously Figure 14 – Tiddington Housing Allocation has also changed. The inclusion of the existing commitment within the Tiddington Built-up Area Boundary its annotation on the Plan is welcomed however the site was previously shown on Figure 14 as a housing allocation and we request that this is annotated on Figure 16 alongside the site being an existing commitment.

Land to the south of the existing commitment is proposed to be allocated as SSB3 Tiddington Fields Green Space. This is a further change to Policy SSB3 that was not within the Pre-Submission Neighbourhood Development Plan. Gallagher Estates are promoting this land as **Land to south of Tiddington Fields** through the Site Allocations Plan for residential development of up to 60 dwellings with open space and access off Phase 1 through Oak Road. The site is a logical extension of the Phase 1 approval if and when future needs require it to be released. The land owner has no intention of permitting the land which is currently in agricultural land to be used as public open space land. The emerging proposals for the site would however include areas of public open space. In addition, the proposals include proposed pedestrian routes around the perimeter of the site linking to the earlier Phase 1, the existing village and the wider countryside for use by existing residents.

Criteria (a), (e), (f) and (g) of Policy SSB3 can be incorporated within the detailed design of the Oak Road, Phase 1 scheme at the Reserved Matters stage.

Criteria (b) refers to the mix of market housing according with Policy H7 of the Neighbourhood Development Plan. Previous comments have been made within Section 2 to the draft housing mix policy which set out that it is contrary to the Policy CS.19 in the Development Plan. Criteria (b) should refer to adopted Policy CS.19 to meet the Basic Conditions.

		<p>Criteria (c) relates to the provision of affordable housing, prioritising the needs of Tiddington residents. The affordable housing requirements set out in criteria (c) should be amended in line with the existing Section 106 Agreement that forms part of the outline approval.</p> <p>Criteria (d) sets out a maximum storey height of 2 storeys for the site. The design parameters assessed by the District Council as part of the approved outline application related to predominantly 2 storey development with some occasional 2.5 storey, this was considered by Officers to be acceptable. The wording of part (d) is therefore too prescriptive and should be revised to state that the predominant building height should be 2 storeys with occasional 2.5 storeys in line with the outline planning approval.</p>
SNP17	SSB1	<p>The Listers Group (LG) have significant interests in Policy SSB1, which is an extension of site policy SUA.1 in the Core Strategy (CS), given their freehold and leasehold interests within the Regeneration Zone.</p> <p>LG owns the freehold of a significant part of Masons Road (just over 2 ha as illustrated by the attached land registry title plan) and has the leasehold on the remaining site area (1.2 ha). LG is therefore in control of a significant parcel of land at Masons Road. LG also has a number of long leases on 4 car show rooms along Western Road and therefore has significant controlling interests in the 5.8ha area of allocation. LG currently has 400 people employed within its operations within Stratford upon Avon within its showrooms and administrative offices and is therefore a significant employer within the town.</p> <p>LG does not object to the principle of regeneration in the Canal Quarter, subject to the need for the company to protect its operational interests. For example, the company may have a requirement in the future to increase its administrative functions based at Mason Road that would necessitate the development of the part of the site with high quality offices.</p> <p>LG are seeking to ensure that the Neighbourhood Plan would not prejudice the operation interests of the business.</p> <p>Core Strategy Policy SUA1 is consistent with LG operational interest and supports the existing businesses and also proposes “9,000 sq m of Class B1 distributed throughout the Canal Quarter”. The Neighbourhood Plan</p>

		<p>refers to this policy requirement and we are seeking to ensure that it is consistent with the requirements of Policy SAU1, that is to say that it must not prejudice the operational interests of the existing businesses.</p> <p>With regard to the Neighbourhood Plan desire for a 5m linear park on at least one side of the canal there is an existing towpath along the whole of the northern side that is 5m wide. Further, our attached copy of the title drawing for Masons Road illustrates that there is at least 5m between our boundary and the canal itself. There is no existing towpath on the southern side but this could be created in this space. Therefore LG proposals would not prejudice this aim.</p> <p>LG will participate in the preparation of the Masterplan process for the Regeneration Area to ensure that the company protects its operational interests and assists with delivering the aims of the Core Strategy.</p> <p>This representation is focused in respect of basic condition (e) of Schedule 4B to the Town and Country Planning Act 1990 i.e. the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p>
SNP18	<p>E5</p> <p>9.1</p> <p>INF5</p> <p>INF9</p>	<p>Widened pavements and 20 mile/h limit are to be welcomed.</p> <p>How is the aim to “enhance the River Avon corridor and ...trees” going to be reconciled with the South-West Bypass road? Details of the route of this should be included in this plan. In particular, there should be a bridge or tunnel over the road for the path to Cross o’the Hill (SB34/35).</p> <p>The impact of any such link on The Greenway should be made clear; one would expect most residents want The Greenway retained and not crammed in with a railway line in the current path width.</p> <p>An intention to create a proper bus station should be included. The present situation on Wood Street is a very poor advertisement for the town with tourists. This should go with improved bus stop signs (clearly labelled A, B, etc) and timetable information. Clarification of what “Hybrid and Start/stop” services means.</p>

described by SADC which includes an emphasised sentence stating “Settlement boundaries therefore help prevent encroachment into the countryside”. The assessment goes on to conclude that with no BUAB defined, there may be an uncertain effect on ‘landscape’ and ‘protecting the integrity of the districts countryside’ (Objectives 2 and 12).

Turning to Policy H2 (Strategic Gaps), paragraph 3.5.6 of the SEA similarly explains the reasons why the approach chosen was made over the alternatives. However, no reference is made here to the fact the BUAB around Tiddington as proposed was taken into consideration when making a decision about which approach to choose. When reviewing Annex C, the following comment is made:

“To have no policy on a strategic gap would mean that there would be an uncertain effect on the landscape as this area of land between Tiddington and Stratford upon Avon would be protected only by the strict adherence to the development boundaries in Policy H1.”

In considering whether to have the BUAB around Tiddington, the SEA states that the benefits of doing so would be to remove the uncertain effect on landscape. Indeed, in reviewing Policy H1, it is made very clear that all areas outside the BUAB are classed as countryside where new housing will be strictly controlled and limited to a small number of exceptions. Notwithstanding the fact that the proposed Strategic Gap lies in open countryside outside the BUAB, the SEA appears to suggest that the BUAB would be ineffective in preventing housing development in such locations, thereby justifying the need for Policy H2 as well as Policy H1. This appears to be an inaccurate assessment of the ‘Do Nothing’ alternative. As previously submitted, we believe that the BUAB, along with other policies in the SNDP, adopted Core Strategy and the NPPF are more than sufficient to prevent the coalescence of existing settlements and as such, there is no justification or need for this additional layer of unnecessary policy.

Furthermore, in terms of the requirement to be in general conformity with the strategic policies of the development plan, we also make reference to the Basic Conditions Statement. Here it states in the matrix at Section 4 that Policy H2 is conformity with Policies CS.13 and AS.1 of the adopted Core Strategy. Policy CS.13 refers to Areas of Restraint as identified on the Proposals Map - this does not include the area covered by Policy H2. Policy AS.1 refers to general principles for development within Stratford upon Avon - this makes no

		<p>reference to strategic gaps. We therefore consider that there is little if no general conformity of Policy H2 with the development plan.</p> <p>Conclusions</p> <p>in respect of Policy H2, the SEA has failed to accurately assess reasonable alternatives, particularly the ‘Do Nothing’ alternative which would have no greater impact on the Objectives in view of Policy H1 and other SNDP and adopted Core Strategy policies. Therefore, the SEA is considered to fail to comply with EU obligations and Basic Conditions 8(2) (a) and (f).</p>
SNP20	H2	<p>I am writing to you to ask you to take a look at the boundary of Hillside in Alveston and ask you to include all of the land in the BUAB rather than just half of it in and half of it out not following any boundary lines. There appears to be no reason for this division of land within the guidelines of the BUAB.</p> <p>The plot has recently gained planning permission for a replacement dwelling (date 27th March 2017 Stratford upon Avon planning reference number 17/00890/FUL). Please find attached Appendix 1). This is the planning permission.</p> <p>When the BUAB line is drawn it divides both the garden and now the house as well. (See Appendix 2) On closer inspection the lounge will be out of the village boundary and the kitchen would be in it. (Appendix 3)</p> <p>The land is clearly a garden with all the grass cut into lawn, children’s play area, fruit and vegetable patches and bee hives. Plus extensive ornamental planting and maintained borders.</p> <p>It cannot be compared to countryside fields or paddocks as it is garden in every sense.</p>
SNP21	TC Project 3	<p>I note that the above policy has a proposed scheme to create a pedestrian/cycle link over the currently unused railway bridge over the canal.</p> <p>It is my understanding that this railway bridge and the land running northwards from it is the property of Network Rail and classified as “operational railway”. This area of land, including the bridge, is part of the wider</p>

		<p>scheme for the provision of a Steam Railway Centre, adjoining as it does land owned by Birmingham Railway Museum. The provision of siding space and steam servicing facilities, including a turntable on adjacent land, watering facilities etc., is integral to any adjoining land's rail use and, therefore, a pedestrian/cycle facility over the disused railway bridge and along Network Rail land is incompatible with a future operational railway. Therefore, I object strongly to proposal TC Project 3 Use of the Land and Bridge.</p>
<p>SNP22</p>	<p>INF Project 8</p>	<p><i>What is the current situation?</i></p> <p>Stratford upon Avon is poorly served when it comes to rail services. In October 2015, we were horrified to see the Local Transport Authority (LTA), Warwickshire County Council, accept a reduction by over 50% in direct rail services between Stratford upon Avon and London. We know from speaking with town centre businesses that there has been a resultant diminution in trade, particularly in UK day trip visitors. Before the London rail service reductions in 2015, Stratford attracted around 6% of visitor journeys by rail, it's likely to be even less now.</p> <p>The Core Strategy of the Local Planning Authority, Stratford on Avon District Council, now adopted, confirms some 5,900 new homes will be built by 2031 in the Long Marston area. A direct consequence of this scale of development will be a forecast 7,300 additional vehicles joining local rural and urban roads without alternative sustainable transport infrastructure. In overall terms the Stratford upon Avon Area Transport Strategy (SATS) forecasts vehicular traffic growth of some 29,000 additional vehicles by 2031.</p> <p>The SLPG wishes to see:</p> <ul style="list-style-type: none"> • Stratford's rail services expanded with more frequent services, both stopping and semi fast, along the Henley in Arden and Shirley route to and from Birmingham. • Consolidation of rail services via Solihull • Restoration and further improvement of frequent rail services between Stratford upon Avon and London. <p>In February 2017 Warwickshire County Council & Stratford on Avon District Council launched a consultation on SATS. The consultation concluded on 23 March 2017.</p>

SLPG highlighted that railway services and the potential for expansion of the railway to address transport needs arising from the major development of over 6,000 homes at Long Marston together with increasing visitors to Stratford's town centre to support its local economy while reducing vehicular traffic within the town were both highly desirable and crucially achievable objectives.

Small and medium-sized businesses are critical to the future success of Stratford upon Avon as a major tourist attraction but also to Stratford's economy providing employment and retail amenity as a local market. The results from the SATS consultation confirmed that 970 people/organisations responded. Of the 970 some 177 (18.2%) responses specifically raised the issue of potential railway service expansion.

Crucially, of the 177 responses regarding potential railway expansion 170 of those respondents (96%) supported and expressed a desire for a comprehensive business study into railway expansion, which is the potential for reopening the 5.9 miles of railway between Stratford upon Avon and Long Marston enabling reconnection with the Cotswold Main line. There were 7 responses (4%) that objected to reopening the railway.

These results, from a formal consultation held very recently by the higher tier local authority, Warwickshire County Council, which is also the Local Transport Authority (LTA), is the second consultation that has taken place in the last 8 months, the Stratford on Avon District Council Citizens Panel also considered transport issues in November 2016. To date, and indeed at the launch of the SATS, it was stated by the County Council in response to the issue of potential railway service expansion that it was a low priority.

Why the role for railways and Stratford upon Avon needs to change

In the light of the results from residents and town centre businesses via the SATS consultation the County Council's position is no longer tenable. The results arising from both consultations, particularly the larger SATS consultation, clearly demonstrates that the local community see railway services and their potential improvement and expansion as a significant and high priority.

In taking part local people and businesses have embraced the formal SATS consultation process and reinforced what the Inspector stated in his final report published in June 2016 concerning the Local Planning Authority, Stratford on Avon's District Councils Core Strategy:

"Reinstatement of this missing section of line holds the key to reinvigorating the Shakespeare Line and would further the Local Transport Plan vision for its Passenger Rail Strategy. There is an opportunity to re-appraise the contribution that rail reinstatement could make as part of the 'Transport Strategy for Stratford-upon-Avon' that is currently underway. It would appear to provide a long-term solution to the town's traffic congestion."

We do not believe that by concentrating largely on roads the LTA can deliver Stratford either the relief the town needs from traffic congestion or the economic growth required to secure its future. Stratford's rail services need redefining. This is best demonstrated by the 6% of visitor journeys that are made by rail to Stratford upon Avon. The national average for visitor journeys by rail to major UK visitor attractions is 13%. Achieving the 13% national average for Stratford as a visitor destination is estimated to be worth up to an extra £20.8 million a year for the local economy.

Most of the people living in the planned new housing in the Long Marston area will be employed in Birmingham, the West Midlands and London. A re-opened railway with a new Long Marston Parkway station would provide a 45-minute direct journey time via Stratford upon Avon with Central Birmingham.

Equally, those living in new homes that are due to be built within Stratford upon Avon would have much improved options for travel to/from employment with several major destinations situated to the South West and South East of Stratford upon Avon.

The desire to attract economic growth to Stratford upon Avon is critical to its local economy and thus its local community, many of whom are dependent upon it for their livelihoods. The need to protect the amenity of the town and its unique elements has to be balanced with this desire. We believe that vehicular traffic, both local and through, requires to be significantly reduced by the provision of much more attractive methods of access and transport by enabling much greater choices to visitors and residents alike.

We would support any improvements that enhance pedestrian priority providing this is matched with excellent public transport provision, investment in good cycle-ways and cycle routes and pedestrian access. The key sustainable transport facility that Stratford upon Avon has is its railway.

However, little, if any, further line capacity south between Leamington Spa, Banbury, Bicester or Oxford now exists. In addition, Network Rail indicate that intervention will be required at Leamington Spa by 2043 due to inadequate system capacity. Consequently, for Stratford upon Avon there is a need to look at a different and better solution in terms of where to invest in rail infrastructure to achieve the aspiration of better Stratford/London services.

Seeking to improve Stratford upon Avon – London services using the Warwick and Leamington Spa route is riven with serious operational constraints. The single line between Bearley Junction and Hatton West Junction, the need to address severely speed restricted curves at Hatton but moreover the lack of available train path capacity on the Leamington – Banbury – Marylebone route.

This means that there is limited scope to improve shuttle services, which are not as attractive as through rail services, and it also determines that passengers using shuttle trains connecting with Chiltern services at Leamington Spa often leads to passengers from Stratford not being able to get a seat on the popular Chiltern Birmingham - London Marylebone bound services that frequently arrive at Leamington Spa already heavily loaded.

Notwithstanding the foregoing there is no evidence to substantiate that consideration of a greater role for the railway should be a low priority. Consequently, the potential arising from the railway should be thoroughly and vigorously examined and explored.

How rail transport could be improved for Stratford upon Avon

SLPG strongly supports the need to improve rail services specifically between Stratford upon Avon and London but not as potentially suggested in SATS, through seeking to improve the Stratford-Warwick-Leamington rail corridor.

We believe that by reopening the 5.9 miles of disused railway line between Stratford upon Avon and Long Marston that would enable connection with the existing branch line from Honeybourne to Long Marston two potential rail services could be operated with existing rail services to and from Birmingham being improved because of greater line capacity. An expansion of the railway south from Stratford upon Avon would also facilitate much needed train paths for any potential extension of the NUCKLE (Nuneaton-Coventry-Kenilworth-Leamington Spa) rail service currently being developed.

Further, any likelihood of direct and fast rail services to a HS2 station near Birmingham International would be dependent on the availability of train paths. The potential availability of such train paths would be much greater if Stratford – London services used a reinstated rail infrastructure to the south of the town.

Where does responsibility rest for pursuing better rail services and by what means?

Under the Localism Act 2010 it is for local authorities in the first instance, supported by the Local Enterprise Partnership, to examine, consider and develop potential transport infrastructure schemes. The key authority is Warwickshire County Council as Local Transport Authority who can seek the involvement of the Local Enterprise Board (LEP)

A comprehensive, independent and objective study and report requires to be undertaken to provide a sound basis from which local authorities can decide if any reopening scheme was desirable and economically attractive or alternatively such a scheme was not viable. This type of examination is largely covered by the Governance of Rail Investment (GRIP) process operated by Network Rail.

Consequently, we believe that proper examination and pursuit of either a GRIP 3 Study refresh or GRIP 4 Study, taking advantage of the offer of £400,000 funding towards such a Study from the Long Marston Airfield developer. We believe this must now be fully considered by the newly elected County Council and also pursued by the Local Planning Authority. The stated support for railway expansion at Stratford upon Avon from Gloucestershire, Worcestershire and Oxfordshire County Councils opens the door for the potential sharing of any remaining funding requirements from their respective LEP's as well as Warwickshire's LEP are also very relevant factors that require consideration.

The request that a GRIP 3 refresh or GRIP 4 Study be pursued does not confer support for reopening the railway. It is about obtaining the facts. The whole purpose of a GRIP 3 refresh or GRIP 4 Study is to fully and objectively consider the economic and social factors arising from any reopening and thus enable the local authorities to consider the matter fully and determine if it worthy of further promotion or requires to be dismissed.

What the Stratford upon Avon Neighbourhood Plan needs to include concerning rail services

That the expansion of railway services southwards to reconnect Stratford upon Avon with the Cotswold Line via Long Marston be fully and objectively examined via a GRIP 3 refresh or GRIP 4 Study together with an Economic Impact Study to ensure that all the economic, environmental, amenity and social factors arising from any reopening are properly examined and presented.

That the Local Planning Authority (Stratford on Avon District Council) and Local Transport Authority (Warwickshire County Council) take due regard of the respondents to the Stratford upon Avon Area Transport Strategy (SATS) in relation to rail services and develop a short, medium and long term plan for the expansion of rail services and thus enable the local authorities to consider the matter fully and determine if reopening the railway between Stratford upon Avon and Honeybourne is worthy of further promotion or requires to be dismissed.

That further residential or commercial development within Stratford upon Avon is dependent upon the provision of improved public transport infrastructure that provides better and frequent national travel connectivity using the rail network.

That the Coventry and Warwickshire Local Enterprise Partnership takes an active part in supporting, examining, developing and funding rail infrastructure for South Warwickshire and as part of this joins with other stakeholders to examine and consider the potential reopening of the railway southwards from Stratford upon Avon.

	TC Project 3	<p>We are willing and prepared to work with Stratford upon Avon Town Council, Stratford on Avon District Council and Warwickshire County Council and other stakeholders in progressing the issue of better rail service connectivity for Stratford upon Avon and are willing to help in anyway.</p> <p>We would object to the creation of a pedestrian/cycling facility over the currently disused railway bridge that crosses the Stratford upon Avon Canal if such a facility was to preclude the realisation of Proposal SUA.1: Canal Quarter Regeneration Zone contained within Stratford on Avon District Council’s Core Strategy specifically in relation to the provision of a Steam Railway Centre.</p> <p>We are currently working closely with Birmingham Railway Museum to develop options that could bring such a facility into being, not least the installation of a turntable to consolidate and develop steam railway services to and from Stratford upon Avon as part of scheduled rail services.</p> <p>Such a facility, if realised, will attract significant visitor numbers and harness economic growth beneficial and crucial for Stratford upon Avon and in particular its town centre businesses with the environmental benefit of increasing visitor numbers and economic activity without increasing vehicular traffic volumes.</p> <p>Unless satisfactory co-existence of any cycle/pedestrian facility with a railway line to facilitate the steam railway facility outlined above can be achieved and guaranteed then promotion of a cycle/pedestrian facility that would preclude the railway option will attract our objection and opposition.</p>
SNP23	CLW3	<ol style="list-style-type: none"> 1. Objection is made to the inclusion of the land to the rear of 30 and 32 Shottery (shown on the attached plan) being included within the proposed Shottery Fields Local Green Space. 2. The line of the footpath to the north of this land would provide a more defensible boundary for the proposed Local Green Space, being the line that separates the publicly owned Shottery Fields land from the privately owned land south of the footpath. 3. With regards to paragraph 77 of the Framework, this paragraph opens with the advice that “the Local Green Space designation will not be appropriate for most green areas or open space.” The Neighbourhood Plan has

		<p>not explained why this land is “demonstrably special to the local community” nor why it “holds a particular local significance”.</p> <p>4. The land lies within the Shottery Conservation Area and the Area of Restraint. National guidance advises that “different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space”. The Neighbourhood Plan does not demonstrate what additional local benefit would be gained by designating this small parcel of privately owned land.</p> <p>5. Paragraph 76 of the Framework advises that “By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development...” Local Green Space designation should not be used to prevent development. This land lies within the main town in the District in a highly sustainable location and to prevent any future development except in very special circumstances would not be consistent with local planning of sustainable development.</p>
SNP24	<p>TC Project 3</p> <p>INF5</p>	<p>OBJECTION - The disused railway bridge over the canal is an integral part of the proposed Stratford Steam Facility and will be required for a reinstated rail link to serve this facility, which is identified in the adopted Stratford-on-Avon Core Strategy, Proposal SUA.1: Canal Quarter Regeneration Zone, including a Steam Railway Centre. This rail facility is important to ensure the retention and future development of steam operated railway services to Stratford-upon-Avon. Use of a pedestrian/cycling facility over the disused railway bridge over the canal, is therefore incompatible with a future operational railway and objected to.</p> <p>SUPPORT - SRTG fully supports Policy INF5, which seeks to protect the Stratford-Honeybourne rail corridor for future reinstatement of the railway. This is in accordance with Policy CS.26 D, Transport Schemes and Proposal LMA, Long Marston Airfield, Stratford-on-Avon District Core Strategy, 2016. However, for the avoidance of doubt it should be clarified that the route safeguarding within the Neighbourhood Plan area extends southwards from Stratford-upon-Avon railway station. This would bring the Policy in line with the Core Strategy Policy CS.26D.</p>

