

Wellesbourne and Walton Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

Rep. No.	Policy/Topic	Representation
WE1	General	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made..</p> <p>Natural England does has no further comment to make on the draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>
WE2	General	Having reviewed your document, I confirm that we have no specific comments to make on it.
WE3	General	Network Rail has no comments
WE4	General	The plan area is not within close proximity to our network and therefore the Canal and River Trust have no comments to make.

WE5	General	<p>1.1.1 These representations are made by Gladman Developments Ltd. (hereafter referred to as Gladman'). Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.</p> <p>1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic development.</p> <p>1.1.3 Gladman has been involved in contributing to the plan preparation process of the Wellesbourne and Walton Neighbourhood Plan (WWNP) having previously submitted representations to the Regulation 14 consultation in August 2016. These representations provide Gladman's response to the current consultation held by Stratford-on-Avon District Council (SDDC) on the submission version of the WWNP under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Following our previous representations, it is disappointing to see that the Wellesbourne and Walton Steering Group (WWSG) have not fully considered the contents of our earlier submissions, as such outstanding Objections to several of the Plan's policies remain.</p> <p>1.1.4 Through these representations, Gladman provides an analysis of the WWNP and the policy decisions promoted within the Plan, Comments made by Gladman through these representations are provided in consideration of the WWNP's vision, objectives, suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG.</p> <p>1.1.5 In accordance with the Neighbourhood Plan Basic Conditions, Neighbourhood Plan policies should align with the requirements of the National Planning Policy Framework (the Framework) and the wider strategic policies of the area set out in the Council's adopted Development Plan. Neighbourhood Plans should provide a policy framework that complements and supports the requirements set out in these higher-order documents, setting out further, locally-specific requirements that will be applied to development proposals coming forward.</p>
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1.1.6 The WWNP should only be progressed if it meets the Neighbourhood Plan Basic Conditions, is supported by a robust and proportionate evidence base and allows for sufficient flexibility as required by national policy.

1.1.7 The Framework is clear that Neighbourhood Plans cannot introduce policies and proposals that would prevent sustainable development opportunities from going ahead. They are required to plan positively for new development, enabling sufficient growth to take place to meet the development needs for the area and to assist local 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 the Framework or the Neighbourhood Plan Basic Conditions.

1.1.8 The WWNP should not seek to include policies in Neighbourhood Plans that have no planning basis, or supporting technical evidence base or are Inconsistent with national and local policy obligations. Proposals should be appropriately justified by the findings of a supporting evidence base and must be sufficiently clear to be capable of being interpreted by applicants and decision makers. Policies and proposals contained In the WWNP should also be designed to add value to existing policies and national guidance, as opposed to replicating (or contradicting) their requirements.

1.1.9 Of particular concern to Gladman is the fact that the Plan has been prepared in the context of prescriptive requirements through the use of non-designated heritage assets that lack the necessary supporting evidence base documents contrary to the requirements of the Framework.

	<p>Legal Requirements, National Policy and Judgements</p>	<p>2.1 Legal Requirements</p> <p>2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of base conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the WWNP must meet are as follows:</p> <ul style="list-style-type: none"> a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order. d) The making of the order contributes to the achievement of sustainable development. 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). f) The making of the order does not breach, and is otherwise compatible with, EU obligations. <p>2.2 National Planning Policy Framework, & Planning Practice Guidance</p> <p>National Planning Policy Framework</p> <p>2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it provides guidance on the requirement for the preparation of neighbourhood plans to be in general conformity with the strategic priorities for the wider area and defines the role which neighbourhood plans can play in delivering sustainable development.</p> <p>2.2.2 At the heart of the Framework, is a presumption in favour of sustainable development which, as outlined in paragraph 14, should be seen as a golden thread running through both plan-making and decision taking. For plan-making this means that plan makers should positively seek opportunities to meet development needs with sufficient flexibility to adapt to rapid change. This requirement is also applicable to neighbourhood plans.</p>
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2.2.3 Paragraph 16 of the Framework makes clear that the presumption in favour has implications for how communities engage in neighbourhood planning, stating that neighbourhoods should;

- **Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development**
- **Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and**
- **Identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.**

2.2.4 Furthermore, paragraph 17 sets out that neighbourhood plans should define a succinct and positive vision for the future of the area and that neighbourhood plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. In addition, neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

2.2.5 Further guidance for groups involved with the production of neighbourhood plans is specified at paragraph 184;

‘Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.’

<p>The wider Local Development Framework</p>	<p>Planning Practice Guidance</p> <p>2.2.6 It is clear from the requirements in the Framework that neighbourhood plan policies should be prepared in general conformity with the strategic requirements for the wider areas, as confirmed in an adopted Development Plan. The requirements set out in the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).</p> <p>2.2.7 The PPG emphasises the role in which local communities can support the delivery of sustainable growth opportunities. Indeed, it states</p> <p style="text-align: center;">“...All settlements can play a role in delivering sustainable development in rural areas — and 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.</p> <p>2.2.8 The approach taken through a number of policies contained in the Plan are in direct conflict with the approach taken in the Framework and PPG and will be discussed in greater detail throughout this response.</p> <p>3.1 Adopted Development Plan</p> <p>3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted Development Plan relevant to the preparation of the SANP is the Stratford-on-Avon Core Strategy, adopted on 11th July 2016.</p> <p>3.2 Emerging Site Allocations Local Plan</p> <p>3.2.1 The Council is progressing a Site Allocations Plan (SAP) which will identify additional sites for development to supplement the strategic sites identified by the Core Strategy.</p>
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3.2.2 In light of the above, the WWNP will need to ensure that it allows for a sufficient degree of flexibility and adaptability so that it can fully react to changes in the market. This degree of flexibility will be required to ensure that the Plan is capable of enduring over its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

“If to any extent a policy in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be)”

General

4.1.1 These representations are made in response to the current consultation on the submission version of the WWNP, under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This chapter of the submission highlights the key points that Gladman raise with regard to the content of the WWNP as currently proposed.

4.1.2 It is noteworthy however that these representations raise a number of matters which were also raised by Gladman through the previous Regulation 14 consultation version of the WWNP, which have not been addressed and as a result remain prevalent in the Regulation 16 version of the WWNP.

4.2 The suitability of the Wellesbourne and Walton Neighbourhood Plan area to support growth.

4.2.1 The Framework seeks to promote sustainable development to meet identified housing needs. The WWNP should therefore seek to promote these interests to ensure that the sustainability of the settlement remains and that it apportions meaningful growth to ensure the ongoing vitality and viability of local services and facilities.

4.2.2 The settlement of Wellesbourne is located approximately 5 miles to the east of Stratford-upon-Avon and 6 miles to the south of Warwick. Wellesbourne has excellent access to transport corridors being situated just off the A429, which bypasses the settlement to the west and leads to Junction 15 of the M40 approximately 4 miles north of the settlement.

asset and establishes that there are two separate balancing exercises which must be undertaken. Paragraph 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight that should be attached to it. This policy must be rewritten to make a clear distinction and recognise that there are two separate balancing exercises which need to be undertaken for designated and non-designated heritage assets.

4.5.3 Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these instances is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage assets. The WWNP fails to reflect this position and applies a blanket approach for all non-designated heritage assets regardless of the scale of harm or significance of the asset.

4.5.4 The guidance published by Historic England (HE) states at paragraph 12:

“While local heritage listing can be a legitimate response to an actual or perceived threat to a heritage asset, including the threat of demolition, the level of protection afforded is influenced by the manner in which the local heritage list is prepared. [he sounder the basis for the addition of an asset to the local heritage list — particularly the use of selection criteria — the greater the weight can be given to Preserving the significance of the asset. The degree of consultation on the list and the inclusion of assets on it also increases that weight...”
(Our emphasis)

4.5.5 Whilst supporting the protection of designated heritage assets, Gladman has concerns of the approach taken to deciding what is included within the Local Lists of Heritage Sites (Appendix 2). The Identification of non-designated heritage assets must follow specific national policy and guidance which has not been followed.

4.5.6 Gladman reiterate the specific comments on the proposal to include a number of items on the Local List:

Wellesbourne Airfield

4.5.7 The proposed designation of Wellesbourne Airfield and the Airfield Museum (by association) has been undertaken in a manner which does not have regard to the guidance for the designation of non-designated

heritage assets apart from 2 word reasons for preservation contained in appendix 2 (namely the fact that it was a “WW2 airfield”. Gladman submit that the proposed designation is contrary to the approach to heritage in the NPPF. It seeks to implement a blanket restriction to the redevelopment of the airfield in a manner which is strictly prohibited by the PPG4. Indeed, the airfield has been redeveloped over the years to provide modern distribution and employment and buildings located on site provide no historical or architectural merit.

Airfield Museum

4.5.8 The reason for preserving this states that it is the WW2 memorabilia housed in a WW2 bunker which is to be protected. It is clear that the memorabilia itself is neither a building, monument or natural feature and is therefore not capable of being listed. The decision as to whether to include the bunker within the local List must therefore solely relate to the bunker itself, not its current use. Further, it is questioned whether the structure is of sufficient historical significance to be Included within the list.

Vulcan Bomber

4.5.9 This aeroplane is a movable vehicle. It is neither a building, monument or natural feature and is therefore not capable of being listed. Further. Appendix 2 states the reason to preserve is Cold war nuclear deterrents. However, the Airfield ceased to have military use a few years after the end of the second World War and it is not the case that Vulcan bombers flew from Wellesbourne as part of the Cold War deterrent. It is located here because that is where its owners choose to keep it. It would not be a planning matter if the owners of the vehicle chose to relocate it to an alternative location outside the neighbourhood area.

4.5.10 The designation of the Vulcan Bomber itself demonstrates the inadequacy of the proposed designations and undermines the evidence base supporting the Plan. Indeed, the lack of evidence supporting the schedule of proposed sites in appendix 2b provides no sufficient detail of why such areas should be considered as non-designated heritage assets. In this regard, Gladman highlight the Fairford Neighbourhood Plan Examiners Report identified at paragraph 7.78 that: -

“...In one of these cases its archaeological significance is disputed by its owners. In both cases I am not satisfied that there is sufficient evidence to justify their inclusion in such a schedule and I recommend that the sites concerned are deleted from the schedule.”

Policy WW4

4.5.11 Similar to the above case, the Plan provides no robust evidence on the reasons for supporting the above designations. This is contrary to the PPG which quite clearly states proportionate, robust evidence should support the choices made and the approach taken, The evidence should be drawn upon to explain succinctly the Intention and rationale of the policies In the draft neighbourhood plan or the proposals in an Order Gladman recommend that Wellesbourne Airfield, the Airfield Museum and the Vulcan Bomber are removed from the list of non-designated heritage assets.

4.6.1 Gladman remain concerned that the emphasis of the policy is to retain the open spaces surrounding Wellesbourne and Walton, including the area covered under Policy CS.13 of the Core Strategy as an Area of Restraint, must be retained. Gladman is concerned that this policy seeks to implement what could be considered to be a blanket approach on housing development on all open spaces surrounding the settlement. Opinions on landscape are highly subjective and the approach contained In the Plan should provide a criteria based approach consistent with national policy, as currently worded this policy is likely to lead to inconsistencies being made through the decision making process contrary to national policy. Whilst an area of farmland on the edge of settlement may be valued by local people, this does not in itself form a valued landscape. This policy must allow a decision maker to come to a view as to whether particular location contains physical attributes that would ‘take it out of the ordinary’. Local residents may raise particular concern with development on the edge of Wellesbourne that forms an area of accessible countryside within the Town. An area’s pleasant sense of openness and the presence of views across an area to open countryside cannot on their own amount to a valued landscape. Further, if the purpose is to retain all open spaces around the settlement then this would undermine views Identified to be important in the above policy.

	<p>Policy WW6</p>	<p>4.7.1 Policy WW6 seeks to define an area of separation. Gladman would be opposed to the proposed area of separation if this would only serve to act as an arbitrary tool to prevent the delivery of sustainable growth. In this regard, we submit that new development can often be located in gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character.</p> <p>4.7.2 Gladman note that the adopted Core Strategy does not identify an area of separation within this area, the only area of restraint identified under policy CS.13 is the Dene Valley and Dog Close to the north of the settlement. It is considered that a policy such as the one proposed is considered to be a strategic policy and should only be confirmed in an adopted Local Plan. Accordingly, It Is not the place of the neighbourhood plan to implement strategic policies that would prevent the delivery of potential sustainable growth opportunities. Gladman recommend that the above policy is deleted.</p> <p>4.7.3 Notwithstanding the above, if the principle is to be retained then it should be altered to allow for a balancing exercise to be undertaken which assesses any harm to the visual or functional separation of settlements against the benefits of the proposal.</p>
	<p>Policy WW7</p>	<p>4.8.1 The above policy seeks to identify areas where housing development is considered acceptable. Whilst in principle, Gladman support the Steering Group’s decision to allocate land for housing development, the sites selected are unlikely to make any substantial contribution to housing needs over the duration of the plan period.</p> <p>4.8.2 Area 1 is identified for 25 dwellings which appears to have been reduced from earlier iterations of the WWNP. The site is subject to significant flood risk issues as the majority of the site is located within flood zones 2 and 3. No evidence has been made available to demonstrate that the site can come forward.</p> <p>4.8.3 Area 2 is identified to provide approximately 250 dwellings, but only possible post 2030. As such it will not provide a positive role in assisting in housing needs until 1 year before the end of the plan period.</p>

4.8.4 Area 3 is subject to existing use as allotments and in accordance with policy WW2 can only be released should land become available to provide new allotments. Accordingly, there is no evidence that such land will become available at this time and therefore the site is not available for housing development.

4.8.5 Whilst the table on p62-63 provides reason for a sites selection, it provides no methodology or scoring analysis as to how the Steering Group has come to the conclusion of which sites should be allocated. As highlighted in Gladman's Regulation 14 consultation response, the Examiner's Report to the Storrington, Sullington and Washington Neighbourhood Plan identified that the lack of suitable arid sustainable locations for housing delivery in respect of more sustainable options for growth (that had been disregarded) led to the Plan failing to meet the neighbourhood plan basic conditions. This was due to the fact that inaccurate scoring had been applied to sites and therefore resulted in the Plan being found inconsistent with basic conditions (d) and (f) and subsequently prevented the Plan from proceeding to referendum. Indeed, no evidence has been prepared to score sites against a consistent methodology and are simply supported by the general viewpoints rather than any technical or expert evidence.

