

# Brailes and Winderton NDP

## Examiner's Question 27/3/19

### Section 4.2

**The District Council's response to the Reg 16 consultation mentions that the quotes from the Core Strategy in Section 4.2 on page 34 are incorrect. I am not quite sure which quotes are being referred to. Please can the District Council clarify?**

SDC's comment at Regulation 16 consultation was as follows:

"Meeting Housing Requirements:

Bullet points 4 and 5 include quotations from the Core Strategy that have not been copied over fully, or correctly. Any quotes from other policy documents should be included in their entirety, since partial quotes can potentially change the emphasis of a statement or could lead to misinterpretation."

#### **Stratford-on-Avon District Core Strategy 2011-2031**

The Brailes and Winderton NDP quotes **Policy CS.11 [Cotswolds AONB]** as stating that:

"Large scale development will not be allowed unless exceptional circumstances and public interest are demonstrated", it goes on to state "Small-scale developments and activities are appropriate"

Whilst the above quote is not incorrect, it excludes large sections of the policy which contain qualification and caveats. The policy and its context/justification need to be read as a whole in order to rule out potential miss-interpretation by all parties. The full policy is as below with parts in **bold** that the NDP has included:

#### **"Policy CS.11 Cotswolds Area of Outstanding Natural Beauty**

Development proposals in the District involving land either within, or outside but affecting, the Cotswolds AONB should conserve and enhance the special landscape qualities and scenic beauty of the AONB and be consistent with the objectives set out in the Cotswolds AONB Management Plan.

In determining planning applications in and adjacent to the AONB, the Council will work closely with the Cotswolds Conservation Board.

Those parts of the AONB that lie within the District are defined as 'tranquil areas' where the minimisation of noise, traffic congestion and light pollution is a priority.

**Large scale development will not be allowed unless exceptional circumstances and public interest are demonstrated** in accordance with all the criteria set out in the National Planning Policy Framework.

**Small-scale development and activities are appropriate**, in accordance with Policy AS.10 Countryside and Villages, but must not harm the historic or built character, local distinctiveness or landscape quality of the AONB.

The impact of development proposals on the economic and social well-being of the area will be taken into account, including the specific needs of agriculture.

The boundary of the Cotswolds AONB is shown on the Policies Map”.

### **Core Strategy Section 6.12 and Policy AS.10 [Countryside and Villages]**

The Neighbourhood Plan quotes Policy **AS.10** as:

Countryside and Villages “will have been protected from inappropriate development”. Proposals will be assessed to “minimise the impact on the character of the local landscape, communities and environmental features” which also applies to “Small scale schemes for housing, employment or community facilities to meet a local need identified by a local community in a Parish Plan, Neighbourhood Plan”

**6.12 Strategic Objective** within the Core Strategy states that:

*(1) The rural character of the District will have been maintained and enhanced. The Green Belt and countryside of the District **will have been protected from Inappropriate development.*** [Bold text is that which has been utilised within the NDP].

The NDP again uses a partial quote and does not state that it is the overarching Strategic Objective that they are quoting from, not the policy itself or explanatory text.

The NDP then quotes only one bullet point and part (a) from Policy AS.10 to back-up the thrust of the associated NDP policy. Policy AS.10 is an extensive policy [and as such is not copied over here]. Concern is again raised that ‘cherry picking’ certain quotes/sentences from strategic objectives and policies and not quoting them fully or correctly could lead to parties reading the NDP potentially miss-interpreting the NDP policy or not understanding the higher level policies sitting behind the NDP at a District or National level [should the NPPF be quoted in a similar manner].

### **Core Strategy CS.18 [Affordable Housing]**

The NDP quotes for this CS policy (and NPPF 63 and Annex 2 definition):

“A range of types and tenures of affordable housing to be provided as a 35% component of the development on small and medium sized sites. Affordable housing to meet identified local needs is required. Delivery on-site will be 35% of the overall number of units. A low threshold level to trigger the affordable housing requirement is permissible in designated rural areas. The Framework sets out the categories that comprise affordable housing”.

Again CS.18 is an extensive policy and for this reason is not repeated here. However, SDC considers that quoting small sections of it and attempting to summarise has the potential to be misleading.

Through this particular representation to the Brailes NDP, the District Council merely wished to point out the potential dangers of including ‘cherry picked’ elements of other policies. In the opinion of officers, policies need to be read as a whole to avoid inconsistency of interpretation and misrepresentation.