	<p>INF Project 8</p> <p>Policy H4</p>	<p>OBJECTION - The Policy Explanation should be amended to make reference to the proposed reinstatement of the railway south of Stratford-upon-Avon station to Oxford and Worcester via Long Marston Garden Village - new station. This would bring the Policy in line with Policy INF5.</p> <p>OBJECTION - On page 27, the Policy misleadingly includes a photograph of land adjacent to Stratford-upon-Avon railway station, as an example of Brownfield Land, by implication implying there is no redevelopment scheme. This is misleading as the land concerned is identified in the adopted Stratford-on-Avon Core Strategy, Proposal SUA.1: Canal Quarter Regeneration Zone, for a Steam Railway Centre. This facility is important to ensure the retention and future development of steam operated railway services to Stratford-upon-Avon. This proposed facility is not referred to in the Neighbourhood Plan and should be specifically included within INF Project 8 or a separate Project, as a consequential amendment to the Neighbourhood Plan.</p>
<p>SNP25</p>	<p>General</p> <p>CLW3</p>	<p>The Town Trust wishes to formally recognise and acknowledge the level of effort that has gone into the development of the current version of the Stratford-upon-Avon Neighbourhood Plan document</p> <p>The Town Trust wishes to specifically endorse the recommendations contained within the Stratford-upon-Avon Neighbourhood Plan on the designation of land widely known as Rowley Fields. For avoidance of any doubt the endorsement of the recommendations contained within the Neighbourhood Plan includes the land to the rear of 7 Benson Road as well as the land known as Rowley Fields.</p>
<p>SNP26</p>	<p>H1</p>	<p>Please find below some considerations when deciding the BUAB for Hillside as I urge you to include the whole garden within the BUAB.</p> <p>The BUAB line has been hand drawn onto the plan not following the recommended guidelines for a BUAB which suggest the line should follow established boundaries.</p> <p>A BUAB should define the built up area of the village, irrespective of constraints (such as flood risk) and potential for development. Some ill-informed comments were posted on the Stratford Town Council consideration document. My understanding is that flood issues are not a part of the BUAB's purpose nor to form a part of the decision making process. Incidentally the garden which is put outside of the BUAB is in the main not in a flood zone, so there is no rationale at all with the proposed location of the boundary.</p>

		<p>What is also clear to me is that the gardens are well within the keeping of the village character rather than surrounding countryside landscape or paddocks.</p> <p>There is nothing within the guidelines for BUAB to suggest why the line should separate a garden onto two parts. Indeed, I understand the property has been given planning permission to be increased in size and the proposed BUAB line now cuts straight through the new house.</p> <p>The Neighbourhood Plan from the Alveston Village Association included the garden of Hillside in their submission to the Town Council for BUAB recommendation. The chairman and Secretary of the AVA have visited the property and can see it is an established garden with lawn and ornamental planting of trees and shrubs plus summer buildings, gazebos and grow-your-own area.</p> <p>I strongly believe that the family living at Hillside with their two young children deserve to be treated fairly by the BUAB process. The BUAB guidelines should be allowed to enforce that their complete garden falls within the boundaries of the village they live in.</p>
SNP27	SSB1	<p>Our client is pleased that the plan supports the principle of development within the Canal Quarter and recognises the important contribution new development will play in the enhancement of this area. Our client's site is ideally suited for residential-led development given its brownfield status, water frontage, good pedestrian links and close proximity to the town centre. The aspirations for 'primarily residential development' and 'some supporting mixed uses' are both welcomed. Equally, the inclusion of a 'linear park' and development fronting onto the canal, with strong pedestrian and cycle links are all urban design principles that our client is keen to implement.</p> <p>Figure 14 within the plan illustrates the Canal Quarter Regeneration Zone and identifies the anticipated linkages that will support new development. The diagram shows a pedestrian route across the railway line to the north via a 'Proposed Railway Bridge/Tunnel'. We note that the location of this link differs from the link across the same land shown in the Urban Design Analysis of the Canal Quarter (figures 24-28) undertaken by Built Form Resource on behalf of the District Council and ratified by the District Council's Cabinet on 5 June. Their link comprises an existing tunnel under the railway line located on lower ground further to the east.</p>

	H6	<p>Clearly, it would be helpful if the NDP and the District Council's urban design analysis accord with each other, so we suggest that Figure 14 be amended to show the use of the railway tunnel as being a further option for consideration.</p> <p>We also note that policy SSB1 in the NDP states that building heights should be 'no more than four storeys', whilst the Urban Design Analysis in the 'Building Heights' section 'B1' suggests 'predominately 3-4 storeys with variations in accordance with Figure 26 to suit and adapt to particular situations within the site and relative to adjacent areas'. Figure 26 illustrates the potential for higher buildings along the north side of the canal. In this context we believe that the NDP text in policy SSB1 should be amended to state 'predominately 3-4 storeys' to accord with the Urban Design Analysis and enable the potential for some limited additional height in appropriate circumstances.</p> <p>This policy follows the affordable housing thresholds and tenures within Core Strategy Policy CS.18 and sets out a preferred stock mix to meet local needs. Whilst our client supports this general approach, we consider that the policy should include some flexibility to accommodate different forms of development that may be at a higher density, predominately flatted or in a location where an alternative mix is more appropriate. Such flexibility will ensure that new development can provide an affordable housing mix in consultation with a Registered Provider that is appropriate to its location, form and the identified need.</p> <p>Paragraph 173 of the National Planning Policy Framework, advises that 'Pursuing sustainable development requires careful attention to viability and costs in planmaking and decision-taking. Plans should be deliverable'. It is therefore vitally important from a delivery perspective that the desire for affordable housing within the Canal Quarter is balanced alongside other planning obligations and infrastructure improvements so that the viability of the area's development is not threatened.</p>
	H7	<p>Policy H7 requires developments of 10 homes or more to provide a preferred mix of market housing. Schemes of 20 homes or more are also required to include the provision of at least 10% of homes as bungalows. The District Council's urban design analysis advises that development within the Canal Quarter will be predominately three to four storeys in height and is therefore likely to be of medium to high density. Such a density is unlikely to be achievable if bungalows are provided.</p>

	BE6	<p>In our opinion, the provision of bungalows within the Canal Quarter would represent an inefficient and expensive use of previously developed land as well as being unnecessary if level-access apartments are provided on the ground floor. It is therefore recommended that the policy wording be amended to ensure that bungalows are only provided where it is appropriate and economic to do so in the context of wider planning and regeneration objectives.</p> <p>Policy BE6 requires all new development over 40sqm to meet the BREEAM 'Excellent' standard and new developments of 10 or more dwellings consented prior to 2020 to include 25% provision of Lifetime Homes. We note that these policy requirements appear to go beyond the policy requirements of the adopted Core Strategy, so we consider that they need to be fully justified by appropriate supporting evidence.</p> <p>Whilst both objectives are understandable and laudable, our experience of meeting these standards elsewhere in the UK is that they can add significant costs to developments, consequentially making both open market and affordable housing units more expensive for consumers. Due to topographical and space constraints, we also have experience of the car parking requirements for Lifetime Homes significantly limiting the number of units that can be accommodated on sustainable sites, to the detriment of local planning authorities meeting housing targets and all parties delivering a development that makes efficient use of land. Having shown local planning authorities the design implications of having to comply with all 16 criteria associated with Lifetime Homes, most have agreed to relax their policy requirements, requiring only some of the 16 criteria to apply to open market and affordable housing units. The bottom line is that it is important that the plan policy is flexibly worded to ensure that the overriding objectives for the Canal Quarter can be fully delivered.</p>
SNP28	H6	<p>The adopted Stratford-on-Avon Core Strategy Policy CS.19 sets out the Council's response to affordable housing thresholds and tenures. The Draft Neighbourhood Plan Policy H6 seeks to amend the Core Strategy Policy through increasing the thresholds for one and two beds and through reducing the thresholds for three and four beds. The Core Strategy policy allows for flexibility however the draft neighbourhood plan policy seeks to remove this flexibility and is more rigid. Policies should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency as set out in the National Planning Policy Framework, paragraph 17. Neighbourhood plan policies must be in general conformity with the strategic policies within the Local Plan and must not undermine its strategic policies.</p>

		Therefore we object to the inclusion of Draft Policy H6 and ask for it to be omitted from the Plan.
SNP29	General	Having reviewed your document, I confirm that we have no specific comments to make on it.
SNP30	Vision	<p>IM Properties acknowledge the key principles of the vision as outlined at paragraph 4.1 of the NP, in particular the reference made to Stratford-upon-Avon having a <i>“strong local economy”</i> and the Town acting as a <i>“centre for the surrounding area for shops, services and jobs”</i>.</p> <p>Despite the above, IM Properties consider that the vision can be more positively worded to reflect the emphasis placed on the economic role of plan-making in the National Planning Policy Framework (“NPPF”). For instance, the vision does not share the same economic positivity for Stratford-upon-Avon, as has been set out in the Core Strategy, which states:</p> <p style="text-align: center;"><i>“new and existing companies will have located on high quality employment land on the periphery of the town, with excellent access to the strategic road work.”</i></p> <p>As set out at paragraph 184 of the NPPF, it is the duty of neighbourhood planning to align the ambition of the neighbourhood with the strategic needs and priorities of the Core Strategy. It is therefore recommended that the vision is amended to add a principle on economic growth, such as:</p> <p style="text-align: center;"><i>“Stratford-upon-Avon will have welcomed inward investment and supported job creation through the delivery of mixed use employment development on land south of Alcester Road (A46).”</i></p> <p>The recommended change sets a positive economic context for the NP as a whole and accords with the economic dimension to sustainable development, which is the contribution to building a strong, responsive and competitive economy.</p>

	TC1	<p>IM Properties acknowledge that the NP seeks a Town Centre first approach for comparison goods retailers.</p> <p>Policy TC1 states that:</p> <p><i>“All comparison retail development in excess of 300sqm (aggregate gross trading area) shall be located in Town Centre or edge of Town Centre locations unless it can be demonstrated by an independent retail study or other relevant evidence that there are exceptional circumstances to deviate from this approach or that the development will not adversely impact on the vitality and viability of the Town Centre.”</i></p> <p>Paragraph 26 of the NPPF sets out local planning authorities should require an impact assessment to support applications for retail uses outside of the town centre, where the development is over a proportionate, locally set floorspace threshold.</p> <p>A locally set floorspace threshold is set out at Policy CS.23 ‘Retail Development and Main Centres’, which states that large-scale retail development, defined as comparison retailing schemes exceeding 1,000 square metres (gross) should be located within or on the edge of Stratford-upon-Avon town centre.</p> <p>Policy TC1 seeks to set the local threshold for comparison retail developments in the town at 300 sqm (aggregate gross trading area). The basis upon which this threshold is derived is unclear from the NP and its evidence base, which does not include a robust Retail Impact Study. In this instance, it is considered that Policy TC1 is not in general conformity with the strategic retail policies of the Core Strategy.</p> <p>Furthermore, IM Properties consider that the policy is inconsistent with national planning policy. Paragraph 27 of the NPPF sets out that where an application is likely to have “significant adverse impact” on existing, committed and planned public and private investment in centres, and town centre vitality and viability, then it should be refused. Policy TC1 goes substantially further by suggesting that proposals must either demonstrate ‘exceptional circumstances’ or ‘no adverse impact’ on the town centre. No detailed justification has been provided to support this higher policy bar, and on this basis IM Properties consider that the policy as worded is not justified or consistent with national policy.</p>
--	-----	--

	BE3	<p>Given there are existing locally set retail floorspace thresholds in place, which have been tested through an Examination in Public and found sound, and the inconsistency with national policy outlined above, IM Properties consider that Policy TC1 should be removed from the Neighbourhood Plan.</p>
	BE4	<p>IM Properties support in principle Policy BE3 and can confirm that the planning application for land south of Alcester Road will be accompanied by an Illustrative Masterplan to demonstrate how the site will integrate with existing infrastructure, such as the A46 and planned infrastructure, such as the Western Relief Road.</p> <p>In addition, the impacts of the proposed development on the local highway network will be robustly assessed through a Transport Assessment, in accordance with paragraph 22 of the NPPF, and a Utilities Report will be submitted to demonstrate the appropriate enabling infrastructure is or will be put in place.</p> <p>IM Properties acknowledges Policy BE4 which states that developments of a significant or sensitive nature will be expected to go through a local design review process once a Design Review panel has been established.</p> <p>It should be noted that the Core Strategy contains guidance relating to the use of Design Review Panels within the Development Management Considerations relating to Policy CS.9. IM Properties question whether it is appropriate for the Neighbourhood Plan to incorporate a policy in this respect, given there is already specific policy relating to this within the Core Strategy.</p> <p>Notwithstanding this, the Core Strategy highlights that the District Council encourages the use of the Local Design Review Panel process <u>where appropriate</u>, and makes specific reference to developments where design issues have been raised as a key concern. The NP should recognise that use of a Design Review Panel will not be appropriate in all cases, and that this will be subject to the specific circumstances and context of the site and the uses proposed, and should also take into account where there are already design related principles established for individual sites through adopted policy.</p>
	BE6	<p>IM Properties acknowledge the requirement for all new development to demonstrate that it has taken account of best practices to achieve high levels of sustainability and safety, whilst exploring appropriate measures to deal with climate change through the use of sustainable drainage systems.</p>

However, IM Properties are concerned with the requirement for all non-residential gross floorspace (including extensions) over 40 sqm to be designed to meet at least the BREEAM 'Excellent' standard, which goes above and beyond Policy CS.2 of the Core Strategy. The Core Strategy policy requires that all non-residential development should be compliant with BREEAM 'Good' standard and developers should seek to exceed this standard where it is viable to do so.

Neighbourhood Plans should have due regard to paragraph 173 of the NPPF in that careful attention to viability and costs in plan-making need to be considered. Paragraph 173 states that:

“the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”

In this regard, IM Properties seek confirmation on whether the policy requirement of BREEAM 'Excellent' standard has been tested in viability terms. No details of any accompanying Viability Assessment are available in the NP evidence base. On this basis, IM Properties consider that Policy BE6 as worded is justified as it is not based on proportionate evidence, and is not consistent with national policy.

IM Properties consider that the BREEAM 'Excellent' standard adds a potentially onerous policy burden for developments, when it may not be viable nor technically feasible to achieve the 'Excellent' standard. Therefore, Policy BE6 has the potential to put at risk the investment in business and the delivery of strategic employment allocations if rigidly applied. It is recommended that as a minimum additional wording should be added to the policy to offer flexibility:

“Developers should seek to meet these standards unless it can be demonstrated that it is not viable and/or technically feasible to do so or where other evidence has demonstrated high sustainability performance (when set against other recognised industry standards)”

Overall, it is recommended that the Policy BE6 is assessed in viability terms to understand whether the policy threatens the delivery of non-residential floorspace. If no viability assessment of Policy BE6 is undertaken then there is no justification for its adoption in its current rigid form, as the policy has the potential to threaten the

	SSB2	<p>delivery of the strategic needs and economic priorities of the District.</p> <p>IM Properties welcomes the inclusion of the land south of Alcester Road, Stratford in the NP, which is in general conformity with Proposal SUA.2 of the Core Strategy.</p> <p>As previously stated, the Town Council should note that IM Properties are currently liaising with Stratford-upon-Avon District Council in relation to the preparation of the Site Allocations DPD to make amendments to Proposal SUA.2. These amendments will take into account new evidence relating to development mix, relocation of businesses from the Canal Quarter Regeneration Zone and the specific policy requirement for vehicle access to the site directly off Wildmoor Roundabout or the proposed Western Relief Road.</p> <p>IM Properties note that Policy SSB2 goes beyond the scope of Proposal SUA.2 to set out additional requirements which development on the site must demonstrate.</p> <p>We provide our comments on some of the specific requirements in detail below:</p> <p>a) <u>A high quality design utilising the most up to date technologies in building construction and renewal technology</u></p> <p>In terms of ‘renewal’ technologies, IM Properties assumes that this is meant to read ‘renewable’ given the reference to the use of renewable technologies at paragraph 12.12 of the NP, which states:</p> <p style="padding-left: 40px;">“The use of renewable technologies such as biomass, ground source heating, and green roofs; and the management of surface water runoff through the provision of sustainable drainage solutions such as permeable parking areas and water cycling will be required in accordance with Policies BE6 and CLW6.”</p> <p>IM Properties are committed to sustainable design principles and fully supports the need for new development to demonstrate high-quality sustainable design, integrating renewable energy where practicable, and efficient use of resources. It is however considered that the best way to support sustainable development is to ensure a flexible policy framework to allow a range of measures to respond to the specific site context or occupier</p>
--	------	---

requirements, rather than a set of prescriptive policies in this regard.

It is also noted that the policy principle is inconsistent with paragraph 96 of the NPPF, which states:

“In determining application, local planning authorities should expect new development to to:

- comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable;”

Given that no reference is made to viability or feasibility in the context of Policy SSB2 (a), the policy principle should be amended for the purposes of consistency.

b) A high quality landscape led layout incorporating extensive screening which takes account of the sensitive landscape in which the site located

IM Properties consider that Policy SSB2 (b) generally conforms with the specific requirement set out for Proposal SUA.2, which underlines aspirations for extensive landscaping to the southern and western boundaries.

c) A sensitive external lighting scheme designed to minimise light pollution

IM Properties consider that Policy SSB2 (c) is consistent with paragraph 125 of the NPPF which sets out that planning policies should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

d) Safe access and egress from the Wildmoor roundabout or the western relief road

In line with paragraph 32 of the NPPF, the feasibility and viability of providing safe and suitable access and egress for all users from either the Wildmoor Roundabout or the proposed western relief road has been considered throughout the pre-application discussions with Highways England and Warwickshire County Council (“WCC”) Highways Department.

The technical work undertaken to date has concluded that provision of a high-capacity junction necessary to serve Proposal SUA.2 (which comprises a material amount of employment development) is not realistically deliverable from the Wildmoor roundabout or the western relief road. The relatively limited length of available site frontage to the western relief road is insufficient to deliver a suitably high capacity junction given junction spacing, queuing space and inter-visibility requirements. However, the length of the A46 site frontage is such that a higher order junction, capable of accommodating the traffic generation associated with the site’s allocation, can be provided.

More detail in respect of the technical challenges associated with the access options specified in Policy SUA.2 (and replicated in SSB2) can be provided in due course.

On the basis of the above, IM Properties propose to provide a new site access roundabout from the A46 / Drayton Manor Drive, which is better in terms of design, capacity and viability. Consequently, in order for the Policy SSB2 to be found consistent with the NPPF with the information provide, IM Properties consider that Policy SSB2(d) should be reworded to:

“d) Safe access and egress from the Wildmoor Roundabout or the western relief road or the Alcester Road (A46);”

		<p><u>e) Use of a high quality pallet of external materials which have regard to the sensitive rural location</u></p> <p>IM Properties note the requirement to use a high quality pallet of external materials which have regard to the sensitive rural location. In applying the policy due regard should also be given to paragraph 61 of the NPPF, which states:</p> <p style="text-align: center;"><i>“Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.”</i></p> <p>On this basis, it should be recognised when applying the policy that the principles of good design go beyond the pallet of materials.</p> <p><u>f) Green travel measures are provided throughout the lifetime of the development including enhanced links with existing public transport</u></p> <p>IM Properties consider that the requirement for green travel measures should not be set out in the Neighbourhood Plan given that this is an existing requirement at paragraph 36 of the NPPF and Policy CS.26 ‘Transport and Communications’ of the Core Strategy, and does not need to be duplicated. On the basis, IM Properties considers that this requirement of the policy should be deleted.</p>
SNP31	General	<p>Road safety</p> <p>Should the Neighbourhood Plan contain proposals that require any changes to the highway i.e. speed limits, traffic calming measures etc. these will need to meet the relevant criteria and be subject to consultation. In addition, funding to achieve these should be provided by the proposed development.</p> <p>Warwickshire County Council generally supports the emphasis that has been placed on increasing public footpaths and cycle routes. We recommend that projects, such as, car share schemes or car clubs be considered for further investigation in order to reduce car usage in the area covered by the Neighbourhood</p>

		<p>Plan.</p> <p>Transportations matters</p> <p>The County Council support the objectives, policies and projects contained within the draft neighbourhood plan. The transport policies are generally consistent with the County Council’s existing and emerging transport Stratford-upon-Avon Transport Strategy objectives.</p> <p>TC6</p> <p>The Council wishes to see further details of any proposed redevelopment of the site and the impact this would have on the transport network before commenting further. In relation to the proposal for a redeveloped site to include ‘further car parking’ please also refer to the comments below under INF Project 3 Car Parking.</p> <p>TC11</p> <p>The Council wishes to see further details of any proposed future town centre conference facility along with details of the implications of such a development on the transport network before commenting further.</p> <p>TC Project 5</p> <p>The County Council is supportive of proposals that seek to improve the attractiveness and economic vitality of the historic centre by restricting traffic and increasing priority for pedestrians. The draft Stratford-upon-Avon Transport Strategy (STS) that has been jointly prepared by the County and District Councils includes a measure that closely aligns with TC Project 5. The STS measure is to; ‘Revise the function and design of town centre streets to reduce traffic and improve the public realm, including providing better conditions for pedestrians and cyclists’. It should be highlighted that any changes to the town centre highway could impact on the wider transport network within Stratford, for example by pushing more traffic onto peripheral town centre streets where there is limited existing capacity and reducing on-street parking spaces. It is noted that reference has been made to seeking to replace any displaced town centre on-street parking, however the plan does not include any suggestions for how this can be achieved and it seems unlikely this can be delivered within the town centre area. The County Council wishes to see detailed analysis of the available options for the town centre and the implications these have for the wider transport network in Stratford before reaching a conclusion on a preferred way forward.</p>
--	--	--

	<p>TC Project 9</p> <p>Infrastructure (Section 10)</p>	<p>Please refer to comments below to INF Project 3: Car Parking.</p> <p>General Section:</p> <p>A – The need for a Transportation Strategy</p> <p>Paragraph 10.6 states that ‘... with a particular focus on Birmingham Road, roads must be made more convenient and safer for all road users.....’ While the County Council agrees with the aim of improving safety the objective of making roads more convenient for all users this could conflict with transport policy for the town. For example, it may be deemed appropriate to discourage traffic from using particular roads through the imposition of traffic calming or traffic regulation orders. Such an approach would be inconsistent with the aim of improving convenience. We suggest that this point is reconsidered or reworded to clarify the matter.</p> <p>B – Redistributing existing traffic with convenient car parking</p> <p>Please refer to comments below to INF Project 3: Car Parking</p> <p>C – Calming Traffic</p> <p>Please refer to comments below to INF Project 5 – Birmingham Road and Guild Street</p> <p>D – Improving the Roads for Cyclists and Pedestrians</p> <p>Please refer to comments below to INF Project 7 – Replacement Bridge at Lucy’s Mill.</p>
--	--	---

Objective C – To prepare a strategic roads and transport strategy to serve the growing town and district in which through and peripheral traffic is taken off Town centre routes.