4.8.6 Indeed, this Issue was also considered in the recent Fairford Neighbourhood Plan examination in which the Examiner identified that the reports failed to properly take account of the nature, location and significance of the various environmental designations in the Plan area. Whereas here, no evidence has been provided to demonstrate the sustainability of sites selected against other reasonable alternatives. The questionnaire survey identifies an overwhelming majority support (78%) for the redevelopment of previously developed land (PDL). Accordingly, if this was a key part of the decision making process it would be expected that Wellesbourne Airfield would have been considered as a suitable location for future growth. However, the Plan does not consider any land for development on brownfield land and therefore we question how the spatial approach has been arrived at. The lack of any subjective analysis as to the sustainability of sites considered brings into question how the planning judgements that have been made in selecting sites have materialised through arbitrary assumptions as opposed to undertaking a comparative exercise to ensure the sites selected are able to contribute to the delivery of sustainable development.

Policy WW8	<p>4.9.1 In principle, Gladman support the general thrust of this policy which seeks to ensure an appropriate mix of new housing types. However, housing mix will inevitably change over a period of time and this policy should seek to secure a greater degree of flexibility going forward so that it can positively respond to changing market conditions. The policy should instead make reference to the latest Strategic Housing Market Assessment' available, rather than basing its evidence on the 2011 Housing Needs Survey which is unlikely to provide up-to-date assessment of Wellesbourne's housing needs.</p>
Policy WW9	<p>4.10.1 Policy WW9 is not a land use policy and does not need to be included in the main WWNP document as it merely repeats the cascaded approach used by SADC. 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 listed criteria be found.</p>
Policy WW10	<p>4.11.1 Gladman reiterate the previous concerns submitted to the Regulation 14 consultation in response to the above policy. This policy requires development to be constructed in accordance with the SADC Design Guide which is now some 16 years old. In this regard, the Design Guide SPD merely provides guidance to developers and it should not be the role of the neighbourhood plan to require development proposals to be in accordance with a document which may stifle innovation and originality. Instead, the wording 'in accordance' should be removed from the policy text and replaced with 'have regard to'.</p> <p>4.11.2 Furthermore, this policy requires homes to meet the 'optional' accessible and adaptable dwellings standards as set out In part M4(2) Building Regulations to facilitate later lire living. The use of M4(2)5 an optional requirement and as made clear in the Government's Written Ministerial Statement dated 27th March 2015 that the optional technical standards should only be undertaken through an emerging Local Plan based on a clear and up-to-date assessment of need and that neighbourhood plans should not be used to apply the new national technical standards. Accordingly Policy WW0 is not in accordance with basic condition (a).</p>
Policy WW12	<p>4.12.1 Newly planted trees will not necessarily be on land which is transferred to the Parish Council. The requirement to provide commuted sums should only apply where a transfer occurs.</p>

Policy WW14	<p>4.13.1 Gladman reiterate the previous concerns submitted in response to the above policy. Whilst it is understandable that local utilities infrastructure is of some concern to the local community, the pre conditions set out in policy WW14 require developers to demonstrate robust provision of utilities to new sites which may include the funding of upgrades to offsite utilities infrastructure. This approach does not have regard to the requirements of national policy as it is the responsibility of the respective utilities companies to manage the capacity of these facilities and not developers who are only required to mitigate any potential adverse impacts associated with a development proposal, not solve existing problems or fund desirable infrastructure. In this regard, policy WW14 is not consistent with the requirements of 204 of the Framework and therefore in conflict with basic conditions (a) and (d) and should be deleted.</p>
Policy WW15	<p>4.14.1 The first element of the policy sets out that all new housing development with a net gain of one dwelling or an extension of 100 sqm or above to a dwelling will be liable to contribute towards CIL. This aspect of the policy is inappropriate as the requirement to pay CIL is governed by statute through the CIL charging schedule and does not therefore need a policy contained in the WWNP.</p> <p>4.14.2 Whilst some of the material within this policy is useful in that it identifies projects which the Steering Group will direct CIL receipts on, this is more akin to an aspiration of the Plan and is better suited to an appendix of the WWNP as opposed to being contained in the main body of Policy WW15.</p>
Policy WW16	<p>4.15.1 The supporting text to this policy notes with regret the absence of secondary school provision within the settlement, and the associated reduction of young people's association with their local community.</p> <p>4.15.2 It is notable that the proposals for the redevelopment of Wellesbourne Airfield proposed the inclusion of a secondary school. Given that positive neighbourhood planning should consider ways to gain benefits for the local community, it is notable that this does not appear to take this into account.</p> <p>4.15.3 Notwithstanding the above, if adequate' (not defined) school places are not available, this policy must recognise that s106 contributions can be provided to resolve capacity issues relating to school places. Accordingly, this policy should not set out a stance which seeks to only allow support whereby there is existing capacity at the primary schools as this is one matter that should be considered through the planning balance</p>

	<p>Policy WW17</p> <p>Policy WW18</p> <p>Policy WW19</p>	<p>as opposed to only offering support should capacity at local schools exist.</p> <p>4.16.1 Despite our previous representations, no consideration has been given to the above policy regarding the changes to permitted development rights for conversion of commercial premises to residential use.</p> <p>4.17.1 Policy WW18 seeks to safeguard existing commercial business premises and employment sites including Wellesbourne Airfield within the WWNP area. Through the Framework the Government is committed to securing economic growth ensuring that the planning system does everything it can to support economic growth and makes clear that planning policies should act to encourage and not act as an impediment to sustainable growth. In particular, §22 of the Framework states:</p> <p style="padding-left: 40px;">‘Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being use for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.’</p> <p>4.17.2 Accordingly, the retention of Wellesbourne Airfield for employment use is inconsistent with the approach required by the Framework given the landowners intention to cease the operational capacity of the airfield function. Notwithstanding this, the proposed redevelopment of Wellesbourne Airfield does offer the potential of new employment land to be used to support the expansion of existing businesses in the local area to the potential benefit of existing businesses and local community members. Given the employment on the airfield is at a very low density, there is clearly the potential for the commercial elements of the regeneration to create significantly increased employment.</p> <p>Notwithstanding the issues previously raised regarding the retention of the airfield, policy WW19 seeks to encourage the retention of Chedham’s Yard and Wellesbourne Airfield as local attractions through the establishment of circular walks that pass places of interest. A neighbourhood plan can only contain policies relating to the development and use of land in the neighbourhood area. In this regard, it is considered that this</p>
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<p>Consultation Statement</p>	<p>policy is more akin to an aspirational initiative rather than a policy relating to land use. Accordingly, we recommend the deletion of policy WW19.</p> <p>5.1.1 The principles of fair consultation proceedings have been set out for many years and confirmed by the Supreme Court in R(Moseley) y 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. That the product of consultation is conscientiously taken into account when finalizing the decision. <p>5.1.2 The fourth Sedley requirement is pertinent to this current consultation. Whilst the Steering Group provided a letter contained at appendix I of the Consultation Statement, it does not address the specific concerns raised in response to the Regulation 14 consultation.</p>
<p>General</p>	<p>6.1.1 Despite our previous representations, it is disappointing to see that the WWNP has not been revisited to allow for sufficient flexibility and the need to ensure that its policies and the rationale behind them are supported by robust and justified evidence.</p> <p>6.1.2 Gladman are still of the opinion that the Plan is unable to meet a number of the basic conditions required of neighbourhood plans in its current form. Whilst some of these issues could be dealt with through modifications, it is our opinion that the amount of modifications needed would likely alter the Plan to such a degree that it would represent a completely different document than the one that has been submitted for consultation.</p> <p>6.1.3 Moreover, the lack of consistency between the WWNP and national policy and guidance is a significant issue which provides an example of the WWNP, in its current form, being inconsistent with the basic conditions required of neighbourhood plans. Other significant issues relate to the</p>

		<p>restrictive approach taken by the WWNP in several instances which cannot readily be dealt with through modification, but which will require a complete overhaul In order to make the WWNP policy compliant and consistent with the required basic conditions.</p> <p>6.1.4 Gladman consider that the Plan should not proceed to Examination as it is considered inconsistent with several basic conditions. However, should the Plan proceed to Examination then Gladman respectfully request that the WWNP Examiner opens up the Examination of the WWNP to allow for public discussion of the issues raised and we formally ask that we are afforded the opportunity to participate at the requested public hearing session(s) in due course.</p>
WE6	Policy WW3 Policy WW7	<p>We do not challenge Policy WW3, but point out that the border of the conservation area as shown on Map 4 contained within the Neighbourhood Plan does not correspond with the conservation area boundary as shown on the Wellesbourne Inset of the Core Strategy Policies Map (Wellesbourne Inset Map). The boundary shown on Map 4 of the Neighbourhood Plan does not extend as far north as the boundary shown on the Wellesbourne Inset Map. The boundary shown on the Wellesbourne Inset Map extends as far as the rear of dwellings on Willett Gardens.</p> <p>We object to Policy WW7 in that it seeks to limit housing development to "replacement and small infill developments of fewer than 10 dwellings" and consequently does not make appropriate provision for windfall development, defined within the National Planning Policy Framework (NPPF) as: "Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that unexpectedly become available."</p> <p>Policy WW7 does not have appropriate regard to the NPPF. In particular, it does not have appropriate regard to the core planning principles (paragraph 17), which include that planning should "encourage the effective use of land by reusing land that has been previously developed (brownfield land)". The Basic Conditions Statement states that there is no longer any available brownfield land around Wellesbourne, but regard is not given to such sites that may "unexpectedly become available". In the event of a currently unidentified brownfield site becoming available, Policy WW7 will prevent its efficient use. In turn, this may increase pressure on the release of greenfield sites, including the reserve sites identified in Policy WW7.</p>

The NPPF (paragraph 47) seeks to "boost significantly the supply of housing". By limiting housing development, Policy WW7 runs counter to this, and it also fails to be in general conformity with the strategic policies of the adopted Core Strategy. Policy CS.16 of the adopted Core Strategy sets a housing requirement of "at least" 14,600 additional homes, of which "approximately" 3,800 homes are distributed to the Main Rural Centres (MRCs). Policy CS.15 identifies Wellesbourne as a MRC. The housing trajectory contained within the adopted Core Strategy includes for 830 dwellings at Wellesbourne. Whilst the Neighbourhood Plan sets out that this number of dwellings are already built or have planning approvals, the Wellesbourne Area Strategy of the adopted Core Strategy (paragraph 6.9.21) sets out that the figure "should be seen as a minimum to be provided over the plan period". Furthermore, Policy CS.15 goes on to set out where development will take place within the MRCs, which includes "through the redevelopment and reuse of suitable land and property within their Built Up Area Boundaries" – that is, windfall sites. The housing trajectory contained within the adopted Core Strategy includes a windfall allowance of 100 dwellings for the MRCs, but the adopted Core Strategy (paragraph 5.2.12) sets out that "the windfall allowance should not be seen as a ceiling".

The adopted Core Strategy clearly sets a minimum housing requirement for the District and Wellesbourne over the plan period, and supports the contribution that windfall sites can make to housing supply. By limiting housing development, Policy WW7 runs counter to the adopted Core Strategy. As such, it does not have appropriate regard to the NPPF (paragraph 184), which requires the Neighbourhood Plan to reflect the policies of the adopted Core Strategy and plan positively to support them. In addition, by limiting development to fewer than 10 dwellings, the Neighbourhood Plan will be limiting:

- (a) Provision of affordable housing, as the adopted Core Strategy (Policy CS.18) sets a threshold of 11 dwellings within Wellsbourne; and
- (b) Revenue from the Community Infrastructure Levy, as under the District Council's Charging Schedule sites up to and including 10 dwellings will be liable to £75psm, whereas sites of 11 dwellings or more will be liable to £150psm.

		<p>For the reasons set out above, Policy WW7 should be amended as follows:</p> <p>Paragraph 1, first sentence: The text “and other windfall sites” should be inserted, so that it reads as – “1) New housing, other than infill and other windfall sites, should be contained within the Area 1 ...”</p> <p>Last paragraph, first sentence: The text “Replacement and small infill developments of fewer than 10 dwellings” should be deleted and replaced with the text “Windfall developments”, so that it reads as – “Windfall developments within the built-up boundary will be supported in principle ...” .</p>
	Policy WW8	<p>We object to Policy WW8 in that it requires approximately 25% of 2 bedroom rented affordable homes to be provided as bungalows. The Neighbourhood Plan seeks to justify this by reference to the Housing Needs Survey 2011. However, this concludes that the greatest need for 2 bedroom rented affordable homes to be for houses not bungalows, with a need for 15 x 2 bedroom houses compared to 9 x 2 bedroom bungalows. Furthermore, there is a lack of apparent evidence to suggest that account has been given to viability, whereas the provision of bungalows is not always cost effective and can reduce the total number of dwellings on a site due to higher space requirements. For these reasons, reference to the requirement that approximately 25% of 2 bedroom rented affordable homes to be provided as bungalows should be deleted.</p>
	Policy WW9	<p>We do not object to Policy WW9, but consider the drafting of the policy requires amendment in three respects:</p> <ul style="list-style-type: none">(i) Policy WW9 refers to the Home Choice Plus Allocation report and sets out criteria for allocation contained within the report. However, allocations should be made in line with the allocation requirement at the time of entering the S106 Agreement and, therefore, to allow for any updates to the allocation arrangements, Policy WW9 should be amended to delete reference to the criteria.(ii) Policy WW9 refers only to use of planning obligations (S106 Agreements), whereas affordable housing can be secured by condition, as it has on recent schemes within the District (e.g. 15/04283/FUL). Policy WW9 should allow for the use of conditions, not least as the National Planning Policy Framework (paragraph 203) requires planning obligations to only be used where it is

	Policy WW10	<p>not possible to use a planning condition. Policy WW9 should therefore be amended to include for the use of planning conditions or planning obligations.</p> <p>(iii) Policy WW9 should be amended to make it clear that the allocation arrangements only apply to the affordable housing provided to meet the affordable housing requirement. That is, any additional affordable housing, over and above the affordable housing requirement, should not be subject to the allocations arrangements.</p> <p>We object to Policy WW10 in that it is overly perspective in two respects:</p> <p>(i) Seeking plot sizes that make provision for at least 2 vehicle spaces for off-road parking: This does not have appropriate regard to factors such as the type and mix of housing and the need to promote sustainable transport outcomes as required by the National Planning Policy Framework (NPPF) (paragraph 39). Policy WW10 should therefore be amended so that 2 vehicle spaces per dwelling is a benchmark, to be applied flexibly, taking account of factors such as the type and mix of housing, character of the area, and opportunities for/provision of on-street parking.</p> <p>(ii) Requiring the optional Building Regulations Part M4(2) to be adopted: Whilst the Neighbourhood Plan seeks to justify the M4(2) requirement by reference to an ageing population, there is a lack of apparent evidence to demonstrate that account has been given to wider factors. It is not apparent that account has been given to impact on viability, and consequently this requirement may constraint housing delivery, whereas the NPPF (paragraph 47) seeks to "boost significantly the supply of housing", as reflected in the adopted Core Strategy setting minimum housing requirements for the District and Wellesbourne over the plan period. Furthermore, it is a blanket requirement. If a policy to provide enhanced accessibility is considered reasonable (which we dispute) then, taking account of national Planning Practice Guidance, it would be more appropriate to require a proportion of dwellings to comply with the requirement, taking account of evidence on the size, type and tenure of the dwellings needed. Furthermore, flexibility would be required to make allowance for site specific factors, such as topography, that may make a site less suitable for M4(2) compliant dwellings. For these reasons, reference to optional Building Regulations Part M4(2)</p>
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		<p>should be deleted. WW11 Object We object to Policy WW11 in that it seeks contributions towards off-site infrastructure for cyclists to be secured through Section 106 Agreements, whereas the District Council is bringing the Community Infrastructure Levy (CIL) into force, which will include for such infrastructure.</p> <p>Policy WW15 of the Neighbourhood Plan acknowledges that residential development will be liable to pay CIL and that S106 Agreements will only be used for on-site infrastructure. CIL will provide revenue for Parish Councils to spend on local priorities for infrastructure, and Policy WW15 goes on to list priorities.</p> <p>To take account of CIL coming into force, and to bring Policy WW11 into line with Policy WW15 of the Neighbourhood Plan, Policy WW11 should be amended to delete reference to contributions towards off-site infrastructure for cyclists being secured through Section 106 Agreements.</p> <p>Policy WW12 requires a commuted sum to be paid to the Parish Council for care of newly planted trees. This does not reflect that developers may make their own arrangements for maintenance, and in the event of any contributions being required these should be secured by the District Council and passed onto the Parish Council if necessary. For these reasons, reference to a commuted sum being paid to the Parish Council for care of newly planted trees should be deleted.</p> <p>Policy WW14</p> <p>We do not challenge the principle of Policy WW14 in that it seeks to secure infrastructure associated with new housing, but consider the drafting of the policy lacks clarity. We consider Policy WW14 may be interpreted as seeking S106/S278 Agreements to secure provision of, or funding for, off-site flood management and transportation schemes, whereas the District Council is bringing the Community Infrastructure Levy (CIL) into force, which will include for such infrastructure.</p> <p>Policy WW15 of the Neighbourhood Plan acknowledges that residential development will be liable to pay CIL and that S106 Agreements will only be used for on-site infrastructure. CIL will provide revenue for Parish Councils to spend on local priorities for infrastructure, and Policy WW15 goes on to list priorities.</p>
Policy WW12		
Policy WW14		

	Policy WW16	<p>To take account of CIL coming into force, and to bring Policy WW14 into line with Policy WW15 of the Neighbourhood Plan, Policy WW14 should be redrafted to make it clear that CIL will provide for off-site flood management and transport schemes, and that S106/S278 Agreements will only be used for provision of on-site works.</p> <p>We object to Policy WW16. The District Council is bringing the Community Infrastructure Levy (CIL) into force, which will include for education provision. As such, any development that is CIL liable will contribute to primary school provision and it will be out of the developers' control as to how the contribution is used. Policy WW16 should therefore be deleted.</p>
WE7	<p>Policy WW1</p> <p>Policy WW2</p> <p>Policy WW4</p>	<p>With regard to areas 4 and 5 there may be scope to extend the proposed area of Local Green Space onto that land to the north of the brook that is subject to flood constraint.</p> <p>My clients support paras b c d and e but object to para a and the preamble to the policy conditions. It is surely Ultra Vires for the implementation of the policy to require the approval of a non statutory body who may not unreasonably be expected to have a set mind in respect of any development proposal. The test as to whether or not a replacement facility should be acceptable or not must surely rest with the Planning Authority after wide consultation with all sections of the community, including the Allotment association. In para a there can be no justification for any replacement facility to provide for a net increase for allotment use. Equivalent replacement areas based upon the average of the preceding five years use and occupation is the standard requirement and should be adopted in the Plan. Consideration should also be given to the fact that cultivation these days is far more intensive and in many cases we are now seeing allotment holders reducing the size of their plots from a full size to a half plot and still maintaining an equivalent level of production.</p> <p>My clients object to WW4 para 1 in respect of CS policy 13. Whilst we accept the principle of protecting the immediate setting and amenity of the Church and the other nearby listed buildings, there can be no justification for washing the area of restraint over the entire area to the west of the Church. The existing frontage to Charlecote Road is heavily developed to the north and there is a residential/commercial property at the mid point of the frontage to the south. Further west there is the developed frontage of the main roundabout. The site itself currently accommodates several agricultural buildings, and there are many very</p>

	<p>Policy WW5</p> <p>Policy WW6</p> <p>Policy WW7</p> <p>Policy WW8</p>	<p>mature trees and hedges on the site. Whilst the area as a whole is never likely to be developed due to land configuration, flooding, and the need to respect the view identified as View 4 in the NP policy commentary and in WW4 para 2d, there can be no sustainable justification to include the land to the north of the River Dene, beyond the flood areas, beyond the Local Green Space designated areas, and beyond the area of view referred to in WWWW 2d. Consequently the northernmost areas of land including the existing residential/commercial building, comprising the immediate road frontage to Charlecote Road should be lifted out of this policy.</p> <p>Support</p> <p>Support</p> <p>My clients generally support this policy BUT have previously objected to the text in policy WW2. Subject to our objections being upheld in policy WW2, my clients will then be able to support</p> <p>Support</p>
WE8	<p>Policy WW1</p> <p>Policy WW2</p>	<p>DLP Planning supports the protection of Local Green Spaces as valuable assets for the community. The WWNP appears to have considered NPPF requirements set out in S76-77 and we consider it down to the examiner as to whether they consider all the spaces meet the designation criteria in para 77.</p> <p>Like the vast majority of respondents to the WWNP survey, DLP Planning supports the protection of allotments. This is a clear finding evidenced by the Neighbourhood Plan as shown through the following statements;</p> <p style="padding-left: 40px;">“The allotments have been a part of Wellesbourne village for over 175 years and continue to be popular with an ever growing waiting list for plots ...88% of respondents were in favour of keeping and expanding the allotments...” (Neighbourhood Plan paragraph 4.1.5). “It is imperative that the presence of allotments is retained and that any opportunity to extend or improve the available area and facilities is explored” (Neighbourhood Plan Paragraph 7.1.2)</p>

We therefore object to any suggestion surrounding the loss of valuable green space such as allotments and suggest a policy which protects allotments, for the following reasons:

- The policy does not support the objectives of the plan;
- The policy does not reflect the wishes of local people; and
- The policy is not in conformity with the Adopted Core Strategy.

Whilst we acknowledge the policy incorporates the re-provision of allotments in another location, it is unclear where this re-provision might be delivered, which then raises concern over the actual availability and deliverability of the site.

This is also highlighted by the Wellesbourne Allotment Association on the Save Our Wellesbourne Allotments web-page;

“The Allotment Association feel that our needs cannot be met on another site and that the offer of two smaller and poorer pieces of land doesn’t take into account the quality and heritage of our current site, nor the value to the village of keeping the biodiverse area in its present location. There was no prior engagement with WAA to assess what our needs or opinions would be regards the matter”.

The above comment suggests the Wellesbourne Allotment and Garden Holders’ Association were openly unsupportive of the relocation of the allotments for obvious reasons, such as the investment of time, energy and money by existing allotments holders in the current site, we would suggest that this policy is deleted or amended to simply protect the allotments and consequently the site removed from Policy WW7 as a reserve housing site. Stratford-on-Avon’s Core Strategy Policy (see below) also sets out to protect allotment land and we would highlight the requirement, in terms of a potential site release, for an “absence of need” and for a site not making a “valuable contribution” both of which are not the case in Wellesbourne;

	<p>Policy WW3</p> <p>Policy WW4</p>	<p>“Development proposals that would result in the loss of public or private open space, including allotments, without suitable replacement being made, will be resisted unless: 1. it can be demonstrated that there is an absence of need or it is surplus to requirements; and 2. it does not make a valuable contribution to the amenity and character of the area”. (Stratford Core Strategy, Policy CS25 Page 208).</p> <p>Clearly NP Policy WW2 is not in conformity with the adopted Core Strategy as the existing allotments are well used, in demand and valued.</p> <p>DLP Planning are generally supportive of the principle of policy WW3, but object on the basis that supporting evidence has been used on a broad-brush basis to reject a larger assessment area for housing with total disregard to the merits of smaller development parcels adjacent to the existing urban edge. Our response to this consultation supports the promotion of our clients site at Land off Walton Road, Wellesbourne for consideration as a more suitable housing reserve site within the Neighbourhood Plan. In consideration of this policy Land at Walton Road is not located within the Wellesbourne Conservation Area and there are no listed or community buildings within or adjacent to the site. The nearest listed properties are approximately 150m to the north east on Chapel Street. The site does not negatively impact on heritage asset 13 (MWA19577) identified on NP Map 8 concerning a surviving field medieval ridge and furrow farming, as this is outside the site boundary.</p> <p>DLP Planning support the principle of protecting valued landscapes and key views, but acknowledge that a balance is required to enable housing needs to be met in a sustainable way. We object to Policy WW4 on the basis that the broad interpretation of evidence when identifying sites has been to the detriment of smaller more discreet sites, such as Land at Walton Road and that county wide landscape evidence has been interpreted incorrectly.</p> <p>Land at Walton Road does not fall within an Area of Restraint, whereby the land is of specific landscape quality considered to make a particular contribution to the character of the village. The Neighbourhood Plan is evidenced by the Landscape Sensitivity Character Assessment 2015 and incorrectly shows Land at Walton Road within an area of high landscape sensitivity for housing development. We would note that the Warwickshire wide assessment identifies the site as medium/high sensitivity to housing development not high as specified in</p>
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the Neighbourhood Plan. (Please see Landscape Sensitivity Study 2011).

We would also note that 2 of the 3 proposed reserve sites are also within the medium/high sensitivity area, so it appears that Land at Walton Road has been unfairly considered. Given this is a key piece of supporting evidence for the Neighbourhood Plan it is concerning that this has been misrepresented.

Land at Walton Road is situated on the outskirts of the River Dene corridor and whilst DLP would agree it is important to preserve and maintain a corridor of land adjacent the river, we would suggest that given the sites scale and location in only the medium/high sensitivity area, development of this parcel of land would be appropriately set back from the river corridor to support this policy objective. The WWNP analysis has been insufficiently focused to consider the merits of our site (and other smaller sites) as it has only considered this “assessment area” on a broad brush basis.

It is clear from Map 6 of the Neighbourhood Plan that unlike other fields in the immediate vicinity, development of Land at Walton Road would also not impact upon cherished views around Wellesbourne and Walton, particularly view 3 from the conservation area to Friz/ Red Hill. This is largely due to the extent of the permitted housing schemes to the South which result in Land at Walton Road, being relatively discreet being contained within the urban edge.

Any future development in this location would protect the existing public rights of way on the northern/ eastern boundary of the site and we consider that these routes and their associated tree lined hedgerows form an appropriate division between the site and preserved countryside buffering the river. Effective landscape buffer elements to frame the site could easily form part of any development proposal to reinforce this edge of the urban area and soften its visibility from the key landscape/river corridor. This is already in place on parts of the site, but the northern and eastern boundaries could incorporate further landscaping and planting to promote a gentle integration into the countryside landscape. The design could incorporate well-landscaped edges and provide green fingers into the site to allow the built development to settle into its context

Policy WW5	<p>DLP Planning are generally supportive of the principle of policy WW5. In terms of considering this policy, when assessing the suitability of Land off Walton Road as a reserve housing site, it should be noted that the site does not lie within or impact upon the Green Belt, SSSI, SAC, Ramsar site or an Area of Outstanding Natural Beauty (AONB). Also, as set out in the Neighbourhood Plan the site also does not fall within a protected area of eco-sites, wildlife habitats or ancient woodland (see NP Map 7) and is not allocated in the Plan under a Local Green Space Designation (see policy WW1).</p>
Policy WW6	<p>DLP Planning support the general principle of Policy WW6. DLP's response to this consultation supports the promotion of our clients site at Land off Walton Road, Wellesbourne for consideration as a more suitable housing reserve site within the Neighbourhood Plan. In consideration of this policy DLP suggest that the site does not diminish the physical gap between Wellesbourne and Walton.</p> <p>We are supportive of the principle of this policy but would note that the WWNP assessment of sites has been insufficiently detailed to enable the differentiation of Land at Walton Road with adjacent fields that are clearly part of the wider River Dene Corridor. Evidence to the support the Neighbourhood Plan identifies constraints in reasonable proximity, but does not identify constraints that undermine the suitability of Land at Walton Road for housing, therefore the site exclusion appears unjustified by evidence.</p>
Policy WW7	<p>Before a neighbourhood plan can proceed to referendum, it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions for the consideration of the Wellesbourne and Walton Neighbourhood Plan includes:</p> <ul style="list-style-type: none"> • The making of the plan 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>A key issue for the Neighbourhood Plan examination is the consideration of whether the Submission Neighbourhood Plan is in general conformity with the Adopted Core Strategy Policies on the provision of housing. Adopted Core Strategy Policy CS.16 Housing Development states that the Stratford-on-Avon District will meet its objectively assessed housing needs for the period 2011 to 2031, through the provision of at least 14,600 additional homes, distributed of the following basis:</p>