INF Project 1 - Initiatives to Reduce Through Traffic

This project states that the County Council should commission a comprehensive report to ‘identify ways in which increased volumes of traffic can be accommodated’. The County Council has over the recent years carried out a number of Strategic Transport Assessments to inform the transport evidence base for the Core Strategy Examination in Public. These assessments considered the implications of a number of different options for achieving the housing and employment growth requirements within the District and identified the key highway infrastructure interventions needed to facilitate the growth included in the now adopted Core Strategy. The required transport infrastructure is outlined in the Core Strategy Infrastructure Delivery Plan and Schedule of Infrastructure Projects and includes:

- **West of Shottery Relief Road (WSRR)** - linking the A46 at Wildmoor with the B439 Evesham Road. This road has planning permission as part of committed development proposals on land to the west of Shottery.
- **South Western Relief Road (SWRR)** – linking the B439 Evesham Road with the A3400 Shipston Road. This road is identified in the Core Strategy and is still subject to detailed design and approval.

In combination, the WSRR and SWRR will form a complete western bypass for the town which will support the scale of development proposed in West Stratford and at Long Marston Airfield to the south of Stratford and will help manage the level of through traffic.

- **Stratford Transport Package (collected finances)** – junction improvements at locations in and around Stratford-upon-Avon to reduce congestion at pinch points

The above technical work has contributed into the consultation draft of the Stratford-upon-Avon Transport Strategy (published jointly by the District and County Council at the beginning of 2017) and the final strategy is

likely to be published in late 2017/ early 2018.

Objective D – To redistribute traffic destined for the Town Centre with appropriately sited car parking which avoids congested routes and cross town trips.

INF Project 2 - Redistribution of Traffic within the Town

The NDP suggests ‘the creation of an access to the Recreation Ground car park from Shipston Road or from Seven Meadows Road at the entrance to the town’. The County Council is sympathetic to measures that reduces traffic volume at local pinch points and recognises that this proposal could have a positive impact on congestion to the road network south of Clopton Bridge. However, the creation of a new access road in this location does not form part of the Local Transport Plan and the Council has no current proposals to promote such a scheme.

INF Project 3 – Car Parking (and TC Project 9)

The County Council recognises the important role parking policy will play in resolving some of Stratford-upon-Avon’s current traffic issues, particularly the impact it can have on reducing congestion. The draft Stratford-upon-Avon Transport Strategy highlights that the widespread availability of parking within Stratford draws traffic into central areas of the town and contributes to congestion. The Council’s current position, as outlined in the draft transport strategy, is to focus parking at out of town centre locations, including through the provision of improved Park and Ride facilities. Therefore, County Council **does not support** proposals to expand the availability of town centre parking as currently described and would question the merit of seeking to protect town centre car parks as outlined in TC Project 9.

INF Project 4 – Promoting and Enhancing Park and Ride Opportunities

The Council supports the proposals to encourage and support the use of existing Park and Ride facilities and the creation of a new southern Park and Ride facility if this can be shown to be a viable solution. However, the Council believes that P&R will only be successful if it is treated as an integral part of an overall parking policy for Stratford-upon-Avon.

Objective E: To calm traffic on access roads in the interests of safety, convenience and environmental improvement

**INF Project 5 - Birmingham Road and Guild Street
Paragraph 10.24**

The Council is currently drawing up detailed designs and actively seeking to secure funding to deliver the first phase of the Birmingham Road Corridor improvement scheme. This was the subject of a public consultation in January 2017. The first phase incorporates a number of improvements designed to reduce congestion and improve facilities for pedestrians and cyclists on Birmingham Road between the A46 and Regal Road. Work is also ongoing to develop options for a second phase of work which includes a new link road from Western Road to Birmingham Road, reconfiguration of the current junction of Western Road and Birmingham Road, and changes to the road layout between Regal Road and Arden Street. The scheme proposals do not include all of the aspirations included within the NHP and it is unlikely that these would be added to the programme.

Objective F: To improve pedestrian and cycle connectivity

INF Project 7 - Replacement Bridge at Lucy's Mill

This section suggests that Lucy's Mill Bridge should be replaced with a design to meet the needs of all users. The County Council has not been able to identify a feasible option for delivering this improvement. This is primarily due to land restrictions, particularly on the northern side of the bridge. The Council does not consider that this situation will change during the lifetime of the NDP. Therefore, **this policy should be deleted** or the situation made clear.

Development
Strategy + Housing
(Sec.5)

The Neighbourhood Plan appears to be silent on need of housing with care for younger adults with disabilities, instead focusing on shortage of housing for 18-35 and older people (bungalows). These needs should be included or expanded upon as part of Objective B and Policy Numbers; H6 and H7 of the Neighbourhood Plan.

The District Council Members have set up a WCC/SDC officer/member scrutiny group to consider care accommodation in both the town of Stratford-upon-Avon and the wider district - the group also includes a number of Town Cllrs, and we suggest that the Neighbourhood Plan should to align with the objectives of this group.

Flooding

Flood Risk Management

The LLFA recommends that flood risk management features more prominently within the plan, especially given the prevalence of flood risk to parts of the area covered.

Creation and Retention of Green Spaces

The LLFA is supportive of the priority placed upon creating and retaining green space as outlined in 4.1 and prescribed widely within the plan, as they provide attenuation during flood events. For example:

- CLW7 – protection of allotments
- 9.6 and 11.23 – protection of green corridors
- CLW project 2 – creation of woodlands

Natural Flood Management Opportunities

Opportunities for Natural Flood Management (NFM) exist within the plan, for example the improvement of Clopton Hills mentioned in 9.1. NFM measures have been implemented successfully in nearby Stroud and are planned elsewhere in the county (e.g. upstream of Shipston, upstream of Fillongley), and would be consistent with the wider aims of the plan mentioned in 4.1 and 9.1.

Urban Sustainable Drainage Systems Opportunities

Opportunities also exist to implement flood management measures in urban improvements (e.g. TC4, TC5, TC6, TC8) through incorporating Sustainable Drainage Systems (SUD's). Whilst providing improvements in water storage and water quality, SUD's can also provide improved amenity value, for example through improved aesthetics and air quality. The inclusion of SUDs should therefore be considered within this section of the plan. The LLFA supports the use of street planting mentioned in TC8.

NE2 and NE4. The functional flood plain

The LLFA supports the strong controls placed upon development in the functional floodplain stated in NE2, 9.7 and NE4, particularly given the prevalence of fluvial flood risk within the area covered by the plan, and to communities downstream.

The LLFA also supports proposals in the plan to seek Local Nature Reserve designation for sites within the functional flood plain, such as Bridgetown Woodland and Meadow. Opportunities may exist to include floodplain reconnection within the plan for such areas, providing further flood storage and wildlife benefits.

H4. Development of Brownfield Land

The LLFA supports plans to develop of brownfield land as opposed to greenfield. In accordance with BS 8582:2013 Code of Practice (Surface Water Management for Development Sites), surface water run-off from all previously developed sites should be reduced to the equivalent greenfield run-off rate wherever possible.

H5/5.10. Garden land

The LLFA recommends that in addition to the criteria listed in H5, the size of impermeable areas should not significantly increase. The cumulative reduction of permeable areas over time (urban creep) can increase risk of surface water flooding. If carefully designed, development can be achieved without reducing permeable areas, for example through the use of permeable paving on new driveways. Specific conditions for garden development to prevent urban creep should be considered, such as broadly attenuation to greenfield runoff rates.

BE6. Sustainable Drainage Systems

For all new developments, the LLFA requires the use of above ground SUDs designed in accordance with CIRIA 753 SUDs manual, providing attenuation to greenfield runoff rates. The requirements set out in the following documents should also be adhered to in all cases:

- The National Planning Policy Framework
- Paragraphs 030 - 032 of the Planning Practice Guidance (PPG)
- Defra's Non-statutory technical standards for sustainable drainage systems
- WCC Flood Risk and Drainage Planning Advice

		<p>The cumulative impact of developments within the plan area upon the catchment should be considered, with additional consideration of any developments outside of the plan area recommended.</p> <p>SSB1 and SSB2. Surface Water flood risk</p> <p>There is a risk of surface water flooding at sites SSB1 and SSB2. Careful consideration of how this risk is ideally reduced through development will be required in consultation with LLFA. Pre-application advice should be sought.</p>
SNP32	BE5	<p>Object - We welcome and support the inclusion of this policy in the Neighbourhood Plan. However, the effectiveness of Policy BE5 would be significantly enhanced through a direct requirement for new development to adopt 'Secured by Design' standards. It would also benefit from applicants being advised to consult with WP's 'Design Out Crime Officer' for a broader range of developments than currently stated. The following amendments are accordingly recommended to achieve this:</p> <p>"All development proposals will be expected to demonstrate how Secured by Design has been applied to reduce crime and the fear of crime. Proposals which fail to do this will not be supported. The advice of Warwickshire Police's Design Out Crime Officer should be sought where possible."</p> <p>The principal problem with the current wording of Policy BE5 is that it will be interpreted differently by developers from scheme to scheme. It will also be interpreted differently by individual professional planning officers of the District Council. This can only lead to an inconsistent and ineffective approach to this issue across Stratford-upon-Avon over the lifetime of the Neighbourhood Plan.</p> <p>Secured by Design on the other hand is a single, consistent and measurable nationwide standard. Including a requirement to comply with it would therefore be fully in accordance with paragraph 58 of the National Planning Policy Framework (NPPF). In case the Town Council is unaware, Secured by Design is a long-running flagship initiative of the National Police Chiefs' Council (NPCC) (formally Association of Chief Police Officers). Its objective is to design out crime during the planning process. It is a highly respected standard in the sector, supported by numerous local authorities (including Stratford-on-Avon District Council) and professional bodies</p>

and is therefore, a vital guidance resource for planners. It is regularly updated and therefore there is no danger of it ceasing to exist during the lifetime of the Plan.

Independent research has shown that homes with low level security suffer far more burglaries than those with Secured by Design level security, whilst criminal damage is reduced by 25%. In one year alone for example, some 700,000 burglaries nationwide could have been thwarted if appropriate Secured by Design measures had been installed, according to Professor Ken Pease OBE and Professor Martin Gill of Perpetuity Research – an independent organisation which specialises in looking at crime reduction, community safety and security.

It should finally be noted that there is already established precedent in the District already for this type of policy wording. Following similar representations from WP and WMP, Policy SP4 - 'High Quality Design' in the Salford Prior Neighbourhood Plan (adopted February 2017) includes the requirement for development proposals to comply with Secured by Design.

BE6

Object - Warwickshire Police and West Mercia Police support the policy, but strongly recommend that the following additional criteria is added to significantly reinforce its ability to deliver community safety for everyone within new developments, in accordance with paragraphs 58 and 69 of the NPPF:

"The design and layout of all new developments should enable emergency services vehicles and personnel to access all areas swiftly. All new developments should include fire suppression systems such as, but not limited to, sprinklers, dry risers and fire hydrants."

Ensuring developments are designed to incorporate the above will enable the emergency services to attend incidents and individuals quickly, helping to prevent injuries and deaths. It is also a fact that deaths, injuries and property damage as a consequence of fire are significantly reduced if fire suppression systems are installed from the outset in developments of all types. Warwickshire Police and West Mercia Police, in partnership with Warwickshire Fire & Rescue Service and West Midlands Ambulance Service, therefore strongly urge the inclusion of the above criteria in Policy BE6.

SNP33	TC8	<p>The Stratford Canal extends for approximately 2.6miles from north-west boundary of the Neighbourhood Development Plan Area at canal Bridge no.61 to the canal’s connection with the River Avon. The waterways can be used as tools in place making and place shaping, and contribute to the creation of sustainable communities.</p> <p>The Trust seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community. We note that there are a number of references to and specific policies relating to the canal within the document. The Public Consultation Draft of the Neighbourhood Development Plan (NDP) recognises the importance of the canal network and the role it can play in supporting sustainable communities. The overarching vision feels positive as the document calls for developments to be of high quality and engaged with the canal.</p> <p>The NDP includes a number of proposals which would require works to our infrastructure and the Trust will require further details on these to assess the impacts and confirm if the principle of the works is acceptable. The Canal & River Trust generally seeks to maintain its assets in a “steady state”, and in the case of towpath maintenance, this is based on current usage. Where new development has the likelihood to increase usage we consider that it is reasonable to request a financial contribution from developers to mitigate this impact by, for example upgrading an access / towpath surface to a standard which is more durable and thus able to accommodate increased usage. The Trust would therefore seek further engagement on the proposals within the NDP to understand how any improvements and ongoing management / maintenance requirements are to be funded.</p> <p>Town Centre - The Birmingham Road and Town Centre-Maybird Centre are identified as important gateways and areas for improvement, visual and connectivity improvements. A central theme of the Plan is improving non-vehicular movement within the town with projects for cycling. Policy TC8 supports residential development linked to the canal site development as outlined in Policy SSB1 and is supported by TC Project 3. The proposals include the creation of pedestrian and cycle linkages utilising the existing disused railway bridge over the canal to facilitate links with the Canal Quarter Regeneration zone as well as the Maybird Centre via the canal towpath. Any new linkages to the towpath will require agreement from the Trust and we would welcome engagement on these to identify any requirements for new access points. The Trust would note that</p>
-------	-----	---

	<p>TC9</p> <p>BE9</p>	<p>there are structures, pinch points and narrow sections of canal towpath, such as adjacent locks, within the NDP area which may be a challenge in terms of increased usage and integrating with other towpath users, visitor moorings and anglers. A Towpath Management Agreement may address these matters, this could be referenced within the NDP, though the Trust would welcome further discussion on this.</p> <p>Homes in the Town Centre - The supporting text for this policy states that particular locations for housing development will be the canal frontages. The Trust would require any development at the canal frontage to not adversely affect the integrity of the waterway structure. Consideration should be given to the impact on water quality and enhancing the landscape, heritage, ecological quality and character of the waterways. Proposals should seek to unlock the potential of the waterway network and relate appropriately to the waterway with active frontage and optimising the benefits such a location can generate for all parts of the community. Para 7.38 also states that housing will have access on foot or cycle along an improved canal side. The Trust would reiterate previous comments that whilst improvements are welcomed the impact of these on the canal infrastructure needs to be properly considered along with details on how the works are to be funded / provided and maintained.</p> <p>Supplementary Guidance This identifies “One of the functions of the Local Design Guide would be to provide a development brief on particular proposals within this Neighbourhood Development Plan such as the Canal Regeneration Zone...” We would welcome involvement in the production of a design guide for the canal regeneration zone. We recommend a number of guiding principles for waterside developments which could contribute to the creation of the masterplan. Individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. Water should not be treated as just a setting or backdrop for development but as a space and leisure and commercial resource in its own right. The ‘added value’ of the water space needs to be fully explored. Waterways themselves should be the starting point for consideration of the development and use of the water and waterside land – look from the water outwards, as well as from the land to the water. A waterway’s towing path and its environs should form an integral part of the public realm in terms of both design and management. It is important that the siting, configuration and orientation of buildings optimise views of the water, generate natural surveillance of water space, and encourage and improve access to, along and from the water. New waterside development needs to be considered holistically with the opportunities for water-based development, use and enhancement. Developments should improve</p>
--	-----------------------	--

	<p>BE10</p> <p>NE1</p> <p>INF Project 1</p>	<p>the appearance of the site from the towing path and from the water at boat level, and enhance the environmental quality of the waterway corridor. It should be recognised that appropriate boundary treatment and access issues are often different for the towing path side and the offside.</p> <p>Designated Heritage Assets - This policy appears to only relate to designated heritage assets. The Trust wish to highlight that the canal is a non-designated heritage asset and the importance of these should be acknowledged within the NDP. Any developments should be required to consider their impact on non-designated assets in accordance with paragraph 135 of the NPPF.</p> <p>The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The importance of the canal to Stratford's natural environment could be more clearly outlined within this section. The proposals within the Plan, particularly in relation to the Canal Quarter Regeneration Zone, present opportunities to enhance the biodiversity and connectivity of the canal network. The provision of a landscaped buffer to the canal is a positive step which would bring environmental benefits with the selection of appropriate native species.</p> <p>The Trust would advise that waterside lighting affects how the waterway corridor is perceived, particularly when viewed from the water, the towpath and neighbouring land, for example waterside lighting can lead to unnecessary glare and light pollution if it is not carefully designed. Proposals within the Plan area should give appropriate consideration to lighting which should not provide flood lighting to the canal corridor to show consideration for bats.</p> <p>This requires the production of a comprehensive report to identify ways in which increased traffic can be accommodated. It states that the report should include: 'a future review of the adequacy of the Bishopton Road bridge across the canal taking into account increased traffic from committed development' Whilst it is noted that there is an intention to review the situation, the outline approval on the allocated housing site adjacent Bishopton Road bridge has already considered the traffic impacts. In addition, it is understood that the Highway Authority will also have made an assessment of all the other anticipated development plan developments and their impact on the existing road infrastructure and its ability to accommodate any increased traffic.</p>
--	---	--

	INF Project 5	<p>Therefore it would appear that the consideration of the adequacy of the Bishopton Road bridge has already taken place. Whilst the Trust would defer to the Highway Authority on the technical highway matters we would highlight that the bridge is owned by the Trust. Therefore, the Highway Authority do not have full control to deliver any works to the bridge that the report may identify. The Trust wish to be consulted on any reports in relation to the Bishopton Road bridge. Any report into the adequacy of the bridge will need to consider the impact on the canal as a non-designated heritage asset, providing full justification for works proposed in addition to identifying funding provision to undertake the works.</p> <p>Birmingham Road and Guild Street Identifies the provision of a distribution road via a new canal bridge. The Trust would require further information before we would be able to agree to the principle of new bridge crossings. It would need to be demonstrated that sightlines for navigation will not be affected nor operational activities such as dredging.</p> <p>A bridge crossing shall also need to comply with the following principles: It should be ensured that the bridge clears the towpath sufficiently to maintain the current width of the towpath so that it will not restrict the Trust and other users use of the towpath. All works should comply with the “Code of Practice for Works Affecting the Canal & River Trust” a copy of which is available on our website. To ensure a good design standard, the following aspects should be fully considered; parapets; safety and drip details; positioning and design of supporting structures; abutment position and design, and side wall design; soffits, often overlooked but a key element; quality standards for exposed finishes (concrete, steel etc.); embankments finish; towing paths and other surfacing underneath the bridge; lighting (if appropriate); drainage; services integration (cabling, ducts etc.); associated fencing details; no ledges for pest roosts etc. Crossings at perpendicular angles to the navigation are normally preferred as they reduce visual mass, spans and frame the navigation centrally within settings. An adverse angle, as shown in Figure 14, could cause substantial design issues. The Trust have produced guidance in relation to bridge crossings as part of work on the HS2 line. Consideration for the canal corridor below the road through the design detail will be key and the HS2 guidance (available on our website) should be referenced in relation to the provision of any proposed bridge crossings over the canal. We can confirm that we shall not take ownership nor maintenance responsibility for the bridge. In regard to the bridge crossing the ‘developer’ will be required to enter into agreement with us for the bridge crossing to obtain the right to oversail the canal as well as obtain consent from the Secretary of State, where necessary.</p>
--	---------------	---

	<p>CLW 1</p> <p>CLW9</p> <p>SSB1</p>	<p>The canal provides a public amenity and a sustainable traffic free route for residents and visitors to local schools and facilities in the Plan area. The towpath would also aid in providing a safe, convenient and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF. In order to ensure the canal is promoted as such within the Plan reference should be made at Para 11.6 to ensure its role in promoting health and well-being is recognised and considered in future developments.</p> <p>Encouraging Local Generation of Renewable and Low Carbon Energy The Trust wish to highlight the potential of the canal for heating & cooling of proposed developments within the NDP area.</p> <p>The energy available may be up to 1MW though this would be subject to a more detailed feasibility study. Any proposals would need to consider the implications of the Stratford Canal being a narrow canal, for cooling purposes, and the ecological impacts. The benefits would need to be balanced with appropriate mitigation to address any negative issues associated with increasing water temperatures, such as vegetation planting, aeration in the canal and even shading if suitable.</p> <p>Reference to this as an option could be included within the Plan with applicants /developers advised to contact the Trust to discuss options in relation to this and any commercial agreements that would be required.</p> <p>The Canal Quarter Regeneration Zone incorporates our land at Western Road and the canal between Timothy Road (bridge 64) and Clopton Road (bridge 66). The Trust welcome the creation of a regeneration zone focussing on the Stratford Canal and the Policy provides a good approach to regeneration of the canal corridor. The provision a 5m strip of landscaping to form public amenity either side of the canal is positive and should offer a key feature for the adjoining developments to anchor towards within their place making. It will be important to ensure that the landscaping is carefully designed and integrated into the wider development to ensure it is a positive space aesthetically and in terms of amenity. The Trust are keen to engage on these proposals as they develop to assist in producing a quality outcome.</p> <p>Any existing heritage assets (designated and non-designated) within the proposed canal quarter area must be considered and protected through the masterplans design. The proposals would present a good opportunity to improve services for existing and future moorings along the canal such as electricity, water and Wi-Fi.</p>
--	--------------------------------------	--

		<p>Opportunities for improved boating facilities could also be included to further promote a vibrant canal community.</p> <p>Para.12.3, states that no commercial businesses are currently using the canal. The Trust have previously made representations to the Stratford-upon-Avon Core Strategy consultation commenting that this allocation did not appear to have recognised the presence of our land holding at Western Road and the operations at this site which include: a hire fleet; long term moorings; and a maintenance wet dock. The site also includes toilet waste facilities and water which are available to all users and this is the only such facility in this section of a busy and popular canal, well used by hire craft bringing tourists to the area It is therefore an essential site for waterway users and it needs to be ensured that such facilities remain available. The need to maintain boating facilities within the canal area regeneration zone (either in the existing location or an agreed alternative) should be referenced in the Plan. Para 12.6 states that a Masterplan will be produced for the proposed Canal Quarter.</p> <p>The Trust would welcome involvement in the production of this to assist in achieving the canal side design of exemplary quality, as called for within the Plan. Figure 14 shows 2no. pedestrian bridges crossing the canal. As stated previously the Trust would require further details to assess the acceptability of any crossing. It is likely that up and over style crossings will be preferred though they will need to be carefully designed and tied into the landscape and development proposals. Horse drawn boats will also need to be considered within the design of any bridge crossings. The Trust wish to engage at the earliest opportunity to ensure proposals are appropriate and an acceptable quality for the canal networks variety of users. The Trust would not take ownership nor maintenance responsibility for any bridges and the applicant/developer will be required to enter into an agreement with us for any crossings to obtain the right to oversail the canal as well as obtain consent from the Secretary of State, where necessary.</p>
SNP34		<p>Support following policies with no further comments: H4, H5, E1, BE3, INF2, INF3, INF4, CLW Project 1, CLW Project 2, CLW4, CLW5, CLW6, CLW7</p>