		<ul style="list-style-type: none">• Stratford-upon-Avon: approximately 3,500 homes• Main Rural Centres: approximately 3,800 homes• New Settlement at Lighthorne Heath: approximately 2,300 homes• New settlement at Long Marston Airfield: approximately 2,100 homes• Local Service Villages: approximately 2,000 homes• Large Rural Brownfield Sites: approximately 1,245 homes• Other Rural Locations: approximately 750 homes <p>The strategy proposes 25.6% of all development to be located in Main Rural Centres which includes Wellesbourne. The Core Strategy allocated 830 dwellings at Wellesbourne which represents 5.1% of the overall planned housing growth to 2031.</p> <p>Policy CS.16d commits the Council to identify reserve sites and keep their release under review if evidence demonstrates that there is an unmet housing need e.g. lack of 5 years supply, significant housing needs arising outside the District (notably from Birmingham and Coventry) or specific housing related job growth i.e. at Jaguar Land Rover.</p> <p>The policy states that “The location of any reserve sites will take account of the settlement pattern and the overall balance of distribution of development set out in Policy CS.15. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031”.</p> <p>DLP Planning would contend that the provision of reserve sites would be focused to the large settlements in the hierarchy and that it would be inappropriate for the emerging site allocations DPD to identify further new settlements as reserve sites or suggesting large quantum’s of development in rural locations. It is understood from our discussions with officers at Stratford-on-Avon District Council that Stratford itself and other Main Rural Centres are likely to be the focus of reserve site allocations and therefore the percentage of housing identified on reserve sites in these location will need to be larger than the proportion currently allocated e.g. greater than 25.6%.</p>
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This assumption can be illustrated by the made Kineton Neighbourhood Plan, which identifies reserve sites totalling approximately 5.23 ha. It is likely that such sites could support circa 130 units at 25dph (a comparable density to that proposed in the WWNP). When compared to Kineton's Core Strategy allocation of 212 dwellings (1.3%) it is clear that to enable sufficient flexibility in the strategy and to be in general conformity with the adopted Core Strategy, this Neighbourhood Plan has identified and allocated a further 61% in reserve sites.

In comparison Wellesbourne received 830 dwellings in the Core Strategy (5.1% of the total). Based on the provision of a comparable level to that of the made Kineton Neighbourhood Plan this would indicate that The WWNP should be identifying and allocating land to accommodate approximately 506 dwellings. Currently the WWNP identifies 3 reserve sites which could support 342 dwellings. On this basis the WWNP is identifying insufficient reserve sites given its scale and position as one of the largest Main Rural Centres.

This issue is further compounded by the availability and deliverability issues of the three identified reserve sites discussed in the following paragraphs.

Review of Allocated Reserve Sites

Neighbourhood Plan Policy WW7 sets out the current locations chosen as potential reserve housing sites. Whilst DLP welcome the consideration of possible reserve locations (rather than leaving these to be allocated through the SAP), the developability issues associated with the chosen sites raises questions in terms of their suitability and potential contribution in order to provide a reserve site buffer and be in conformity with the Core Strategy.

Housing Reserve Site Area 1

Area 1 to the north of Wellesbourne is a large site adjacent to the built-up area boundary, however significant flood risk issues affect this location and only a limited part of the southern section of this site is being proposed for development. Since the previous Pre-submission version of the Neighbourhood Plan, the proposed number of dwellings on this site has further reduced from 50 to 25 dwellings, in response to the restricted developable

area. It should therefore be acknowledged that this site is only going to make a limited contribution in terms of meeting any future need for reserve housing sites.

Housing Reserve Site Area 2

Area 2 is located to the east of Wellesbourne, adjacent to Area 3. DLP Planning are sure the examiner is aware the it is clearly expressed in in Neighbourhood Planning Guidance and Legal Judgements that Neighbourhood Plans should not contain policy that arbitrarily restricts the timing of development sites coming forward. A site is either developable by definition or not and a reserve site, like any other allocation, needs to be available and deliverable or developable within the plan period 2011-31.

The Neighbourhood Plan currently restricts Area 2 from coming forward until post 2030. DLP planning assume that this is because the site is unavailable until this time due to reasons that are not clearly set out in the Neighbourhood Plan, perhaps a long term agricultural lease. DLP planning would therefore question the sites availability and its suitability for allocation as a reserved site. Given the length of the time until 2030 and close proximity to the end of the plan period to 2031, it is considered that Area 2 cannot reasonably be conceived as being a developable site i.e. has a reasonable prospect of delivery within the plan period.

Housing Reserve Site Area 3

This potential reserve site is located to the east of Wellesbourne, adjacent to the settlement boundary and is currently in use as community allotments. Given the fact these allotments are well-used and given the Neighbourhood Plans own policy (and Stratford LPA's strategic policies) which seeks to protect allotments; DLP would suggest the allocation of this land as a reserve housing site is inappropriate and unlikely to be deliverable for the following reason:

- The site's release from allotment use does not support the NP objectives;
- Loss of allotments are not supported by those who responded to the WWNP survey;
- The loss of well used, valued and in demand allotments are contrary to adopted Core Strategy Policy CS25.

On the basis of the above analysis it is questionable whether site are suitable, available and developable and if the sites selected represent the genuine reserve housing sites required for the WWNP to be in general conformity with the Adopted Core Strategy. DLP planning consider that Land at Walton Road is suitable, available and developable and would make a good reserve housing site. The following paragraphs address the inconsistencies and errors in the WWNP analysis of the site.

WWNP's consideration of Area 5

The WWNP reason for not allocating Area 5 (which contains Land at Walton road) is: "Located within the River Dene corridor to the south of the village along a narrow rural road in an area of high sensitivity landscape and containing sites of historic significance. Part of this area also provides space for water dispersal and flood storage".

DLP would highlight the following points of clarification:

- Land at Walton Road is not within the Warwickshire Landscape Sensitivity Character Assessment high sensitivity area for housing development. It is in fact located in the medium/high area which is the same grade as the proposed reserve site allocations (Area 1 and Area 2).
- Whilst in reasonable proximity to historical features including examples of ridge and furrow agricultural landscape, Land at Walton Road is not adversely effected by historical designations as these are all outside the site boundary. Clearly any formal planning application on Land at Walton Road would need to include an assessment of the potential for archaeological remains, but this is not a reason to exclude the site for consideration as a reserve site allocation.
- The Environment Agency's Flood Map shows the site to be within Flood Zone 1, meaning it has the lowest probability of flooding. Land at Walton Road is not the part of the wider area that provides space for water dispersal and flood storage for the River Dene.

It is clear that the reasons for excluding Area 5 from consideration for housing relate to the wider site and not to Land at Walton Road. If you consider the criteria that WNNP uses to define Areas 1 to 3 on page 62 of the NP, they could also generally apply to Land at Walton Road, as it is also outside the limits of flood zone 2 and 3,

		<p>could be considered acceptable in terms of landscape sensitivity and in reasonable proximity of the commercial centre of the village.</p> <p>DLP Planning contend that the need for additional reserve sites is clear and Land at Walton Road should be given due consideration.</p>
	Policy WW8	DLP Planning are supportive of this policy.
	Policy WW9	DLP Planning are supportive of this policy.
	Policy WW10	DLP Planning are supportive of this Policy
	Policy WW11	DLP Planning are supportive of this policy as long as all contributions secured meet the S106 tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010.
	Policy WW12	DLP Planning would note that commuted sums are only appropriate in instances where public open space is adopted by the District Council or other public body such as the Parish Council, landscape areas within new development can be managed as part of the wider management of new housing development and therefore this policy should be amended to reflect the variety of different delivery options that occur.
	Policy WW13	DLP planning are supportive of this policy and would therefore question the suitability of reserve housing site (Area 1) given its partially covered by Flood Zone 2 and 3 designations and the future likelihood the 1-100 flood risk areas are likely to expand due to climate change. It appears a little short sighted of the WWNP to propose such a reserve site given the availability and longer term suitability of other options that are not affected by flood risk.
	Policy WW14	DLP Planning are generally in support of this policy subject to all contributions conforming to the S106 Reg 122 test set out in The Community Infrastructure Levy Regulations 2010. It is not the responsibility of new developments to address pre-existing infrastructure deficiencies that are not exacerbated by new developments and even in instances where there are impacts contributions must be clearly necessary to make

		<p>the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p>
	Policy WW15	<p>Whilst the principle of this policy is acceptable, it simply duplicates existing policy both nationally and at the district level. The infrastructure list set out is welcome, but this should not be included within the policy section.</p> <p>The Neighbourhood Plan has not evidenced or justified that housing development of over 50 dwellings should ensure that public transport is within 10 minutes' walk. The sustainability of sites should have been considered as part of the plan making process through a Sustainability Appraisal and the merits of individual sites will be considered through the determination of planning applications in any case. This part of the policy sets arbitrary thresholds, which are not justified and this undermines the soundness of the plan, as it artificially restricts housing development.</p>
	Policy WW16	<p>DLP Planning consider that the policy is too restrictive. Whilst new development should address its impacts and ideally children should go to primary school locally, it is for the Local Education Authority to determine the need for pupil places and plan accordingly for the location and scope of any required extensions or new school. A policy that prevents development on the basis of primary provision locally is not justified by evidence in the Neighbourhood Plan.</p>
	Policy WW17	<p>DLP Planning is supportive of this policy.</p>
	Policy WW18	<p>DLP Planning is supportive of this policy.</p>
	Policy WW19	<p>DLP Planning is supportive of this policy.</p>

WE9	<p data-bbox="228 193 528 1244">General</p> <p data-bbox="228 1244 528 1370">Objective 8</p>	<p data-bbox="528 193 2000 351">The County Council welcomes communities proposing neighbourhood Plans that shape and direct future development. The main responsibilities of the County Council are highways and public transport, education, social services, libraries and museums, recycling/ waste sites and environment. The County Council's role is to deliver the services and facilities efficiently.</p> <p data-bbox="528 351 2000 414">Financial implications of Parish Plans</p> <p data-bbox="528 414 2000 622">We would like to state at the outset that the County Council cannot commit to any financial implications from any proposals emanating from Neighbourhood Plans. Therefore, Neighbourhood Plans should not identify capital or revenue schemes that rely of funding from the Council. However, we will assist communities in delivering infrastructure providing they receive any funding that may arise from S106 agreements, Community Infrastructure Levy or any other sources.</p> <p data-bbox="528 622 2000 686">We have the following comments to make as a guide any amendments prior to formal submission of the Plan.</p> <p data-bbox="528 686 2000 750">Comments on transport matters</p> <p data-bbox="528 750 2000 941">The County Council supports the emphasis 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 Parish Plan.</p> <p data-bbox="528 941 2000 1069">The County Council recommends that projects such as cycling, walking and car club schemes are considered for further investigation in order to reduce car usage in the area covered by the Neighbourhood Plan.</p> <p data-bbox="528 1069 2000 1244">Warwickshire County Council endorses the emphasis has been placed on increasing the amount of footpaths and cycle routes. We would recommend that projects such as car share schemes be considered for further investigation in order to reduce car usage in the area covered by the Neighbourhood Plan.</p> <p data-bbox="528 1244 2000 1370">Warwickshire County Council supports developments providing walkways and cycle paths that link to the rest of the village but all new developments will be subject to approval.</p>
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Objective 15	Warwickshire County Council will require more information on the traffic management and parking aspirations before commenting further.
Policy WW11	Warwickshire County Council supports the proposal in the Neighbourhood Plan in principle, subject to both planning and transport planning criteria being met.
Policy WW14	Warwickshire County Council supports this proposal in the Neighbourhood Plan in principle, subject to both planning and transport planning criteria being met.
Policy WW15	<ul style="list-style-type: none"> • Warwickshire County Council supports new developments providing adequate amounts of parking subject to the criteria set out in the Local Transport Plan (2011-2026) and the parking standards as set by Stratford-on-Avon District Council. • Any new developments will be subject to Warwickshire approval, including any proposals for pedestrian and cycle routes. • Warwickshire would require further information on the provision of public transport services before commenting further
Policy WW17	Warwickshire County Council would require further information on protecting land for additional car parking. All new developments are subject to the parking standards set by Stratford-on-Avon District Council.
Policy WW19	Warwickshire supports providing walkways and cycle paths that link to the points of interest and rest of the village.
General - road safety matters	Should the Neighbourhood Plan proposals require any changes to the highway i.e. speed limits, traffic calming measures they will need to meet the relevant criteria and any required consultation. In addition, funding to achieve these should be provided by the proposed development.
General – public health matters	To provide guidance for communities Public health experts have produced guidelines. Please also find attached our Neighbourhood Development Planning for Health document. The document contains evidence and guidance for promoting healthy, active communities through the neighbourhood planning process. The

	<p>General – flood risk matters</p>	<p>document can be found on:</p> <p>https://apps.warwickshire.gov.uk/api/documents/WCCC-630-656</p> <p>Alongside this, Public Health England's local health tool can be used to understand the health needs of the population.</p> <p>The County Council as the Lead Flood Risk is only consulted on developments of over ten properties. However, we suggest that developments below this consideration of SUDS (sustainable urban drainage systems) should be considered when applications for both minor and major sites are put forward.</p> <p>The cumulative impact of surface water from a very small number of houses or barn conversions coming forward can impact on by surface drainage in the area. Therefore, these single units should also their impact on the immediate locality.</p> <p>Our detail comments are contained in Appendix 1 attached to this letter.</p> <p>Should any major applications of ten houses, then consultation with the LLFA drainage standards could be added the plan. As a minimum, requirements set out in the following guidance should also be adhered to:</p> <ul style="list-style-type: none"> • 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>General – housing policy matters</p>	<p>The County Council welcomes the inclusion of housing for our vulnerable citizens at para. 7.2.2. and Policy WW8, however this to be restricted to bungalows. Ideally, this definition should be refined to include apartments and flats, which are a far more effective and cost-efficient housing type when considering the delivery of health and care services, e.g. shared support, adaptations and the use of Assistive Technology.</p>