H1	<p>Support - It is very important that Tiddington keeps its status as a village, and that the boundaries dictate and maintain a strategic gap between Tiddington and Stratford. Similarly the gap between Alveston and Tiddington needs to be protected, with special mention to the allotment and fields that villagers use as amenity to walk and keep fit. Tiddington has already however accepted 103 new houses, almost 25% of the housing allocation for the LSV1s in the area, and the local infrastructure will not cope with any further housing. For example Alveston Primary School is already at full capacity with all children being in catchment this year. This is before the new allocation of the 103 houses! Infrastructure and long term impacts needs to be fully considered.</p>
H2	<p>Support - Absolutely, the strategic gaps are fundamental to securing the village status of Tiddington. We love and value the green space around our village, and for Tiddington to lose its rural status would have a great effect in villagers who love the village for what it is; a close, caring, rural community.</p>
H3	<p>Object - Tiddington has already accepted 103 new houses; nearly 25% of the 450 allocation for LSV1s in the area. The village school, Alveston is already at full capacity before these 103 houses. So I am already thinking how this will impact on villagers. Any more additional housing to this would make this problem worse. As I mentioned before, housing developments need to be given full consideration with infrastructure - and on a long term context.</p>
H6	<p>Object - What does 'affordable' housing actually mean? Affordable housing is a major issue in the area; not just for those on low incomes. Key workers such as teachers, and nurses on average salaries simply cannot afford to buy in the Stratford area and so are leaving the district. Why can't 100% of the new housing be affordable for local people on average as well as low incomes? The developers are making massive profits and it just not seem to be fair. Local people who are not benefitting. For example, on the new housing development on the Home Guard Club in Tiddington a detached four bed house on a modest plot is currently being marketed at over £700,000. So is a teacher with three children going to be able to afford to buy this house? I think not!</p>
H7	<p>I think that there should be more allocation to 3 bed housing to allow couples to buy and then expand their family without having to move.</p>

NE1	<p>It would be wonderful for Tiddington to have a designated nature reserve on the fields around the village. We have lost some of the fields to housing, and any more would have a great impact on local Wildlife and habitats.</p>
INF1	<p>How can schools be encouraged to expand? Is this right to expect this? Surely there does have to become a point when the schools simply cannot be expanded. For instance, Alveston school has already been extended, and any further development would impact on the playing fields that are such an important asset for the school.</p>
INF Project 6	<p>More cycle paths please - that would be great!</p>
CLW1	<p>Tiddington Fields has accepted 60 houses, any more housing on our lovely fields would have a great impact on the village. So many villagers use the fields to keep fit, walk their dogs, and make dens with their children. They are such an important amenity for our village as we are so short on open space. The play area on Knights lane is bordered by two busy roads, so Tiddington fields is the only open space where children in the village can run freely. This should be protected.</p>
CLW3	<p>Also protect Tiddington fields by making the south part a village amenity and so protected from further development - this is a vital green space for villagers to enjoy and is fundamental to wellbeing of many villagers.</p>
SSB3	<p>Support - It is absolutely fundamental that the South part of the fields is protected amenity land for the village to use. I am very appreciative that this has been formally proposed. Thank you. So many villagers will be in support of this; we love our fields! I would be keen to understand how this is amenity land is going to be protected for future generations. Will it be owned by the council? It would be a wonderful space where we can put benches, have picnics etc. As I have stated before, it is so important that all new housing in the district should be affordable for local people on average incomes, not just low incomes. How else can local people buy the houses to stay in the village? Developments should put people first and that means creating homes that people can afford.</p>

<p>SNP35</p>	<p>H1</p>	<p>Support following policies with no further comments: H4, TC Project 8, TC Project 9, BE1, BE2, BE5, BE10</p> <p>Oppose following policies with no further comments: H2, CLW Project 2</p> <p>Object - Policy H1 sets out that all new development should be located within the built up boundaries of Stratford-upon-Avon, Tiddington and Alveston and developments outside of these boundaries are considered inappropriate development in open countryside.</p> <p>The NPPF sets out that planning system should be “genuinely plan-led” and should set out a positive vision for the future of an area.</p> <p>In relation to housing the Framework sets out that local authorities should have a clear understanding of the housing needs within their area.</p> <p>The Framework goes on to state that local authorities should prepare a Strategic Housing Market Assessment to fully understand the housing needs for the area and, where necessary, work across administrative boundaries to identify the scale and mix of housing that is required to meet the needs of the local population over the Plan period.</p> <p>In line with the Localism Act of 2011, the Neighbourhood Planning process allows local communities the opportunity to “plan” for themselves. The NPPF advocates such an approach whereby the Neighbourhood Plan forms an additional layer to the Development Plan, supporting the strategic development needs set out in Local Plans, and including policies for housing and economic development that reflect the needs and priorities of communities providing they are planned in a positive manner.</p> <p>It specifically advises at paragraph 184 that “Neighbourhood Plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.” Once made a Neighbourhood Plan becomes part of the statutory development plan and a material planning consideration in the decision making process.</p>
--------------	-----------	---

The Neighbourhood Plan should not just consider the strategic allocations for the area but also seek to allocate additional sites to meet not just the residential but the economic needs of Stratford-upon-Avon. Sites on the edges of the existing settlements can make sustainable and logical extensions to contribute towards the housing need of the area in the short to medium term. The proposed Sustainable Urban Extensions to the north west of Stratford-upon-Avon cannot be relied upon to deliver housing in the short term. In reality, larger strategic sites are more likely to produce housing towards the end of the plan period due to the requirement for design and sustainability codes, significant infrastructure, land remediation and flood alleviation as well as commercial decisions in terms of market saturation – all of which will delay delivery.

As such Cerda Planning have been instructed to submit representations on behalf of Grevayne Properties Ltd in relation to a site to the south of Alcester Road, Stratford-upon-Avon which should be considered as a site suitable for providing 57 houses. The site makes a logical extension to the built form of Stratford-upon-Avon close to Shottery and would provide a number of houses that would make a significant contribution to meeting the needs of the District. Development of the site has been fully tested from an environmental and technical aspect and there are no constraints to development. The site is immediately deliverable. An Ecological Assessment considers that there is no evidence of protected species given the site is under equestrian management and is therefore of little value to wildlife. Development proposals include significant areas of wildflower planting and open spaces to enhance ecology in the local area.

A Desk-Based Archaeology Assessment has been undertaken and concludes the site is of limited archaeological value and would not constrain development of the site.

A full Heritage Assessment has established the development would have limited impact on views in and out of the adjacent Shottery Conservation Area. A Flood Risk Assessment and Drainage Strategy has established the site is located within Flood Zone 1 and therefore at a low risk of flooding. A viable means of drainage is available and therefore development of the site would not increase the risk of flooding elsewhere in the local area.

A Transportation Assessment sets out that the site can be safely accessed from the surrounding highway network and is sustainably located and connected to local services and facilities. Traffic associated with

		<p>development of site can be safely accommodated on the surrounding highway network without any adverse impact on highway safety or the free flow of traffic.</p> <p>The site makes a logical infill, bounded on two sides by existing residential development, and is capable of delivering both market and affordable housing within a sustainable location to meet housing needs. The site is sustainable, available and immediately deliverable and should be allocated for housing.</p> <p>H3 Support – It is acknowledged that windfall sites can make an important contribution to the provision of housing in towns and villages. However the Framework states that planning should be “genuinely plan-led”. The number of brownfield windfall sites are finite and the Local Plan and the Neighbourhood Plan should not be over reliant on windfall sites. The Council should plan comprehensively (as set out in the NPPF) and allocate suitable sites such as the land to the south of Alcester Road being promoted on behalf of Grevayne Properties Ltd.</p> <p>H6 Object – Cerda Planning support the requirement for the provision of affordable housing to assist in the aims of the NPPF to create mixed and balanced communities, however, the mix and tenure set out in the policies CS.18 and CS.19 may negatively impact on viability and the delivery of housing which would be contrary to the aims and objectives of the NPPF. The requirement for affordable housing and indeed the mix and tenure should be considered on a site by site basis taking into account the demand and need at the time the development proposals are assessed.</p> <p>H7 Cerda Planning support the requirement for a mix of market housing (particularly on larger sites) in order to support the aims of the NPPF to create mixed and balanced communities, however, the mix should be considered on a site by site basis taking into account the demand and need at the time the development proposals are assessed. The requirement for bungalows on sites of 20 or more is considered overly onerous and may affect viability and the delivery of housing which would be contrary to the aims and objectives of the NPPF. In addition on certain sites the provision of bungalows may not be appropriate.</p>
--	--	--

	<p>BE6</p> <p>BE7</p> <p>CLW3</p>	<p>Object – Cerda Planning broadly support developments that take account of climate change and that are environmentally sustainable. However, the requirements to meet BREAAAM excellent and Lifetimes Homes Standard may negatively impact on viability and in turn the delivery of housing which would be contrary to the aims and objectives of the NPPF.</p> <p>The second part of the policy sets out a requirement to provide lower density and building heights on the edges of the built up area. This blanket approach may not necessarily be the most appropriate design solution. Each development should be considered on its own merits with design, layout and density reflecting the surrounding context.</p> <p>Object – Paragraph 77 of the Framework states:</p> <p>The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance (including as a playing field) recreational value, tranquility or richness of its wildlife; and • Where the green area concerned is local in character and is not an extensive tract of land. <p>For the Neighbourhood Plan to be found sound at referendum stage the Forum needs to be confident that the Local Green Spaces identified meet the test set out in paragraph 77 and are not designated solely to stifle new development.</p>
--	-----------------------------------	--

SNP36		<p>Support following policies with no further comments: H7, E2, TC1, TC2, TC3, TC4, TC8, TC12, TC Project 6, TC Project 7, TC Project 8, BE2, BE8, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, INF4, CLW2, CL5, CLI6, CL7, CLW Project 2, SL8,</p> <p>H1 Object - Too many houses allocated to this historic area.</p> <p>H2 Object – Gap not big enough.</p> <p>H3 Object – Too many houses allocated to this area.</p> <p>H4 Object – Greenfield sites should never be built on. Too many houses. Infrastructure cannot support them.</p> <p>H5 Object – Garden development affects the atmosphere and 'feel' of a village.</p> <p>H6 Support - If we have to have houses they should be affordable for younger people</p> <p>INF Project 1 I completely object to the proposal for a ERR, which is completely unnecessary and has been added in to planning without discussion in the core strategy.</p> <p>CLW3 Support – Should the top half of Tiddington Fields be added to this, as it has been proposed as public open space for the village of Tiddington, which is really short on public open space.</p> <p>SSB3 Support – Although I fiercely opposed building on Tiddington Fields, which is prime agricultural land, the protection of the top half of the field MUST be agreed so that it can be saved for perpetuity for the benefit of the village and stop the spread of housing, which would eclipse our village.</p> <p>A village consultation document overwhelmingly showed that the south end of Tiddington Fields was the least popular site for building on and is valued as public open space – something that Tiddington is very, very short of. Please, please let this be adopted! Thank you. Less than 60 houses would be better too as our village can't support this many new homes.</p>
-------	--	--

SNP37		<p>Support following policies with no further comments: H3, H4, E1, TC Project 1, TC Project 2, TC Project 3, TC Project 4, TC10, TC11, TC12, BE1, BE2, BE3, BE4, BE5, BE7, BE9, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF 5, INF Project 2, INF Project 4, INF Project 8, CLW1, CLW5, CLW6, CLW7, CLW Project 1, CLW Project 2, SSB1, SSB2, SSB3.</p> <p>H1 Support – I believe that the council should do their utmost to include as much affordable housing in the mix as possible. Furthermore, as part of policy CLW9, there should be attempts at getting housing developers to include passive housing, which will reduce poverty by saving house owners money, and also generating electricity.</p> <p>H2 Object – The attempt at trying to prevent coalescence between the named places is in vain. It is unsustainable.</p> <p>H5 Support – Parking should not be a term in this agreement. Forcing developers to provide parking is only making the traffic worse. If there is a lack of parking, then people will have to pay for it, which thus will deter residents from buying cars, and instead using public transport and bicycles/foot.</p> <p>H6 Support – However, the council should do their utmost to include as much affordable housing as possible in the housing mix</p> <p>H7 Object – There should be no 5 bed room housing.</p> <p>E2 Support – Stratford must diversify away from just tourism if it is to retain young people. If it does not, then skilled young people, such as myself will leave as there are no opportunities other than working in tourism or retail.</p> <p>E3 Object – Young people, such as myself, will leave if there will be more low paid, repetitive, boring jobs in tourism or retail. This will leave you with no source of income since all the people are elderly people on pension, or people working below the income tax threshold.</p> <p>E4 Support – Working from 'electronic cottages' is the future, and the council should not stop this happening.</p>
-------	--	---

TC1	Support – There should be no more shops added anywhere in the town- Bell court is no where near capacity, along with the entire of bards walk and many other places. This makes the town center seem 'dead', and will also fill up with Greenhill street style tacky shops if there are any more created, since the rent will fall. Furthermore, residential properties and high paid, skilled jobs should be priorities.
TC2	Support – Same comment as TC1
TC3	The Rother street connection is the only exception to the below policy which I will continue to repeat, since it will improve the EQI of that area. However, the Rother Street triangle should not be shops.
TC4	Support – Same comment as TC1
TC5	Support – Same comment as TC1
TC6	Object – The rother street triangle would be such a significant shift outside to town centre the I believe it would contradict yourselves on policy TC1. It is so far outside of the centre of town that it would move the town centre to the American fountain.
TC7	Object – Hotels, education, Offices and residential is acceptable, but shops are not.
TC8	Support – Particularly Cycle Paths!!!
TC9	Support – Also allow people to convert shops to homes on the edge of town, such as at the end of green hill street, where it would be nicer to have homes than some of the tacky shops there.
TC Project 5	Support – Bicycles particularly important to reduce traffic and to reduce air pollution. Increase the number of bialy parking spots available also, as well as more cycle lanes, and fewer cars in the town centre. Ensure that if the centre of town is pedestrianised, then bicycles can also legally access it.

TC Project 6	Object – THIS IS NOT ENOUGH. There should be a separate report brought out on how to increase cycling in Stratford, which includes ensuring every single route possible across Stratford is able to be cycled, without walking. I cycle because I have to. At the moment I do not feel safe on the roads. There is also no safe way on the Warwick road without cycling on the pavement, with a £500 fine, or getting killed on the road. This means there is no safe way to cycle to Snitterfield or Warwick.
TC Project 7	Support – The shutting down of BHS is an ideal opportunity to knock that eyesore down, and use the land for prettier shops, as well as a coach park and bus stop. The bus stop outside Mcdonalds is unacceptable since it blocks up the pavement and road. A place for busses and coaches in the town centre where BHS is is a better, safer place.
TC Project 8	Support - There needs to be a cycle friendly river crossing.
TC Project 9	Object – Parking in the town centre is only causing the traffic to get worse. By attempting to cure the problem, you have caused it. Retaining car parks is important, but there should be no more built. The NCP car park should go, and town centre parking should also go - it is an eyesore, and would greatly improve town centre EQI if they weren't there - not to mention the ones outside M&S have caused many near misses when they reverse. Remaining car parking should be allocated to disabled. This would ensure that or perl who need it have it, and people who don't need it don't use it and instead get healthy by walking and cycling, increase air quality (limits breeched regularly), and reduce car dependency.
BE6	Furthermore, consider passive housing, since it reduces fuel bills, easing poverty, and also produces elctricity under CLW9
BE8	Support – Less signs on the pavement in town centre.
INF Project 1	Support - Cycle lanes included
INF Project 3	Object – Fewer car parks= less traffic, healthier people, less air polllution, less utilisation of public transport...

	INF Project 5	Support – Also include cycling lanes
	INF Project 6	Support – Still patchy, must cover all areas, including Warwick road
	INF Project 7	Support – Wider also
	INF Project 9	Support – by making a bus/ coach station by knocking down BHS and making that the bus stop for the town centre.
	CLW2	Object – Community facilities are already underused- public money shouldnt be used to fund more waste
	CLW3	Also include getting rid of parking spaces to make population walk/cycle. Also more cycle lanes
	CLW4	Object – 25 homes instead
	CLW8	Support - By reducing parking and increasing cycling to get cars out. Also, where is the ring road?? Needs to be a new road from Alcester road/A46 meeting point to the A46/Warwick road meeting point to divert traffic around Stratford, not through it.
	CLW9	Support – Include passive housing in new housing- creates energy.
SNP38		Support following policies with no further comments: H1, H2, H3, H4, H5, H6, J7, E1, E2, E3, E4, TC1, TC2, TC3, TC7, TC8, TC Project 2, TC Project 3, TC9, TC Project 6, TC Project 7, TC Project 9, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF Project 1, INF Project 7, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB1.
	TC4	Object – To me it seems that the Development plan prioritises commercial and tourist interests disproportionately over those of residents. Certain areas of the town centre, I would suggest, such as Rother Market, are and should remain, primarily for the benefit of the residents rather than visitors. Rother Market as

		it stands has a quiet charm of a kind not found elsewhere in the town. Change associated with the needed development of Bell Court is understandable, but apart from this the area will lose its character and its allure if subjective "improvements" are introduced, especially if ghastly soft landscaping, such as I recently saw newly established to detrimental effect in an historic part of the City of London, is used.
	TC5	Support – One can hardly object to any proposals that might enhance these areas!
	TC6	Object – Do not agree that the whole of this area should form "a key gateway to the Town Centre."
	TC Project 1	Support – I have to support this as a strategy that examines these issues is certainly needed, but once again note that the town's residents do not appear to be considered.
	TC10	Support – Any changes in Henley Street will need to be very sensitively done.
	TC11	Object – Put them in Bridgeway if you must.
	TC12	Support – But your illustrated example, before and after, does not inspire confidence.
	TC Project 4	Support – See previous comment
	TC Project 5	Support – I suppose I must support this project - however:- That the additional parking space needed has yet to be explored is worrying. I am 79 and don't see how a 20 mph speed limit will improve the environment for me.
	TC Project 8	Difficult to say until more specific proposals are to hand.
	BE1	Support – Well, it all sounds good. Not sure I know what some of it means though.
	INF Project 2	Support – Access via Shipston Road far better. Alternative a lengthy route through pleasant green fields.

	INF Project 3	Support – Church Street - maybe - it is hidden from view Rother/Grove - hard to support when half has just been sold to the new hotel! Arden Street - maybe - it is on a slope and would be an eyesore Railway station - Yes!
	INF Project 4	Support – More than one facility is needed to make P & R work properly. But no mention of where the southern one might be situated.
	INF Project 5	Object – I'm no expert but it sounds like a recipe for still more congestion to me.
	INF Project 6	Object – Not really necessary in my view.
	INF5	Support – Support the safeguarding but not convinced as yet about re-opening a line
	INF Project 8	Support – Especially to London one hopes.
	SSB2	Unable to support or object.
	SSB3	Unable to support or object.
SNP39		<p>Support following policies with no further comments: H5, H6, H7, E1, E2, E3, E4, TC1, TC2, TC4, TC5, TC6, TC7, TC Project 1, TC9, TC10, TC12, TC Project 5, TC Project 7, TC Project 9, BE1, BE2, BE3, BE4, BE5, BE6, BE8, BE9, BE10, B312, BE13, NE2, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF Project 3, INF Project 4, INF5, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW4, CLW6, CLW7, CLW Project 2, CLW9, SSB1, SSB2</p> <p>Object to following policies with no further comments: TC Project 8</p>
	H1	Object – I think that Tiddington should be designated as a separate village, and should not be considered as an overspill of Stratford. The strategic gap between the village and the town needs to be made official and not just marked as agricultural land. There needs to be an absolute cap set on the amount of houses that can be built in Tiddington. The local school is full to capacity, as is the High School.

H2	Support – As previously, a Strategic gap between Tiddington and Stratford needs to be officially enshrined. It should not just be designated as agricultural land as planning permission has already been granted at appeal to developments on agricultural land (see top of Knights Lane and Loxley Road). H3 Object I strongly object to windfall development in Tiddington. There should be an absolute cap set on the number of houses that can be built. Tiddington should be protected from windfall development.
H3	Object – I strongly object to windfall development in Tiddington. There should be an absolute cap set on the number of houses that can be built. Tiddington should be protected from windfall development.
H4	Support – I support the use of Brownfield land. I cannot see why greenfield development is being permitted when there is brownfield land available, and this should be stopped - developers are making huge profits because they don't have to clean-up brownfield sites.
TC3	Support – I don't know who currently decides what is "compatible with the historic Town Centre", but approvals have been given to developments which are COMPLETELY unsuitable e.g. new buildings in Chestnut Walk. How can these modern boxes be compatible, especially when they do not use materials compatible with the surrounding environment??
TC8	Support - The provision for cyclists in Stratford is absolutely appalling. You literally take your life in your hands every time you cycle through the town. The only solution to the so called Traffic Crisis is to get more people out of cars and onto bikes or public transport. This isn't going to happen unless cyclists have safe routes.
TC Project 2	Support – See comments about the safety of cyclists in Stratford - current provision is wholly inadequate and very dangerous. It is only a matter of time before a cyclist is killed in the town centre.
TC Project 3	Support – Strongly support these plans to improve cycle usage and safety.
TC11	Object – I am not convinced that conference facilities are required. There are plenty of hotels in Stratford which can and do provide conference facilities.

TC Project 6	Support – Strongly support these measures
BE7	Support – The problem of empty buildings needs to be tackled as a priority e.g. properties on Birmingham Road - empty for 10+ years - why has this been allowed?
NE1	Support – I would like to see the old sand pit land (back of Knights Lane and Lawson Avenue) designated and developed as a local wildlife site.
NE3	Support – I do not know why developers have been allowed to remove historic hedges. Re-planting does not make up for the fact that biodiverse habitats have been destroyed.
INF Project 1	Object – NEW RELIEF ROADS ARE NOT NEEDED - THEY WILL ONLY ATTRACT MORE TRAFFIC. We need to stop building more houses and then encourage people to use public transport or cycle.
INF Project 2	Object – BUILDING MORE ROADS IS NOT A SOLUTION TO THE PROBLEM.
INF Project 5	Object – I will not support any project which involves building new roads. This simply encourages more cars to come through Stratford.
INF Project 6	Support – This is very much needed to improve levels of people cycling and to improve safety for cyclists.
INF Project 7	Object – I do not believe it is necessary for a new bridge to be built - access can be provided by other means.
CLW3	Support – In addition, I would like to see areas of Tiddington designated as Local Green Space. We have already lost part of the Home Guard Club and amenity land, and we need to act now before more is lost.
CLW5	Support – Strongly support this policy.

	CLW8	Support – THIS INCLUDES ALL PROPOSALS IN THIS PLAN WHICH INVOLVE BUILDING NEW ROADS! Air quality in the town is appalling. S
	SSB3	Support – How will the land be designated for the community? How will this be enshrined in law so that the land cannot be built upon in the future?
SNP40	H4 TC Project 5	<p>Support following policies with no further comments: H5, H6, H7, TC1, TC3, TC4, INF Project 2, INF Project 4m INF Project 5, INF Project 6, INF Project 9, CLW3, CLW5.</p> <p>Support – I fully support the use of brownfield sites for development, ahead of any green field site ever being considered.</p> <p>Support – Point 7.15 of the SAO Neighbourhood Development Plan is an enlightened idea, and one we as a business in the High Street fully support. With the door open, the soot from the diesel fumes has to be cleaned off our white shelving on a daily basis, so the traffic is creating a less than healthy environment for workers, visitors and residents. Also the noise from the traffic makes it often hard to hear what customers are saying. There is also a major issue with safety, with the town attracting a huge proportion of overseas visitors who are used to traffic coming from a different direction. These, along with the many young and elderly in the town are extremely vulnerable to the large vehicles passing through, and those who feel it is fine to drive through the town at high speed. This is a particular issue at weekends during the summer where there is a large element of 'show-boating' by those on low fast motorcycles and exotic cars who feel the need to show off what their expensive toys can do. It is only a matter of time before people are seriously injured or killed by such traffic. Pedestrianisation will only enhance the experience of all who live, work and visit the High Street, and allow for a more relaxed atmosphere which will help to bring people back. Such well thought-out schemes will help Stratford to differentiate itself from many other towns which have less foresight or guts to stand up to the few who object to any change for the good of the town. This proposal I believe make Stratford a better place for trade and leisure, supporting not just the residents of the town, but also those within the surrounding area. We look forward to implementation of the project, and please do call on me for any further in-pu as required. Well done.</p>

	TC Project 6	Support – It would be absolutely brilliant if cycling became not just an activity for the sportsman and woman who have no choice but to take their lives in their hands, but an activity for the majority, where cars can be parked at very modest cost on the outskirts of the town, and walkways and cycleways are used to transport all except the least able into the town. May be this is a pipe-dream, but its good to aim high!
	TC Project 7	Support – There is no need for coaches to come into the town centre. The same for lorries after 9am or before 6pm. Deliveries can be timed and made through the night, and if retailers don't wish to work in such a way that benefits the town as a whole, and ultimately benefits the retailer, then in my opinion they can trade elsewhere. Its not beyond the imagination that town centre retailers could use a central co-operative warehouse hub, where we all have goods delivered during the day even if that makes life easier, and then allotted smaller vehicles deliver from the hub to the shops after 6pm.
	TC Project 9	Parking is simply far too expensive in Stratford. Customers often cut short their visits, and are so mindful of being back at their cars to avoid a fine that their spend is significantly reduced in the town, which ultimately makes Stratford a less viable place for businesses operating here. This has a knock-on effect in making the business less prosperous. leading to the shops looking tardy and the historic buildings are not maintained as they should be. The product offering is also limited and less imaginative. Staff are also paid less and therefore are potentially few in number and of a lesser quality, all of which affects the experience gained by the visitor to Stratford.
	INF Project 3	Out of town parking provision should be increased and provision for moving people from those to town should be made, not increasing in-town parking. This will only create more congestion given the inadequate road system.
	CLW9	Support – Low carbon will be massively enhanced by allowing no vehicles in the town centre between 9am and 6pm!

SNP41	H1	<p>Object – The Built up Area Boundary for Alveston is tightly defined around the existing settlement. Consequently, with reference made to the objection to Policy H3 below, it is not in conformity with the strategic policies of the Stratford on Avon District Core Strategy to meet the housing requirement. This is because it neither provides for housing allocations which would be drawn within the boundary or allow for development outside the boundary beyond the strict limits set.</p>
	H3	<p>Object – Policy H3 is not consistent with SOAD Core Strategy Policy CS.15 & CS.16 insofar as there is no plan to address the housing requirement for Category 4 Local Service Villages (LSV) of which Alveston is placed in. This policy requires at least approximately 400 dwellings across 20 villages, of which no more than around 8 % should be in any one village. Based on SOADC housing monitoring data up to 31st March 2016, for Category 4 LSV there are 34 net completions and 282 net commitments. If a reasonable discount of 10% for expiries is taken from commitments this adjusts the figure to 253. Hence, there is still a requirement for a further 84 units across Category 4 LSV or 113 if an assumption is made about expiries.</p> <p>It should be noted that three Category 4 LSV have already gone beyond the 8% limit. The remaining 17 LSV would therefore need to deliver between 5 & 7 units each to meet the requirement in the Core Strategy. However, three of these remaining villages have so far contributed nothing to net supply. And a further five villages have completions and commitments totalling only 13 units. Furthermore, five of the remaining LSV in category 4 are also within the Green Belt. In response to representations submitted to the Draft Stratford Neighbourhood Plan 2015, the Town Council considered the Core Strategy need not provide a minimum number of dwellings for Alveston. This is a stance which appears to have carried through in the submission plan. This approach is then reliant on other Category 4 LSV providing dwellings. As set out above, based on the evidence available, there is no certainty that sufficient dwellings will be come forward elsewhere. For those Category 4 LSV that are the subject of the Neighbourhood Plans, none are at as advanced a stage as Alveston.</p> <p>Furthermore in Stratford District Council’s response to the Draft Neighbourhood Plan, it suggested that a reserve site or fall-back position should be provided for Alveston if windfalls are delivered at the rate anticipated by the plan. This approach has not been carried forward in the submission plan. Finally, it should be recognised that policy CS.16 Housing requirement provides for “at least 14,600”, which suggests this is a minimum number for the plan and its constituent allocations. It is not appropriate for the Stratford</p>

	<p>BE9</p> <p>BE10</p>	<p>Neighbourhood Plan to rely on the likelihood of further windfalls in Alveston given the robust policies in the Core Strategy and elsewhere in this proposed plan which place limits on infill development.</p> <p>In this context, there is a requirement on this Neighbourhood Plan to ensure Alveston positively contributes towards its requirement as a Category 4 village by making a proportionate and small allocation. A substantial portion of the land to the north of the village is within Flood Zones 2 and 3 which in part explains the lack of suitable sites identified in SOADC SHLAA. However, land at Church Lane, Alveston to the south is suitable for development and could contribute to housing supply in the Neighbourhood Plan and ensure compliance with the strategic policies of the Core Strategy. Enclosed with these representations are plans which show how a small allocation of 5 dwellings could be accommodated.</p> <p>Object - The final sentence of this policy is not consistent with Stratford Core Strategy Policy CS.9: - Design and Distinctiveness and its explanation in para 3.8.4 which states: “...A number of communities have prepared Town or Village Design Statements and Parish Plans which should be taken into account when making decisions about the design of new development...” The final sentence is not drafted positively and too restrictive. It places significant weight on one non-statutory document, and does not reflect the balance required when making planning decisions.</p> <p>Object – Policy BE10 as proposed goes beyond Chapter 12 of the Framework, in particular the following sentence: “All proposals must as a minimum preserve the important physical fabric and settings of listed buildings and ancient monuments.” The above is also inconsistent with the first sentence of Policy BE10, which recognises the balancing act to be undertaken where there is less than substantial harm to designated assets and their settings.</p>
<p>SNP42</p>	<p>SSB3</p>	<p>Support following policies with no further comments: H1, H2</p> <p>Support – I strongly support the community orchards, woodland and open space for perpetuity.</p>

<p>SNP43</p>	<p>H6</p> <p>INF2</p> <p>CLW Project 1</p> <p>SSB1</p> <p>SSB3</p>	<p>Support following policies with no further comments: H1, H2, H3, H7, TC9, BE13, INF1, INF3, INF4, INF Project 1, INF Project 2, INF5, INF Project 8, INF Project 9, CLW1, CLW8</p> <p>Support – there is a chronic shortage of affordable housing which MUST be addressed..... Our Stratford born children cannot afford to live locally.</p> <p>Object – schools south of the river should be primary only</p> <p>Object – Older people do not as a rule welcome noisy children ! Their social lives should be governed by their own choices, Some welcome a peaceful neighbourhood</p> <p>Support – sounds like a good idea in principle</p> <p>Support - As a Tiddington resident I can support this.....provided the density and particularly the provision of affordable housing is honoured.</p>
<p>SNP44</p>		<p>Support following policies with no further comments: H1, H2, H3, H4, H5, H6, H7, E1, E2, E3, E4, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4, TC Project 5, TC Project 6, TC Project 7, TC Project 8, TC Project 9, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF5, INF Project 1, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF Project 7, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB1, SSB2, SSB3.</p>
<p>SNP45</p>		<p>Support following policies with no further comments: H2, H6, H7, E1, E3, E4, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4, TC Project 5, TC Project 6, TC Project 7, TC Project 9, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, Be11, BE12, BD13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF3, INF4, INF Project 1, INF Project 2, INF Project 3, INF Project 5, INF Project 6, INF Project 7, INF5, INF Project 8, INF Project 9, CLW1, CLW2, CLW PRoject 1, CLW3, CLW4, CLW5, CLW6, CLW Project 2, CLW8, CLW9, SSB1, SSB2.</p>

	<p>H1</p> <p>TC8</p> <p>TC Project 8</p> <p>INF2</p> <p>INF Project 4</p> <p>SSB3</p>	<p>Object to following policies with no further comments: H3, H4, H5, E2</p> <p>Object – There is not the infrastructure in the village to support additional housing, in particular the road and traffic management. The Tiddington Road in Stratford cannot cope with the number of vehicles using it now so it most certainly will be worse with extra housing in Tiddington. The same would apply to the Banbury Road into Stratford as this is often used as a alternative to the Tiddington Road for Tiddington residents.</p> <p>Object – Wider pavements will have a negative effect on the already congested roads. Additional lanes on the roads are needed unless TC8 is implemented after traffic improvements have been made.</p> <p>Support – I would welcome this so long as it doesn't include the proposed traffic light control.</p> <p>Object – South of the river cannot cope with the additional traffic this would create.</p> <p>Support – Park and ride will only work if the road system can handle it, i.e. specific bus lanes. No one will want to sit in traffic on a hot smelly bus when they could be sitting in traffic in the comfort of their own car. I think a total ban on traffic within the town to force the se of park and ride would be worth considering. This works well in York, I believe.</p> <p>Object – As stated before, the Tiddington Road cannot cope with the additional vehicles that any further housing would create.</p>
<p>SNP46</p>	<p>H1</p> <p>H2</p>	<p>Support following policies with no further comments: H4, H6, H7, E1, E2, E3, E5, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8, BE1, BE2, INF1, INF4,</p> <p>Object – New housing within buab should only be permitted where it is in line with (or not in contravention of) all other planning policies. The wording of this policy suggests it is a free for all.</p> <p>Support – Welcome the identification of the strategic gap at Tiddington and area of restraint but guidance is required about what constitutes a sufficient gap.</p>

H3	Object – Housing in LSVs should be capped at a sensible figure to allow organic growth over a longer period.
H5	Support – Needs to be made clear that garden land is excluded as a source of windfall development in accordance with 5.2.12 of the core strategy.
BE7	Support – Particularly important to preserve arable, grazing and rural land.
INF2	Support – Tiddington needs greater schooling provision
INF3	Tiddington would benefit from local healthcare facilities
INF Project 1	Support – No relief road should be proposed without inviting consultation on a range of options. These should be evidence based and modelled to show the projected impact on environment, countryside and effectiveness. They should also be fully coated with the means of funding clearly identified so residents can make informed contributions.
CLW3	Tiddington fields should be included in this list.
SSB3	Support - The amenity allocation is warmly welcomed. It needs to be made clear how the southern part of Tiddington fields will be secured as much needed amenity space. Should be changed to reflect planning decision of 60 homes and not say approx. The consultation on the Neighbourhood Plan closes at 5pm TODAY. Tiddington will soon have nearly 400 new houses in, or near, the village. This has all been granted on the basis that the current infrastructure is sufficient to support it. - infrastructure; E.g. The schools are almost at maximum capacity and other facilities are limited. The draft Neighbourhood Plan has not given sufficient consideration to tackling this. - green space; half of Tiddington Fields has been designated amenity land. But there is no information about how SDC will secure the land. This needs clarification. - the strategic gap; this is important so we maintain our own housing allocation and don't get counted in Stratford's. This strategic gap allocation is welcomed. - the white space between tiddingtons built up boundary and the Strategic Gap is confusing. This is currently erroneously classed as countryside land but should be re-categorised as strategic gap and coloured grey.

SNP47		<p>Support following policies with no further comments: H1, H6, H7, E1, E3, E4, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC11, TC Project 4, TC Project 5, TC Project 6, TC Project 7, TC Project 8, TC Project 9, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, Be11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF Project 7, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB2, SSB3.</p>
	H2	Support – The strategic gaps have been much eroded of late and require greater protection.
	H3	Support – Development in these areas should be restricted to limited infill of appropriate sized housing.
	H4	Support – Use of brownfield land should have precedence over greenfield sites in similar locations.
	H5	Support – Garden land development should only be considered in exceptional circumstances.
	E2	Support Development south of the river which requires a bridge over the Avon should not be permitted. The Avon valley requires more than AONB status and complete protection.
	TC1	Support – Town centre development should be considered the norm.
	TC12	Support – Provision for restoring some ugly modern shop fronts back to more traditional designs in keeping with their neighbours.
	INF Project 1	Support – New bridges down stream of the town centre should be avoided
	SSB1	Great care should be taken with the design and planning of the canal corridor to prevent wind tunnel problems and excessive shading of the route.

SNP48	<p>INF5</p> <p>INF Project 8</p> <p>CLW3</p> <p>CLW5</p> <p>CLW Project 2</p> <p>CLW9</p>	<p>Support following policies with no further comments: H1, H2, H3, H4, H5, H6, H7, E1, E2, E3, E4, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4m TC Project 5, TC Project 6, TC Project 7, TC Project 8, TC Project 9, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF5, INF Project 1, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF Project 7, INF Project 9, CLW1, CLW2, CLW Project 1, CLW4, CLW6, CLW7. CLW8, SSB1, SSB2.</p> <p>Object – Any proposal to re-instate a railway along this line should be rejected based upon excessive cost, environmental damage to the greenway environmental corridor and complete disruption/gridlock to traffic for a period of some 2yrs during build particularly down Seven Meadows Rd</p> <p>Support – Re-instatement of the Straford - Honeybourne link should be rejected based upon cost, useage, environmental destuction, noise pollution and traffic chaos in the build phase.</p> <p>Support – Summerton Way should be included in the above list. The Greenway cannot be protected it remains underthreat from a railway.</p> <p>Support – Protect the Greenway from any possible re-instatement of a railway line. A railway cannot co-exist with walkers, cyclist etc. in a limited space.</p> <p>Support – Protect the Greenway from any railway</p> <p>Support – A deisel train runnning down Seven Meadows Rd will do nothing to enhance pollution</p>
SNP49		<p>Support following policies with no further comments: H2, H3, H5, H6, E1, E3, E4, TC1, TC3, TC4, TC6, TC7, TC8, TC Project 2, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4, TC Project 6, TC Project 7, TC Project 8, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF4, INF Project 1, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF Project 7, INF5, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW Project 2, CLW8, CLW9, SSB1, SSB2, SSB3.</p>

	<p>H1</p> <p>H4</p> <p>H7</p> <p>E2</p> <p>TC2</p>	<p>Support – Agree with this policy. There also needs to be resistance to changing this boundary over time as otherwise there is likely to be an inevitable creep in the boundary definition which means that the few remaining green spaces in Stratford-upon-Avon will succumb to development.</p> <p>Housing development within Countryside should by default be refused. If there are increases to housing allocations during the plan period they should be located on brownfield sites where there is access to good infrastructure rather than developing Countryside and green areas.</p> <p>Support – Agree with principle of brownfield land use and would suggest that brownfield use should be the priority over greenfield.</p> <p>There needs to be a clear distinction drawn between greenfield land outside the built up area boundaries, as mentioned in this policy, and Countryside as defined in Policy H1. It is not clear to a layperson what the difference between Countryside and greenfield land is but the restrictions on development are more rigid for Countryside than they are for greenfield land outside the built up area boundaries. The wording needs to be tight enough to ensure that Policy H4 does not become a back door for acceptance of building on Countryside, by deeming it to be greenfield, and then arguing that a set of circumstances are specific and relevant to justify development.</p> <p>Support – Idea of at least 10% of the total number as bungalows is a good one.</p> <p>Support – Where an employer does not need to be in the town (e.g tourism related) then it makes sense to consider moving them to the proposed SUA.2 area. However this needs to be considered alongside traffic management as without a traffic management strategy/plan the current traffic congestion problems will only be exacerbated.</p> <p>Support – Support the policy but feel that 20% cap on non retail use is too high – 10% would be a better number. What needs to be avoided at all costs is turning Wood Street into the next Greenhill Street and over time lowering the quality of the facilities provided. Wood Street is also a main gateway into the town from Greenhill Street and needs to retain a quality feel.</p>
--	--	--

	TC5	Support – Agreed – this area does not give a great first impression to visitors or residents and needs a major facelift.
	TC Project 1	<p>Support – There are a large number of items within this plan which propose redevelopment of areas and introduction of what is effectively new retail space. This needs to be done in conjunction with a demand survey – i.e. is there the potential end consumer demand currently/likely in future to support all of this space. What needs to be avoided is development of lots of new space which for whatever reason is then unable to be let, as this will mean lots of empty units which inevitably leads either to the feeling of a ghost town or means that standards are dropped in relation to type of businesses that use these premises. The ultimate long term impact is that the perception and image of the town centre decreases significantly.</p> <p>Fully support the item re independent businesses as this is likely to lead to a wider variety of the types of business that will be attracted.</p>
	TC Project 5	Support – 4pm time for reopening of High Street is going to make it difficult for King Edward School with school buses, parents picking children up etc – 3.30pm would be a more suitable time to allow for this. “Exploring” parking does not sound like a commitment to make it happen – if there is a loss of parking overall then this creates a new problem. One also has to question in this context why there is a proposed demolition of the NCP car park which in itself has 250 spaces?
	TC Project 9	Support – This needs to be reviewed in line with all the development that is proposed as this will inevitably increase the amount of vehicle traffic.
	INF1	Support – Given all the growth and development identified in this Neighbourhood Development Plan there needs to be a coherent and realistic transport strategy which adequately supports it.
	INF2	Support – Needs to be done without damaging the character and setting of the Recreation Ground.

	INF3	Support – Church Street car park is closed to the public during the day so difficult to see how this helps significantly. Decking at Church Street car park is likely to spoil the character/setting of that car park so should be resisted.
	CLW7	Support – 40sqm re new 2 bed houses seems too small.
SNP50		Support following policies with no further comments: H2, H3, H4, H5, H7, TC Project 3, TC Project 4, TC Project 8, BE7, NE1, NE3, NE Project 1, INF Project 1, INF Project 5, SSB1.
	TC Project 5 + 7	Support – Page 124: An intention to create a proper bus station should be included. The present situation on Wood Street is a very poor advertisement for the town with tourists. This should go with improved bus stop signs (clearly labelled A, B, etc) and timetable information. Clarification of what “Hybrid and Start/stop” services means.
	NE2	Support – Page 101 9.1 How is the aim to “enhance the River Avon corridor and ...trees” going to be reconciled with the South-West Bypass road? Details of the route of this should be included in this plan. In particular, there should be a bridge or tunnel over the road for the path to Cross o’the Hill (SB34/35).
	CLW3, CLW5, CLW Project 2, INF Project 6	Support – Page 139: Walking and Cycling. “Development should not reduce physical or visual amenity”. How is this reconciled with the bypass roads? Page 101 9.1 How is the aim to “enhance the River Avon corridor and ...trees” going to be reconciled with the South-West Bypass road? Details of the route of this should be included in this plan. In particular, there should be a bridge or tunnel over the road for the path to Cross o’the Hill (SB34/35).
	INF5 + INF Project 8	The impact of any such link on The Greenway should be made clear; one would expect most residents want The Greenway retained and not crammed in with a railway line in the current path width. I
	INF Project 9	Support – comments repeated from TC Project 5

SNP51		<p>Support following policies with no further comments: H2, H3, H4, H5, H6, H7, E1, E2, E3, E4, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC Project 1, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4, TC Project 7, TC Project 8, TC Project 9, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE11, BE12, BE13, NE1, NE2, NE3, NE Project 1, INF1, INF2, INF4, INF5, INF Project 1, INF Project 2, INF Project 3, INF Project 7, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB1, SSB2</p>
	H1	The 'gap' on the map between Tiddington and Alveston, which contains a house, should either be in Tiddington or Alveston built up area boundary or a 'strategic gap'.
	TC Project 2	Support – need to widen pavements and remove railings at junction as no room for pedestrians, and add cycle routes
	TC Project 5	Support – need cycle ways, and support the pedestrianisation in particular air pollution in town is a big problem
	TC Project 6	Support – need cycle routes all over town and on roads into town
	BE10	Support – need to include Historical archaeological sites in this, as well as monuments and buildings.
	NE4	Support – should have no development within SSSI.
	INF3	Support – Caution with healthcare provision for whole population must be considered if planning permission for a large number of retirement, or care, and nursing homes is given.
	INF Project 4	Object – the park and ride at rosebird should be re-opened, do not need to create a new one
	INF Project 5	Support – include Stratford hospital road link, as will be insufficient road space with the one access from Arden St. Will need link to western rd, and birmingham rd.

	INF Project 6	Support – most important
	CLW3	Support – Tiddington village is very short of public open space, and needs an area designating as such
	SSB3	Support – Tiddington needs open space area designated that is appropriate in terms of hectares per population head
SNP52		Support following policies with no further comments: H2, H3, H4, H5, H6, H7, E1, E3, E4, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4m TC Project 5, TC Project 6, TC Project 7, TC Project 8, TC Project 9, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF5, INF Project 1, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF Project 7, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB1, SSB2, SSB3
	H1	Support – The AVA would request that the BUAB around Hillside be amended to the natural boundary of the estate but cutting back from the hedge line just over two thirds of the way down the boundary from the north across the garden to the access road, thus ruling out the flood plan area in the lower part of the site. The AVA understand that the boundary around this house was amended from the original proposed due to the flood plain and this would be a good compromise.
	E2	Support – The AVA would like to see a properly researched relief road plan for South of the River, if this is required, before it is put out for consultation.
SNP53		Support following policies with no further comments: H2, H3, H4, H5, H6, E1, E3, TC1, TC2, TC3, TC4, TC6, TC8, TC Project 1, TC Project 2, TC9, TC Project 4, TC Project 7, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE1, NE Project 1, INF1, INF2, INF3, INF4, INF5, INF Project 4, INF Project 5, INF Project 6, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB2.