	<p>Flood Management Risk</p>	<p>Objective 9 – This objective could specify that future development will provide betterment in discharge rates for surface water run-off, meeting at least the greenfield Qbar rate, if not lower.</p> <p>Policy WW4 – We believe the mention to the use of protected green spaces specified, could be more detailed, explaining how they act as natural flood protection; as well as having the potential to be used to intercept or slow surface water flows, through additional tree planting and hedgerow growth.</p> <p>Paragraph 7.2 – House and Land Use – This section (and others) refers to climate change allowances in Appendix F however, this is limited and does not provide enough detail to the actual allowance figures. We suggest a table is included in the appendices in relation to climate change allowances for flood risk found in the National Planning Policy Framework and online from https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</p> <p>Paragraph 7.24 – Design Standards in New and Modified Housing – There is mention to flood protection and effective water management, details of preferred options could be suggested; with clear detailed consideration to design standards, and maintenance strategies (both in accordance with the SuDS manual) in relation to SuDs features.</p> <p>Policy WW10 – Consideration to surface water flooding mitigation measures should be made, irrelevant to whether the site falls within flood zones 2 or 3.</p> <p>Policy WW13 – Clear instruction on finished floor levels (0.6m above the 1 in 100 year plus climate change allowance), in relation to the set Environment Agency standard for fluvial (river flooding) however, if a proposed development site is at risk from surface water flooding we would expect FFL to be at least 150mm, this could be added.</p> <p>Modified Housing – There is a statement on the use of SUDs, however the plan could include greater detail on what type of SuD features the parish would prefer and find most beneficial. We would suggest mentioning the multiple benefits of SuDs, including greater biodiversity and amenity value.</p>
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		<p>There is no specific detail referring to greenfield Qbar rates, and we would suggest that restricting flows to less than 5 l/s is viable.</p> <p>Referring to the SUDS discharge hierarchy would be of benefit, with the preferred choice of infiltration or water discharged into an existing watercourse being the first options, before connecting to a sewer.</p> <p>Any new developments should be designed and built with separate systems up to the point of where they connect to the combined sewer, in line with building regulations.</p> <p>We would suggest as a minimum that you add a paragraph specifically for the need for new developments to incorporate SUDS into plans. Our preference would be for an additional policy detailing a requirement for all new developments to utilise SuDS to achieve the multi-functional benefits of good SuDS design. This policy should include a requirement for all sites to attenuate to greenfield rates and include that 5 l/s is NOT the minimum possible discharge rate achievable.</p>
WE10	Policy WW3	<p>This policy is not consistent with paragraph 135 of the NPPF and therefore does not meet the basic condition of compliance with National Policy. Paragraph 135 is concerned with non-designated heritage assets. It states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application.</p> <p>It also refers to a balanced judgement being required in weighing applications which affect non-designated heritage assets. It is clearly anticipated that circumstances will arise when there is harm to the character and appearance of a non-designated heritage asset, but a balanced judgement is that planning permission should be granted notwithstanding the harm to a non-designated heritage asset.</p> <p>Draft Policy WW3 does not acknowledge paragraph 135 in so far as the policy refers to the local list of heritage sites. The policy adopts the same approach to the determination of applications which impact on non-designated heritage assets as applications which affect the Conservation Area and designated Listed buildings. The policy fails to draw the distinction in National Policy that a lower test applies to non-designated assets. Policy WW3 should be amended to indicate that for non-designated assets identified on the Local List of</p>

	<p>Appendix 2b</p> <p>Policy WW18</p>	<p>Heritage Sites, account will be taken of the impact of development on the significance of non-designated heritage assets in determining applications for development.</p> <p>The representation pro forma provides no opportunity to object to the Local List of Heritage Sites at Appendix 2b of the plan. With regard to Wellesbourne Airfield, the justification for inclusion within the local list is that it is a World War Two airfield. However, all World War Two buildings at the airfield have been lost and their sites redeveloped. The Airfield does not have the appearance or character of a wartime aerodrome.</p> <p>The site of hangers, the control tower, workshops and technical buildings has redeveloped for a modern distribution and employment area.</p> <p>The existing buildings and structures associated with aviation at the airfield are all late 20th Century, ad hoc of temporary appearance with no historical or architectural merit. Furthermore, protecting the airfield as a local heritage site under Policy WW3 is likely to conflict with the objectives of Policy WW18: Support of Commercial Business and Policy WW19: Support for Tourism in that any development at the Airfield would be subject to Policy WW3 that will compromise any future development.</p> <p>The Airfield should be removed from the Local List of Heritage Assets. The Avro Vulcan is identified in Appendix 2b as a local heritage site. this does not qualify as a heritage asset which must be either a building or a place. The definition of a heritage asset is: "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest." (Annex 2: Glossary, NPPF). An aeroplane cannot qualify and should be removed from the local list in Appendix 2b of the Neighbourhood Plan. Similarly, wartime memorabilia houses in the wartime museum does not qualify as a heritage asset and consequently the wartime museum should be removed from the local list.</p> <p>Policy WW18 should be clarified in respect of Wellesbourne Airfield because it is not the function of the planning system to safeguard or promote individual commercial interests.</p>
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WE11	Policy WW1	Support
	Policy WW2	<p>The headline doesn't match the paragraphs below (preservation means preservation not destruction) which could lead to a challenge to the entire document. We propose that our suggested amendments be adopted for the sake of consistency in the wording as follows:</p> <p>Policy WW2 Preservation of Allotments</p> <p>The existing allotment site provides a valuable contribution to biodiversity and the healthy lifestyle of many residents within the Parish and should be retained and preserved.</p> <p>Any additional allotment site would need to satisfy the following conditions, and would require the approval of the Wellesbourne Allotment and Garden Holders' Association.</p> <p>a) additional land should provide a net increase in open space for allotments which has equivalent or preferably improved soil quality b) the additional site is at a convenient location near to the village which includes access by both roadway and existing or extended new footpaths and public rights of way c) the area is made more accessible for use by people with disabilities, general mobility problems, and children d) services to the additional site should include the provision of distributed water supply to all plots, toilets, car parking and perimeter security fencing e) the additional site should be located outside recognised flood zones (2,3) and surface water flooding areas associated with both the River Dene and the Newbold Brook. Relates to Objectives 1, 14 and 16 Wellesbourne Allotment Association would be pleased to discuss with the Inspector any queries on the points raised about Policy WW2</p>
	Policies WW3 - WW19	Support

WE12	Policy WW1	I support the designation of the sites listed 1-12 as areas of green space, though it is regrettable that part of the most important green space within Wellesbourne is to be used for building, even if this is to accommodate a new medical centre.
	Policy WW2	While I support the aims of the conditions outlined above, I do not see these as an acceptable alternative to preservation of the existing historic Kineton Road allotment site, which is certainly an important community asset within the village and believed to be one of the oldest, if not the oldest, allotment site still in existence in the country. Wellesbourne has already lost too many buildings of historic interest, too much high quality agricultural land, and is now about to lose part of the most important green space in the village on Dog Close. To lose the allotment site, its natural environment and setting, to construct 50 houses, would have a detrimental effect on the character of the village and amount to irresponsible and negligent destruction of the countryside around Wellesbourne and the English countryside, affording no consideration to local land use requirements and needs of the population in future years.
	Policy WW3	Protection should extend to all historic buildings and areas, whether within the conservation area, listed, contained within the Local List of Heritage Sites, or elsewhere.
	Policy WW4	The natural environment and setting of Wellesbourne allotments, together with views across open countryside, definitely need to be preserved.
	Policy WW5	Support
	Policy WW6	Support
	Policy WW7	Support, but object to any building on Area 3 (the allotments) and Area 4, the loss of which would have a considerable detrimental effect on the character and rural landscape of Wellesbourne, along with its status as a "village". Further, building on these sites of high quality agricultural land would afford no consideration of such land needs by future generations.
	Policy WW8	Support

Policy WW9	Support
Policy WW10	<p>Have doubts that houses located near, but outside flood zones, will not require flood protection at some point. Also the effect of building in such areas may possibly give rise to flooding on existing properties elsewhere. Two-and-a-half storey buildings are too high and out of keeping in my opinion. Parking spaces should be provided off-road at the front of properties, not to the rear where residents are loath to access them and instead clog street frontages with parked vehicles.</p> <p>Roads should be wide enough for all vehicles to pass in opposite directions with ease.</p>
Policy WW11	<p>While I would support the policy, I have real doubts that this would lead to a great increase in cycling and a decrease in use of the car and therefore traffic congestion. Even now, drivers travel very short distances within the village on a regular basis, which places increased demand on the limited parking spaces available. This leads to drivers parking partly on or across any width of footway/footpath seen as appropriate to their destination.</p>
Policy WW12	<p>Support, but provision of landscape buffers of trees and hedges does not take away the fact that any development exists, and is of detriment to the local countryside.</p>
Policy WW13	Support
Policy WW14	<p>Support the theory, but wonder what level of provision and contributions will actually be directed towards Wellesbourne.</p>
Policy WW15	<p>Support, but subject to further details and a satisfactory level of provision of parking facilities near the village centre and, in particular, the primary school. Little, if any information, is currently available about what facilities might be made available to bring the current chaotic parking and dangerous traffic system to an acceptable standard.</p>

	Policy WW16	Support, but with the proviso, that any school development should be required to have effective school travel, traffic flow and parking plans in place, together with sufficient facilities to accommodate all parents', visitors' and commercial traffic.
	Policy WW17	To believe that all children, parents and visitors will walk or cycle to schools, or travel by public transport, is completely unrealistic.
	Policy WW18	More car parking is required, but current parking limitations by road markings and restricted periods of stay need to be extended, and a greater level of enforcement provided.
	Policy WW19	Support
	Policy WW19	Support
WE13	Policies WW1 - WW19	Support (no further comments)
WE14	Policies WW1 - WW19	Support (no further comments)
WE15	General	<p>I am writing on behalf of our client A C Lloyd Homes to make representations to the Wellesbourne and Walton Neighbourhood Plan, Submission Version 2017. This representation relates to the existing allotment land off Kineton Road. A C Lloyd Homes is representing the landowner who is consulting on bringing the site forward for development.</p> <p>These representations should be read in conjunction with the completed forms and the attached plan which shows the extent of developable land lying to the north-east of Kineton Road and possible alternative locations for the existing allotments.</p>

	<p>Policy WW2</p>	<p>These representations take into account advice within the Localism Act and Regulations that require neighbourhood plans to meet a number of basic conditions. These are explained further in Planning Policy Guidance.</p> <p>We do not object to the principle of Policy WW2 but have some observations regarding the criteria that have to be met before the site can be considered for housing.</p> <p>Firstly, we object to the pre-condition in the policy text which states that the development of the site would require approval from the current tenants, the Wellesbourne Allotment and Garden Holders' Association. Whilst it would be the intention that the tenants will be fully consulted and involved in the decision making process, the policy should not be this explicit in requiring their approval. Accordingly, the last sentence of the first paragraph of Policy WW7 should be amended to read as follows: <i>"... require full consultation with the Wellesbourne Allotment and Garden Holders' Association."</i></p> <p>Secondly, we disagree with criteria a) as any alternative land for the allotments should not need to provide a net increase in open space. The wording of the criteria should be amended to ensure that any alternative location will provide an 'equivalent quality' of land.</p>
	<p>Policy WW7</p>	<p>We fully support the identification of Area 3 as a potential housing site. As outlined in Policy WW7 the development of Area 3 is subject to the re-provision of the existing allotments. Both the landowner and A C Lloyd Homes fully understand that this is the main issue to site delivery. However, the development of Area 3 for new housing is a realistic prospect as the landowner owns other land at Charlecotte Road and Kineton Road to provide new allotments (see attached drawing). The two alternative land parcels for the allotments are shown as Parcels B and C. These areas would not be developable for other purposes due to planning constraints. Parcel B is too detached from the settlement and Parcel C is designated as an area of restraint in the adopted Stratford-on-Avon Core Strategy. Furthermore, in accordance with Policy WW2 the combined proposed alternative locations would provide:</p>

		<p>a) an equivalent quality of land b) convenient locations near the village. Access is achievable for both vehicles and pedestrians c) the provision of two allotment locations rather than one increases the accessibility of allotments within the settlement d) services to the new sites would include the provision of distributed water supply to all plots, toilets, car parking and perimeter security fencing e) the sites are located outside the flood plain</p> <p>In our opinion, Area 3 (Parcel A on our plan) provides a sustainable location for new housing as it abuts the settlement boundary of Wellesbourne. The existing gated access off Kineton Road leads to a driveway through the site which could be upgraded to provide satisfactory access. The site is within easy walking distance of Wellesbourne Primary School, convenience store, pharmacy, public house, village hall, post office, bank, cafes and restaurants. There are bus stops on Kineton Road with frequent bus services to reach further facilities in Stratford-upon-Avon, Kineton, and Banbury.</p> <p>In terms of the Council's assessment of the site, the SHLAA Review 2012 identifies that the site does not have any physical constraints to development and it could form an extension of the existing built up area. The report states that with suitable relocation of the allotments the site has potential for 80 houses.</p>
WE16	General - Legal Compliance	<p>2.1. At the outset, it must be noted that:</p> <p>(a) All neighbourhood plan policies must be drafted in a way that is clear and unambiguous (PPG 041);</p> <p>(b) The policies must be based upon robust evidence (PPG 040 and 042);</p> <p>(c) The policies must be appropriate, having regard to national planning policy and guidance, which includes the national imperative of significantly boosting the supply of housing (paragraph 8(2)(a) of Schedule 4B);</p>

	<p>Policy WW4</p>	<p>(d) Such policies must support the strategic development needs set out in Local Plans, including policies for housing and economic development (NPPF 16 and PPG 070);</p> <p>(e) Such policies cannot promote less development than set out in the Local Plan or undermine its strategic policies (NPPF 184 and PPG 070);</p> <p>(f) The policies must contribute to and not frustrate the achievement of sustainable development (paragraph 8(2)(d));</p> <p>(g) The policies in a neighbourhood plan must be in general conformity with the development plan documents in the area, albeit with careful regard to the emerging Local Plan (PPG 009, 040 and 044 and paragraph 8(2)(e));</p> <p>(h) The policies within a neighbourhood plan must ensure that the sites and the scale of development identified in a plan are not subject to such a scale of obligations and policy burdens that their ability to</p> <p>2.2. Policy WW4 is supported, in principle.</p> <p>2.3. Criteria 4 specifies that:</p> <p style="text-align: center;"><i>“Any development to the north of Wellesbourne adjacent to the Newbold Brook should incorporate the floodplain area as community open space linking the new development to the village.”</i></p> <p>The floodplain area referred to is yet to be fully defined. Hydraulic modelling is being undertaken to identify the extent of this, if any, along the Newbold Brook. It may be that the land is entirely outside of the floodplain. The supporting Landscape Study sets out policy suggestions in relation to the specific landscape zone in which this area is located. The suggestions include:</p> <ul style="list-style-type: none"> • Refer to Stratford Landscape Sensitivity Study for potential landscape enhancement and mitigation. • Conserve and enhance the wooded character of the streamline.
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	Policy WW7	<ul style="list-style-type: none">• Conserve and enhance tree cover around edge of existing development. <p>2.5. None of the recommendations refer to provision of a community open space in landscape terms. Public open space will be provided as part of any residential development of the site referred to, in accordance with local plan policy requirements, rather than the entirety of the flood plain area, as alluded to in the draft policy.</p> <p>2.6. The provision of a community open space is not landscape related and does not form part of the evidence base for the landscape study and Neighbourhood Plan. As noted above, policies must be based upon robust evidence (PPG 040 and 042).</p> <p>2.7. No robust evidence base supports the requirement for a community open space area and it would therefore be unlawful for criterion 4 of Policy WW4 to be made. As such this criterion should be deleted from the draft policy.</p> <p>2.8. The allocation of Area 1 – ‘Map 10: Land Options for Additional Housing Around Wellesbourne’ and Policy WW7 is supported, in principle.</p> <p>2.9. The locational merits and reasons for the choice of Area 1 are articulated in the Neighbourhood Plan and include matters such as: a local choice for any housing to be to the north and east of Wellesbourne; a location adjacent to the built-up area of the settlement and the future residents being able to access by non-car modes of travel the facilities and service available within the village centre.</p> <p>2.10. In terms of landscape and visual impact, residential development would be visually consistent with the existing housing fronting Warwick Road, Hammonds Green, Daniell Road and Hopkins Way. The proposed new homes would be within a site that is well contained by vegetation and sits at a lower topographical level, with the adjacent housing providing a background when viewed from the surrounding area. In addition to the proposed new homes, there is the potential for open space uses to occur within the land between built development and Newbold Brook.</p>
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2.11. There is an opportunity in any proposals to undertake improvement works to Newbold Brook and its immediate corridor. Such improvements would present opportunities both in terms of biodiversity but also in improving channel capacity and rationalising any flood extents to a more defined corridor.

2.12. In terms of access to the site, Warwick Road has a carriageway width of some 7.5 metres, with footways both sides of between 1.8 to 2.0 metres in width. The design of the carriageway and footways provides sufficient capacity to accommodate existing traffic and any traffic generated by housing on Area 1. In addition, there are good pedestrian connections to local facilities within Wellesbourne, including the bus services.

2.13. The site extends to approximately 5 hectares, however a smaller area has been identified (1ha) for built development due to the Environment Agency (EA) Flood Maps for Planning show a proportion of the site as falling within Flood Zones 2 and 3.

2.14. It is understood that the Flood Zone Maps were derived from strategic national scale flood risk models (JFLOW) and that the catchment upstream of the watercourse, just north of Lower Lea Farm, is understood to be too small to have been included in the national scale Flood Mapping. As a result of this, the EA Flood Maps are not considered suitable to inform a site specific flood risk assessment.

2.15. It is also understood that the EA and Lead Local Flood Authority (LLFA) do not hold detailed modelled flood data of the watercourse.

2.16. EA surface water flood risk maps identify the potential areas at risk of flooding if rain water does not enter the drainage system or infiltrate into the ground. While not strictly a fluvial source, this mapping can provide an indication of the potential flood risk associated with minor watercourses where detailed modelling has not been undertaken.

2.17. The surface water map illustrates that the potential floodplain extents within the site could be less extensive than the Flood Zone maps predict. It is believed that this could be a result of more extensive upstream floodplain attenuation within the village, as well as the inclusion of a flow route through the A429.

2.18. The EA do not have any records of flooding within the area of the study site, and no historic flooding incidents are reported within the SFRA or PFRA.

2.19. BWB have undertaken a strategic level 2D hydraulic modelling exercise of the Newbold Brook to identify the potential fluvial flood risk that this may pose to the development site. Further detailed modelling is currently being undertaken to more accurately define the areas outside of the floodplain. This includes a detailed topographical survey of the watercourse and cross sections of the channel. The modelling exercise will be used to inform the masterplanning and capacity of the site and also a future Flood Risk Assessment (FRA).

2.20. In addition to increasing the accuracy of the model, potential flood mitigation options are also being explored. Including the option to manage flood risk to the proposed developable areas by using some of the other available land holdings nearby.

2.21. Given the above it is considered that the drafting of Policy WW7 and the accompanying Map 11 should be amended as discussed below.

Criterion a)

2.22. In the supporting text the policy it sets out that the questionnaire survey showed a strong preference for development to be spread over the Plan period, however within criterion a) it specifies that the site should be considered as a reserved area, only to be released for development if a clear requirement to do so is identified by SDC, and in any event not before 2021.

2.23. It is considered that, following the detailed hydraulic modelling of the brook and establishing the associated flood plain and available developable areas, that the site can come forward for residential purposes, during the plan period, prior to 2021.

2.24. Concern is also raised in that the level of growth proposed does not make adequate provision for C2 – Residential Institutions which are required to meet the needs of older people in the community. The ageing population will continue to grow and in turn will place increasing pressure on both health care infrastructure and also specialist housing. C2 – Residential Institutions, when in the form of extra care accommodation,

provide an important service meeting the specialist requirements of those older members of the community who are in need of support. This support is provided in the form of onsite care by medical staff, on site catering provision and general everyday assistance. Extra care developments are also a valuable source of jobs.

2.25. It is considered that the site could come forward to meet the needs of a cross section of housing, including affordable needs and extra-care accommodation.

2.26. The site is considered to be sustainable and can contribute to the supply of dwellings as defined by, and in accordance with, the Core Strategy. As the preferred site for development within the village, this should not be considered a reserved area, nor limited to post 2021. It is considered that the site should be able to come forward for development immediately, subject to the detailed hydraulic modelling findings.

2.27. It is considered that the criterion as drafted is unclear and ambiguous as to how SDC would provide a 'clear requirement' as to whether the site should be released. This conflicts with PPG 041 which states that all neighbourhood plan policies must be drafted in a way that is clear and unambiguous. In addition, the criterion conflicts with Paragraph 8(2)(a) Schedule 4B to the Town and Country Planning Act 1990 which cites that policies must be appropriate, having regard to national planning policy and guidance, which includes the national imperative of significantly boosting the supply of housing. SDC have defined the clear requirement for housing delivery and by reserving sites this limits the ability for such sites to come forward efficiently. It is therefore considered that for the policy to be lawful that criterion a) should be deleted.

Criterion b)

2.28. Draft Policy WW7 Criterion b) sets out that:

"no housing shall be built within the zone 2 or 3 flood areas designated by the Environmental Agency. The distance that buildings will be permitted from the edge of the zone 2 and 3 areas is specified in WW13."

2.29. As set out above, the EA Flood Zones for the area are derived from strategic national scale flood risk models and that the catchment upstream of the watercourse is understood to be too small to have been included in the national scale Flood Mapping. As a result of this, the EA Flood Maps are not considered to be accurate in this area and therefore the policy as drafted would preclude development in areas that could be

outside of the accurate flood plain.

2.30. Paragraph 8(2)(d) Schedule 4B to the Town and Country Planning Act 1990 states that the policies must contribute to and not frustrate the achievement of sustainable development, with paragraph 8(2)(a) stating that policies must be appropriate, having regard to national planning policy and guidance, which includes the national imperative of significantly boosting the supply of housing. Criterion b) unnecessarily frustrates this imperative and as such it would therefore be unlawful for criterion b) of Policy WW7 to be made.

2.31. Criterion e) of Policy WW7 sets out that proposals for development of Area 1 must include a master plan to address site specific constraints. Flood risk management is one of those constraints and the first criterion sets out how such management would incorporate sustainable drainage systems. These further emphasizes the fact that criterion b) is not necessary for inclusion within Policy WW7 as provision to ensure flood risk is managed elsewhere in national planning policy, and in criterion e) of the drafted policy. As such the criterion does not add anything further to the Neighbourhood Plan, it seeks only to frustrate potential developable area.

2.32. It is also considered that this criterion is not necessary as the point is covered by the first paragraph of the policy, which includes text saying the flood plain extents will be established by the modelling. As such criterion b) should be deleted from Policy WW7.

Criterion c)

2.33. In terms of criterion c), the landowner supports the principle of providing a community open space onsite, as would be required as part of any residential development proposals. The general location of this to the east of Area 1 is supported, and a footpath link to the site boundary to the adjacent local green space will be provided, however it is considered that the specific wording should be amended to provide a degree of flexibility to the positioning of the open space following the findings of the detailed hydraulic modelling of the brook and associated flood plain.

2.34. In order for the policy to be considered sound, and lawful, in relation to Paragraph 8(2)(d) Schedule 4B to the Town and Country Planning Act 1990, it is considered that the criterion should be worded as follows:

		<p><i>“development proposals must incorporate an area of community open space to help redress the deficit of community open space in Wellesbourne, also providing a link to the site boundary with the local green space and the public footpath to the north of Hopkins Way, immediately adjacent to Area 1.”</i></p> <p>Criterion d) 2.35. No further comments.</p> <p>Criterion e) 2.36. No further comments.</p>
WE17	Introduction	<p>1.1 This representation is made by Pegasus Group, on behalf of Rainier Developments, to respond to the Wellesbourne and Walton Neighbourhood Development Plan submission document (hereafter referred to as ‘the NDP’). This representation is made in relation to land south of Walton Road, Wellesbourne (see Site Location Plan at Appendix 1).</p> <p>1.2 Rainier Developments are grateful for the opportunity to make representations in respect of the NDP which is currently at Regulation 16 (Submission) stage, and are supportive of the proactive approach the Wellesbourne and Walton NDP Steering Group have taken in engaging in the planning process in a manner which seeks to identify and deliver the aspirations of the local community.</p> <p>1.3 The representations are framed in the context of the basic conditions relevant to the preparation of a Neighbourhood Plan:</p> <ul style="list-style-type: none"> ➤ Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan; ➤ The ‘making’ of the neighbourhood plan contributes to the achievement of sustainable development; ➤ The ‘making’ of the neighbourhood plan 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);

	Housing – General	<ul style="list-style-type: none"> ➤ The ‘making’ of a neighbourhood plan does not breach, and is otherwise compatible with EU obligations; and ➤ Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. <p>1.4 The vision of the NDP is to make Wellesbourne and Walton a place where people are proud to live and work. The NDP sets out 16 objectives in order to meet the vision for the Wellesbourne and Walton Parish, this representation is focussed on the objectives and policies that relate to housing and land use, notably Policy WW7.</p> <p>2.1 Policy CS.16 of the adopted Stratford on Avon Core Strategy requires the delivery of at least 14,600 additional homes between the period 2011 to 2031. This is to be distributed in accordance with Policy CS.15 which sets out the settlement hierarchy for the District.</p> <p>2.2 Policy CS.15 identifies Wellesbourne as one of the 8 Main Rural Centre’s in the District, the second tier of the District’s settlement hierarchy. Stratford-on-Avon is identified as the Main Town (first tier). Policy CS.16 sets out that approximately 3,800 homes are to be provided across the Main Rural Centres. The NDP states that by July 2016 Wellesbourne had contributed 830 homes, through completions and commitments, stating that this is around 22% of the total contribution from the Main Rural Centres. However the NDP goes on to add that there may be a future requirement for the District to accommodate extra housing from neighbouring areas such as Coventry and Birmingham and therefore there is a need to identify additional sites around Wellesbourne which should be reserved for future housing needs.</p> <p>2.3 Policy CS.16 states that the forthcoming Stratford-on-Avon Site Allocations Plan will identify reserve housing sites providing flexibility to ensure that the District can meet in full its agreed housing requirement (including any arising unmet needs). The location of any reserve sites will need to take account of the settlement pattern and the overall balance of distribution of development set out in Policy CS.15. Policy CS.16 adds that reserve sites would be released under the context of a shortfall in the five year housing land supply across the District, to contribute meeting any additional need for housing in relation to a net growth in jobs at</p>
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Jaguar Land Rover (Gaydon Lighthorne Heath), meeting any shortfall arising from the Coventry and Warwickshire Housing Market Area (HMA) and also any shortfall arising outside the HMA.

2.4 Policy CS.17 of the adopted Core Strategy states that the existence of unmet need arising outside the District will not render the Plan out of date, but the Plan will be reviewed if significant housing needs arising outside the District need to be met within the District. Note that it is the role of the emerging Site Allocations Plan to identify reserve sites to allow flexibility in the District being able to meet any arising unmet needs.

2.5 The NDP acknowledges the findings of the questionnaire survey where the majority of residents considered that no more housing should be built in Wellesbourne, however it does consider that In light of the possibility of additional needs to be met, the location of any new housing should be in either the north or the east of the village.

2.6 The recognition of the NDP that there may be a need to identify reserve sites to provide flexibility In the housing supply is welcomed and supported. Given that Wellesbourne Is one of the most sustainable settlements in the District is it therefore an appropriate location for future housing development to meet any future shortfalls in housing within and outside of the HMA. Paragraph 6.9.21 of the Core Strategy identifies that reserve sites may need to be identified in the village through the Site Allocations Plan and/or the Neighbourhood Plan, as the figure of 830 homes to be provided in Wellesboume in the Core Strategy should be seen as a minimum.