H1	Support – Subject to the developments not being on the "local green spaces".
H7	Object – I don't really see why such a high proportion of 4+bed houses is needed.
TC5	Support – Strongly support any measures to refresh this area.
TC7	Support – The Birmingham Road is fairly awful for pedestrians and any measures to make it a more pleasant, less congested and less noisy/polluted area of the town get my support - particularly between the One Elm and the Maybird Centre.
TC Project 3	Support – Strongly support. This is not a nice place to walk through and anything to make it easier for pedestrians is to be welcomed. A pleasant walkthrough from Maybird to Town Centre and vice versa may also encourage more people to make that trip.
TC10	Object – Don't know why this is needed.
TC11	Object – Not sure I see why this is needed.
TC12	Support – Yes. I think some more uniformity of frontages and less brash signage would be a good idea.
TC Project 5	Support – I appreciate this may cause quite a lot of short-term disruption, but the Wood Street end of Bridge Street is awful for pedestrians and could be a lot better. I also think widening the walkways on Bridge Street is an excellent idea. The pavements on the Sainsbury's side get incredibly congested and it isn't always safe. One of the best measures in the plan in my opinion. I think this could be a major improvement.
TC Project 6	Support – Strongly support any efforts to increase cycle traffic.
TC Project 8	Support – Yes please! No idea how and I expect the devil is in the detail on this one. Any additional crossings would need to be acceptable to "the town" and would need careful thought as to siting to ensure they have the desired effect. A big part of the problem is the way the Rec car park funnels people up to that end of town.

		there'd need to be a crossing further down which was accompanied by strong signposting for visitors. A "feature" crossing might do it.
	TC Project 9	Support – We don't want Stratford to become a Mecca for multi-storey car parks!
	NE2	Support – Strongly support. Stratford needs its green spaces protecting!
	NE4	Support – Should not be compromised in any way!
	INF Project 1	Support – I support, although I suspect this one will run and run... I
	INF Project 2	Not sure about what is proposed so wouldn't like to "support" until I know.
	INF Project 3	Object – No more additions to multi-storey car parks please.
	INF Project 7	Support – Strongly support. Ideally a bridge which has some aesthetic appeal, because the current one has none
	SSB1	Support – Support Strongly support any measures to make this part of town more "human" focused and accessible to the general population.
	SSB3	Object – Is this really needed?
SNP54	H4	Object – On page 27, the Policy misleadingly includes a photograph of land adjacent to Stratford-upon-Avon railway station, as an example of Brownfield Land, by implication implying there is no redevelopment scheme. This is misleading as the land concerned is identified in the adopted Stratford-on-Avon Core Strategy, Proposal SUA.1: Canal Quarter Regeneration Zone, for a Steam Railway Centre. This facility is important to ensure the retention and future development of steam operated railway services to Stratford-upon-Avon. This proposed facility is not referred to in the Neighbourhood Plan and should be specifically included within INF Project 8 or a separate Project, as a consequential amendment to the Neighbourhood Plan

SNP56		<p>Support following policies with no further comments: H4, E1, E3, E4, TC2, TC3, TC4, Tc7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC12, TC Project 4, TC Project 5, TC Project 7, TC Project 9, Be1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE12, BE13, NE1, NE2, NE4, INF3, INF4, INF Project 2, INF Project 5, INF Project 6, INF Project 7, INF Project 8, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB1.</p> <p>Object to following policies with no further comments: H1, TC11, BE11, INF1<, INF Project 4.</p>
	H2	Support – It is vital that these villages remain separate entities and do not get engulfed into the town. The each have very different qualities and still retain rural character and have strong communities.
	H3	Object – Object In the short time we have lived here there have been quite a few planning applications and there fear is that if some of these had been granted it would lead the door open to much more development. Kissing Tree house and grounds are one of our main concerns as this is a stunning house and grounds and it forms a rural boundary for the village which is unique. Alvestons location close to the river also supports a great variety of bird and bat species as well as many mature trees and their needs should also be considered as windfall development could threaten them.
	H5	Object – This worries me as it has frequently been exploited by people, often with a means to expensive lawyers as a means of making fast money. Once they have creamed off their profits they then move out of the area having spoiled it for other residents
	H6	Object – Not really as once property comes onto the market it is subject to market conditions and so much of it is bought as investments and rental. A massive amount of new houses have been built which has already swamped the town and caused congestion especially in the birmingham road. Who has decided that that the town needs all this extra housing? Stratford has always been an expensive area compared to surrounding towns and I don't the think this will change as long as investors are allowed buy up new housing stock.
	H7	Object – don't really understand how housing needs are surveyed and calculated. Has this allocation been decided on by the town or the Government? At one meeting I attended reference was made that we are having to take some of Birmingham's housing allocation yet no one explained why. The town has changed so

		<p>much in the past few years with huge amounts of new housing and it doesn't have the infra structure or resources to cope.</p>
	E2	<p>Object – I'm not really sure why the town is hell bent on wanting to expand. Traditionally it has been a market town with a good mix of employment opportunities. The expansion of more business development comes along with the need for bigger faster roads and these always come wit a cost of yet more housing.</p>
	TC1	<p>Object – I don't really understand this. I am against the development of further out of town shopping centres.</p>
	TC5	<p>Support – This approach to the town does look quite sad and neglected.</p>
	TC Project 6	<p>We cycle from Alveston but often resort to using the pavement as there is no safe road road route Alveston and Tiddington.</p>
	TC Project 8	<p>Support – The Lucy Mill bridge could be further utilised for pedestrian and cycle access.</p>
	NE3	<p>A consultation process similar to a planning application should be mandatory when someone makes an application to cut down a large tree on their property. The beautiful blue cedar trees in Avonfields close are one such example. One has been felled and none of the neighbors had any prior knowledge this would happen. The trees are home to a number of bird species including the goldcrest and their habits should be taken into account and not just the inconvenience of having a tree on their land.</p>
	NE Project 1	<p>Object I think this is a very important aspect of any development. It is all very well providing a habitat once you have destroyed the species but the priority must not be to destroy it in the first place</p>
	INF2	<p>Object – My only comment on this is that parents always want to take their children to school in cars. Any new facility should have cycle, buss and walking routes planned in and must restrict and discourage car access to make parenets find alternative ways of getting children to school.</p>

	<p>INF Project 1</p> <p>INF Project 9</p> <p>SSB2</p> <p>SSB3</p>	<p>Object - Rather than building yet more roads better use must be made of the ones we have first.</p> <p>Object I am strongly against tany plans to build an eastern relief road for HGVs but support enhancing bus and coach facilities</p> <p>Object – I'm not sure about this. In theory it sounds like a reasonable idea but it could lead to much greater expansion and this would be detrimental on the outskirts of the town.</p> <p>Object I'm not sure about this as I think it will lead to further development behind Tiddington and the associated traffic will contribute to congestion going into town.</p>
<p>SNP57</p>	<p>H1</p> <p>H2</p> <p>H3</p>	<p>Support following policies with no further comments: TC3, TC4, TC5, TC6, TC7, TC8, TC Project 3, TC12, TC Project 5, TC Project 6, TC Project 7, TC Project 9, BE1, BE2, BE3, BE7, BE8, BE9, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF5, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB1</p> <p>Object to following policies with no further comments: BE5</p> <p>Support – I support the plan under the current criteria that any development will definitely be strictly controlled</p> <p>Support – Strategic Gaps are very important, not only to preserve the setting but to preserve Stratford Upon Avon as whole. As one of the most famous places in the world we should strive to preserve the uniqueness of the whole area and any development should not be to the detriment of Stratford upon Avon town center which is looking tired and run down.</p> <p>Object – 'Windfall' development seems very subjective and is something that would need very careful consideration and is not something I would support. It is also contradictory to other parts of the plan where it states "all development will be strictly controlled"</p>

H4	Support – I fully support the redevelopment of Brown field sites. Some areas in the Stratford district could now benefit from regeneration, for example areas along and surrounding Masons Road
H5	Object – If you actually look at the Stratford and some the more rundown areas, there are enough areas to develop in the surrounding district without the need for any kind of plans to include Garden Land. I really think full consideration should be given to developing and regenerating the town and its immediate surroundings.
H6	Support – I support prioritising those living within the surrounding parishes, but I would like to see the number of 1 bed propereties increased to a minimum of at least 30%
H7	Support – I support in principle, but, although you can strive to attract managers and senior executives to commit to take up properties it will be difficult to do this with the current state of Stratford upon Avon Town. You really need to focus on revitalizing the town. This is also important to the tourist trade. Especially along Bridge Street which is one the key streets in the town and the first area people see when arriving in the town. The buildings seem to be in disrepair with peeling plaster and paint and the former BHS store, once a proud landmark is now what can only described as "derelict"
E1	Support – I fully support this proposal. Consideration should be given to prioritise sites currently unoccupied within the Stratford district.
E2	Object – The reason for objection is that there are numerous redevelopment sites that could be used without attempting to build on greenfield sites.
E3	Support – Definitely support this plan. It's one of the most important proposals for the town. One of the most famous places in the world should also be one of the best places for tourism. Consideration should also be given to diversification of current buildings within bridge street and the immediate town centre including the run down maple tree centre which would make a superb hotel or aparthotel with the attached shops being put back to their original state.

E4	Support – I support this proposal with the proviso that the sites are conversions and not new builds. Use what we have already. TC1 Support Town centre support is vital. You have built bell court at a cost of 30million pounds and the town centre needs desperate revitalisation. When you hear tourists and visitors saying the town centre isn't very good or in one case I overheard some American tourists say the place is lovely by the riverside and praise for the theatre they said the town is dirty rundown and horrible. I don't believe that's a very good advertisement for the town although you might.
TC2	Support – This proposal is excellent but keep the original facades or rejuvenate and regenerate by putting shops back to their original state. That's what tourists and visitors come to see.
TC Project 1	Support – This is very important and should be a priority.
TC Project 2	Support – This area needs this
TC9	Object – Reuse should be the only option
TC10	Object – No more large retail developments you should concentrate on the buildings in the town
TC11	Object – Why new. Why not regenerate and rejuvenate
TC Project 4	Support – Definitely support this. It needs it
TC Project 8	Object – You should concentrate on the town centre rejuvenation or you will have no one to use the bridges
BE6	Object – I object to greenfield sites. You have enough other rundown sites to regenerate
BE10	Support – Very important for the town and tourism
INF Project 1	Object – I object in principle because if you don't prioritise the town centre there will be no need for further bridges. If they are to be built you need to ban heavy lorries etc from the old bridge that crosses the Avon

	<p>INF Project 7</p> <p>SSB2</p> <p>SSB3</p>	<p>adjacent to tramway bridge. If you don't put something in place this bridge will be damaged beyond repair in the future.</p> <p>Support – For pedestrians only</p> <p>Object – Can you not make use of existing run down sites</p> <p>Object – Considering you have numerous housing plans already proposed there is no real value to this. You either want to protect Stratford upon Avon's heritage and environment or not. You can't have your cake and eat it.</p>
SNP58	<p>H1</p> <p>H2</p> <p>SSB3</p>	<p>Support Although the part of the strategic gap for Alveston/Tiddington north of the B4086 has been removed following previous consultations the proposed alteration also contained the inclusion of the Red House and Avon Court within the Built-up Area Boundary for Alveston. Figures 2 and 17 suggest that this has not happened</p> <p>Support – Figures 2 and 16 show a gap between the intended Built-up Area Boundary for Tiddington and the south eastern segment of the strategic gap. Shouldn't the strategic gap commence at the Built-up Area Boundary?</p> <p>The inclusion of additional community green space in Tiddington is extremely welcome.</p>
SNP59	<p>E3</p>	<p>Support following policies with no further comments: BE1, INF Project 7, INF5,</p> <p>Support – We strongly support the continuation of Stratford's special status as Shakespeare's home town and welcome the promotion of employment associated with the theatre, heritage, cultural, media and creative industries.</p>

TC Project 1	Support – We support the town centre strategic partnership and welcome the opportunity to play an active role in the development and delivery of a town centre strategy, particularly in relation to the tourism economy and the public realm. We want to see a thriving Stratford which meets the needs of those who live in, work in and visit the town.
TC10	Support – We strongly support development within the town which promotes cultural and learning activities, including proposals relating to Henley Street. However, we object to the definition of a specific cultural and learning Quarter which excludes Waterside and Southern Lane where the RSC operations are located - the whole town has a cultural and learning offer and we ask for the Plan to reconsider the naming of this area.
TC Project 5	Support – We support pragmatic solutions to improving the balance between vehicles, pedestrians and cyclists across the town, whilst ensuring appropriate access for deliveries and coach transport.
TC Project 6	Support – We support environmentally sustainable transport options, for staff and visitors.
TC Project 7	Support – We support arrangements with coach operators to facilitate smooth and easy access to pick up and drop off points, whilst minimising congestion. In addition, in light of heightened security concerns, we also want to see appropriate measures to manage access in the vicinity of the theatres (particularly Waterside and Chapel Lane) to maximise visitor safety and security. We look forward to playing an active role in future discussions with the Highway Authority and Local Transport Group on this topic.
TC Project 8	Support – We welcome proposals to ease access and congestion and pedestrian flow across the River Avon.
TC Project 9	Support – We support the retention of existing car parks within the Town Centre, in particular, Bridgeway Car Park which is highly used by theatre visitors. We ask that parking considerations take account of convenience and safety for evening visitors. as well as shoppers and residents, the needs of disabled visitors, and the health and viability of the night-time economy.
INF Project 1	Support – We welcome such a review.

	INF Project 8	Support – We strongly support all measures to improve public transport routes to and from Stratford-upon-Avon.
	INF Project 9	Support – We support enhanced bus and coach facilities, but ask for a more ambitious approach which seeks to increase the public transport options for residents, workers and visitors. The lack of public transport, particularly between Coventry and Stratford-upon-Avon, impacts on visitors and recruitment of staff, at the RSC for example.
	CLW5	Support – We welcome more sustainable routes for walking and cycling.
	CLW8	Support – We welcome measures to reduce pollution.
	CLW9	Support – We strongly support the encouragement of renewable and low carbon energy.
SNP60	TC7 Support	Support - the SBT are supportive of the policy to regenerate this part of Stratford and welcome further opportunities for public consultation and to take part in Master Planning so that there is a joined up approach which will enhance linkage to adjoining policy areas for instance the Henley Street Cultural Quarter
	TC10	Support – The presence of Shakespeare’s Birthplace and activities of the SBT at the Shakespeare Centre define and shape Stratford-upon-Avon as a cultural destination, especially in this part of Town. The SBT is supportive of the policy as set out and in particular the requirements of design briefs to value and respect pedestrian spaces and links within this designated Cultural Quarter.
	TC12	Support – We welcome this approach in terms of raising standards for High Street frontages in terms of being sympathetic to heritage assets and attracting visitors, shoppers and residents alike. We urge that this policy is extended throughout the Cultural Quarter in particular to include all of Henley Street and the eastern end of Windsor Street.
	TC Project 4	Support – We are supportive of this policy in terms of the benefits it has given to the street landscape. We would urge that funding is protected for the period of the plan.

	BE10	Support – The SBT supports this policy to protect Stratford’s unique and internationally important heritage assets, keep them in use and in a particular to protect those adjacent to the Historic properties that the Trust owns and controls. All proposals should take into account impacts on the wider setting and not just that on immediate neighbouring buildings.
	INF Project 1	Support – A sound transport infrastructure is critical to the sustainability and resilience of the SBT and of Stratford-upon-Avon as the world-renowned town which helps attract some 10m trips to Shakespeare’s England (Coventry and South Warwickshire) spending £508m. Those trips account for a total value of tourism to local business turnover of £635 million, supporting some 11,150 (1 in 8) jobs (2014 Economic Impact Assessment).The vast majority of our visitors arrive by car and coach, given the paucity of public transport options. We would like to see more weight given in a detailed strategy to sustainable and integrated improvements to strategic road, rail and air links with national networks, particularly public transport links to London, Coventry and Birmingham. This would not only enable Stratford to attract more visits from major population centres, but also open up a wider recruitment pool for SBT and other businesses. Should a further report be commissioned as recommended in the policy the Trust would welcome the Opportunity to play a full role in the consultation.
	INF Project 9	Support – Whilst the Trust is generally supportive of this policy due regard should be taken of any effects of the outcomes of the report to be commissioned in INF Project One and that visitors, locals and residents do not suffer in terms of accessing the Town
	CLW3	Support – The Shakespeare Birthplace Trust is extremely supportive of this policy to protect Open spaces and local Green spaces for their recreational and amenity value and in particular spaces , alongside Cottage Lane for the benefit of the setting , safety and ambience around Anne Hathaway’s Cottage
	CLW Project 2	Support – The Shakespeare Birthplace Trust has done much over the years through its ownership of land within the green necklace (in particular along the Warwick road) to preserve the approach to the town. The Trust is thus supportive of the general aims of this policy for people to connect to these places provided that such connections enhance the landscape.

SNP61		<p>Support following policies with no further comments: H4, E1, E2, E3, E4, TC10, TC12, TC Project 5, TC Project 7, BE1, BE2, BE3, BE11, BE12, NE1, NE2, NE3, NE Project 1, INF3< INF Project 2, INF Project 3,INF Project 6, INF Project 8, INF Project 9, CLW2, CLW5, CLW Project 2, CLW 8, CLW9.</p> <p>H1 Support – We are however concerned that there is an area on the Tiddington Fields SSB3 map (Figure 16 - also just on Figure 17) to the east of the defined Tiddington BUAB that is not colour coded - it should be grey not left white making it part of the eastern strategic gap</p> <p>H2 Support – See previous comments re 'undefined area east of Tiddington Fields</p> <p>H3 Support – Fully support – all along the TVRA has endeavoured to be supportive of the Local Service Village approach - but critically maintaining the independent identity of the village (and indeed that of Alveston)</p> <p>H5 Support – Agreed must not impact on neighbours - there have been local attempts to squeeze in extra builds!</p> <p>H6 Support – Whilst supporting the overall policy there must be opportunities for movement up the housing ladder in order to make space for new first time buyers</p> <p>H7 Support – Remember not all OAPs want to sleep on the ground floor!</p> <p>BE4 Support – even for Tiddington BE5 Support BE6 Support BE7 Support BE8 BE9 Support - and consult with TVRA!</p> <p>BE13 Support – As long as building on these spaces don't squeeze the surrounding area.</p> <p>INF1 Support – In supporting this Policy the TVRA requires that the local primary school catchment area is redrawn so local village children attend 'our' primary school and those from outside the village do not; firstly squeeze out local children or cause the expansion of the school - ie to remain a one class annual intake.</p> <p>INF2 Support – Secondary</p>
-------	--	---

	INF4	Support – Medical/doctor support south of the river - not least as we have a number of residential complexes
	INF Project 1	Support – In supporting this the TVRA are strongly opposed to any concept for an Eastern Relief Road (ERR) not in a NIMBY approach but because it could cut across all other aspects of maintaining Tiddington as an independent village; and the road would actually lead no where helpful
	INF Project 4	Support – As long as it helps reduce congestion on the Tiddington Road
	CLW1	Support – Tiddington is short of community space!
	CLW Project 1	Support – Whilst supporting thrust of policy it must be noted that facilities/ amenities for local villagers are not sufficient
	CLW3	Support – Whilst supporting maintaining Knights Lane open space, we are concerned that Tiddington Fields is not locked into this policy as well
	CLW4	Support – Critical in Tiddington as space is lacking
	CLW7	Support – Must be maintained here in Tiddington not least as garden space is limited
	SSB3	Support – Whilst it will be sad to loose this space the TVRA support this policy as long as the provisions listed are followed not least that the southern end of TF is maintained in perpetuity. - and traffic developments for Oak Road are enhanced.
SNP62		Support following policies with no further comments: H1, H2, H3, H4, H5, H6, H7, E1, E2, E3, E4, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4, TC Project 5, TC Project 6, TC Project 7, TC Project 8, TC Project 9, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF2, INF4, INF5, INF Project 1, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF Project 7, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB1, SSB2, SSB3

		Object to following policies with no further comments: INF1, INF3
SNP63		Support following policies with no further comments: H1, H2, H3, H4, H5, H6, H7, E1, E2, E3, E4, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4, TC Project 5, TC Project 6, TC Project 7, TC Project 8, TC Project 9, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF5, INF Project 1, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF Project 7, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, CLW9, SSB1, SSB2, SSB3
SNP64		Support following policies with no further comments: H2, H4, E3, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC Project 4, TC Project 5, TC Project 6, TC Project 7, TC Project 9, BE2, BE5, BE8, BE10, BE11, BE12, BE13, NE1, NE3, NE Project 1, INF3, INF4, INF Project 4, INF Project 6, INF Project 9, CLW1, CLW6, CLW7, CLW8, CLW9, SSB1
		Object to following policies with no further comments: H1, H3, INF Project 7, CLW Project 1
	TC12	Support – I would like to see existing poor shop front design addressed - such as changing the awful yellow of L'occitane in Bridge Street to a colour more in keeping with Stratford
	NE2	Support – his should include the preservation of the Greenway as a leisure amenity (and not allow it to be turned into a railway or any other transport link).
	NE4	Support – Stop any development at this site
	INF5	Object – This rail link should never be built. The Greenway and Summerton Way should be held in trust as green spaces, wildlife corridors and leisure facilities for future generations.
	INF Project 8	Object – If this means reinstating the disastrous rail link to Honeybourne, then I object. We don't need it, can't afford it, and it would cause irreparable damage to one of our best green spaces.

	CLW3	Support – Please add Summerton Way to the list of open spaces and protect it and the Greenway from being turned into a railway, any other transport link or otherwise developed. This policy seems to conflict with INF5 (Q130/131) - the damned railway link to Honeybourne should never be built.
	CLW5	Support – Protect the Greenway and Summerton Way from being turned into a railway, and keep them as part of National Cycling Route 5 and as important walking routes.
	CLW Project 2	Support – Please ensure that the Greenway and Summerton Way are included in the green corridor.
SNP65		<p>Support following policies with no further comments: H1, H2, H3, H4, H5, H6, H7, E1, E2, E3, E4, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4, TC Project 5, TC Project 6, TC Project 7, TC Project 8, TC Project 9, BE1, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF5, INF Project 1, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF Project 7, INF Project 8, INF Project 9, CLW1, CLW2, CLW Project 1, CLW3, CLW4, CLW5, CLW6, CLW7, CLW Project 2, CLW8, SSB1, SSB2, SSB3.</p> <p>Object to following policies with no further comments: SSB3</p>
SNP66		<p>Support following policies with no further comments: E3, TC1, TC2, TC Project 2, TC Project 3, TC9, TC Project 4, TC Project 6, TC Project 7, BE2, BE5, BE9, BE10, BE12, BE13, NE1, NE2, NE3, NE4, NE Project 1, INF3, INF4, INF Project 2, INF Project 3, INF Project 5, INF Project 6, INF 5, INF Project 8, INF Project 9, CLW1, CLW3, CLW4, CLW5, CLW7, CLW Project 2, CLW8, CLW9</p> <p>Object to following policies with no further comments: TC3, TC4, TC5, TC7, TC10, TC1, TC12, TC Project 5, TC Project 8, TC Project 9, BE1, BE4, BE8, INF1, INF Project 4, INF Project 7, CLW2, CLW Project 1, CLW6, SSB1, SSB2, SSB3</p>
	H1	Support – I strenuously object to having any further development in Alveston , indeed for Stratford upon avon and Tiddington. What has been allowed to take place so far has been detrimental to the character of the villages and the town. Much too much. I believe housing developers are laughing.

H2	Support – Housing developers are greedy and self serving. I oppose strongly, any further development of any kind.
H3	Object – I don't support ANY development. Who are these houses for?? I certainly do NOT support any development outside BUABs
H4	Support – I have put support, however I am very anxious that sites such as the Wellesbourne Airfield may be considered. The definition of brown field needs to be much tighter. You need to realise how adverse the impact of more and more housing is on traffic, pollution, health and wellbeing etc.
H5	Object – There must be NO development on garden land. Why are we kow towing to developers and housing lobby constantly!
H6	Support – Caveat - the juxtaposition of social housing against private housing does not work. I say this as someone who has lived in a mixed tenure road in London and Stratford upon Avon for over 30 years prior to moving to my current address 3 years ago. There are many more social problems now, drugs, anti social behaviour and I certainly found this impacted on us at our previous addresses.
H7	Object – No further housing is needed - who are all these houses for? I am sorry I simply do not believe the need for more and more developments. Is this because everyone wants larger properties and children expect a large house as soon as they are 21 as opposed to the old days when you lived at home till you got married, saving up , not expecting things quickly.
E1	Object – I only support employment within Stratford town, there is a train station there and bus station. More offices in out of town and rural areas simply add to congestion.
E2	Object – See my previous comments. too much traffic.
E4	Object – No more housing - stop ruining this once beautiful area. it is utterly depressing to have green areas under constant pressure.

	TC6	Object – no view, other than don't waste my council tax
	TC8	Object – I see no need
	TC Project 1	Object – this sounds like more meetings.
	BE3	Support – I am supporting this but in reality I believe this agenda is completely in the hands of housing developers. As a local resident I am sick of constantly worrying about every field and garden being developed as well as the airfield. I strongly oppose every new house going forward unless it is infill in the town.
	BE6	Support – But I totally oppose every new house!
	BE7	Object – I only support bringing empty buildings back into use in town. NOT using agricultural land, we need to keep this. NOT having massive developments with miniature gardens.
	BE11	Object – No idea and no time to read about this.
	INF Project 1	Object – No further road building, it doesn't help congestion, just adds to this. More use of trains and buses needed.
SNP67		Support following policies with no further comments: H3, H4, TC12, TC Project 6, BE2, BE7, BE8, BE9, BE11, BE12, BE13, NE1, NE3, NE4, INF3, INF4, INF Project 6, INF5, INF Project 9, CLW1, CLW5, CLW7, CLW Project 2, CLW8, CLW9, SSB3
	H1	Support – Thanks to the intervention of the Town Council and the Appeals Inspectorate, the land East and West of Knights Lane in Tiddington did not fall into the hands of developers - making it now possible to classify it in the Neighbourhood Plan as Countryside, ensuring strict controls on any proposed development in the future to protect the Strategic Gap and preserve the character of this distinct settlement
	H2	Support – See previous comment.

SNP68	<p>H2</p> <p>H3</p> <p>INF Project 1</p> <p>SSB3</p>	<p>Support following policies with no further comments: H1, H4, H7, TC2, TC12, TC Project 4, BE2, BE8, BE12, BE13, NE1, NE2, NE3, CLW Project 1, CLW3, CLW4, CLW5, CLW7, CLW8</p> <p>Support – Gap should be bigger. Include white space.</p> <p>Object – Too many houses allocated</p> <p>Strongly object to ill thought through proposal for ERR</p> <p>Support – The decision to build houses on Tiddington Fields was hugely controversial and the compromise of the south part being allocated as community space is an excellent idea. PLEASE MAKE THIS HAPPEN. Who would own this land? Tiddington is really lacking in community green space.</p>
SNP69	<p>NE2</p> <p>NE4</p> <p>INF5</p> <p>CLW3</p>	<p>Support following policies with no further comments: H2, H4, TC Project 2, TC Project 3, TC Project 6, TC Project 8, NE1, NE3, NE Project 1, INF Project 4, INF Project 6, CLW1, CLW8</p> <p>Support – This should include preserving the Greenway as a wildlife corridor and recreational amenity and not allowing it to be turned into a railway, any other transport link or otherwise developed.</p> <p>Support – There should be no development at this site.</p> <p>Object – This railway should never be built. The Greenway and Summerton Way should be held in trust for future generations of residents and visitors as green spaces, wildlife corridors and leisure facilities. INF Project 8 Object If this means reinstating the disastrous rail link to Honeybourne, then I object. We don't need it, can't afford it and it would cause irreparable damage to one of our best green spaces.</p> <p>Support – Please add Summerton Way to the list of green spaces and protect it and the Greenway from being turned into a railway, any other transport link or otherwise developed. This excellent policy seems at odds with INF5 (Q130/131) and shows that the damned railway link to Honeybourne should never be built.</p>

	CLW5	Support – Protect Summerton Way and the Greenway from being turned into a railway or any other transport link. Keep them as important walking and cycle ways and part of National Cycling Route 5.
	CLW Project 2	Support – Please include Summerton Way and the Greenway in the green corridor.
SNP70		Support following policies with no further comments: H4, H5, H6, H7, E1, E4, TC1, TC2, TC3, TC4, TC6, TC7, TC8, TC Project 1, TC Project 2, TC Project 3, TC9, TC10, TC11, TC12, TC Project 4, TC Project 5, TC Project 6, TC Project 7, TC Project 8, TC Project 9 , BE2, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE11, BE12, BE13, NE3, NE4, NE Project 1, INF1, INF2, INF3, INF4, INF Project 1, INF Project 2, INF Project 3, INF Project 4, INF Project 5, INF Project 6, INF Project 7, INF Project 9, CLW1, CLW2, CLW Project, CLW4, CLW6, CLW7, CLW8, CLW9
	E2	Object – This is an example of how the Council's development vision for Stratford has become overly commercial
	E3	Support – provided that there is a careful balance between environmental matters and those of commerce. The former loses out too many times.
	TC5	Object – there is no mention of specific cycle links
	BE1	Support – this underlies how important it is that members of the Planning Committee have some training in design aesthetics
	BE3	Object – Long Marston's major development will not integrate into the existing community. Another example of good words, not so good actions.
	NE1	Support – We must not forget Summerton Way. This is a wild life corridor, even though W.C.C.categorised it as a "highway" some years ago.
	NE2	Support – the proposed road link to Luddington with its planned high bridge poses a major biodiversity threat

	<p>INF5</p> <p>INF Project 8</p> <p>CLW3</p> <p>CLW5</p> <p>CLW Project 2</p> <p>SSB1</p> <p>SSB2</p>	<p>Object – there are substantial financial and environmental arguments against this proposal, detail of which I can supply if requested</p> <p>Support – there is no practical expansion of rail services, without incurring major environmental damage</p> <p>Support – Summerton Way should also be added</p> <p>Support – So 'development should not reduce physical or visual amenity'... really. What about the Long Marston and the Greenway and Summerton Way developments?</p> <p>Support – Summerton Way should be integrated into this project</p> <p>Support – I propose 3 stories maximum height as we need to reduce visual impact</p> <p>Object – Th is constant gobbling up of land, is damaging our origin as a market town and spreading ourselves out into the countryside bit by bit</p>
<p>SNP71</p>	<p>TC Project 3</p>	<p>I am informed that Policy TC Project 3 is proposing conversion of the disused railway bridge over the canal to a cycle/pedestrian route and there are apparently also still long term plans by Warwickshire CC to build a link road through this site, to which Vintage Trains also strongly objects. There appears to be some confusion over this latter proposal, as we had recently been led to believe that these plans were scrapped.</p> <p>The disused railway bridge over the canal although still owned by Network Rail, along with the land beyond, is an integral part of the proposed Stratford Steam facility for which Vintage Trains previously obtained planning permission and would be required for a reinstated rail link to serve this facility, which is identified in the adopted Stratford-on-Avon Core strategy, Proposal SUA.1: Canal Quarter Regeneration Zone, including a Steam Railway Centre. This rail facility is important to ensure the retention and future development of steam operated railways to Stratford upon Avon.</p>

	INF5	<p>The use for a pedestrian/cycling facility (or road) over the disused railway bridge over the canal is therefore incompatible with a future operational railway. In order to protect their position I therefore write on behalf of Vintage Trains to make a formal objection.</p> <p>Vintage Trains are sympathetic to other groups promoting the reinstatement of the Honeybourne Rail Link under your Council's Policy INF5 protecting the Stratford to Honeybourne rail corridor and in the long term see a reinstated railway to Honeybourne as business opportunity for additional steam rail services to Stratford and beyond.</p> <p>This would be an extension of the existing Shakespeare Express Steam Train running twice a day on Summer Sundays between Stratford and Birmingham, now commencing its 19th Season and would bring more tourists to visit Stratford.</p>
SNP72	<p>Proposals Map</p> <p>List of Figures (p.2)</p> <p>Contents (p.7)</p> <p>Contents (p.8)</p> <p>Section 2 (p.13)</p> <p>Para 3.9 (p.16)</p>	<p>The map should have a title on it, including Figure 2. Tiddington Fields and Home Guard Club housing commitments should be shown as such - as illustrated on Figure 16. Alveston Primary School on Knights Lane is shown incorrectly as a sports facility. The inclusion of the 'white land' to the east of Tiddington is confusing – it is not clear why it isn't within the Strategic Gap.</p> <p>List of figures should ideally appear after contents page?</p> <p>Amend the title of Objective C to: "To prepare a Strategic Roads and Transport Strategy to serve the growing town and District in which through and peripheral traffic is taken off Town Centre routes" in order to reflect the content of the NDP.</p> <p>Amend title of Site Specific Brief Policy SSB2 to include reference to Stratford-upon-Avon, as in main body of the NDP.</p> <p>In para 2.1, replace 'district' in 5th line with 'neighbourhood area'.</p> <p>The housing allocation for Stratford should be acknowledged as a minimum, not a target.</p>

	Section 4 (p.17)	Vision Statement – Nowhere in the Plan is there any discussion as to how its delivery will be monitored and reviewed; nor are there any targets or benchmarks to provide a meaningful basis against which progress towards achievement of the Vision Statement can be assessed.
	H1 (p.21)	As worded, this policy is more restrictive than the NPPF. It could identify areas where constraint is necessary if the evidence base supports it, but to guide all new development to identified sites is contrary to the NPPF which requires LPAs to identify an on-going 5 year housing land supply.
	H1 (p.21)	There appear to be inconsistencies in how the built-up area boundaries for the three settlements have been drawn. The boundary for the village of Alveston in particular includes areas of land that are clearly not ‘built-up’ and are non-domestic in nature. Additionally, these areas of land have not been brought forward as allocations. In one instance, the large garden associated with one property has been severed, with no explanation as to why. The residential curtilage of the property in question should be either removed entirely or included entirely. The boundary for Tiddington village excludes the NFU complex to the west. This site appears to have been excluded to artificially create a gap between Tiddington and Stratford to prevent coalescence. The exclusion of this large employment site is not consistent in approach. Concern is raised that there is already coalescence between all three settlements and that the separation gaps have been artificially and incorrectly created.
	H2 (p.22)	It is unclear what the ‘white land’ that sits between the proposed strategic gap and the eastern edge of the village of Tiddington is for.
	H3 (p.24)	It is noted that there are no allocations proposed for Alveston and that its housing needs are expected to be met through windfall development. Whilst not convinced that this approach by itself provides sufficient confidence that the housing needs of Alveston would be met in the plan period, if it is considered that the reliance on windfall development is the right approach for Alveston (as opposed to an allocation), then the Neighbourhood Plan should build in some flexibility and identify a reserve housing site or sites (in Alveston or Tiddington) and include a mechanism to bring these forward for development should the rate of windfall development in Alveston not be as expected.

	<p>H4 (p.26)</p> <p>H5 (p.28)</p>	<p>It would be helpful if the explanation included a table to provide clarity as to how the housing needs are being met for each village (e.g. setting out the housing target, the number built since 2011, the number expected to be built (i.e. with planning permission), the number proposed to be allocated, and the number expected to come forward as windfall). Is the title of this policy appropriate, since the policy includes reference to windfall development, which by definition is not allocated?</p> <p>The justification in the accompanying explanation that further allocations cannot be accommodated is not considered adequate. Firstly, planning is about balancing different, and often competing, demands and whilst it is acknowledged that the ambition of the Neighbourhood Plan is to resist development on greenfield sites, this has to be balanced with the need to provide for an adequate amount of housing. Moreover, to what extent does this 'justification' contradict the approach of Policy H1 of setting built-up area boundaries within which development will be focused, even on greenfield sites within these boundaries. Secondly, it is noted that there is reference to Tiddington being considered less sustainable than other locations within the Neighbourhood Plan Area. If this is the case, then the Neighbourhood Plan should compensate for this by providing to meet Tiddington's housing needs in these more sustainable locations. As drafted, the Neighbourhood Plan ignores the issue.</p> <p>Clause (c) seems to set a higher bar than Clause (a). Does this present a conflict?</p> <p>Final paragraph - Is this relevant in a section on brownfield land? What is the difference between greenfield sites and countryside as discussed in Policy H1 page 21 which states 'All areas outside of the built up area boundaries are classed as Countryside'?</p> <p>Replace 'should' with 'will' and replace 'permitted' with 'supported'.</p> <p>It should be recognised that permitted development rights will allow some development of garden land without the need for planning consent.</p>
--	-----------------------------------	---

	<p>H6 (p.29)</p> <p>H7 (p.33)</p>	<p>It is noted that whilst the Policy adopts the thresholds and tenure provisions already set out in Core Strategy Policy CS.18, it adopts a slightly different approach towards determining acceptable stock mixes on eligible sites.</p> <p>The effect of the Policy will be to require that at least 60% of all new affordable homes comprise one or two bedroom properties. There is no distinction made as to the types of properties: for example, flats, maisonettes, houses or bungalows. At present, the Council's partner housing associations have to strike a difficult balance between meeting identified local needs and ensuring that any given scheme is viable taking into account associated risks. I would therefore prefer to seek an explicit acknowledgement of the need for a reasonable measure of flexibility over the exact mix on individual sites to reflect those considerations.</p> <p>The definition of 'local connection' specifically refers to eligible links to the Neighbourhood Area of at least five years. This requirement will need to be given effect, normally through the inclusion of appropriate clauses within S.106 Agreements. As a point of fact, this period differs from the Council's current model S.106 Agreement clauses. More importantly, however, this may present certain practical difficulties, especially in relation to people moving home for work-related reasons. We would therefore welcome discussion with the Town Council as to whether modifications to this paragraph could be introduced to allow greater scope for flexibility to reflect those considerations.</p> <p>The ability to deliver this Policy will, of course, impact on the delivery of the affordable housing that is the subject of Policy H6. It is noted that this Policy refers only to dwelling sizes by reference to the number of bedrooms, and does not refer to the type of units.</p> <p>It would often be difficult to achieve the exact stock mix specified in the Policy. This may be because of the practical necessity of rounding percentages to the nearest whole unit, or site-specific design issues. It is for this reason that Core Strategy Policy CS.19 expresses unit sizes as a range rather than a fixed percentage. If this approach were to be taken in relation to this Plan policy, it is difficult to see what 'added value' this part of the Policy creates over and above Part C of Policy CS.19. We would therefore welcome further discussion with the Town Council on the scope for modifying the Plan Policy to reflect our concerns.</p>
--	--------------------------------------	--

Part of the Policy containing requirements in respect of the provision of bungalows, although continue to express my concern that it is important to recognise that the provision of bungalows does not represent the only solution to the housing needs of an ageing population. In this respect it is difficult to see what added value the final paragraph of the Policy creates over and above Part C of Core Strategy Policy CS.19. Again, we would welcome further discussion with the Town Council on the scope for modifying this part of the Plan Policy to reflect our concerns.

The final paragraph of the policy refers to the provision of an appropriate mix of homes for employees, managers and senior executives. It is not clear what this is trying to achieve. Suggest text is deleted or if retained, more appropriately worded e.g. "...an appropriate mix of homes to meet the full range of housing needs, including for those in all areas of work."

It is unclear whether this Policy is aimed primarily at conventional housing schemes, as opposed to schemes catering specifically for older people.

It applies two different thresholds: (i) 20 or more units to include homes "designed for an ageing population" including a requirement for at least 10% of dwellings to be bungalows "unless there are site specific reasons why this would not be appropriate"; (ii) 10 or more units – to be built to Lifetime Homes standard, in accordance with Policy BE6 (25% until 2020, 100% from 2020). See comments under Section 8 relating to Built Environment and Design and appropriateness of reference to Lifetime Homes. The policy does not explain why or how these thresholds have been chosen. This will require explanation and justification. What sort of 'site specific reasons' are envisaged that could allow a proposal to be acceptable and not meet these targets?

The main concerns are essentially operational – around ambiguity – and failure to address the issue of care provision. In practice, the number of sites to which this Policy would apply (by virtue of the relevant thresholds) is likely to be limited.

Section 6:
Employment (p.36)

Para. 6.8 - Clifford Park Business Centre is in Clifford Chambers Parish so strictly speaking shouldn't be included in the table.

	<p>Section 6: Employment (p.36)</p> <p>E4 (p.43)</p> <p>Section 7: Town Centre (p.45)</p> <p>TC1 (p.53)</p> <p>TC2 (p.54)</p>	<p>Would it be beneficial to have the business areas set out in para's 6.8 and 6.9, mapped?</p> <p>It's unclear whether new build work/live units are acceptable outside the BUAB. Core Strategy Policy CS.22 (para.8) says they aren't, so this issue will need to be clarified.</p> <p>Para. 7.4 - explanation to Core Strategy Policy CS.23 (para. 5.9.14) makes it clear that there may be a need to provide additional convenience goods floor space in the town after 2021 - this should be acknowledged.</p> <p>The retail development figure has increased from 150 sq.m to 300 sq.m since the Reg.14 consultation. What is the reasoning and justification for this new figure? The revised figure is still a very low threshold that is inconsistent with Core Strategy Policy CS.23 and the NPPF.</p> <p>The % of primary shopping frontage has been increased from 10 to 20 since the Reg.14 consultation. This figure is still inconsistent with Policy CS.22 of the Core Strategy. What is the evidence/justification to override the CS?</p> <p>Core Strategy Policy CS.22 – Retail Development and main Centres, states: “Retail (Class A1) should remain the predominant activity at ground floor level on the primary shopping streets in Stratford town centre as defined on the Policies Map. At least 60% of the total gross floorspace at ground floor level on each primary street should be retained in this use”. Therefore, the requirement in Policy TC2 for retail use to achieve a minimum 80% coverage is not consistent with CS.22. It is most likely that the majority of the streets listed do not even achieve this proposed standard at present. There is no evidence or justification as to how the % figures quoted in Policy TC2 has been reached or why they need to be at such levels.</p> <p>Restricting such streets to only 20% non-retail is not likely to be possible as they probably already contain a larger % of non-retail units. The vitality of a town Centre is not based on how many shops it has but on how many people want to use its buildings. Part of vitality and viability of the town is that retail is mixed with other services, offices, leisure and cultural uses. The town centre is not just about shopping. The demand for retail use may change over the next 20 years. The stores or type of retail offered cannot be controlled.</p>
--	---	---

TC4 (p.58)	Replace 'be resisted' with 'not be supported'.
TC5 (p.60)	Replace 'be resisted' with 'not be supported'.
TC Project 2 (p.69)	Concern that there is no explanation as to how this project will come to fruition. There is no explanation; no delivery mechanism; no indication of project partners and no indication of potential funding.
TC Project 3 (p.70)	Concern that there is no explanation as to how this project will come to fruition. There is no explanation; no delivery mechanism; no indication of project partners and no indication of potential funding.
TC11 (p.73)	Replace 'Proposals for' with 'Any'.
TC12 (p.73)	Replace 'meet the following criteria' with 'be'. Concern that the studies being referred to are out of date.
TC Project 4 (p.74)	Unsure how the architectural advice will be given, or by whom. Unsure who will provide the funding.
TC Project 9 (p.80)	Bullet point 4 doesn't read properly. Suggest revise to 'the effectiveness in meeting these strategic objectives'.
BE3 (p.85)	Unsure of the reasoned justification and evidence for the thresholds set by this policy?
BE3: Explanation (p.86)	Para's 8.17 and 8.18 refer to Design Codes. The Reg.14 version of this policy did refer to Design Codes, but the submission version has removed mention of them. Therefore, reference to Design Codes should also be removed from the explanatory notes.
BE4 (p.87)	Whilst the concept underpinning this Policy is laudable, it is questioned whether this Policy really represents a land use planning policy: as it appears to relate more to "process".
BE4: Explanation (p.87)	Para 8.22 refers to thresholds. However, this is not the test as set out in the policy...

		consideration should be given to mapping this spatially, in order to make it easier to interpret policy.
	BE11 (p.98)	Para 8.48 – In the explanation, is it appropriate to include the sentence relating to good quality dwellings not being demolished to meet a personal preference or desire? This is stifling personal choice. Nowhere in National policy does it state that you cannot replace an unlisted dwelling just because it is in good condition.
	BE12 (p.99)	As written, the policy is too restrictive, particularly if applied to buildings in the urban area.
	INF1 (p.113)	Insert the word ‘Levy’ in last line.
	INF3 (p.115)	Replace ‘be resisted’ with ‘not be supported’.
	INF Project 1 (p.117)	Last bullet should read ‘Bishopton Lane’.
	INF Project 6 (p.121)	Explanation missing? If explanation elsewhere cross referencing required.
	INF5 (p.123)	The land in question is not mapped or indicated on the associated NDP proposals map.
	INF Project 9 (p.124)	Explanation missing? If explanation elsewhere cross referencing required.
	Section 11 (p.125)	Para 11.3 – It is inaccurate to state that ‘Stratford’s recent dramatic expansion in housing has not been matched by the provision of new or enhanced community and leisure facilities and open spaces’. Housing developments have provided for additional open space and the refurbishment of the Stratford Leisure Centre through S106 agreements.
	CLW Project 1 (p.130)	Not sure the term ‘ghetto-isolation’ is appropriate.