2.7 In identifying the most appropriate locations for development in the village the Core Strategy at paragraph 6.9.17 concludes that land on the southern and eastern side of the village is the most appropriate. It notes that the southern location is some distance from the shops and services in the village centre and the primary school, but is relatively close to a supermarket, recreation facilities and the main employment area.

2.8 There has been a number of recent housing developments that have been approved to the south and eastern edges of the village. This includes developments at Loxley Road, Dovehouse Drive and Ettington Road to the south and Ettington Park and The Grange to the south east. The questionnaire survey identified that residents were resistant to further housing development in the south of the village and also to any housing at

	Policy WW7	<p>Wellesbourne Airfield (to the west).</p> <p>2.9 Map 10 of the NDP illustrates those areas around Wellesbourne which have been assessed for potential housing development. It also shows those sites to the south and south-east where housing development has been approved in the village. There are 9 areas around Wellesbourne that have been assessed, of these only 3 have been identified as suitable for further housing development should additional sites be required. These 3 areas are located to the north and east of the village.</p> <p>2.10 The areas identified are all considered by the NDP to be in reasonable proximity to the commercial centre of the village on land that could be considered acceptable in terms of sensitivity for housing development. They also include at least part of the area outside the limits of both surface water and flood zones 2 and 3.</p> <p>2.11 The remaining areas (4 to 9) are rejected as locations for more housing due to there being ecological, flooding, landscape and heritage constraints. Others are considered too remote and others have been rejected by the community (i.e. to the south). The airfield is also rejected.</p> <p>2.12 The NDP comes to the conclusion that Area 1, land off Warwick Road, which is to the north west of the village, is the most suitable for any future housing development. The NDP identifies Area 1 to be 1 hectare in size, with a capacity of 25 houses. The reasons for its preference is due to the fact it is located immediately adjacent to the built-up area boundary and is in the preferred area for growth.</p> <p>2.13 Policy WW7 of the NDP guides the location of new houses in the Parish. It states:</p> <p>“New housing, other than in fill, should be contained within the Area 1 shown on Map 11 which, in accordance with the wishes of residents, is north of the village, near existing housing, and in close proximity to the traditional centre. This location has been identified by the Environment Agency as containing areas within flood zones 2 and 3. The extent of the flood zone and surface water flooding area should be confirmed as part of any development by detailed hydraulic modelling, taking into account the prevailing climate change allowances.”</p>
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2.14 The policy goes on to add that the site should be considered as a reserved area and will only be released for development if a clear requirement to do so is Identified by the District Council and in any event not before 2021, when it is anticipated that the development of houses with already approved planning permissions within Wellesbourne, will have been completed.

2.15 The policy is clear that no housing is to be built within flood zone 2 and 3, with the distance that buildings will be permitted from the edge of the flood zone specified in NDP Policy WW13. It goes on to require that the development proposals must incorporate a scheme to help redress the deficit of community open space in Wellesbourne by allocating the areas contained within flood zone 2 and 3 as community open space. The policy also sets out other requirements for any development In this location.

2.16 The Policy WW7 then sets out that Area 2, which is to the east of Wellesbourne (north of Kineton Road) and adjacent to both existing housing and the allotments, including flood zone 2 and 3, should be safeguarded from any development that might compromise its future release for possible residential housing use beyond 2030. The extent of the flood zone and its relationship with any development should also be established.

2.17 Finally Area 3 is identified as the existing allotments off Kineton Road to the east of Wellesbourne. Policy WW7 requires that any consideration for use for this site as a location for housing development is subject to Policy WW2 (preservation of allotments).

2.18 Policy WW7 is clear that Areas 4 to 9 on Map 10 are rejected from consideration as sites for additional housing. It is also clear that no new housing will be allowed outside the built-up area boundary. The NDP is in principle supportive of small infill developments of fewer than 10 dwellings within the built-up boundary.

2.19 None of the land options that have been assessed for future housing development through the NDP include the site south of Walton Road. The land south of Walton Road which is subject to this representation, is identified in Map 10 as retained open space associated with approved planning permissions. This is Incorrect. The site (as identified in Appendix 1) does not form part of the open space associated with the recently approved developments at The Grange and Ettington Park. It forms a parcel of land that sits between the approved areas of open space for these developments. It is an existing agricultural field with a number of

farm buildings/structures. The site does not have any public access. The site should therefore be reclassified on Map 10 in the NDP.

2.20 Rejected Area 5 is located to the north on the other side of Walton Road. Site 5 was rejected as it is located within the River Dene corridor to the south of the village along a narrow rural road in an area of high sensitivity landscape and containing sites of historic significance. Parts of site 5 also provides space for water dispersal and flood storage. Land south of Walton Road does not form part of Area 5.

2.21 Land to the south of Walton Road, is not located within the River Dene corridor, does not contain any sites of historic significance, is not within flood zones 2 or 3 and does not provide space for water dispersal and flood storage. It is also not in an area of high landscape sensitivity, rather is Identified in Map 5 of the NDP as being within an area of medium landscape sensitivity, which is the same as the adjoining new developments at The Grange and Ettington Park.

2.22 Rainier Developments considers that the site south of Walton Road, should be correctly identified as being outside of the retained open space associated with approved planning permissions on Map 10 of the NDP. The site should then be assessed as an option for housing.

2.23 The land south of Walton Road is circa 2.5 hectares in size with the capacity to accommodate circa 67 dwellings. This is a greater capacity than the preferred site (Area 1) identified in Policy WW7, which has a capacity of approximately 25 dwellings.

2.24 Rainer Developments take concern with the preference of Area 1 as the preferred site for housing growth. It is appreciated that in accordance with the results of the local questionnaire the preferred location for new housing growth is to the north and east of the village, however Area 1 is partly covered by flood zones 2 and 3. The extent of the flood zone does not extend across the entirety of the area, however Rainer Developments consider that it does significantly restrict the amount of housing development that can come forward in this location. It is not ideal to have housing development on the edge of a flood plain when there are better alternative sites away from the flood plain.

2.25 Furthermore, houses should be set back some distance from the flood plain, further restricting the capacity of the site. The context plan included as Map 11 of the NDP indicates that the area within the flood zone could be used as new open space. It is not ideal to have the public open space located within the flood plain.

2.26 The site south of Walton Road is not constrained by an area of flood risk. Housing development can therefore come forward across the site without being at risk.

2.27 With regards to landscape sensitivity the preferred site in Area 1 is identified as being within an area of high to medium landscape sensitivity (Map 5 of the NDP). Whereas the site south of Walton Road is identified as being within an area of medium landscape sensitivity, which is preferable.

2.28 It is acknowledged that the site at Area 1 is within close proximity to the services and facilities within Wellesbourne, notably along Kineton Road. However, it is also considered that the site south of Walton Road is also within close proximity to the services and facilities in Wellesbourne. Particularly the Co-operative food store off Ettington Road and the recreation facilities in the village. The facilities on Kineton Road are about a 15 minute walk from the site south of Walton Road. The site south of Walton Road is not located in the southern extremities of the village where local residents consider development should not be located. It is located to the south east of the village adjacent to new residential development which came forward in a sustainable location. The site south of Walton Road is located closer to the centre of Wellesbourne than much of this new housing development and therefore should also be considered as a sustainable location.

2.29 It is worthy to note that development on the site south of Walton Road would not reduce the separation gap between the settlements of Wellesbourne and Walton as evidenced on Map 9 of the NDP. It is also important to highlight that it would not impact upon any of the cherished views around the village as identified in Map 6.

2.30 The NDP identifies that Area 2, which has a capacity for approximately 250 dwellings, should be designated as reserved for possible future development beyond 2030. It is not expected to come forward in the short to medium term to meet arising needs before 2030. This is an acceptable strategy.

2.31 Area 3 however is currently occupied by the allotments to the north of Kineton Road. The NDP at section 7.1.2 makes out that these allotments are highly valued by the local community and have been for the past 175 years. Policy WW2 then sets out that the allotments provide a valuable contribution to biodiversity and the healthy lifestyle of many residents within the Parish. The Policy sets out a number of conditions that would need to be satisfied if the allotments were to be considered for development, this includes the provision of alternative land to provide a net increase in open space for allotments.

2.32 It is considered that if there are other sites that are available in the village which do not result in the loss of these allotments then these should be preferred for housing development. It is appreciated that the allotments are in a suitable location for housing development, but the requirements for any developer to provide new replacement and improved allotment provision elsewhere in the village is onerous and unlikely to be delivered. The site south of Walton Road can provide the same number of units as the allotment site, is currently available and is not occupied by any community asset, such as allotments. Therefore Rainier Developments consider that the allotment site should not be identified as a reserve site, rather the NDP should identify the site south of Walton Road as a reserve housing site.

2.33 The site south of Walton Road is promoted by Rainier Developments as being the most suitable site to accommodate future housing in Wellesbourne. The site should be preferred over the site identified as Area 1 in Policy WW7 as the site south of Walton Road is more suitable given it is outside and away from the areas of flood zone 2 and 3 (which do not limit the development area), is in an area which has lower landscape sensitivity, it is not within the southern extremities of the village where residents do not want to see more housing developed and is also located within close proximity to nearby services and facilities.

2.34 Rainier Developments support the approach of the NDP to seek to identify reserve sites in Wellesbourne to accommodate future housing development, this may be due to the requirement of the District to take unmet arising needs from Coventry and Birmingham, but also to help rectify any shortfall in five-year supply across the District should such a position arise.

2.35 Rainier Developments do not agree with the identification of the site Area 1 in Policy WW7 as a reserve site and consider that the site south of Walton Road is more suitable for housing development and should

therefore be identified as a reserve housing site to meet future needs. It is considered that the site could come forward in the short to medium term (i.e. before 2030). Rainier Developments also consider that the allotment site identified in Area 3 should not be identified as a reserve site for future housing development when the site south of Walton Road is more suitable, does not result in the loss of the allotments and can deliver a similar capacity over a similar timeframe. The identification of the site south of Walton Road as a reserve site is therefore preferable.

Details of alternative suggested site

Site Proposals

3.1 The site is located to the south east of Wellesbourne village, south of Walton Road and covers an area of circa 2.5ha. It comprises an agricultural field with several farm buildings/structures to the east of the new residential development at Ettington Park (Copeland Avenue), and north of the new open spaces as part of the Ettington Park and The Grange residential developments (see the appended Site Location Plan - Appendix 1).

3.2 As mentioned the site is bordered to the east, west and south by new areas of public open space being provided by the new residential developments at Ettington Park and The Grange. The area of open space to the east of the site is a thin sliver separating the site from the new development on Copeland Avenue. The site is bound to the north by Walton Road. The boundaries of the site are defined by hedgerows, with the western boundary of the site including a number of trees.

3.3 The site has capacity to accommodate approximately 67 dwellings. Given the site's size, there is the flexibility to allow for a mix of housing types and tenures, as well as allowing for the provision of on-site open space.

Social Infrastructure and Accessibility

3.4 The site is well located to the centre of the village, within close proximity to the local services and facilities. The Co-operative supermarket is about a 5 minute walk (0.4km) along Walton Road, with the Wellesbourne Sports and Community Centre a 7 minute walk again along Walton Road and Loxley Close. Further west is the larger Sainsbury's supermarket, about a 15 minute walk (1km). The Stag's Head public house is located about a

9 minute walk (0.8km) to the north towards the village centre. Wellesbourne village centre itself contains a Post Office, surgery, pharmacy, bank, convenience store, public houses, coffee shop, library, takeaway and petrol station. The centre is located about a 15 minute walk from the site (1km). Wellesbourne Church of England Primary School is about a 17 minute walk north from the site. All of these services are within accepted walking distances.

3.5 There are bus stops located on Ettington Road (about a 9 minute walk — 0.6km) and Dovehouse Drive (about an 11 minute walk — 0.8km) providing hourly and direct services to Stratford-on-Avon, Warwick and Leamington Spa, including the railway stations serving these towns. There are also less frequent bus services connecting the village to Banbury. The services which run by the hour from the bus stops on Ettington Road and Dovehouse Drive represent a genuine sustainable transport option for residents of Wellesbourne.

Suitability

3.6 The site is located outside of the settlement boundary of Wellesbourne. The settlement boundary is located along Copeland Avenue to the west of the site, with a sliver of public open space (approximately 25 metres in width) in between. The site is bound by the new residential development to the west and south, with the new areas of open space wrapping around the southern and eastern boundaries of this site. It is clear that development of this site would be contained within the new areas of open space provided by the new residential developments and would make a logical extension to the village along Walton Road.

3.7 There are no statutory designations covering the site. Any localised ecological considerations could provide a green infrastructure framework that would contribute towards achieving environmental sustainability, whilst at the same time working within the natural features of the site. The site does not have any impact upon the River Nene corridor.

3.8 The site is located entirely within Flood Zone 1, the area at least risk from flooding. Any development proposal would seek to utilise Sustainable Drainage Systems (SUDS) in developing the most appropriate strategy for drainage of the site. The Proposed Illustrative Masterplan Included at Appendix 2 shows how SuDS could be accommodated in any layout.

3.9 The site is within an area of medium landscape sensitivity. The site is bound by existing landscape features, namely hedgerows. The site does not impact upon any of the cherished views as identified in the NDP.

3.10 The site is not within or adjacent to the Wellesbourne conservation area. There are no listed buildings or structures on or within the immediate vicinity of the site.

3.1.1 With regards to access the proposed development would be accessed from Walton Road via a new priority junction which has been designed to accommodate visibility splays for surveyed vehicles speeds. The speed limit could be reduced to 30mph if that is considered appropriate by Warwickshire County Council. It will also be possible to widen Walton Road to accommodate the level of traffic that would be generated from 67 dwellings. The level of traffic generated by a development of this scale will not materially impact upon the operation of the local highway network. Pedestrians would be able to access the site either along the Walton Road via a new footway or via the neighbouring development. The pedestrian linkages offer the opportunity for residents to walk to Wellesbourne village centre and the variety of facilities that it offers within a reasonable walking distance from the site.

3.12 It is considered that there are no infrastructure constraints or requirements to bring forward this site for residential development. The village is well served by all utilities and broadband.