CLW3 (p.131)	Concern that sites 1, 2, 4 and 6 under Local Green Space designations are large tracts of land and do not comply with assessment criteria set out in para 77 of the NPPF.
CLW4 (p.135)	There is an inconsistency between 10 homes and 1 hectare. Densities tend to be at least 25dph so it is suggested 25 homes should be specified.
CLW5 (p.139)	There appears to be some duplication here with p.121 INF Project 6? 'Development proposals will be expected to demonstrate how pedestrian and cycle links have been incorporated throughout the development and how the development connects to the existing infrastructure'.
CLW6 (p.141)	Reference to Figure 1 seems to be spurious.
CLW7 (p.142)	Not sure of the reasoning, justification and evidence base for the 40 sq.m and 60 sq.m thresholds set out in the last paragraph of the policy. These will need to be justified.
Figure 13 (p.144)	An element of the 'green necklace' is outside the neighbourhood area.
SSB1: Explanation (p.150)	Para 12.8 - The urban design analysis commissioned by SDC says higher than 4 stories in some instances.
SSB2 (p.152)	<p>This policy refers to Design Codes; however other references to Design Codes elsewhere within the NDP have been removed.</p> <p>The site area for employment development is approximately 22 Ha (i.e. excluding the housing part of the Proposal SUA.2).</p> <p>Pallet – 'a slab or framework for carrying things or a straw mattress'...it is considered they mean 'palette'.</p>
Figure 15 (p.154)	The map does not include the eastern 'tip' of allocation SUA.2 as shown on the equivalent Core Strategy map of the same site.

	<p>SSB3 (p.155)</p> <p>Figure 16 (p.157)</p> <p>Figure 17 (p.158)</p> <p>Appendix 1 (p.159)</p>	<p>Warwickshire County Council do not have any adopted parking standards re: criterion f)</p> <p>The NFU site on the western edge of Tiddington has been excluded from the proposed settlement boundary for the village where the District Council would expect to see this site included in any such boundary. Unsure what the 'white land' is to the eastern edge of the village.</p> <p>There appears to be coalescence between Tiddington and Alveston. A large residential garden to the northern edge of the village has been cut in half. The site should either be included in its entirety or excluded in its entirety. There is a large tract of agricultural land that in the opinion of the District Council should not be included within the settlement boundary, unless it is being specifically promoted as a site allocation (which it isn't). The Manor House to the southern edge of the village and its entire curtilage should be removed from the settlement boundary.</p> <p>Should perhaps mention here the limitations of S106 contributions (Necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development) which doesn't apply to the Levy?</p>
<p>SNP73</p>	<p>General</p> <p>Figure 2 – Proposals Map</p> <p>H1</p>	<p>The plan makes no provision for policies to be relaxed in the event that there is no 5yr housing land supply or if Policy CS.17 kicks in and means even more sites are required. CS.17 should perhaps be reflected in an additional policy.</p> <p>Several policies give unconditional support to certain matters, but without caveats regarding assessing within the planning balance. Policies E3, TC10, BE10, BE12, NE1 and CLW1.</p> <p>This identifies the frontage of Bishopton Lane as a Local Wildlife Site. It is not a LWS and, given the allocation and extant permission, this protection no longer appears sound</p> <p>The exceptions that allow new dwellings in the open countryside are significantly more restrictive than Core Strategy Policy AS.10. For example, there is no scope for conversion schemes or houses of exceptional design as per para 55 NPPF.</p>

		<p>Suitable brownfield sites should also not be excluded, particularly as NDP Policy H4 does not require these to be in the built up area.</p> <p>The equivalent policy in the Core Strategy is CS.15, but that policy covers all development and does not specify only housing when supporting development within the BUAB. Does the NDP need to be broader?</p> <p>H2 The policy is quite strong and does not allow a balanced consideration of a scheme's benefits.</p> <p>H3 Supporting windfall development within the BUAB of Tiddington and Alveston is standard policy, but this should be subject to the numbers provided during the Core Strategy period. The explanatory policies refer to the development limits from the CS.16. The policy then goes on to refer to SSB3 which specifically deals with a 60 dwelling commitment at Tiddington Fields. H3 attempts to link that policy as a criteria-based assessment policy for development on allocated sites, but in truth it is a site specific policy. To achieve the policy aims of H3 it would be better to extract the non-site specific criteria elements from SSB3 and include them within H3.</p> <p>H4 Does not consider the need to protect existing employment land and does not relate its considerations to the built up area boundaries. Land in unsustainable locations should not be supported in principle for housing whether it is brownfield or not. Policy H4 introduces a test that proposals for development on greenfield land outside the built up area boundaries must clearly demonstrate 'specific and relevant circumstances' to justify development before proposals will be looked upon favourably. This though is not referred to at all in Policy H1 (which prevents any housing development other than exception sites and rural workers dwellings etc.) These two policies therefore appear to conflict.</p> <p>H5 The first two bullet points address the same issue.</p> <p>The criteria seem rather limited. Often backland housing results in limited outdoor amenity of the new dwelling – the policy seems skewed towards preserving the existing circumstances and context, which whilst understandable also needs to review future conditions of the new occupiers. Additional bullets regarding flood risk/drainage, landscape, amenity space for residents, services may be appropriate.</p>
--	--	--

		<p>The policy calls for ‘an appropriate’ mix of homes for employees, managers and senior executives. This appears to be a rather archaic class based approach where the workers get the terraced houses and the ‘senior executives’ have the luxury penthouses. Quite what is meant by the inclusion of the sentence is unclear. It appears to be geared towards attracting businesses and investment to the town but without a clear link being demonstrated. If on the other hand there was a policy which encouraged ‘key worker’ housing that is subsidised for the public sector employees that work in the town (nurses, police, teachers etc) but who might not be able to afford to live in the town, then that might have more appeal and be of more benefit to the community.</p> <p>The requirement for 10% of bungalows is not necessarily the best way to cater for an ageing population. Why not encouragement of Extra Care housing instead?</p> <p>The policy states that all schemes of 20 plus must have 10% bungalows. How does this impact on flatted schemes? What are the exceptions likely to be?</p> <p>Does the policy also relate to conversion schemes of 10 or more units?</p> <p>The requirement for ‘specialist’ accommodation for older people to be near to services and amenities is laudable but it is not clear whether this includes the bungalows.</p> <p>E1 This is unacceptably lenient. A marketing exercise should also be undertaken to demonstrate that employment land is no longer viable in that use before it is allowed to change. Point c) needs expanding so to ensure any replacement site is of at least equivalent economic value to the District and is sustainably located. Point d) is too broad and will be easily argued. Point e) could be argued by almost any town centre development of housing</p> <p>E2 The policy is very complicated and contains lengthy timescales (the Plan period) and vague triggers (e.g. ‘coherent and significant road infrastructure changes’).</p> <p>It mentions Atherstone Airfield but this appears to be outside the NDP Area Plan.</p>
--	--	---

E3	This gives unconditional support with no requirement to assess impacts such as parking, impacts on the character of an area, impacts on neighbours etc. Under this Policy the Stratford Wheel would have been supported, we're not sure the local people want such carte blanche approval!
TC1	The policy provides a very low threshold for requiring a sequential type test, which is at odds with CS Policy CS.23 (300sq.m vs 1000sq.m)
TC2	The 20% figure has no evidential basis for inclusion. Where is the evidence that the town centre is suffering in comparison with all other similar towns? The function of town centres is changing and to set a 20% limit until 2031 seems inflexible. Again this is at odds with CS Policy CS.23.
TC4	Given the constraints of this area and the resultant limited opportunities for new developments, is this policy necessary? Any schemes that might come forward would be very minor and would be covered by existing, generic policies.
TC5	This purports to be a policy to improve the area but then narrowly restricts the uses that buildings can be used for and thus may limit the ability for inward investment. What would be wrong with having other uses along here? What evidence is there that only shops and cafes can spruce up an area? Is this a veiled attack on the late night takeaways, if they are forced out then where do they go? Is it the intention of the word 'primarily' to provide scope for some non-A1/A3 uses?
TC10	The policy gives unconditional support with no requirement to assess impacts such as parking, impacts on the character of an area, impacts on neighbours etc. Pedestrian links would be better as Pedestrian/Cycle links.
TC12	The High Street Study guidance is not necessarily relevant to other streets and courtyard areas e.g. Bell Court. The Shop Front Design Guide is not SDC policy.
TC Project 4	Who will provide the architectural advice and funding for this scheme? In essence this seems to mirror the objectives of the High Street Study completed in 2005.

	<p>TC Project 5</p> <p>BE3</p>	<p>There may be an opportunity here to use the historic development of Bridge Street to inform a redesign, but practically it may not be possible. (Originally there were buildings at the top of Bridge Street, roughly where the traffic lights are now).</p> <p>The trigger for a master plan to be provided with applications is 25 dwellings, however many outline applications do not specify the number of units. To overcome this, a threshold of site area would also be needed.</p> <p>The word 'should' in the phrase <i>'If it is not accompanied 'Housing developments of 25 dwellings or more or developments exceeding 1,000sqm of non-residential floor space should be accompanied by a Master Plan'</i> makes the provision of Master Plans optional and the explanation does not set out clear criteria to explain where a masterplan is required. If the intention is to require a Master Plan with every application above 25 dwellings, the explanation does not justify why. This is especially important as the NPPF set no such threshold even though it could have done.</p> <p>The main objectives of the Master/Contextual Plan (Social cohesion and integration with existing infrastructure) are both relevant matters for a Design and Access Statement and do not appear to need a Master Plan.</p> <p>In the second paragraph, the requirement not to <i>'compromise future development opportunities on adjacent sites within the Environmental Improvement Areas identified in this Plan'</i> is unlikely to have any impact on developments in TC5, 6 and 7 as they are in Town Centre locations where large scale redevelopment is unlikely to occur. The policy is likely to apply to the Canal Quarter which will be extensively controlled through SPD (or similar) and therefore the requirement is unnecessary.</p> <p>The footnote for point 15 refers to CS.25 but this should be CS.26. BE3 requires a Transport <u>Assessment</u> for schemes of 25+ dwellings. A TA is not usually triggered by such a small number of units and would either be supported by a Transport <u>Statement</u> (or Access Statement). CS.26 mentions both TA and TS.</p>
--	--------------------------------	---

	BE4	<p>The other requirements - schools, medical facilities, POS and broadband are all addressed either through existing Core Strategy policies or through other departments such as Adult Social Care at the County Council and are therefore unnecessary.</p> <p>Overall, there is concern that the policy requires development to encourage 'social cohesion' or 'environmental improvement' but it is not written with precision and it is unclear what measures are to be used to establish whether the level of 'social cohesion' or 'environmental improvement' proposed is acceptable. There is therefore concern that the policy does not provide certainty to the LPA or developers and thus it will not be an aid to decision making.</p> <p>The Design Review Panel process is called for and the threshold set at 10 dwellings or 1,000 sq.m (non-residential), however many outline applications do not specify the number or size of units. To overcome this, a threshold of site area might also be needed.</p> <p>The NPPF para 62 talks of 'major projects' rather than 'large scale development' (the term used in the NDP) possibly being referred to <u>National</u> Design Review. There is a distinction between a major 'project' and an application proposal that triggers a 'major' classification merely because its scale goes over a threshold of 9 dwellings. Notwithstanding this, the NPPF uses the phrase "when appropriate" in relation to when major projects should be referred to Design Review, which signals that this is not an automatic referral system.</p> <p>It is acknowledged that the NPPF states that LPA's should set up local design review arrangements, but the NDP states it is necessary for sensitive smaller scale developments to also be referred for design review, such as conservation areas, listed buildings and visually prominent sites. Firstly, there is no suggestion in the NPPF that all smaller scale development or development proposals need go through such review and no mention that certain sensitivities trigger the need for design review. Secondly, there will be hundreds of applications each year within the NDP area that are either large scale or within a conservation area or affecting a listed building or which are prominent sites. How would a Design Review Panel deal with such workloads and who would fund this? Thirdly, if such special Design Review treatment is afforded to Stratford Town then other sensitive towns and villages would be likely to also demand such attention – how would this be resourced and managed?</p>
--	-----	--

		<p>The suggestion that the Town Council forms the Design Review Panels is worrying and potentially takes what should be a professional, non-political process into the political arena in terms of appointments and management. Para 62 NPPF only refers to LPA's as setting up local design review systems and the Planning Practice Guidance only identifies Local Authorities as setting up the Design Review system rather than Town/Parish Councils.</p> <p>The issues raised by a design review panel would need to be framed in terms of the policies of the Development Plan. It should not be the case that their comments become material considerations of themselves.</p> <p>The Design Review concept is a good idea when dealing with major projects (such as the new settlements at reserved matters stages) and might be a useful tool at pre-application stage with the involvement of MADE. However it is not a process that can be used on every large scale scheme or sensitive scheme due to the time it takes up, the costs involved and the limited added value it would provide in such circumstances.</p> <p>A further option is to re-write the policy to encourage developers to approach the TC as part of their Public Participation exercise and to enter into design review with the TC at that stage. This would enable developers to find ways to overcome TC objections and create genuinely local solutions prior to submission of applications. The process would remain voluntary and outside the evaluation process operated by the LPA, although the views of the panel could be a material consideration in determining applications.</p> <p>BE5 The policy calls for <u>all</u> development proposals to demonstrate how design has been influenced to reduce crime. This seems unnecessarily onerous and is not a requirement of the SDC Local List for validation.</p> <p>BE6 The policy requires everything over 40sq.m to meet 'BREEAM Excellent' which goes some way beyond what we currently ask for under Core Strategy policy. The use of Lifetime Homes Standard is interesting as Council officers have recently been seeking the enhanced standards under Part M4 (2) as a <u>preference</u>. Even so, developers will be challenged by viability to provide this across entire sites – 50% has proven more achievable.</p>
--	--	---

	BE7	<p>This policy is likely to cause confusion without clearer explanation. BREEAM's New Construction Technical Standards can apply to individual buildings, whereas BREEAM Communities Technical Standard is for Medium to Large scale developments, including new communities and regeneration projects.</p> <p>BREEAM is more commonly applied to strategic and major developments. The proposed application to 'excellent' standard more or less across the board seems excessive. Has thought been given to the practicalities of having <u>all</u> smaller schemes independently assessed for accreditation? This will have a significant resource implication for the Development Management team.</p> <p>The BfL 12 guidance document provides a 'How To Use' section. The emphasis in terms of using it as local policy is to require all proposed developments to use BfL12 as a design tool throughout the planning process with schemes performing 'positively' against it. The policy could be better worded to reflect this collaborative approach where the joint mission should be to always avoid 'reds' and challenge 'ambers' in the traffic light scoring system.</p> <p>In the explanation a series of density limits are identified. Strangely there is a limit for development in proximity to the Town Centre and for the periphery of the town but no 'guidance' within the town centre itself or between the centre and the periphery which provides a very prescriptive approach to some parts of the town and seemingly a more laissez faire approach in others.</p> <p>There is also mention of housing mix and 5 bed units in the explanation which would be better located in the housing mix policy H7. Notwithstanding this the guidance to allow a "small number" of 5+ bed houses on "large plots" provides little clarity about where this should be directed to or what the definition of "small number" is e.g. a small number in the town as a whole or per development site?</p> <p>The call to vary density across a site will be impossible in some cases e.g. small sites or apartment dominated developments (which the NDP seems to encourage in a drive to attain 20% 1 bed units). It is also unclear why for example a town centre site (which is acknowledged can have a higher density) should then have to demonstrate a differential of densities within the site itself. In reality few sites in the town will be of large enough scale to warrant creating recognisably different densities in an attempt to create different character</p>
--	-----	--

	BE10	<p>characteristics. Or is the Local Design Guide to be for particular sites?</p> <p>The explanation also introduces a Shop Fronts Design Guide stating that this will be prepared and adopted by the Town and District Councils – is this in the SDC Policy Teams’ work programme? There is a requirement for the process to be “in conjunction” with the Stratford Society or others with appropriate expertise – who decides on this level of expertise required? What powers will these conjoined groups have?</p> <p>The policy appears to give unconditional support to proposals which enable restoration of listed buildings without any reference to balancing the wider costs and benefits of such proposals.</p> <p>That preservation of assets should be given the ‘highest priority’ needs to be reflected in the policy itself. It needs to be consistent with the language used in the NPPF and Core Strategy which encourages positive engagement with conservation. The wording of the NDP policy suggests acceptance of harm if there is sufficient public benefit. Whilst this balancing exercise is consistent with NPPF guidance on local authority decision-making, it actually foremost states that harm should be avoided or minimised. The policy ought to reflect this.</p> <p>Reference is made “strictly controlling” development within or adjacent to the Historic park at New Place Gardens. What are the controls envisaged? The location of New Place Gardens ought to be identified on a map.</p>
	BE12	<p>The support for the conversion of upper floors ‘in principle’ needs to be caveated with need to be compliant with relevant Core Strategy policies. Likely that a lot of candidates for this type of conversion are listed buildings.</p>
	BE13	<p>The policy is ambiguous, is it saying that an empty home can be brought back into use for a non-residential purpose? If the intention is to increase the number of homes then shouldn’t the policy reflect this?</p> <p>Particular support is given to the reuse of <u>vacant</u> upper floors above <u>shops</u> within the town centre for residential use. Why is the support not widened out to the reuse of all upper floors above all properties within</p>

		<p>the town for residential use (subject to the vitality/viability of the town centre not suffering due to loss of employment opportunities or community services/facilities)? The explanation to the policy appears to widen the approach beyond just upper floors of shops.</p>
	NE2	<p>This area is not shown on the map – is it the same as the Area of Restraint? It also refers to “Flood Zones” of the River Avon but without specifying whether these are flood zones 1, 2, 3a 3b (all land is in Flood Zone 1 at least). The explanation clarifies things a bit, but such text should be in the main body of the policy. The support/not support stance is not balanced by wider considerations.</p>
	NE3	<p>The wording offers <u>protection</u> for “mature healthy trees and hedges” which seemingly rules out protection for “young healthy trees and hedges” or trees and hedges that are beyond mature or trees and hedges that are unhealthy but which could be restored to health via better management.</p> <p>The use of the word “protect” is a bit ambiguous, the explanation uses the term “preserve” instead. Are they seeking to retain trees and hedges or simply protect them during the construction phase? Surely the starting point should be to retain and protect all trees and hedges and to justify any deviation from this.</p> <p>The quoting of BS documents is welcomed but there should be a caveat to allow for replacement BS documents to also be adhered to.</p> <p>The requirement for all developments to prove how they have been landscape led seems unduly onerous and unnecessary for the majority of cases.</p>
	CLW Project 1	<p>This is an interesting approach, but is there any underpinning evidence to support the hypothesis that there is an existing problem or that the solution is as proposed? Such evidence would make requests for developers to implement this project more robust.</p>
	CLW 3	<p>A) Why not include the Welcombe Hills country park? B) Whilst all of the older Open Spaces are listed here it appears that more recent areas of POS that have been secured as part of housing developments are not included. This would include POS at Packhorse Road, Worths</p>

	<p>CLW4</p> <p>CLW7</p> <p>CLW Project 2</p> <p>CLW8</p> <p>CLW9</p>	<p>Way, St Peters Way, David Way – these should be added, together with a review of housing developments over the last 15 years to make sure that the associated POS is included. There are also school playing fields including KES, allotments, the racecourse and other sports pitches to consider whether worthy of designation.</p> <p>States that development of 1ha or more triggers POS – this should be clarified that it only relates to residential development.</p> <p>Would it be prudent to state that POS arising from new developments will be afforded the same protection as Open Spaces in Policy CLW3?</p> <p>There should be cross reference of the garden size part of the policy with a housing policy so that it is not missed – there are other reasons for having gardens of a minimum size e.g. amenity space, play space, storage space, wildlife benefits etc. Should other polices pick up on this? Does the use of the word ‘houses’ preclude bungalows and maisonettes from having to have minimum sized gardens?</p> <p>Why not aim to have access to private parts of the River Avon corridor opened up for public access e.g. beyond the Fishermans car park through the Allens caravan park and Oxstalls Farm farmland to link to the riverside footpath leading to the back of Ryon Hill? In addition seek the joining up of the riverside walk that runs near Hatton Rock to link it to Alveston.</p> <p>The Necklace goes beyond the confines of the NDP area to the North East.</p> <p>The policy ought to also cover light pollution and ground pollution.</p> <p>The caveats for rejecting renewable facilities are too harsh - “no adverse impacts”. Most schemes will have some adverse impact but this might not be materially harmful and there may be other benefits which outweigh such harm. Should re-draft to allow for this.</p> <p>Why not reference the District Council’s renewable energy landscape sensitivity study? b) Why is this being so prescriptive about building heights? (max 4 storey) Why not allow for flexibility and wait</p>
--	--	--

	SSB1	<p>for the emerging SPD to set the parameters? There is no underpinning work justifying why 4 storey is the highest you might go in this location.</p>
	SSB2	<p>c) Similarly, why stipulate that the linear park has to be a minimum of 5m wide, why not allow for flexibility and wait for the emerging SPD to set the parameters?</p> <p>d) Development fronting the canal might preclude the linear park next to the canal.</p>
	SSB3	<p>a) requiring the “most up to date technologies in building construction and renewable technology” is unduly onerous. There is no detailed justification for requiring this in the explanation.</p> <p>The site has the benefit of outline planning permission which sets the parameters and limitations of the development. The permission cannot now be usurped by emerging policy that may be at odds with the permission, for example there are no limits to building heights on the outline permission and yet (d) seeks to limit this to 2 storey.</p> <p>The outline permission reference quoted at footnote 31 is incorrect. This should read 15/02057/OUT.</p> <p>f) refers to adequate off-road parking provision being provided in accordance with WCC standards. WCC have no standards for parking.</p>