3.13 There are no known ground contamination issues on this site.

3.14 If the site were to come forward for residential development this would not impact upon the amenity of neighbouring properties. The predominant land use around the site is residential and public open space. There are no other uses in the immediate vicinity that may be compromised if residential were to come forward on this site.

Achievability

3.15 The site is capable of coming forward for residential development In the next five years. The site is within single ownership and is being promoted by Rainier Developments. Residential development on this site is

viable and therefore the site is considered achievable.

Availability

3.16 The site is within single ownership and is being promoted by Rainier Developments. There are no ownership issues that would prevent development coming forward on this site.

Economic Benefits

3.17 In terms of economic sustainability, jobs would be created during the construction phase of the development (including indirect employment through the construction supply chain). The new residents of the development would also serve to support the existing local facilities and services within the village, through additional household spend.

Proposed Illustrative Masterplan

3.18 Rainier Developments have prepared a Proposed Illustrative Masterplan included at Appendix 2 to demonstrate how the site might come forward for residential development.

3.19 The Proposed Illustrative Masterplan shows the possible developable area on the edge of Wellesbourne to allow for approximately 67 dwellings to be accommodated with 35% affordable provision (23 units). Such a development would be at a density of circa 27 dwellings per hectare. The layout shows how a mix of housing types and tenures could be accommodated on site.

3.20 The site would be accessed via a new access point off Walton Road. Further pedestrian links could be provided, by connecting to the new areas of public open space to the east of the site.

3.21 The Proposed Illustrative Masterplan shows that a new area of on-site public open space could be provided with the potential to incorporate a new children's play area.

	General	<p>4.1 Overall Rainier Developments are supportive of the Wellesbourne and Walton Neighbourhood Development Plan which is regarded as being positively prepared and recognises that reserve sites within/adjacent to the village are required to meet future housing development needs arising within the District in line with Stratford- on-Avon District Council's emerging Site Allocations Plan.</p> <p>4.2 Notwithstanding this general support there is concern with the identification of the preferred reserve housing sites within Area 1 and 3. For reasons explained in this representation the reserve sites identified are not the most suitable for housing development in the village. Rainier Developments therefore object to the identification of the preferred reserve sites in the NDP.</p> <p>4.3 These representations are prepared in support of the site south of Walton Road, Wellesbourne, to be a reserve site for future housing development in Wellesbourne. The site south of Walton Road is incorrectly identified in the NDP as a retained area of open space associated with approved planning permissions in the village. Map 10 of the NDP should therefore be rectified. The site is not and should not be within an area rejected for future housing development. The site south of Walton Road is capable of accommodating 67 new homes as illustrated by Appendix 2. Rainier Developments consider that the site to the south of Walton Road represents the most logical and sustainable growth option for Wellesbourne and therefore should be identified it as a preferred reserve housing site for future housing development in the village.</p> <p>4.4 This representation has set out how the site south of Walton Road, Wellesbourne is suitable, achievable and available for development. The site is therefore deliverable, in the context of paragraph 47 of the NPPF.</p> <p>4.5 Rainier Developments intend to continue the promotion of the site through the process of the Stratford-on-Avon District Site Allocations Plan.</p> <p>4.6 Rainer Developments welcomes the opportunity to comment on the Wellesbourne and Walton Neighbourhood Plan Document and will endeavour to facilitate an on-going dialogue with the Parish Council and local community in the promotion of land south of Walton Road, Wellesbourne.</p>
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WE18	Paragraph 7.2 – Housing and Land Use	<p>These representations have been prepared by Walsingham Planning Ltd on behalf of our client Bluemark Projects and relate to the formal Regulation 16 Submission consultation on the Wellesbourne and Walton Neighbourhood Development Plan (NDP).</p> <p>Our representations relate to Section 7 of the NDP, and 7.2.1: Location of New Housing in particular</p> <p>7. The Neighbourhood Plan Policies: 7.2 – Housing and Land Use</p> <p>The strategic context to the NDP is provided by Stratford-Upon-Avon District Council’s adopted Core Strategy, which identifies Wellesbourne as a Main Rural Centre which is a suitable location for housing and business development and the provision of local services. The importance of the role of the Main Rural Centres in the District’s spatial development strategy over the period to 2031 is highlighted by the fact that collectively, they are required to provide the greatest proportion of new dwellings (3,800 homes).</p> <p>As part of the implementation of the Core Strategy’s development strategy, the District Council is producing a Site Allocations Plan which will identify reserve sites. These are to be released selectively for development to rectify any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land, or if there is a need to address a future cross-boundary housing requirement.</p> <p>We welcome the fact that the NDP acknowledges the need to consider additional land for housing around Wellesbourne in response to the anticipated requirement to identify reserve sites. However, in our view insufficient land is identified to make any meaningful contribution to future strategic requirements. Policy WW7 of the NDP identifies three sites as potential housing sites known as Areas 1 – 3 as follows (and to paraphrase):</p> <ul style="list-style-type: none">• Area 1 – approx. 25 dwellings. Suitable for development and immediately adjacent to the built-up area boundary.• Area 2 – approx. 250 dwellings. Possibly suitable for development, but only post-2030 (emphasis added).
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- Area 3 – approx. 67 dwellings. Land currently occupied by allotments, and any proposals for development would need to be considered against Policy WW2. The objective of Policy WW2 as drafted is to preserve existing allotments whether in situ, or via re-provision on another site, subject to specific criteria and the approval of the Wellesbourne Allotment and Garden Holders’ Association.

Of the three sites listed above, only Area 1 appears likely to be a suitable candidate for housing delivery over the period of the adopted Core Strategy, ie. to 2031. Area 2 is identified as having a possible delivery time-line of beyond the Core Strategy period, which suggests that this element of Policy WW7 is not in general conformity with the Core Strategy (and therefore as a consequence the Basic Conditions are not met). Being currently used as valued local allotments, there can be no certainty that housing development within Area 3 will come forward, particularly as an alternative site for the provision of allotments does not appear to have been identified.

The National Planning Policy Framework requires neighbourhoods, through Neighbourhood Plans, to plan positively to support strategic policies, and not to promote less development or undermine such policies (paragraph 184). In this context, our concerns in respect of delivery on these sites clearly suggest that a further site/sites should be identified for housing over the period to 2031. This is particularly so as there is every likelihood that the Core Strategy will require review as envisaged by Core Strategy Policy CS.17, and Wellesbourne will continue to be a focus for further development. Furthermore, the NDP itself recognises that further housing aimed at meeting local needs is required in Wellesbourne (paragraph 4.2.2).

We note that there is a reluctance on the part of the local community to see further development to the south of the village (Area 8, page 63), however that is not necessarily a good planning reason to preclude development that would otherwise be logical and sustainable. In this regard, it is important to consider that the Wellesbourne Area Strategy within the adopted Core Strategy considers landscape sensitivity to residential development in and around the village and concludes that land on the southern and eastern sides of the village is the most appropriate for development. This is supported by the appeal Inspector in the case of planning application reference 13/03173/FUL for 80 dwellings on land at Loxley Road, Wellesbourne, whereby he concluded that views of that site were generally limited, and there were no strong or overriding landscape (or accessibility) constraints that precluded its development for housing.

		<p>We consider that land to the south east of Loxley Road shown on the enclosed plan, which is immediately adjoining the site that is the subject of planning application reference 13/03173/FUL, is eminently suitable for new residential development. As with Area 1, this site immediately adjoins the built-up area boundary of the village, and is effectively bounded on two sides by residential development, and contained to the west by the driveway to Chadley House. Access is achieved directly from Loxley Road. At approximately 1.2 ha in area, the site could accommodate in the range of between 35 and 45 dwellings, which would constitute a development of an appropriate scale for this sustainable, edge of village location. We therefore propose that this land is included as a site for residential development in Policy WW7 of the NDP as being deliverable during the Core Strategy plan period, and we would welcome the opportunity to expand on the planning reasoning at a future NDP examination.</p>
WE19	<p>p.10, end 2nd para</p> <p>P.10, 3rd para</p> <p>P.47, Policy WW3(c)</p> <p>P.49, Map 2</p> <p>P.62, Area 2</p> <p>P.63, 1st para</p> <p>P.66, Policy WW7</p>	<p><i>Paul Harris (Senior Planning Policy Officer)</i></p> <p>Reword to read '...becomes an integral part of the Stratford-on-Avon District Development Plan.'</p> <p>I'm sure they now mean March 2018!</p> <p>Should refer to Appendix B2.</p> <p>Unclear whether Area of Restraint is also of high landscape sensitivity. Suggest AoR is shown in some form of hatching.</p> <p>Reserve sites may be needed before 2030 in accordance with Policy CS.16.D in Core Strategy. This should be acknowledged.</p> <p>Spelling of Wellesbourne!</p> <p>Final para - fewer than 10 dwellings may be too low a threshold for a settlement the size and nature of Wellesbourne but I suppose the wording doesn't rule out a larger scheme being considered favourably.</p>

p.71, 2nd para	Interesting view about what is good layout and design. I don't think we would see Willow Dene as being a good example but it is clearly perceived locally as such, e.g. spacious, plenty of scope for on-street parking.
P.74, Policy WW11	(d) and (e) more likely to be secured through CIL than s106 funding because off-site.
P.89, Map 13 & P.90, Policy WW18	Proposed business site now has planning permission for single user, ie. Wixey Transport. <i>Matthew Neal (Policy Officer)</i>
Front Cover	Replace 'Report' with 'Version' and add the Plan Period 2016 – 2031 as described on p.8 of the Plan.
Section 1 (p.6)	Requires amending to acknowledge current stage of the process. Suggest the following amendments: <p>"This <u>Neighbourhood Plan draft report</u> has been prepared based on extensive engagement sessions held since early 2014 and <u>includes</u> is now offered to all members of our community to seek feedback on what is being proposed. Within this report you will find details about the Neighbourhood Plan process and how it has been applied within our Parish, along with draft statements on vision, objectives and policies covering the range of issues that have been identified as being of concern.</p> <p>There are many references to planning related documents and terms used throughout this report <u>the Plan</u>. A brief explanation of key documents and where these can be found is shown in Appendix F, and a summary of terms is included in the Glossary.</p> <p>Your views on this draft report are important so don't miss the chance to have your say on the future of our Parish!"</p>
Section 2.2 (p.8)	Replace 'report' with 'Plan' in final 2 paragraphs.
Section 2.3 (p.10)	This section is now out of date and either requires re-drafting to take account of the current stage of the process or deleting entirely.

Section 4.2 (p.19)	First sentence – add “...Main Rural Centre (MRC), as set out in the adopted Core Strategy...” after “Wellesbourne is a...”
Section 7 (p.37)	First paragraph – replace “section” with “Policy” and replace “draft” with “adopted” in final line.
Table of Local Green Space Designations (p.39)	No.12 – replace “Land” with “Green” to be consistent with Policy WW1.
Policy WW1 (p.41)	There is a difference between areas of green space and land for Local Green Space designation as set out in para’s 76 and 77 of the NPPF. The final two paragraphs beginning “Any new areas...” and “If any of this...” refer to general areas of green space and do not comply with para’s 76 and 77 of the NPPF. As such, these should be removed from the policy. If open space was an issue, it should have been considered through a separate, but distinct policy.
Policy WW2 (p.43)	Para’s 76, 77 and 78 of the NPPF are not relevant as supporting evidence in relation to allotments.
Policy WW3 (p.47)	First paragraph of policy – not sure the word “significance” has been used in the correct context.
Policy WW4 (p.51)	The policy as written seeks to protect patterns of development, views, parkland settings, field patterns, hedgerows and flood plain. There is an inherent confusion in this policy as it looks to cover so many different elements. This policy may need splitting up to cover ‘views’ in one policy and ‘landscape character’ in another.
Policy WW5 (p.55)	The final paragraph has not appeared in any previous iterations of the Plan. It is not clear from where it has materialised, or why. Where is the nature reserve going to go? Has it been mapped? Is the land available? Where is the evidence for its creation? Are developers being asked to contribute money, and if so, how? This paragraph should be removed from the Policy.
Policy WW7 (p.66)	Is there a need to include point 4) in the policy? Penultimate paragraph – Built-up area boundaries can’t be re-drawn ‘on the hoof’ and could only be amended via a review of the NDP or through the Site Allocations Plan or

		Core Strategy review. This should be re-drafted to take this into account. Final paragraph – remove “...in other parts of Wellesbourne,” as it is not required.
	Policy WW10 (p.72)	First paragraph – The District Design Guide is to be superseded by a Design SPD. Should the policy be amended to take account of future design documents, to ‘future-proof’ the policy? Final paragraph – replace “must be” with “are” in the first line.
	Policy WW11 (p.74)	The policy won’t be applicable or appropriate for small-scale development, which is the focus of the Plan. Consider replacing first paragraph with “New development should include, where appropriate:”
	Policy WW12 (p.76)	First paragraph – not all development will be on the edge of the village, particularly given the ‘infill’ policy preference. Therefore, a landscape buffer will rarely be appropriate. The policy will need to be re-drafted to reflect this. Second paragraph – appears to indicate that the Parish Council will look after trees on private land...is this correct and/or appropriate?
	Policy WW13 (p.79)	Paragraph 1 – the first part says ‘no’ to any development in the Flood Zone, but the second part appears to state that development in the Flood Zone should be in accordance with hydraulic modelling thus indicating that <i>some</i> development may be appropriate. This is confusing... Paragraph 2 – is not worded very well and the associated criteria cannot be insisted upon in policy terms, since they fall under works that can be carried out under householder permitted development rights. Third paragraph – SUDS is not appropriate for smaller schemes. Final paragraph – Why is there an 8 metre ‘buffer’? Where is the evidence for this figure?
	Policy WW14 (p.81)	What does “...robust provision of utilities” mean in the first paragraph? Will such infrastructure upgrades be appropriate for the scale of development being promoted through the Plan? Replace “...increased constraints in the capacity of...” with “...detrimental harm to the...”.
	Policy WW19 (p.91)	Where will the walks be located? Have they been mapped? Who would be responsible for them? Are they a ‘tourism’ issue? Where is the evidence base for them? This element appears aspirational rather than policy and should be removed or added to an Appendix of the Plan.